

# Site Allocations DPD Regulation 22(1)(c)(v) Statement of Consultation (Pre Submission)

## 1. Introduction

- 1.1 Pre-Submission consultation on the Site Allocations took place between 8<sup>th</sup> January and 4<sup>th</sup> March 2016. Consultation was undertaken in accordance with the Council's Statement of Community Involvement (2011) and in line with regulations of the Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations require the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken on the Site Allocations at the Pre-Submission stage, a summary of the main issues raised in response to that consultation, and to detail the Council's response to comments made.

## 2. Summary of consultation undertaken on the Pre-Submission Site Allocations

- 2.1 On 23rd November 2015, Haringey's Full Council endorsed the Pre-Submission Site Allocations and resolved to publish the documents for consultation for a period of eight weeks and, following consultation, submission to the Secretary of State for independent examination in public (see [here](#))
- 2.3 Formal notification of the Pre-Submission publication of the Site Allocations was given on 8<sup>th</sup> January 2016, and representations were invited for an eight week period ending 4<sup>th</sup> March 2016. Representations were also invited on the Sustainability Appraisal of the Site Allocations during this period.
- 2.4 A formal notice setting out the proposals matters and representations procedure was placed in the 'Haringey Independent' newspaper on both January 8<sup>th</sup> 2016 and January 15<sup>th</sup> 2016 (see **Appendix A**). In addition, on 8<sup>th</sup> January, a total of 1,582 notifications (see **Appendix B**) were sent by post or email to all contacts on the LDF database (see **Appendix C**), including all appropriate general consultation bodies. Additionally 8,484 properties within Site Allocation boundaries were notified. Addresses outside Site Allocation boundaries were not notified directly, but site notices were placed outside sites. Enclosed with the letter was the Statement of the Representations Procedure (see **Appendix D**). Those emailed were also provided with the web link to the documents on the Council's Local Plan web pages. All specific consultation bodies (see **Appendix E**) were also notified on 8<sup>th</sup> January 2016. Unless otherwise requested by the consultation body, enclosed with the notification was a hard copy of the Pre- Submission Site Allocations, the Statement of the Representations Procedure, and the Sustainability Appraisal Report. In accordance with Regulation 21 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a separate letter was also sent to the Mayor of London requesting his opinion on the conformity of the DPD with the London Plan 2015 (see **Appendix F**).
- 2.5 Hard copies of the Pre-Submission Site Allocations, the Sustainability Appraisal Report, the Statement of the Representations Procedure and the response form (see **Appendix G**) were made available at the Haringey Civic Centre, the Planning Reception at River Park House, and at all public libraries across the Borough. Additional copies of the Pre-Submission Site Allocations were also made available at the libraries for short term loan. The documents were also made available to view and download from the LDF web pages of the Council's website. The response form was made available

on the Council’s website for downloading or could be completed and submitted online. Council’s Facebook and Twitter were also used to advertise the consultation and the dates of the drop-in events held during the consultation period:

<b>Library</b>	<b>Drop In Date and Time</b>
St Anns’s	Monday 18 <sup>th</sup> January 4 – 7pm
Highgate	Tuesday 19 <sup>th</sup> January 2 – 5pm
Wood Green	Thursday 21 <sup>st</sup> January 11am – 2pm
Alexandra Park	Tuesday 26 <sup>th</sup> January 1- 4pm
Coombes Croft	Wednesday 27 <sup>th</sup> January 3 – 6pm
Muswell Hill	Thursday 28 <sup>th</sup> January 4 – 7pm
Stroud Green	Thursday 4 <sup>th</sup> February 3 – 6pm
Hornsey	Tuesday 2 <sup>nd</sup> February 3 – 6pm
Wood Green	Thursday 25 <sup>th</sup> February 4 – 7pm
Tottenham town hall	Tues 9th Feb - 6. 30-8. 30pm
639 High Road Tottenham	Monday 15th Feb - 6. 30-8. 30pm
Ferry Lane Primary school	Tues 16th Feb - 6. 30-8. 30pm
Northumberland Park Residents Association	Wed 2 <sup>nd</sup> March
Dowsett Estates RA	26 <sup>th</sup> January

2.6 A week prior to the close of consultation a reminder e-mail was sent out to those on the LDF consultation database to remind online consultees of the closing date for making their comments.

### 3. Duty to Cooperate

3.1 Section 110 of the Localism Act inserts section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A imposes a duty on a local planning authority to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed.

3.2 The other persons prescribed are those identified in regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The bodies prescribed under section 33A(1)(c) are:

(a) the Environment Agency;

(b) the Historic Buildings and Monuments Commission for England (known as Historic England);

- (c) Natural England;
- (d) the Mayor of London;
- (e) the Civil Aviation Authority;
- (f) the Homes and Communities Agency;
- (g) each CCG;
- (h) the Office of Rail Regulation;
- (i) Transport for London;
- (j) each Integrated Transport Authority;
- (k) each highway authority and
- (l) the Marine Management Organisation.

3.3 The duty imposed to co-operate requires each person, including a local planning authority, to:

- (a) engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and
- (b) have regard to activities of the persons or bodies (above) so far as they are relevant to activities within subsection (3).

3.4 The relevant activities listed under subsection (3) comprises the preparation of development plan documents/local development documents, and activities which prepare the way for and which support the preparation of development plan documents, so far as relating to a strategic matter.

3.5 The Council has and continues to engage constructively with other local planning authorities and other public bodies on the preparation of the Local Plan, including the Site Allocations, following the approach set out in the NPPF. The mechanisms for and evidence of cooperation and engagement is set out below.

## Duty to Cooperate – Engagement Undertaken

Cross Boundary Consultee	How we Cooperated	Outcomes
Neighbouring authorities (see map 1)	<p>Letters sent inviting representations on the DPD at both stages of preparation and responses received. (See Consultation Statements)</p> <p>Planning Officer meetings with:</p> <ul style="list-style-type: none"> <li>• Camden: 19 September 2014, 15 June 2015, 13 May 2014, 26 February 2016</li> <li>• Barnet: 22 September 2014</li> </ul>	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements</p> <p>Cross boundary issues identified included:</p> <p>Enfield/Barnet: Pinkham Way (partly in Barnet ownership) and potential Opportunity Area at New Southgate, with outcome seeking to keep future options open for wider</p>

	<ul style="list-style-type: none"> <li>• Islington: 19 September 2014</li> <li>• Waltham Forest: 25 September 2014</li> <li>• Hackney: 8 October 2014, 6 April 2016</li> </ul> <p>ALBPO Meetings</p> <ul style="list-style-type: none"> <li>• 24 November 2015</li> <li>• 22 October 2015</li> <li>• 31 March 2015</li> <li>• 28 November 2013</li> <li>• 6 February 2013</li> </ul>	<p>comprehensive development – TfL also engaged in such discussions. More recently, preparation of joint statement on the importance of this spur of the Crossrail 2 project remaining in the initial funding bid to Treasury.</p> <p>Hackney – South Tottenham Residential Extensions SPD and the potential to prepare a joint SPD at point of next review. Agreement to work on the issue/ concept of warehouse living and access to and through the Harringay Warehouse District.</p> <p>Enfield – relationship between Meridian Water’s development and North Tottenham – agreement over sharing of infrastructure requirements and joint provision cross boundary to avoid duplication.</p> <p>Camden – joint response to the Highgate Neighbourhood Plan ensuring consistency of view from the two LPAs</p> <p>Waltham Forest, Enfield &amp; Hackney: Work on the jointly produced (with GLA) Upper Lee Valley Opportunity Area Framework (OAPF) and OAPF District Infrastructure Funding Strategy</p> <p>Updates given by respective Borough’s on Local Plan progress at All London Borough Planning Officer Group and any cross boundary issues raised. Meetings last held in March - April and are scheduled for every quarter.</p> <p>Hackney &amp; Islington: Joint progression of the Finsbury Park Town Centre SPD.</p>
Environment Agency	Letters inviting representations on the Local Plan documents and Sustainability Appraisal and responses received. (See Consultation Statements for each DPD) Meetings at Council offices:	Details of representations received and the Council’s actions as a result are detailed in the Consultation Statements. Key area of discussion was regarding sequential testing of

	<ul style="list-style-type: none"> <li>1 April 2014, 7 July 2014</li> </ul>	<p>proposed development sites in Tottenham. EA provide flood mapping for the Borough. Comments received and taken on board on the Sustainability Appraisal scoping and, in later iterations of the appraisal.</p>
Historic England	<p>Letters inviting representations on Local Plan documents and Sustainability Appraisal and responses received. (See Consultation Statements for each DPD)</p> <p>Written communications between the Council and Historic England</p> <p>Early engagement in seeking view of Historic England on the heritage policies sent before formal consultation.</p> <p>Meetings at Council offices</p>	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</p> <p>Advice on Heritage and Conservation policies given Heritage policies amended in light of specialist advice.</p> <p>Funding from HE to assist in preparing up to date CAAMs for the six Conservation Areas in Tottenham with focus on ensuring heritage conservation and the regeneration proposals are better integrated.</p> <p>Further HE funding for completion of the Noel Park CAAM, which is part in and adjoins the Wood Green AAP area.</p> <p>Comments received and taken on board on the Sustainability Appraisal scoping and, in later iterations of the appraisal.</p>
Natural England	<p>Letters inviting representations on all Development Plan Documents and responses received.</p> <p>Engagement on SA</p>	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</p> <p>Comments received and taken on board on the SA scoping and, in later iterations, the assessment of effects on natural habitats. Assistance with Habitats Regulations Assessment ensuring compliance with relevant EU Directives.</p>
Greater London Authority	<p>Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)</p> <p>Meetings with Haringey assigned Officer from the GLA to discuss strategic fit of emerging policies</p> <p>GLA Housing Study meetings and work</p> <p>Liaison with specialist officers for policy development regarding affordable housing and sustainability in light of</p>	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</p> <p>Officer advice on policy development to ensure there are no conflicts with the strategic London Plan – especially release of industrial land, affordable housing provision and meeting strategic housing requirements.</p> <p>Participation in the London wide SHLAA and SHMA</p>

	<p>changes to Lifetime Homes etc and London Plan alterations</p> <p>GLA represented on governance boards for the Tottenham housing zone's and the Wood Green AAP.</p> <p>Current engagement on Crossrail 2 spur serving Wood Green.</p> <p>Submitted responses to the Further Alterations to the London Plan consultation.</p>	<p>evidence base studies – most recently the call for sites. Agreement to methodology for surveys on Town Centre Health Checks to take place mid-2016.</p> <p>Discussions held, advice, and funding agreed for tall buildings policy work, including the acquisition of 3D model and zmapping. GLA input into brief and commitment to further involvement on subsequent Tall Buildings and Views SPD.</p> <p>Housing Zone confirmed for Tottenham and ongoing work regarding implementation of development schemes in accordance with agreed DCS and High Road West masterplans – including GLA assistance on procurement process for delivery vehicle.</p>
Civil Aviation Authority	<p>Letters inviting representations on all Development Plan Documents and responses received.</p> <p>(See Consultation Statements for each DPD)</p>	<p>Details of representations received are provided in the Consultation Statement. No major issues raised. Further engagement likely to be required on the Tall Buildings and Views SPD, which sets upper parameters for tall buildings within growth areas.</p>
Haringey Clinical Commissioning Group (CCG)	<p>Letters inviting representations on all Development Plan Documents and responses received.</p> <p>(See Consultation Statements for each DPD)</p> <p>Infrastructure Delivery meetings and correspondence.</p>	<p>Details of representations received and the Council's actions as a result are detailed above.</p> <p>Consulted on evidence base documents, and provided information to inform future service delivery, including 'deep dive' for North Tottenham, Tottenham Hale, Green Lanes and Wood Green areas, resulting in floorspace figures for new provision for CCG to take forward to capital bid stage.</p> <p>Continued engagement on healthcare requirements/priorities being reflected in local plan policies, including those that address obesity and mental health.</p>
Homes and Communities Agency	<p>Letters inviting representations on all Development Plan Documents</p>	<p>Details of representations received are provided in the Consultation Statement. No major issues raised</p>
Highways Agency/ Highways England	<p>Letters inviting representations on all Development Plan Documents and responses received.</p>	<p>Details of representations received are provided in the Consultation Statement. No major issues raised</p>

Transport for London	<p>Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)</p> <p>Quarterly 1:1 meetings to discuss all transport related matters.</p> <p>Liaison with TfL regarding transport study modelling and findings Infrastructure Delivery.</p> <p>Meetings and correspondence on specific transport projects.</p> <p>Meetings on Crossrail 2 proposals</p> <p>Engagement on DCF for the Upper Lee Valley OAPF.</p>	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statement.</p> <p>Agreed the methodology for transport modelling of broad growth assumptions, and the results of the findings of the study, using TFL data.</p> <p>Consulted on evidence base documents, and provided information to inform future infrastructure provision in particular around Tottenham, including the Station overdevelopment, Bus station Improvements, STAR, cycle superhighway, White Hart Lane station improvements, and Crossrail2.</p> <p>Further engagement on Crossrail 2 following Council's proposal for a single station serving Wood Green, extension to New Southgate, and subsequently, Growth Commissions recommendation that spur be delayed.</p> <p>Confirmation of population projections and sites informing infrastructure provision across the Lee Valley OAPF area, in recognition of refresh.</p>
Office of Rail Regulation	<p>Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)</p>	<p>Details of representations received are provided in the Consultation Statement. No major issues raised.</p>

#### 4. Who responded and number of representations received

4.1 There were 235 representations received to the Pre-Submission consultation on Site Allocations. These came from a mix of developers and agents, local interest groups, public bodies, and local residents and individuals. A number of representations, in respect of SA62 Broadwater Farm, were petitions, with the number of signatories ranging from 14 through to 499. **Appendix H** provides a full list of the respondents. In total, 444 individual comments were made that were considered and responded to by the Council. These are provided by Respondent order at **Appendix I** and by Alternation order (grouped by relevant chapters in the Strategic Policies DPD) at **Appendix J**.

#### 5. Summary of the main issues/comments raised to the Site Allocations Pre-Submission consultation

5.1 Regulation 22(1)(c)(v) requires a summary of the main issues raised in representations made to the pre-submission Site Allocations. Pursuant to this requirement, the following paragraphs set out the main issues raised in respect of the proposed alterations, grouped by the relevant chapter within the Strategic Policies DPD, and to the Proposals Map.

### Introduction

There were several comments in respect of the approach to tall buildings in Wood Green and other parts of the Borough. The Council considers that the map at Figure 2.3 of the plan, when used in conjunction with DM6 of the DMDPD, establishes an appropriate framework for assessing the suitability of tall buildings.

One respondent noted that the maps for SA39 and SA40 are not accurate, having been swapped over. This Council acknowledges this publishing error and will rectify it through a proposed minor modification.

### SA1: Indicative Crossrail 2 Areas

A respondent noted that the “option via Wood Green” Crossrail 2 option is not included in the Plan. The Council supports the “option via Wood Green” however at the time of publication, and submission, there had not been an announcement by TfL/DOT that this option has been approved. It is noted that the Wood Green AAP will potentially refresh the allocation in this area, reflecting any updated commitment to Crossrail 2 serving Wood Green.

### SA2: Changes to Designated Employment Areas

There were no representations received on this policy.

### SA3: Changes to Town Centre Boundaries

Landowners suggested that the Arena Shopping Park should be retained within Green Lanes District Centre, particularly in view of the strength of the centre’s current retail function. The Council agrees that this is a successful centre and it is not its intention to reduce the overall quantum of activity, or indeed commercial floorspace on this site, but rather to establish a new urban form along Green Lanes, creating a “High Street” frontage. Currently there is a presumption that the creation of this new typology in the long term, will mean that the town centre boundary will shift to reflect this. There is however no need for the town centre boundary to reduce to meet the aims of the policy. Indeed a range of activity being achieved “behind the High Rd”. As such, and noting the co-ordinated responses from landowners on SA29, the Council will amend the Town Centre boundary on the proposed Proposals Map, so that it matches that in the current adopted 2013 Proposals Map.

A respondent suggested that the Council should give consideration to extending the Metropolitan Town Centre boundary to cover the area to the north of the Clarendon Gas Works. The Council does not believe that there is sufficient evidence to justify increasing the extent of the boundary. It is acknowledged that the emerging Wood Green AAP will go into more detail regarding development in this area, and offers an opportunity to alter town centre boundaries as necessary.

#### SA4: Safeguarded Waste Sites

One respondent sought a removal of safeguarding of the 44 White Hart Lane site. However the Council considers that it is not in a position to remove the waste safeguarding from this site, as it is still waiting on demonstration that the actual maximum waste throughput capacity from 44 White Hart Lane can be accommodated for through an alternative facility at Brantwood Road.

In order to clarify points raised by respondents regarded waste safeguarding, and to ensure consistency across the Local Plan, a minor modification is proposed to Table 2 to replace the licensed waste capacity with the maximum throughput capacity achieved to align with the baseline data underpinning the emerging North London Waste Plan.

#### SA5: LBH Civic Centre

There was support for the proposal to redevelop the car-parking area, recognising this could encourage more sustainable modes of transport.

#### SA6: Green Ridings House

The representation received on this policy sought to correct inconsistencies in the wording for the development guidelines across this site and others that have the same constraint in terms of Source Protection Zones.

#### SA7: Wood Green Bus Garage

There was support for the Green Link on this site. The respondent suggested that this link should be as ecologically rich as possible. The Council notes support for the Green Link but considers that delivery of a wildlife corridor is unlikely to materialise, given the site's location within the town centre and its proposed use.

#### SA8: Station Road Offices

It was suggested that the requirements of SP9 and the Planning Obligations SPD should be waived as a reduction in employment floorspace is in line with the Council's aspirations for this site. The Council notes that policy requirement is for the employment floorspace on this site be re-provided as part of any

mixed use redevelopment. Provision is however made for retail and other town centre uses at ground and first floors, as well as replacement employment floorspace. The allocation also recognises that the site lends itself to residential use. The balance between residential and replacement employment floorspace will likely be determined by issues of layout, bulk, mass, height and viability. If employment floorspace is lost, this will need to be compensated for through a financial obligation.

The respondent made several representations in respect of proposed design and access requirements/guidelines, as well as with the 'stepping down' of building heights. The Council considers the proposals are necessary to ensure a high quality development appropriate to the location, and having regard to the adjoining site allocations. The provision of a landmark building on the corner of Wood Green High Road and Station Rd necessitates a stepping down in heights across the rest of the site, especially along Station Road in particular and this is a long linear frontage.

#### SA9: Mecca Bingo

The respondent supported the requirement that proposals investigate opportunities for deculverting the Moselle, which runs in a culvert along the site.

#### SA10: Morrison's Wood Green

There were no representations received on this policy.

#### SA11: Wood Green Library

A respondent suggested revisions to the development guidelines, to state that development on parts of the site directly opposite residential buildings on Caxton and Mayes Road should respect their residential amenity. The Council agrees that the development guidelines could be improved and has proposed a minor modification to this effect.

It was also noted that there are multiple landowners on this site and that the policy should therefore set additional guidelines dealing with site delivery considerations, such as phasing. There are policies in the DMDDP which seek to co-ordinate delivery of more complicated sites, and this additional information is therefore not required. It is noted that the Council is at present in the process of developing a Wood Green AAP, with a linked delivery framework.

#### SA12: The Mall

There were no representations received on this policy.

#### SA13: Bury Road Car Park

There were no representations received on this policy.

#### SA14: 16-54 Wood Green High Road

The respondent sought amendments to the site allocation, in particular more explicit details on town centre uses so as to ensure that a supermarket use can continue during the lifetime of the Plan. Given its location with the Metropolitan town centre and with designated primary frontage onto the High Street, the Council considers that the site is suitable for the full range of town centre uses, including A1 uses, which will be required and prioritised at ground floor level. Ultimately however, it will be for the detailed planning application(s) to establish the development use on site, including retail provision, having regard to commercial and viability considerations. It is therefore not appropriate for the allocation to safeguard any specific A1 use for re-provision on the site.

#### SA15: Westbury & Whymark Avenues

The respondent broadly supported the site allocation however some comments were raised in respect of the development requirements and guidelines.

Changes were sought to reflect that development will be encouraged on this site regardless of whether Crossrail 2 is formally announced to be aligned with Turnpike Lane Station. It is considered that, although the plan continues to be predicated on the potential introduction of a Crossrail 2 station at Turnpike Lane, the development would continue to be acceptable in light of proposed upgrades to the Piccadilly Line, and that therefore the change, to increase flexibility, and therefore deliverability is acceptable.

The respondent considered that requirements/guidelines on building height and development capacity might limit full development potential of the site. The Council considers that the Local Plan sets a robust basis for meeting objectively assessed need, and that the quantum of development that comes forward on each site will be determined through a design-led analysis of applications using the principals set out in the Site Allocation, and the DMDPD.

In terms of delivery, the respondent noted the complex land ownership situation on the site and suggested that the Plan should provide further details in managing this, to ensure development can come forward. The Council considers that the policy requirements, along provisions in the DMDPD, are sufficient to address this matter. There was also a concern that timeframes for delivery might restrict development opportunities on the site. The Council considers that this timeframe is the most realistic of the options. However, the timeframes are indicative and as such it is not a restriction on development, but a guide for stakeholders/ residents/ infrastructure providers.

#### SA16: Turnpike Lane Triangle

There were no representations received on this policy.

### SA17: North of Hornsey Rail Depot

It was suggested that the indicative residential development capacity for the site is too low. The Council has used a consistent approach in calculating the indicative development capacities for each allocation. This is to show that together, the site allocations can meet the objectively identified housing need in the borough. The actual quantum of development that comes forward on each site will be determined through a design-led analysis of applications using principles set out in the Plan.

A respondent did not consider the requirement for employment floorspace provision to be sound or justified, particularly given that the site is not within a Designated Employment Area. The council has a requirement to plan proactively for economic growth in the borough so that development meets emerging employment need. The Council's policy position is that on former employment sites, and sites with good public transport access, new employment floorspace should be provided to meet job growth in the borough. Technical evidence also provision of employment floorspace can be cross- subsidised by residential development.

There were several responses regarding the New River and New River Path, with general support for maintaining and improving their ecological and amenity value. The Council has proposed a minor modification to clarify that applicants should consult with Thames Water in respect of opportunities to enhance the New River. One respondent suggested that the allocation should reflect the potential for energy provision via a heat pump in the New River, but the Council is unclear on whether this is appropriate and how it would be delivered.

### SA18: Wood Green Cultural Quarter (North)

It was suggested that the allocation should be amended to better reflect the site's potential for delivering mixed-use development, including residential uses. The Council agrees that the allocation should be expanded to reflect this, consistent with the Appendix to the Site Allocations DPD. Furthermore, clarification was sought on the terms 'complementary employment' and 'ancillary' residential uses. It was also stated that further consideration should be given to the range of acceptable uses permitted, having regard to the wider objectives of the Cultural Quarter. It is noted that the plan can be made clearer on the principle of uses, to reflect that that the aim is to enable a range of commercial opportunities on the site, with residential to provide the land value necessary for the development to proceed.

A change was sought to enable this site to deliver a tall building however the Council does not consider this is supported by technical evidence or consistent with the spatial strategy.

The Council has proposed a minor modification to the SA18 site boundary (along with SA19) in order to appropriately reflect ownership arrangements which have been called to its attention through the consultation.

### SA19: Wood Green Cultural Quarter (South)

The respondent suggested that the site allocation does not go far enough in seeking to optimise the development potential/capacity of the site. The Council considers that the site allocations within the Local Plan make sufficient provision to meet and exceed the minimum strategic housing requirement for the Borough as set out in the London Plan. This site is designated for employment use. Both the designation and site allocation seek to promote the intensification of employment uses on the site, maximising its contribution to delivering the Borough's jobs target. The Council acknowledges that a mixed use development may be required to help achieve this. The optimum capacity of the site will be determined by through a design-led approach having regard to the principles set out in the allocation and the DMDPD.

The respondent also raised a number of issues in respect of deliverability, having particular regard to viability (including the viability of employment development, provision of affordable workspace and decentralised energy development). The Council considers that the plan is sufficiently flexible to enable development to come forward, and that the requirements support the wider regeneration of Wood Green and the spatial strategy for the Borough.

### SA20: Wood Green Cultural Quarter (East)

Clarification was sought on who would be responsible for coordinating the site-wide masterplan, as required by the policy. The Council considers that the plan is clear that proposals should be accompanied by a site wide masterplan, prepared by the applicant, demonstrating how the proposal meets the requirements of the Local Plan.

It was considered that the plan is too restrictive in its approach to limit the residential development to only the quantum required to allow for the maximum employment floorspace. The Council notes that the higher level policies promote growth of all forms of development, not just housing. The position set by the Council on employment led allocations, and non-allocated employment sites, is that it will approve schemes which come forward to bring new employment floorspace to Haringey which will support jobs growth, consistent with the spatial strategy for the Borough.

One respondent noted a situation in respect of commercial rents in the Chocolate Factory building. Whilst the representation was not specifically on the Local Plan, it is noted that the Council is seeking to address affordable workspace through the proposals.

### SA21: Clarendon Square Gateway

The respondent suggested amendments to the allocation and commentary to support. The Council considers the allocation is appropriate to supporting wider Wood Green regeneration and the spatial strategy. This site is both identified as a designated employment area, and as a town centre site. As such the Council will seek to promote employment uses which are also town centre suitable. This will generally be high density employment uses.

It was suggested that the policy should be amended to specify student accommodation as an acceptable use. The Council's broadly supports conventional housing over other forms in order to meet identified need. Applications for student accommodation will be supported where appropriate on a case-by-case basis, with proposals considered having regard to the DMDPD.

The respondent considered the development requirements/guidelines to be overly prescriptive, particularly on the accessibility arrangements and links through the area. The Council considers these are necessary to support Wood Green regeneration and delivery of the spatial strategy.

#### SA22: Clarendon Square

Whilst one respondent supported the principle of mixed use development, it was provided that the education use should be removed from the site allocation given there is no evidence to support this. The plan responds to the need for additional primary school capacity, which has been identified in the Council's Infrastructure Delivery Plan, as well as in the Issues & Options draft of the Wood Green AAP. The respondent also considered that for site development capacity, a 'Central' classification should be confirmed to cover the Clarendon Gas Works site. The Council notes that 'Central' density assumptions have been made regarding the indicative site capacities of development in Wood Green.

There were several comments on urban design / accessibility objectives. One respondent supported the proposed improvement to the cycle and pedestrian route at Penstock Tunnel. Another respondent suggested the requirement to straighten the existing kinks in Clarendon Road/Mary Neuner Way should be deleted, however the Council considers the existing layout is sub-optimal and that the proposal will help support delivery of the spatial strategy.

The Health and Safety Executive noted that there is the potential for land allocated in the plan to encroach on consultations zones. It is noted that the Clarendon gas holder is at the centre of already consented planning application. In this regard it is considered that the HSE advice given on 21/03/2012 is extant.

#### SA 23: Clarendon Road South

The respondent suggested that new development should add to and enhance the ecological corridor on its western edge. The Council notes that improvements to the ecological corridor are likely to fall to CIL – being outside of the development boundary - rather than as a requirement on the development.

#### SA24: Northwest of Clarendon Square

The respondent supported the site allocation and suggested that, should the site be included within the wider redevelopment of SA22 then the land use objectives could be consumed within the masterplan. The Council notes that SA24 was not included in SA22 as SA22 has an extant planning permission, and therefore the allocation seeks to bring forward this additional parcel of land outside of that permission.

#### SA25: Land Adjacent to Coronation Sidings

Respondents to this policy welcomed the proposals in respect of the ecological corridor enhancements and improvements to linkages between Alexandra Palace Park and Wood Green.

There was an objection to a tall building at this site owing to adverse impact on Alexandra Park and Palace conservation area and conflict with DM5. The Council considers that the Local Plan provides appropriate protection for the heritage assets and their wider setting, along with strategically identified views and vistas.

#### SA26: Hawes & Curtis, Green Lanes

The responses to the policy sought changes to ensure flexibility in the amount of the ground floor use to be provided for healthcare provision to ensure viability, that the density of the scheme be revised upward, concern over height reflecting the planning permission for the site not the allocation, and to amend the site development guidance to ensure consistency across sites with Source Protection Zone constraints.

#### SA27: Wightman Rd

The respondent supported enhancement of the ecological corridor on this site.

#### SA28: St. Ann's Hospital Site

The respondent supported enhancement of the SINC on this site.

#### SA29: Arena Retail Park

There was concern from local landowners about the removal of the Town Centre designation from a portion of this site, believing that it could potentially undermine the local retail property market. With the principle of comprehensive redevelopment not generally objected to, it was considered appropriate to reinstate the original town centre boundary, and retain the allocation. There was support locally for a change to the site that reduced traffic congestion in and around the site, but some concern about the potential density of development.

#### SA30: Arena Design Centre

The landowner objects to the designation of this site as a Regeneration Area on the basis that most of the site has gained lawful use as residential. The Council note this position, but feel that RA designation is the only suitable designation due to the desire to obtain both employment and (non-conventional) residential outcomes on the site that will deliver the Plan's strategic objectives. There was support locally for the connection to the St. Ann's site under the rail line, provided it is well designed to ensure crime is not fostered.

#### SA31: Crusader Industrial Estate

The respondent supported enhancement of the SINC on this site.

#### SA32: Omega Works

The respondent supported enhancement of the SINC on this site.

#### SA33: Vale/ Eade Rd

The responses on this policy were generally supportive, with LB Hackney seeking further collaboration on the warehouse living developments, the retention of creative industries, which the policy seeks to achieve, and an amendment to the development guidelines to ensure consistency across sites to reflect the Source Protection Zone constraint.

#### SA34: Overbury & Eade Rds

There was support for the creation of a new link between the Harringay Warehouse District and Woodberry Down.

#### SA35: L/b Seven Sisters & Tewkesbury Rds

Two responses received. The first seeking consistency across sites subject to the Source Protection Zone constraint, and the second, regarding the need to retain creative industries, which the policy seeks to achieve.

#### SA36: Finsbury Park Bowling Alley

There was concern on this site regarding the proposals for a tall building in close proximity to Finsbury Park, with scepticism regarding the construction of a new entrance to the Park through the site. The Council acknowledges that these is a complex design challenge, but believe that the site presents a

significant opportunity to benefit Finsbury Park Town Centre. Additionally the landowner questioned why the cycle parking facility was excluded from the site allocation boundary. The Council agrees that its inclusion, subject to re-provision on site, would enhance flexibility in delivery of the site.

SA37: 18-20 Stroud Green Rd

A respondent sought that new development have regard to the Stroud Green Conservation Area, while another respondent raised concerns about the town centre frontages, having more residential development so close to a transport interchange, and the relationship of the development to Finsbury Park and the potential for impacts.

SA38: 460-470 Archway Rd

A respondent was concerned that Highgate had been identified as an area suitable for tall buildings. It hasn't.

SA39: Former Highgate Rail Station

Respondents noted that the Maps on SA39 and SA40 were the wrong way around. This will be corrected in the minor modifications.

SA40: Gonnermann Antiques

Respondents noted that the Maps on SA39 and SA40 were the wrong way around. This will be corrected in the minor modifications. The Friends of the Parkland Walk objected to the use of MOL as suitable for housing. This is not the case, no change in the MOL boundary has been proposed.

SA41: Highgate School

The landowner supported the allocation although notes the boundary of school ownership and the allocation boundary are not consistent. Other note concerns with loss of MOL and the need to have regard to the listed buildings within the site.

SA42: Highgate Bowl

It was noted that the SLOL was not present on the Policies Map. This will be added.

SA43: Summersby Rd

A respondent is concerned about the impact the redevelopment of this site could have on the adjoining Queens Wood. It is considered that there are adequate policies protecting the amenity of open spaces in the Local Plan to mitigate this effectively. Additionally the site size is incorrect on this site, which is proposed to be amended.

#### SA44: Hillcrest

There were a number of objections to the proposal to infill residential on this publically owned housing estate. The Council believe it is essential that all sites are planned positively to help meet the overall strategic housing need in the borough. The proposed masterplanned approach offers a suitable way to ensure the most appropriate types of new development on this site are progressed.

#### SA45: Highgate Magistrates Court

A respondent was concerned that Highgate had been identified as an area suitable for tall buildings. It hasn't.

#### SA46: Hornsey Depot

English Heritage requested that the Development Guidelines and Site Requirements should reference the need for the development to contribute positively to the Hornsey conservation area and its significance. Unfortunately, planning permission has already been granted and the development is now underway.

#### SA47: Cross Lane

The applicant for a planning consent on this site objected to the requirement to reprovide all the existing employment floorspace on this site. To ensure consistency with other policies in the Plan, a requirement to provide the maximum amount of employment floorspace will replace this.

#### SA48: Hornsey Town Hall

There was concern that this development needed to be sympathetic to the existing Town Hall building. It was considered that the DMDPD policies will require this.

#### SA49: 72-96 Park Rd & Lynton Rd

There were a number of objectors to this policy, on ground of loss of employment floorspace, loss of open space, loss of a conservation asset and density of development. The conservation asset is not listed, the open space is referenced as being safeguarded, employment floorspace is scheduled to be reprovided, and the density of development will be determined in line with the DMDPD.

#### SA50: St. Luke's Hospital Site

There were no responses to this policy.

#### SA51: Cranwood Care Home

The main concern on this site was that it doesn't exacerbate existing parking pressure. The parking standards will be set in accordance with the London Plan's parking standards.

#### SA52: Pinkham Way

While the existing landowner supports the dual designation of Employment Land and SINC, local resident groups are seeking that the site is allocated solely as SINC, with an open space designation. Specific concern was raised with regard to the risk that redevelopment of the site could exacerbate flood risk in the area. The Council's Polivcy, and the London Plan, and the NPPF all state that new development would be required to reduce flood risk through it's design.

#### SA53: Tunnel Gardens

Respondents on this policy were primarily concerned with ensuring the Palace and Park are appropriately conserved through the policies. Small amendments to the factual details such as addresses and references will be proposed, but broadly the policy, and those complementing it in the DMDPD are considered sufficient.

#### SA54: Alexandra Palace

There is concern over the prospect of intensification on the site. Although there is no detailed approach proposed, it is considered that enabling flexibility for a masterplan to identify the most suitable form of development is an appropriate policy approach.

#### SA55: Coppetts Wood Hospital

The prospective developer of this site wish the policy to acknowledge the vacancy of the hospital portion of the site, and that it can be allowed to come forward on its own, without the rest of the site. This is acceptable, but what the Policy requires is that any proposals show how they do not prejudice the rest of the site.

#### SA56: Park Grove & Durnsford Rd

There was a representation objecting to the redevelopment of an existing housing estate, with the perception that this could negatively affect the existing occupants, and that refurbishment would be preferable. The Council has identified these properties as being defective, and believe there is potential to increase stock on the site. This will provide more, better quality homes for local residents, including existing occupants.

#### SA57: Myddleton Road Local Centre

There were no responses to this policy.

#### SA58: Red House

The principle of improving the existing open space was supported locally.

#### SA59: Haringey Professional Development Centre

Consultees did not feel that there was sufficient consultation locally about this site, and object to the potential loss of a community facility. The consultation was carried out in line with the SCI and relevant regulations, and the policy states that the building could be re-used as a community facility depending on the outcomes of subsequent Infrastructure Delivery Plans.

#### SA60: Keston Centre

There was concern regarding encroachment on MOL. While the site adjoins MOL, it will not develop on it. There is an issue with access to the site which will be managed at the detailed planning stage.

#### SA61: Barber Wilson

Concern was expressed about the potential loss of employment floorspace and existing use on this site. The main aim of this site is to create a new link between Wood green and Lordship Rec. Not all of the site will be required to achieve this, and it is expected many businesses will continue to operate.

#### SA62: Broadwater Farm Area

There was significant and organised opposition to the inclusion of the Broadwater Farm Estate in the site allocations document. There is concern that it is a foregone conclusion that the site will be demolished, and existing residents priced out of the area. The Council in the Plan sets out certain principles that would be required and when any proposals for redevelopment come forward. It is not clear that any demolition will occur at the current time. It is considered that the Allocation provides to ensure that a comprehensive masterplanned approach is taken to any redevelopment on this site in the future.

### SA63: The Selby Centre

The Existing occupiers of the site wish to pursue a community led upgrade of the site. The Council (the freehold landowner) wish to ensure that the site is used for maximum public benefit. As such the approach which requires consideration of how the existing users are provided in the future is considered sound.

### SA64: The Roundway

A local amenity group are concerned with the potential scale of development on this site in close proximity to conservation assets. It is considered that the Allocation and DMDPD policies will guide a sensitive development.

### SA65: Leabank and Lemsford Close

Occupants are concerned about the potential impact of a redevelopment of the site upon which they reside. The Council believe there is potential to increase stock on the site. This will provide more, better quality homes for local residents, including existing occupants.

### Consequential Changes

- 5.24 It should be noted that the proposed minor modifications arising from the representations to other DPDs necessitates consequential changes to certain parts of the Proposals Map. There are also a number of changes that pick up on typographical errors or areas where additional information could provide more clarity or help with orientation.

# Appendix A – Notice placed in the local newspaper on both the 8th and 15<sup>th</sup> January 2016

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**HARINGEY LOCAL PLAN PUBLIC NOTICE**  
**Planning and Compulsory Purchase Act 2004**  
**The Town and Country Planning (Local Planning) (England) Regulations 2012**  
**Publication of a Local Plan (Regulation 19) Haringey's Local Plan documents:**  
**Alterations to Strategic Policies; Development Management DPD**  
**(Pre-submission); Site Allocations DPD (Pre-submission); and**  
**Tottenham Area Action Plan (Pre-submission)**

Haringey Council has prepared the proposed submission versions of the above Development Plan Documents (DPDs), which form Haringey's Local Plan to guide planning and development in the borough up to 2026 and beyond. The Strategic Policies (adopted 2015) is subject to a partial review to take account of new growth requirements for the borough as set out in the London Plan as well as the findings of updated evidence base studies. The Development Management DPD contains the general planning policies for the borough that will be used to assess and determine planning applications for new development. The Site Allocations DPD identifies sufficient development sites, outside of the Tottenham AAP area, to meet the identified needs for housing, jobs, and the delivery of required infrastructure. The Tottenham Area Action Plan sets out relevant policies, proposals and site allocations for future development within the Tottenham area. The DPDs are accompanied by a Sustainability Appraisal, Habitats Assessment and an Equalities Impact Assessment.

**Inspection of documents**  
The Council is inviting representations on the above DPDs and the accompanying documents. They are available for inspection from **Friday 8th January to Friday 4th March 2016**:

- at all Haringey libraries (during normal opening hours);
- at the Civic Centre, Wood Green N22 8LE;
- at the Planning Service, 6th Floor, River Park House, 225 High Road Wood Green, N22 8HQ; and
- on line at [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan)

**Representation procedure**  
The DPDs are being published in order for representations to be made prior to the documents being submitted to the Secretary of State for examination in public. Representations received during this pre-submission consultation will be considered alongside the submitted DPDs by an independent Planning Inspector. The purpose of the examination is to consider whether the DPDs comply with legal requirements and are 'sound' against the test of soundness prescribed by the Government in the National Planning Policy Framework (2012). To be 'sound' the DPDs must be positively prepared, justified, effective and consistent with national planning policy and in general conformity with the London Plan (2015). Representations may be accompanied by a request to be notified at a specific address about the submission of the DPDs to the Secretary of State for examination in public. All comments must be made on a 'representation' form which is available at the above venues and on the Council's website. Representations must be received by 5pm on **Friday 4th March 2016**. Representations may be made by any of the following means:

- the online response form at [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan)
- by email at [ld@haringey.gov.uk](mailto:ld@haringey.gov.uk); or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

**Further information**  
For enquiries, email [ld@haringey.gov.uk](mailto:ld@haringey.gov.uk) or contact the Planning Policy Team on 020 8489 1475 or at the above address.  
Dated 8th January 2016

January 15, 2016 25

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**HARINGEY LOCAL PLAN PUBLIC NOTICE**  
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- by email at [ld@haringey.gov.uk](mailto:ld@haringey.gov.uk); or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

**Further information**  
For enquiries, email [ld@haringey.gov.uk](mailto:ld@haringey.gov.uk) or contact the Planning Policy Team on 020 8489 1475 or at the above address.  
Dated 8th January 2016

## Planning and Compulsory Purchase Act 2004

### The Town and Country Planning (Local Planning) (England) Regulations 2012

#### **Publication of a Local Plan (Regulation 19) Haringey's Local Plan documents: Alterations to Strategic Policies; Development Management Policies (Pre-submission); Site Allocations (Pre-submission); and Tottenham Area Action Plan (Pre-submission)**

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- at the Planning Service, 6<sup>th</sup> Floor, River Park House, 225 High Road Wood Green, N22 8HQ; and
- on line at [www.haringey.gov.uk/local-plan](http://www.haringey.gov.uk/local-plan)

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Representations may be accompanied by a request to be notified at a specific address about the submission of the DPDs to the Secretary of State for examination in public.

All comments must be made on a 'representation' form which is available at the above venues and on the Council's website. Representations must be received by **5pm on Friday 4<sup>th</sup> March 2016**. Representations may be made by any of the following means:

- the online response form at <http://haringey.gov.uk/localplan>
- by email at: [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk); or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

**Further information**

For enquiries, email [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk) or contact the Planning Policy Team on 020 8489 1479 or at the above address.

Dated 6<sup>th</sup> January 2016

## Appendix B – Notification Letter sent to all Consultees on the Council’s LDF Consultation Database

Date: 6<sup>th</sup> January 2016  
Contact: Planning Policy Team  
Direct dial: 020 8489 1479  
Email: [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

Dear Sir/Madam,

### **Haringey Local Plan Pre-Submission Public Consultation**

**8th January2015- 4<sup>th</sup> March2016**

Haringey Council is now consulting on the final drafts of four Development Plan Documents (DPD), which make up Haringey’s Local Plan. These include:

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

These documents have been prepared in response to the previous consultation in February/March 2015; and earlier consultations on the Development Management Policies in 2013; and the Site Allocations and Tottenham Area Action Plan in 2014. We are now seeking your views on the final drafts of the above plans.

The Strategic Policies (adopted 2013) set out the Council's spatial strategy for how Haringey will develop and grow over the period to 2026. The partial review of the policies take account of new growth requirements for the borough as set out in the London Plan as well as the findings of updated evidence base studies.

The Development Management Policies contains the general planning policies for the borough that will be used to assess and determine planning applications for new development. Once adopted, the policies will replace those contained in the Haringey Unitary Development Plan (2006).

The Site Allocations identifies sufficient development sites, outside of the Tottenham AAP area, to meet the identified growth needs/targets set out in the Strategic Policies DPD, including those for housing, jobs, and the delivery of required infrastructure. It also establishes specific site requirements against which planning applications will be considered.

The Tottenham Area Action Plan sets out policies, proposals and site allocations for future development within the Tottenham area, based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

A Local Plan Policies Map has also been produced to graphically represent the planning designations and policies contained in the four DPDs.

Following this consultation, the documents along with the consultation responses will be submitted to the Secretary of State for independent examination.

Please find enclosed a Statement of Representations Procedure, which provides details of how you can provide your comments on the documents, all of which are available to view at [www.haringey.gov.uk/local-plan](http://www.haringey.gov.uk/local-plan) ; and in hard copies at all public libraries, Planning Service offices, 6<sup>th</sup> Floor, River Park House, 225 High Road Wood Green, N22 8HQ, and the Civic Centre, Wood Green N22 8LE.

Please provide us with your comments via:

- The online response form at <http://haringey.gov.uk/localplan>
- by email at: [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk); or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

**Comments must be received by 5pm on Friday 4<sup>th</sup> March 2016.**

Comments may be made in support of the policy documents, as well as in objection. However, at this stage of the Local Plan's production it is required that your comments focus on the legal compliance and soundness of the documents. Details of what constitutes legal compliance and soundness can be found in the Statement of Representation Procedures attached. In addition, the Sustainability Appraisal and supporting evidence base are available to view and download from the Council's website: [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan).

### **Next Stages**

Following the end of the consultation period, copies of all responses received will be sent to the Planning Inspectorate for consideration alongside the documents, together with a summary of the key issues, including the Council's responses to the points raised.

The Council anticipates that the Examination in Public will take place in summer 2016. We will regularly update our website [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan) with information about this. If you would like to find out more about the Local Plan you can call the Planning Policy team on 020 8489 1479 or email us at [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk).

Yours faithfully,

*Stephen Kelly*

Stephen Kelly, Assistant Director, Planning

## Appendix C – List of contacts on the Council’s LDF Consultation Database

Lynne Zilkha	Elizabeth Sutton-Klein	Cllr Mallett Antonia	Cllr Christophides Joanna	Cllr Adamou Gina
Jasper Woodcock	Henriette Stuchtey	Cllr Mann Jennifer	Cllr Connor Pippa	Cllr Adje Charles
Heather Wood	Celeste Menich	Cllr Marshall Denise	Cllr Demirci Ali	Cllr Ahmet Peray
Kitty Wong	Margaret Stoves	Cllr McNamara Stuart	Cllr Diakides Isidoros	Cllr Akwasi-Ayisi Eugene
John Wise	Kevin Stanfield	Cllr McShane Liz	Cllr Doron Natan	Cllr Amin Kaushika
Teresa Wing	Michael Edwards	Cllr Meehan George	Cllr Ejiofor Joseph	Cllr Arthur Jason
Carolyn Whitehead	Evelyn Ryan	Cllr Morris Liz	Cllr Elliott Sarah	Cllr Basu Dhiren
Edward Webb	Tara Ryan	Cllr Morton Peter	Cllr Engert Gail	Cllr Beacham David
Julia Warburton	Nicholas Rusz	Cllr Newton Martin	Cllr Gallagher Tim	Cllr Berryman Patrick
Jonathan Vellapah	Joyce Rosser	Cllr Opoku Felicia	Cllr Goldberg Joe	Cllr Bevan John
Nick Triviais	Jeff Rollings	Cllr Ozbek Ali Gul	Cllr Griffith Eddie	Cllr Blake Barbara
Max Tomlinson	Chris Roberts	Cllr Patterson James	Cllr Gunes Makbule	Cllr Blake Mark
Joey Toller	Lorna Reith	Cllr Peacock Sheila	Cllr Hare Bob	Cllr Bull Clare
Jane Thompson	Barry Rawlings	Cllr Reith Lorna	Cllr Hearn Kirsten	Cllr Bull Gideon
Rachel Tedesco	Kimberley Pyper	Cllr Rice Reg	Cllr Ibrahim Emine	Cllr Carroll Vincent
Alison Taylor-Smith	Annabruna Poli	Cllr Ross Viv	Cllr Jogee Adam	Cllr Carter Clive
Simon Miller	Karl-Dirk Plutz	Cllr Ryan James	Cllr Kober Claire	Cllr Sahota Raj
Richard Perry	Chris McNamara	Gabrielle Kagan	Alexander Elliot Ltd	Cllr Stennett Anne
Andrew Papadopoulos	Louise McNamara	Petal Caddu	Alexandra Mansions Tenants Association	Cllr Strickland Alan
Pavel Pachovský	Peter McNamara	Francois Joubert	Adult Literature Group	Cllr Vanier Bernice
Christopher Owen	Richard Max	Nick Jenkins	African Caribbean Association	Cllr Waters Ann
Stephen Overell	Kim Mason	Tony Hopkins	African Cultural Voluntary Organisation	Cllr Weston Elin
Gerrit Ormel	Colin Marr	Marian Hone	African Women's Welfare Group	David Lammy MP
Christian Ogilvie-Browne	Jason MacKay	Elaine & Ben Holgado	Africans & Descendants Counselling Services Ltd	Lynne Featherstone MP
Juliet Oerton	Stephen Lubell	Susie Holden	Age UK	A Anva Ltd
Carol Norton	John Long	Michael Herbert	Agudas Israel	A P T Consulting

Joseph Nicholas	Alison Lister	Frances Heigham	AH Architects	A S Z Partners Ltd
Ollie. Natelson	Barry and Louise Lewis	Claudia Hawkins	Air Transport Users Council	A. E. Butler & Partners
Jill Naeem	Rebecca Lellis Ferreira	Lauritz Hansen-Bay	Aitch Group	A.C.H. Turkish Speaking Pensioners Club
Eleni Murphy	Ethan Lazell	Paul Hancock	AJ Architects	Abbeyfield (North London) Society
Dave Morris	Charlie Kronick	Laura and Marcus Graham	Alan Cox Associates	Abbeyfield Society
Said Moridi	Heather Kinnersley	Marcos Godinho	Albany & Culross Close Residents Association	ACHE (Action for Crouch End & Hornsey Environment)
Faye Morgan	Angie Kikkides	Joe Friedman	Avenue Mews Tenants Association	Alexandra Palace Action Group
Mary Mitchell	Hannah French	Tinu Cornish	Aztech Architecture Ltd	Alexandra Palace Residents Association
Elaine Graham	Paul Brown	Lucia Brusati	Bahai Community	
Sean Fewlass	Stephen Brice	Tim Brierley	Bangladesh Muslim Organisation	Alexandra Park/Grove Lodge Meadow Allotments
Carla Ferrarello	Jill Bowden	Arthur Leigh	Bangladeshi Cultural Society	Alexandra Primary School
Pasco Fearon	Tim Blake	Beatrice Hyams	Bangladeshi Women's Association	Alexandra Residents Association
Cindy Evans	Anna Blackburn	Valerie Rose Berry	Baptist Church	Alexandra Tenants Association Group
Sue Ettinger	Matthias Bauss	Bill Temple-Pediani	Barnet, Enfield and Haringey Health Authority	Allenson House Medical Centre
Chris Elser	Frances Basham	Laura Forrest-Hay	Bashkal & Associates	Ally Pally Allotment Society
Kieron Edwards	Miles Attenborough	Sarah Lane	Bedford Road Tenants Association	Al-Rasheed Dauda Architect
Johnny Dixon	James Athanassiou	Elizabeth Gray	Belcher Hall Associates	Altaras Architecture
Angharad Davies	Ruth Antoniadis	Nicola Venning	Bell Residents Association	Anatolitis Associates
Felipe Da Rocha	Paulette Amadi	Panos Nicolaidis	Belmont Infant & Junior School	Ancient Monuments Society
Ruth Cowan	Linda Alliston	Poppy Rose	Bethel United Church of Jesus Christ	Andrew Kellock Architects
Stephen Cook	Andreas Adamides	Christopher Chadwick	Bhagwati Sai Culture & Social Centre	Andrew Mulroy Architects Ltd

Kenneth Connelly	Leila Sifri	Barry James	Bibles Christian's Assembly	Anglo Asian Women's Association
Anastasia Christofis	Eliza Kaczynska-Nay	Bob Maltz	Bicknell Associates Chartered Architects	Apcar Smith Planning
David Burrowes MP	Cynthia Jenkins	Flavio Poli	ASRA (GLHA)	Arbours Association
Paul Bumstead	Robert Franks	Selina & Dan Egerton	Aspire Design & Survey Ltd	Architectural Heritage Fund
Reuben Payne	Elizabeth Barnett	Broadwater Farm Community Health Centre	Blitzgold Ltd	Architectyourhome-Highgate
Hannah Redler Hawes	Angela Rossi Carter	Broadwater Farm Residents Association	Born Again Evangelistic	Archi-Tone Ltd
John Murray	Tony Baker	Broadwater Residents Association	Bostall Architecture Services	Archway Road Residents Association
Christine King	Gordon Forbes	Brown & Co (Surveyors) Ltd	Bounds Green & District Residents Association	Archway Road Tenants Association
Jon Brooks	Huub Nieuwstadt	Bruce Castle Village Residents Association	Bounds Green Group Practice	Archway Road Tenants Association
Chris Warburton	Bill Nottage	Brunswick Park Health Centre	Bounds Green Health Centre	ARHAG Housing Association
David Lichtenstein	Frederick Limbaya	Buckingham Lodge Residents Association	Bounds Green Infant & Junior School	Arnold Road Residents Association
Nick Oparvar	Feolezico Calboli	Building Design Consultants	Bounds Green Owner/Occupier Ass. & Neighbourhood Watch	Arnos Grove Medical Centre
Ruth Ortiz	Sue Penny	CA (UK) Ltd	Bowes Park Community Association	Arta Architectural
Ursula Riniker	J N Douglas	CAAC Highgate	Bowes Park Community Association	Ashdown Court Residents Association
David Baker	David Rennie	CABE	Bracknell Close/Winkfield Road Residents Association	Asian Carers Support Group
Michele Eastmond	Steve Roe	Campbell Court Residents Association	Brendan Woods Architects	Asian Community Centre
Chris Mayled	Katy Andrews	Campsbourne Baptist Church	Bridge House Health Care Centre	Asian Community Group
Jeremy Munday	Sophie Cattell	Campsbourne Centre	Briffa Phillips Architects	Asian Family Group

Nicholas Embling	Capital Architecture Ltd	Campsbourne Infant School	Britannia Hindu Temple Trust	Broadwater Farm Community Centre
Andrew Tiffney	Calvary Church of God in Christ	Chestnut Area Residents Association (CARA)	Client Design Services Ltd	Crawford Partnership
Carolyn Squire	Carr Gomm Society	Chestnut Northside Residents Association	Clyde Area Residents Association	Crouch End open Space (CREOS)
Corporation of London	Carter Surveying Associates	Chestnuts Community Centre	Coldfall Community Centre	CRH Tenants Association
London Borough of Haringey	Caryatid Architects	Chinese Community Centre	Coldfall Primary School	Cromwell Avenue Residents Association
London Borough of Sutton Planning and Transportation	Casa de la Salud Hispano Americana CASAHA	Chomley & Causton Residents Association	Coleraine Park Primary School	Crouch End Dental Practice
London Borough of Redbridge	CASCH	Christ Apostolic Church Kingswell	Collage Arts	Crouch End Health Centre
London Borough of Brent Planning Services	Charlton House Medical Centre	Christ Church	Commerce Road Tenants Association	Crouch End Health Centre
London Borough of Barking & Dagenham	Cherry Tree House Residents	Christchurch West Green	Community Action Sport	Crouch End Traders Association
London Borough of Barnet Planning Department	CASE	Christopher Wickham Associates	Community Church of God	Crouch End URC Church
London Borough of Bexley	Causeway Irish	Church Commissioners	Community Gay & Lesbian Association	Crouch Hall Road Surgery
London Borough of Croydon	CB Architects	Church Crescent Residents Association	Community Response Unit	Crowland Primary School
London Borough of Enfield	Cemex (UK) Operation Ltd	Crammond Browne Architects	Community Safety Unit	Cube Building Consultancy
London Borough of Hammersmith and Fulham	Central & Cecil	Circle 33 Home Ownership Ltd	Confederation of British Industry	CUE
London Borough of Harrow	Centre for Accessible Environments	Circle 33 Housing Group	Co-op Homes	CUFOS Community Centre
London Borough of Hillingdon	Charisma Baptist Church	Clark Designs Ltd	Coppetts Residents Association	Cypriot Centre
London Borough of Hounslow	Albany & Culross Close Residents Association	Clarke Desai Ltd	Corporation of London	Cypriot Women's League

RB Kensington & Chelsea	Alexandra Mansions Tenants Association	Claudio Novello Architects	Council for British Archaeology	Cyprus Turkey Democratic Association
RB Kingston upon Thames	Alexandra Palace Action Group	Cherry Tree House Residents	Edgcott Grove Residents Association	D R M Associates
London Borough of Lambeth	Alexandra Palace Residents Association	Chestnut Area Residents Association (CARA)	Eldon Road Baptist Church	DASH
London Borough of Lewisham	Alexandra Park/Grove Lodge Meadow Allotments	Chestnut Northside Residents Association	EMJCC Community Side	David Langan Architects
London Borough of Merton	Alexandra Residents Association	Chomley & Causton Residents Association	ENKI Architectural Design	Dental Health Centre
London Borough of Newham	Alexandra Residents Association	Church Crescent Residents Association	Eritrean Community in Haringey	Dental Practice
London Borough of Richmond Upon Thames Policy and Design	Alexandra Tenants Association Group	Clyde Area Residents Association	Ermine House Residents Association	Dental Surgery
London Borough of Tower Hamlets Strategic Planning	Archway Road Residents Association	Commerce Road Tenants Association	Ermine Road Residents Association	Department for Culture Media and Sport
London Borough of Waltham Forest	Campbell Court Residents Association	Coppetts Residents Association	Evering Pentecostal Church	Ecodomus
Westminster City Council Planning and City Development	Archway Road Tenants Association	CRH Tenants Association	FA Drawing Service	Devonshire Hill Primary School
London Borough of Havering	Arnold Road Residents Association	Cromwell Avenue Residents Association	Faith Baptist Church	Direct Planning Ltd
London Borough of Wandsworth	Ashdown Court Residents Association	Eastbourne Ward Residents Association	Faith Mosque	Discount Plans Ltd
London Borough of Ealing	Avenue Mews Tenants Association	Edgcott Grove Residents Association	Faith Restoration Ministry	Downhills Infant & Junior School
London Borough of Hackney	Bedford Road Tenants Association	Ermine House Residents Association	Family Health Service Authority	DPA (London) Ltd
City of London	Bell Residents Association	Ermine Road Residents Association	Family/Landmark Housing Association	DPDS Consulting Group
London Borough of Camden	Bounds Green Owner/Occupier Ass. &	Ferry Lane Estate Residents Association	Federation of African Peoples Organisation	Duckett Dental Surgery

	Neighbourhood Watch			
Department for Transport	Bowes Park Community Association	Fortismere Residents Association	Ferry Lane Estate Residents Association	Earlsmead Primary School
Garden Residents Association	Bowes Park Community Association	Garden Residents Association	Finsbury Park Track & Gym	Eastbourne Ward Residents Association
Grosvenor Road Residents Association	Bracknell Close/Winkfield Road Residents Association	Muswell Colney Residents Association	Friends of Ivatt Way	Ebenezer Foundation Advisory Association
Hale Estate Residents Association	Broadwater Farm Residents Association	Nelson Mandela Residents Association	Friends of Lordship Rec	South Hornsey Residents Association
Harmony Close Residents Association	Broadwater Residents Association	Noel Park North Area Residents Association	Friends of Markfield Recreation Ground	Southwood Lane Residents Association
Hillcrest Tenants & Residents Association	Bruce Castle Village Residents Association	North Grove Residents Association	Friends of Muswell Hill Playing Fields	Springfield Avenue Residents Association
Hillside Road Residents Group	Buckingham Lodge Residents Association	Northumberland Park Tenants & Community Association	Friends of Muswell Hill Playing Fields & Coldfall Wood	Stokley Court Residents Association
Hilltop House Residents Association	Flower Michelin Ltd	Oakdale Resident Association / South Tottenham RA	Friends of Noel Park	Stroud Green Residents Association
Hornsey Lane/Colwick Close Residents Association	Forestry Commission England	Palace Gates Residents Association	Friends of Paignton Road	Suffolk Road Residents' Association
HTBG Residents Association	Fortismere Residents Association	Palace View Residents Association	Friends of Queen's Wood	Summersby Road Residents Association
Jackson's Lane Residents Association	Fortismere School	Park Lane Close Residents Association	Friends of Railway Fields	The Chine & Cascade Residents Association
James Place/Church Road Residents Association	FQW	Partridge Way Residents Association	Friends of Railway Fields	The Weymarks Residents Association
Kingsley Place Residents Association	Frederick Knight Sports Ground	Plevna Crescent Residents Association	Friends of Stationer's Park	Tiverton Tewkesbury Residents Association
Lancaster Road Residents Association	Freight Transport Association	Remington Road Residents Association	Friends of the Earth (London Region)	Tower Gardens Residents Network
Lomond Close & Brunswick Road RA	Friends of Albert Road Recreation Ground	Resident Association	Friends of Tottenham Cemetery	Turner Avenue Residents Association
Lomond Close Residents	Friends of Bowes Park	Resident Association	Friends of Wood Green	Veryan Court Residents

Association	Garden		Common	Association
Love Lane Residents Association	Friends of Bruce Castle	Robert Burns Residents Association	G T Project Management	Wood Green Black Tenants Group
Millicent Fawcett Tenants Association	Friends of Hornsey Church Tower	Seymour Road Residents Association	Gage Limited	Wood Green Central Area Tenants & Community Assoc.
Moselle Close Residents Association	Friends of Brunswick Road Open Space	Sophia House Residents Association	Garden Drive Neighbourhood Watch	Woodridings Court Residents Association
Friends of Chestnut Park	Friends of Cherry Tree Wood	Friends of Crouch End Open Space	Friends of Downhills Park	Woodside Residents Association
Garden Residents Association	Guyana People's Congress	West Green Residents' Association	Haringey Irish Cultural & Community Centre	The Queens Mansions Residents Association
Gf Planning Limited	Habinteg Housing Association	Woodlands Park Residents Association	Haringey Leaseholders Association	Avenue Gardens Residents Association
Gladesmore Community School	Haines Philip Architects	Woodstock Road Residents Association	Haringey Mencap	Beresford Road Residents Association
Gladesmore Girl's & Young Women's Club	Hale Estate Residents Association	Cranley Gardens Residents' Association	Haringey Pakistan Cultural Society	Burghley Road Residents Association
Gladesmore Youth Club	Hamilton Bishop Ltd.	Wood Lane Residents Association	Haringey Phoenix Group	Chestnuts Northsid Residents Assn
Globe Projects Ltd	Hancock Architects	Gardens Residents Association (GRA)	Haringey Police	Chitts Hill Residents Association
Goan Community Centre	Haringey African Organisation	Grovelands, Lemsford & Leabank Residents Assoc.	Haringey Solidarity Group	Glasslyn, Montenotte Tivoli Road Residents Assoc.
Grace Baptist Chapel	Haringey Area Youth Project	Torrington Park Residents Association	Haringey Sports Council	HFRA (Haringey Federation of Residents Association)
Greek Community Care	Haringey Arts Council	Tynemouth Area Residents' Association	Haringey United Church	Morrish Residents Association
Greek Orthodox Church	Haringey Asian Women Aid	Friern Village Residents' Association	Haringey Women's Aid	Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park
Greek Parents Association	Haringey Autism	The Bounds Green and District Residents	Harmony Close Residents Association	Parkside & Malvern Residents Association

		Association		
Green City Landscapes Ltd	Haringey Breastfeeding Centre	Dowset Road Residents Association.	HART Architecture	Parkside Malvern Residents Association
Greig City Academy	Haringey Community Volunteer	Haselmere Residents Association	Hartleys Projects Ltd	Rookfield Estate Residents Association
Gridline Architecture	Haringey Deaf Group	Haselmere Residents Association	Health and Safety Executive	Sandlings Residents Association
Grosvenor Road Residents Association	Haringey Faith Forum	Haringey Federation of Residents Associations	High Cross Church	The Alexandra Residents Association
Groundwork London	Haringey Ghanaian Community	Palace Gates Residents' Association	High Cross United Reformed Church	Warner Estate Residents Association
Gus Alexander Architects	Haringey Group London Wildlife Trust	Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth	Highgate Group Practice	West Green Residents' Association
Highgate Library Action Group	Crouch End Forum	Alexandra Palace Charitable Trust	Home Craft Consultant	HTBG Residents Association
Highgate Newton Community Centre	Fountayne Residents Association	Al-Hijra Somali Community Association	Homebase Ltd	IBI Design Associates
Highgate Primary School	Office of Government Commerce	Alliance Planning	Homebound Social & Luncheon Group	Industrial Dwellings Society
Highgate United Synagogue	Cornerstone Trading	Angolan Community Association	Homes & Community Agency	Innisfree Housing Association
Highgate Wood School	Barratt Development PLC	Arriva London	Hornsey Dental Practice	Irish Community Centre
Highpoint Dental Surgery	Inland Waterways Association	Asian Action Group	Hornsey Housing Trust	Irish in Britain Representation Group
Highway Youth Club	LB Greenwich	Asian Women's Association	Hornsey Housing Trust	Islamic Community Centre
Hill Homes	Metropolitan Development Service	Avenue Gardens Residents Association	Hornsey Lane & Colwick Close RA	Islamic Community Centre Women's Group
Hillcrest Tenants & Residents Association	London TravelWatch	Avenue Gardens Residents Association	Hornsey Lane Association	JA Architecture
Hillside Road Residents	St. Peter in Chains RC Infant	Barnard Hill Association	Hornsey Lane/Colwick Close	Jack Cruickshank Architects

Group	School		Residents Association	
Hilltop House Residents Association	Aarogya Medical Centre	Barton Willmore	Hornsey Moravian Church	Jacksons Lane Community Centre
Hollickwood Park Campaign	London Ambulance Service	Barton Willmore	Hornsey Mosque	Jackson's Lane Residents Association
Holly Park Clinic	3 Valleys	Bellway Homes	Hornsey Police Station	James Place/Church Road Residents Association
Holmes Design Ltd	African Caribbean Leadership Council	Beresford Road Residents Association	Hornsey School for Girls	Jason Read Pugh
Holmesdale Road & Orchard Road Neighbourhood Watch	Alexandra Palace & Park CAAC	Black & Ethnic Minority Carers Support Service	Hornsey YMCA	Jesus for the Word Community Project
Holy Innocents	Christian Action (Enfield) Housing Association	BME Community Services - Selby Centre	Housing 21	Jewish Orthodox Association
Holy Trinity Church	City Planning Group	BPTW	HPN Ltd	John Grooms Housing Association
British Waterways	Civil Engineers Ltd	John L Sims Surveyor	The Old Surgery	LB Harrow
Canal River Trust Head Office	Cluttons LLP	John Perrin & Co	Ethiopian Community Centre	LB Havering
Bruce Grove Primary School	College of Haringey, Enfield and North East London	JS Surveying And Design	Euroart Studios	LB Kensington & Chelsea
Burghley Road Residents Association	Colney Hatch Management Company Ltd.	Julian Cowie Architects	Family Mosaic	LB Lambeth
Buying Solutions	Connexions	Kings Avenue Dental Practice	Fields in Trust	LB Merton
CARA Irish Housing Association	Council of Asian People (Haringey)	Kingsley Place Residents Association	First Plus Planning	LB Newham
CB RE	Crossover Group	Kurdish Advice Centre	FirstPlan	LB Richmond Upon Thames
CGMS Consulting	Cypriot Elderly & Disabled Group	Kurdish Community Centre	Friends of Priory Park	LB Sutton
CGMS Consulting	Department for Business, Innovation and Skills	Kurdish Housing Association	Friends of Priory Park	LB Tower Hamlets
CGMS Consulting	Alexandra Park School	Kush Housing Association	Muswell Hill and Hornsey Friends of the Earth	LB Wandsworth
CgMS Ltd	Department of Environment Food and Rural Affairs	L & P Consultants	Friends of the Earth Tottenham & Wood Green	Lea Valley Primary School
CGMS Ltd	Derek Horne & Associates	Ladybur Housing Co-	Friends, Families and	League of Jewish Women

		operativr	Travellers and Traveller Law Reform Project	
Chestnuts Northsid Residents Assn	Dialogue Communicating Planning	Lancaster Road Residents Association	Fusion Online Limited	LETEC
Chettle Court Ranger Youth (FC)	DP9 Planning Consultants	LB Barking & Dagenham	Genesis Housing Group	Level Ltd
Cheverim Youth Organisation	Drivers Jonas Deloitte	LB Brent	Glasslyn, Montenotte Tivoli Road Residents Assoc.	Liberty Church
Chitts Hill Residents Association	LB Hammersmith & Fulham	LB Croydon	GLC-RAG	Lidl UK
Alderton Associates	Greek Cypriot Women's Organisation	LB Ealing	Grace Organisations - Elderly Care Centre	Lipton Plant Architects
GreenN8 Community Group	Livingstone Youth & Parent Support Centre	Hornsey Historical Society	Lord Morrison Community Centre	Living World Temple
Gt. Lakes Initiative & Support Project	Lomond Close & Brunswick Road RA	Hornsey Vale Community Association	Lordship Lane Infant School	Metropolitan Housing Trust
Haringey Chinese Centre	Lomond Close Residents Association	London First	Lordship Lane Junior School	Metropolitan Police
Haringey Cycling Campaign	London Ambulance Service	Jala - Johnathan A Law and Associates	Loren Design Ltd	Metropolitan Police
Haringey Fire Service	London Basement Company Ltd	Jamait-Al-Nissa	Love Lane Residents Association	Methodist Church
Haringey Peace Alliance	London Bat Group	Joint CAAC	M C Dentistry	Ministry of Justice
Haringey Play Association	London City Airport	Jones Lang LaSalle Planning	Manor House Dental Practice	Morrish Residents Association
Haringey Racial Equality Council	London Forum of Amenity & Civic Societies	King Sturge Llp	Marianne Davys Architects Ltd	Mount Anvil plc
Haringey Somali Community & Cultural Association	London Historic Parks & Gardens Trust	Knight Frank	Mario Pilla Architects	Mulalley and Company Ltd
Haringey Womens Forum	London Housing Federation	Ladder Community Safety Partnership	Markfield Project	Nathaniel Lichfields and Partners
HAVCO	London Islamic Cultural Society	Lambert Smith Hampton	MD Designs	National Federation of Gypsy Liaison Groups
Her Majesty's Court Service	London Islamic Cultural	LB Bexley	Metropolitan Development	AMEC for National Grid

	Society		Consultancy	
HFRA (Haringey Federation of Residents Association)	London Port Health Authority	LB Redbridge	Metropolitan Home Ownership	National Market Traders' Federation
Home Builders Federation - London	London Walking Forum	Lee Valley Estates	Metropolitan Police	New Testament Church of God
Home Office	London Waste Ltd	Lee valley Park Authority	Metropolitan Police Service	NHS London Healthy Urban Development Unit
Home-Start Haringey	London Wildlife Trust	London Continental Railway	Middle Lane Methodist Church	Noel Park CAAC
Hornsey CAAC	London Windows Direct Ltd	Dron & Wright	Middlesex Area Probation Service	Tottenham CAAC
Millicent Fawcett Tenants Association	North London Business	Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park	Millennium Neighbourhood Watch & Residents Association	Rapleys
Millyard 7th day Baptist Church	North London Chamber of Commerce	Muswell Hill & Highgate Pensioners Action Group	New Stroud Green Health Centre	Redrow Homes (Eastern) Ltd
Ministry of Praise	North London Partnership Consortium	Muswell Hill Police Station	Newton Architecture	Restoration Community Project
Missionaries of Africa	North London Waste Authority	Muswell Hill Synagogue	NHS London	Rookfield Estate Residents Association
MJW	North London Waste Authority	Muswell Hill Youth Project	Nightingale Primary School	RPS Planning
Moravian Church	North Middlesex Hospital	N London Cultural Diversity Group	Noel Park Infant & Junior School	Sandlings Residents Association
More Space	Caldotec Ltd	N.A.G.	Noel Park North Area Residents Association	Savills
Morris House Dental Surgery	Campsbourne School	National Romany Rights Association	Noel Park Over 55's Club	Savills Planning
Morris House Surgery	Parkside & Malvern Residents Association	Neelkamal Asian Cultural Centre	North Grove Residents Association	St. James Church
Moselle Close Residents Association	Parkside Malvern Residents Association	Neil Wilson Architects	North Haringay Infant & Junior School	Selby Trust

Mountview Arts Centre	Peacock & Smith for WM Morrison Supermarkets plc	Nelson Mandela Residents Association	North London West Indian Association	Shian Housing Association Ltd
Mt. Olivet Baptist Church	Peacock and Smith	New Deal for Communities	Northumberland Park Community School	Haringey Trades Council
Murray Graham Architecture Ltd	PEEC Family Centre	New Image Design	Northumberland Park Tenants & Community Association	Woodstock Road Residents Association
Murray Mackeson Associates	Planning Perspectives	New River Action Group	Northumberland Park Women's & Childrens Centre	Workspace Group
Muswell Colney Residents Association	Pollard Thomas & Edwards Architects	New River Sports Centre	npower	YMCA
Muswell Hill & Fortis Green Association	PTEA	New Space	Oakdale Resident Association / South Tottenham RA	Cabinda Community Association
Muswell Hill & Highgate Handicapped Pensioners Club	Okpanam Women's Association	Patrick Hickey Design	Tottenham CAAC	Veolia Water Partnership
St. Mary's Church	Oromo Community in Haringey	Paul Archer Design	Tottenham Civic Society + Tottenham CAAC	London Parks and Gardens Trust
Stapleton Hall Ltd	Osel Architecture	Paul Buxton Associates	Transport For London	Pinkham Way Alliance
Stewart Ross Association/Dev Plan	Outline Building Limited	Peabody Design Group	Tree Trust for Haringey	Thames Water
Stock Woolstencroft	P R P Architects	Peabody Trust	Triangle Community Centre	Freehold Community Association
Stonewall	P. E. Ottery	Peabody Trust	Turley Associates	Natural England Consultation Service
Sustrans	P.D. Associates	People's Christian Fellowship	Campaign to Protect Rural England (CPRE)	Office of the Green MEPs,
Tan Dental Practice	Palace Gardens Association	Perfect Fit Kitchen & Interiors Ltd	Turnaround Publisher Services	Member of Parliament for Chipping Barnet
Tetlow King Planning	Palace Gates Residents Association	Peter Brades Architects	Pathmeads	One Housing Group
Thames Water Utilities Ltd	Palace View Residents Association	Phoenix Group	Unite Group PLC	Hyde Housing

Thames Water Wastewater Services	Park Lane Close Residents Association	Plevna Crescent Residents Association	Veolia Environmental Services (UK) Plc	Protect Bruce Castle Area (PBCA)
The Alexandra Residents Association	Park Road Dental Practice	Police & Community Working Group	Wards Corner Community Coalition	Pyramid Counselling Services
Haringey Council	Park Road Pool	Port of London Authority	Wards Corner Community Development Group	Quorum Associates
The Mulberry Primary School	Park View Academy	Post Office	Warner Estate Residents Association	Randall Shaw Billingham
The Planning Inspectorate	My Dental Care	Post Office Counters Ltd	Haringey Citizen's Advice Bureau	Redemption Church of God
The Ramblers	Park Vue Dental Practice	Powergen plc	West Green Residents' Association	Remington Road Residents Association
The Theatres Trust	Parsons Brinckerhoff Ltd	Pride of Ferry Lane	Woodlands Park Residents Association	Rennie & Partners
<u>Sustrans</u>	Partridge Way Residents Association	Propel Projects	Sierra Leone Family Welfare Association	Rhodes Avenue Primary School
Tiverton Primary School	Mobile Operators Association	Planning Potential	Sigma Design Build UK	Richard S McCarthy Architect
Viridian Housing	Milmead Industrial Management Ltd.	Shire Consulting	Simon Bocking Building Services	Rie Nijo Architecture
Tamil Community Housing Association Ltd	Martineau	Sunlight Lofts Ltd	Simon Levy Associates	Risley Avenue Infant & Junior School
London & Quadrant	Royal Society for the Protection of Birds	Haringey Allotments Forum	Society for the Protection of Ancient Buildings (SPAB)	Robert Burns Residents Association
Muswell Hill CAAC	Rutland House Surgery	Montagu Evans	Solon Housing Co-operative Housing Services	Robert Harrison Property
Lee Valley Regional Park Authority	Saheli Asian Girls & Young Womens Group	Newlon Housing Trust	Somali Community Group	Rolfe Judd Planning Ltd
LB Southwark	Sakumoh Dance Group	Karin Housing Association	Somali Welfare Association	Royal Mail Property Holdings
British Waterways Board (London Office)	Sanctuary Housing Association	CG Architects	Somerset Gardens Family Health Care	Springfield Avenue Residents Association
Friends of Parkland Walk	Sanctuary Youth Club	Tottenham Police Station	Sophia House Residents Association	St, Paul's and All Hallows CE Junior School
Friends of Woodside Park	Save Britain's Heritage	Methodist Homes	South Harringay Infant	St. Andrews Vicarage

			School	
The Highgate Society	Save the Environment of Park & Palace (STEPP)	Network Housing	South Harringay Junior School	St. Ann's Primary School
Circle Houing Group	Savills Plc	Innisfree HA	South Hornsey Residents Association	St. Anns Church
Highgate CAAC	Scenario Architecture	Arhag HA	Southwood Lane Residents Association	St. Benet Fink
Lien Viet Housing Association	Schamroth + Harriss Architects	Lee Valley Estates	Spenser Associates	St. Cuthbert's Church
Islington and Shoreditch HA	Servite Houses	Logic Homes Ltd	Sport England London Region	St. Francis de Sales RC Infant & Junior School
Apna Ghar Housing Association	Seven Sisters Infant & Junior School	North London Business	Sporting & Education Solution	St. Gildas' RC Junior School
Carr-Gomm	Seventh Day Adventist Church	North London Sub-Region	St. Paul's Church	St. Ignatuis RC Primary School
Circle 33 Housing Trust	Seymour Road Residents Association	Notting Hill Housing Association	St. Peter Le Poer	St. James CE Primary School
Community HT (One HG)	SGI Sokagakkia	Nottinghill Housing Group	St. Thomas More School	St. James Dental Surgery
Grainger PLC	Sierra Leone Community Empowerment Project	Origin Housing	St. Vincent Social & Economic Association	St. John the Baptist Greek Church
Guinness Trust	Space Design Consultants Ltd	Origin Housing	Stagecoach - SELKENT	St. John Vianney Church
Habinteg Housing Association Ltd	Stokley Court Residents Association	Origin Housing Group	Stamford Hill Primary School	St. John's
Hornsey Housing Trust	Stroud Green Baptist Church	Pocket	Stationers Community Centre	St. Marks Methodist Church
Housing 21	Stroud Green Housing Co-operative	Pocket	Staunton Group Practice	St. Mary Community Centre
Teachers Housing Association	Stroud Green Residents Association	Pocket Living	Stephen Donald Architects	St. Mary's CE Infant School
The Abbeyfield Society	STS Structural Engineering	Sahil HA	LB Bromley	St. Mary's CE Junior School
Pinkham Way Alliance	Stuart Crescent Health Centre	Sahil Housing	St. Martin of Porres RC Primary School	St. Mary's Greek Orthodox Cathedral
Muswell Hill Sustainability Group	Stuart Henley & Partners	Sanctuary Group	Turkish Cypriot Community Association	St. Mary's RC Infant & Junior School

S. Mary's Vicarage	Studio 11 Design Ltd	Sanctuary Housing	Iceni Projects Limited	St. Michael's CE Primary School
Networked Neighbourhoods	Studio 136 Architects	Shian Housing Association	Mind In Haringey	St. Paul the Apostle
Cranley Gardens Residents' Association	Suffolk Road Residents' Association	Southgate Churches & Wood Green	Pellings Llp	St. Paul's
The Hawthorns RA and Neighbourhood Watch	Summersby Road Residents Association	St Mungo	Oliver Burston Architects	St. Paul's and All Hallows CE Infant School
Haringey Forum for Older People	Sunshine Garden Centre	Tetherdown Primary School	Highgate URC Church	The Clock Tower Practice
Woodside High School	Sure Youth Foundation Project	Thames Gateway London Partnership	Earlham Primary School	The Gainsborough Clinic
LB Lewisham	Symon Smith & Partners	The Alexandra Surgery	John Rowe-Parr Architects	The Georgian Group
Barker Parry Town Planning Ltd	T.B.F.H.A	The Bowes Road Dental Practice	The Garden History Society	The Green CE Primary School
Lancasterian Primary School	Tasou Associates	The Chine & Cascade Residents Association	Westminster City Council	The Gypsy Council
Exposure Organisation	Temple of Refuge	The Christchurch Hall Surgery	Wood Lane Residents Association	8 Stuart Crescent Health Centre,
Open Door	Templeton Associates	Spur Road Surgery	Gardens Residents Association (GRA)	The John Loughborough School
Muswell Hill Primary School	The Willow Primary School	The Tree Council	Royal Borough of Kingston upon Thames	The North London Gay & Lesbian Association
Family Mediation Service	Millennium Dental Practice	The Tree Trust for Haringey	St. John the Baptist Greek Church	The Surgery
Sovereign Group Ltd	St. Paul's Catholic Primary School	The United Reformed Church	Grovelands, Lemsford & Leabank Residents Assoc.	Myddleton Road Surgery
St. Francis de Sales	Rokesly Junior School	The Victorian Society	Tottenham Traders Association	St John's Road Surgery
Leads Design Partnership	Tynemouth Area Residents' Association	The Weymarks Residents Association	Tottenham Trust	Dowset Road Residents Association.
St. Aidan's VC Primary School	Papa Architects Ltd	Affinity Water Limited	Tottenham Women's Aid	Bridge Renewal Trust
Keeping it Simple Training (KIS) Ltd	Friern Village Residents' Association	Tibbalds TM2	Tower Gardens CAAC	Winbourne Martin French (chartered surveyors).

Home Group	Enfield, Haringey and Barnet Samaritans	Tiverton Tewkesbury Residents Association	Tower Gardens Residents Network	Muswell Hill & Fortis Green CAAC
The Parish of Wood Green	Dixon Searle LLP	Tomlinson Tree Surgeons	Town & Country Planning Limited	Transition Crouch End
Ferry Lane Primary School	Mario Pilla Architects Ltd	Tottenham & Wood Green Pensioners Group	Trafalgar Christian Centre	Hornsey Historical Society member.
St. John Vianney School	LB Merton	Tottenham Baptist Church	Transco	MHFGA
Action for Kids Charitable Trust	LB Merton	Tottenham Community Sports Centre	Trinity at Bowes Methodist Church	CgMs Consulting
Muswell Hill Centre	The Bounds Green and District Residents Association	Tottenham Green Sports Centre	Turkish Cypriot Counselling Group	London borough of Enfield
Coleridge Primary School	Rapleys LLP	Tottenham Green Taskforce	Turkish Cypriot Elderly Group	London Borough of Enfield
Stroud Green Primary School	Savills,	Tottenham Irish Women's Group	Turkish Cypriot Forum	Collins & Coward
Barnet, Enfield and Haringey Mental Health Trust	Mario Pilla Architects Ltd	Tottenham Peoples Initiative	Turkish Cypriot Peace Movement in Britain	Hornsey Historical Society member
Our Lady of Muswell Hill Primary School	Planning Bureau - McCarthy and Stone	Tottenham Police Station	Turkish Cypriot Women's Project	A2 Dominion Group
Torrington Park Residents Association	Turnpike Lane Citizens Advice Bureau	Warham Road Neighbourhood Watch	Turkish Parents Association	The Highgate Society
Mayor's Office for Policing and Crime	Twentieth Century Society	Charalambous Architectural Consultant	Turkish Youth Association	Urban Vision Partnership Limited Regulatory Services
Haringey Young Carers Project	TWG FoE/FoE London	Welbourne Primary School	Turner Avenue Residents Association	Planware Ltd
We Love Myddleton Road	Tynemouth Medical Practice	West Green Neighbourhood Watch	TfL London Rail	Wood Green Central Area Tenants & Community Assoc.
Architectural Heritage Fund	Uganda Welfare Association	West Green Primary School	LOROL	Wood Green Community Link
Smith Jenkins Town Planning Consultants	Umfreville Road Neighbourhood Watch	West Green Regeneration Group	Metroline	Wood Green Dental Practice
Levvel Ltd	Unit One Architects	Westbury Dental Practice	Abellio	Wood Green Police Station

SSA Planning Ltd	United Apostolic Faith Church	Westbury Medical Centre	Go Ahead	Wood Green Regeneration
London Gypsy and Traveller Unit	Universal Church of the Kingdom of God	Weston Park Primary School	Greater Anglia	The Archdeacon of Hampstead
Met Police – Safer Transport Team - Haringey	Urban Futures London Ltd	White Young Green Planning	Haselmere Residents Association	Wood Green Youth Club
First Capital Connect	Urban Homes Ltd	Whitehall Community Centre	Haringey Disability First Consortium	Woodberry Down Baptist Church
DSO Edmonton London Ambulance Service	Van Rooyen Design	Willoughby Road Methodist Church	London Travel Watch - Chair of Consumer Affairs	Woodlands Park Infant & Junior School
London Ambulance Service	Veryan Court Residents Association	Wilson & Bell	London Travel Watch	Woodridings Court Residents Association
Arriva	Victim Support Haringey	Winkfield Road Community Centre	Haringey Cycling Campaign	Woodside Residents Association
Metroline	Visit London	Wise thoughts - gaywise	Age UK	Xeva Design Concepts
Transport for London	Vivendi Architects LLP	Women & Medical Practice	Mobility Forum/ Age Concern Haringey	Yabsley Stevens Architects
W. A. Shersby	Voluntary Action Haringey	Wood Green Area Youth Project	Haringey Disability First Consortium (Access & Transport sub-group)	Young Lesbian Group
Haringey Federation of Residents Associations	Amec Foster Wheeler on behalf of National Grid	Wood Green Black Tenants Group	Fairview	Youth One Stop Shop
Palace Gates Residents' Association	Berkeley Homes (North East London) Ltd	The Queens Mansions Residents Association	Fountayne Residents Association	Youth Theatre Project
Highgate Neighbourhood Forum	Boyer Planning London	Ladder Community Safety Partnership	DP9 Planning Consultants	Zatkhon Construction Co. Ltd.
Sustainable Haringey/ Muswell Hill and Fortis Green Association	Living Under One Sun	Department for Education	Chartered Landscape Architect	NHS Property Services Ltd
Sustainable Haringey Transport Group	Hackney Community Transport Group	Chris Thomas Ltd	Fairview New Homes	HAVCO
Barking-Gospel Oak line users group	London at BT Group and Chair, Haringey Business Board	Haringey NHS	Crouch End Forum	Whittington Hospital Trust

Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth	Haringey Teaching Primary Care Trust			
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## Appendix D – Statement of Representation Procedure

### Statement of Representations Procedure for the Haringey Local Plan:

#### Alterations to the Local Plan Strategic Policies Proposed Submission (Regulation 19)

#### Development Management DPD Proposed Submission (Regulation 19)

#### Site Allocations DPD Proposed Submission (Regulation 19)

#### Tottenham AAP Proposed Submission (Regulation 19)

As part of the local Plan, Haringey Council plans to submit four Local Development Documents (Alterations to the Local Plan: Strategic Policies DPD, the Development Management DPD, the Site Allocations DPD, and the Tottenham Area Action Plan) to the Secretary of State for Communities and Local Government. The submission documents are being published for representations.

#### Title of Documents

Alterations to the Local Plan Strategic Policies: Pre-Submission Consultation

Development Management DPD: Pre-Submission Consultation

Site Allocations DPD: Pre-Submission Consultation

Tottenham AAP: Pre-Submission Consultation

#### Subject Matter

The Strategic Policies were adopted in 2013 and sets out the Council's spatial strategy for how Haringey will develop and grow over the period to 2026. A partial review is proposed to take account of new growth requirements for the Borough as set out in the London Plan (2015) as well as the findings of updated evidence base studies. A schedule of proposed changes is subject to public consultation and comment.

The Development Management Policies DPD sets out the policies that will be used to assess and determine planning applications for development across the borough. Once adopted, the policies will supersede those contained in the Haringey Unitary Development Plan (2006).

The Site Allocations DPD allocates 'proposal sites' for development where opportunities have been identified, and identifies new or revised designations to which planning policies will apply (including shopping frontages and reclassification of industrial designated land), outside of the Tottenham AAP area. Once

adopted, the proposal sites and designations will appear on the Haringey policies map, replacing that which accompanies the Haringey Unitary Development Plan (2006).

The Tottenham Area Action Plan proposes a comprehensive set of policies, proposals and site allocations for future development within the Tottenham area based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

### Area Covered

The draft Tottenham Area Action Plan area comprises the wards of Northumberland Park, Tottenham Hale and Tottenham Green, and parts of the Bruce Grove, St. Ann's and Seven Sisters.

The Strategic Policies (Partial Review) and Development Management Policies apply to the entire Borough, while the draft Site Allocations DPD applies to that part of the Borough outside of the draft Tottenham AAP boundary.

### Period within which representations must be made

Representations must be made between **8<sup>th</sup> January and received no later than 5pm Friday 4<sup>th</sup> March 2016.**

### Where have the documents been made available, and the places and times at which they can be inspected:

The four DPDs and supporting documentation are available for inspection at the following locations:

- Council's website [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan)
- Haringey Civic Centre, Wood Green High Rd, N22 8LE
- Level 6 River Park House, Wood Green, N22 8HQ
- At all of Haringey's libraries (see details below)

Address	Opening Times	Address	Opening Times
<b>Alexandra Park Library</b> Alexandra Park Road, N22 7UJ	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm	<b>Coombes Croft Library</b> Tottenham High Road, N17 8AG	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
<b>Highgate Library</b> Shepherds Hill, Highgate, N6 5QT	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed	<b>Hornsey Library</b> Haringey Park, Hornsey N8 9JA	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm
<b>Marcus Garvey Library</b>	Mon – Fri 9am – 7pm	<b>Muswell Hill Library</b>	Mon – Fri 9am – 7pm

1 Philip Lane, Tottenham Green N15 4JA	Sat 9am – 5pm Sun noon – 4pm	Queens Avenue, Muswell Hill N10 3PE	Sat 9am – 5pm Sun Closed
<b>St Ann’s Library</b> Cissbury Road, Tottenham N15 5PU	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed	<b>Stroud Green and Harringay Library</b> Quernmore Road N4 4QR	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
<b>Wood Green Library</b> High Road, Wood Green N22 6XD	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm		

### **Making a representation**

The Council welcomes comments on the four DPDs. At this stage of the plan-making process, it is important that representations are made in the format included on the representations response form. These are available alongside consultation documents both online and in hard copy form.

Representations can be made via:

- the online response form at <http://haringey.gov.uk/localplan>
- by email at [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)
- by post to Local Plan Consultation, Level 6, River Park house, Wood Green, N22 8HQ

Please note that all responses received will be made publically available.

**Comments must be received by 5pm on Friday 4<sup>th</sup> March.**

For any further enquiries, please email [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk) or contact the Local Plan Team on 020 8489 1479

## Appendix E – List of Specific Consultation Bodies

Greater London Authority

English Heritage

The Coal Authority

Environment Agency

The Historic Buildings & Monuments Commission for England

Natural England

London Midland

Harrow Primary Care Trust

Defence Infrastructure Organisation

British Gas PLC Group

EDF Energy

Thames Water Utilities Ltd

Thames Water Property

Veolia Water Central

Homes and Communities Agency - London

Planning Inspectorate

Communities and Local Government

Entec on behalf of National Grid

## Appendix F – Letter to the Mayor of London

Mayor of London  
City Hall  
The Queen's Walk  
London  
SE1 2AA

Date: **11<sup>th</sup> January 2016**  
Contact : Planning Policy Team  
Direct dial: 020 8489 1479  
Email: ldf@haringey.gov.uk

Dear Mayor,

### **Haringey Local Plan Regulation 19 Pre-Submission Public Consultation**

**8<sup>th</sup> January 2016 - 4<sup>th</sup> March 2016**

As you are aware, Haringey Council has recently published four Local Plan documents for pre-submission consultation in accordance with Regulation 19(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The four Development Plan Documents are the:

- Alterations to the Strategic Policies 2011 - 2026;
- Development Management DPD;
- Site Allocations DPD; and
- Tottenham Area Action Plan.

Copies of these are enclosed.

Pre-submission consultation on the DPDs will run for eight weeks from **Friday, 8<sup>th</sup> January to Friday, 4<sup>th</sup> March 2016**.

I write to you pursuant to section 24(4)(a) of the Planning and Compulsory Purchase Act (2004) and Regulation 21(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 to seek your opinion as to the conformity of the pre-submission Development Plan Documents with the London Plan.

In accordance with the statutory requirements, I would be grateful to receive your opinion no later than Friday 4<sup>th</sup> March 2016.

Yours sincerely,

*Matthew Patterson*

**Matthew Patterson**, Head of Strategic Planning

cc. Graham Clements, Greater London Authority

## Appendix G – Response Form

### Haringey Local Plan Pre-submission

#### Response Form

##### Pre-Submission Consultation

The council is publishing four Development Plan Documents for consultation. These are the:

- Alterations to the Strategic Policies (DPD) (adopted 2013)
- Draft Tottenham Area Action Plan: Preferred Option
- Draft Development Management Policies (DPD): Preferred Option
- Draft Site Allocations (DPD): Preferred Option

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

##### How to Make Comments

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

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

Complete the form overleaf and return to:

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

Or by email to:  
[ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

Or on-line:  
[www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan)



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## Part A

1. Personal Details <sup>1</sup>		2. Agent's Details
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email address	<input type="text"/>	<input type="text"/>

## Part B – Please use a separate sheet for each response

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<sup>1</sup> If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.  
LB Haringey Local Plan – Site Allocations DPD – Responses to Publication consultation with Council responses

Name or Organisation:

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

<b>Paragraph</b>	<input type="text"/>	<b>Policy</b>	<input type="text"/>	<b>Policies Map</b>	<input type="text"/>
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4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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

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

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

**Please note** your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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

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

**Yes**, I wish to participate at the oral examination

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

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

9. Signature

Date:

## Appendix H – Respondents to the Pre-Submission Site Allocations DPD Consultation

### Respondents to the Pre-Submission Site Allocations DPD Consultation

ID	Respondent	Wishes to Attend Hearings	ID	Respondent	Wishes to Attend Hearings
1	Montagu Evans obo LaSalle Investment Management	Yes	29	Paul Secher	Not stated
2	<b>Sainsbury's Supermarkets Ltd</b>	Yes	30	Anne Bentham	Yes
3	Quod obo THFC	Yes	31	Iceni Projects obo Oakforest Properties Ltd	Yes
4	Tottenham & Wood Green Friends of the Earth	Not stated	32	Katharine Ward	Not stated
5	GL Hearn obo Capital and Regional Plc	Yes	33	Simon and Stephanie Puleston Jones	Not stated
6	GL Hearn obo Wood Green Investments	Not stated	34	North London Waste Authority	No
7	Fairview Homes	No	35	Freehold Community Association	Yes
8	Rapleys on behalf of LaSalle Investment Mgt	Yes	36	Alexandra Park and Palace CAAC	Not stated
9	Barton Willmore obo Workspace	Not stated	37	Lynne Zilkah	Not stated
10	Fiona Carson	Yes	38	Joseph Catlin	No
11	Billfinger GVA on behalf of Safestore Ltd	Not stated	39	Liz Avital	Yes
12	DP9 obo Oceanwave Estates Ltd	Not stated	40	Savills obo Catalyst Housing Group	Not stated
13	Quod obo St. William	Yes	41	Barbara Carlisle	Yes
14	Chris Williams	No	42	Francis Spinks	Yes
15	Planware obo <b>McDonald's Restaurants</b>	Not stated	43	Alda Terracciano	Not stated
16	CGMS on behalf of Provewell	Yes	44	Michele Bowers	No
17	Friends of Finsbury Park	Not stated	45	Susannah Haiste	Not stated
18	Susie Barson	Yes	46	G Holt	No
19	CGMS obo Parkstock Ltd	Yes	47	Health & Safety Executive	Not stated
20	Lloyd Gee	No	48	Sport England	Not stated
21	Sarah Wrightson	Not stated	49	SMART Urban Ltd obo Selby Trust	Yes
22	Tony Rybacki BA, MBA	Yes	50	Tottenham Civic Society	Not stated
23	N A Gonnermann	No	51	Canal and River Trust	Not stated
24	CBRE obo Highgate School	Not stated	52	Hannah Ward	Yes

25	Harington	Not stated	53	Mavis Maclean	Not stated
26	Savills on behalf of NHS Properties	Not stated	54	Visna Macpherson	Not stated
27	Highgate Neighbourhood Forum	Yes	55	Savills obo Kennet Properties Ltd	Yes
28	Hillcrest Residents Association	Yes	56	Friends of the Parkland Walk	yes
57	Diana Thomas	Not stated	86	Nthabiseng Faku-Juqula	Not stated
58	Claire Palmer	Not stated	87	Carola Kornfeld	Not stated
59	Philip Harland	Not stated	88	Francis Blake	Not stated
60	Alan Whitehouse	Not stated	89	Maria Lopez	Not stated
61	Carol Jones	Not stated	90	Catherine Collingborn	Not stated
62	Jennifer Collins	Not stated	91	Wendy Smith	Not stated
63	Monika Szlenkier	Not stated	92	Edgar Jacobsberg	Not stated
64	<b>Susan Scott Hunt</b>	Not stated	93	A&P Investments Ltd	Not stated
65	<b>Will &amp; Nicola Spokes</b>	Not stated	94	Alinson Johnston	Not stated
66	Susan Taylor	Yes	95	Suzan Fella	Not stated
67	JV Thomas	Not stated	96	David Wheatley	Not stated
68	Defend Crouch End	Yes	97	Lordship Lane Private Houses Group	Not stated
69	Will Johnson-Marshall	Not stated	98	Anne Schulthess	Not stated
70	Crouch End Neighbourhood Forum	Not stated	99	Jonathan Stevenson	Not stated
71	Jo Sheppherd	Not stated	100	Storm Moncur	Not stated
72	David Beard	Not stated	101	Gulden Ezer	Not stated
74	Friends of Lordship Rec	Not stated	102	Angela Napolitano & Sacha Armitage	Not stated
75	Lynne Darnell	Not stated	103	Carla Harding	Not stated
76	Mr D Chambers	Not stated	104	David Martins	Not stated
77	Liz Carter	Not stated	105	Peter Corley	Not stated
78	Elizabeth Adams & Peter Corley	Not stated	106	Mr C Yumakci	Not stated
79	Pitkins	Not stated	107	David Stoker	Not stated
80	Candy Amsden	Not stated	108	Peter Thomlinson	Not stated
81	Eartha McDermott	Not stated	109	Peter Cripps	Not stated
82	Mark Applegate	Not stated	110	Susan Johal	Not stated
83	Tim Rawe	Not stated	111	Andrew Topp	Not stated
84	Sandra Saad	Not stated	112	Esther Pierce	Not stated
85	Charlie Greenway	Not stated	113	Zelda Platten	Not stated

ID	Respondent	Wishes to Attend Hearings	ID	Respondent	Wishes to Attend Hearings
114	Ghazale Jamsheed	Not stated	144	L Regan	Not stated
115	Deborah Berger	Not stated	145	Carmelifa Kadeena	Not stated
116	Issy Harvey	Not stated	146	P Murray	Not stated
117	John Murray	Not stated	147	Maureen Cole	Not stated
118	Richard Cooper	Not stated	148	Valerie Marquez	Not stated
119	Gulem Ezer	Not stated	149	Thomas Moss	Not stated
120	Tracey Tindall	Not stated	150	Nicholas Kaptamis	Not stated
121	Karolina Maroszek	Not stated	151	Jean Tate	Not stated
122	Janet Lallysmith	Not stated	152	Hilary Aoams	Not stated
123	Joan Curtis	Not stated	153	Sherine Khall	Not stated
124	Yessica	Not stated	154	Derchienberg Paul	Not stated
125	Catherine Else	Not stated	155	Alan Vile	Not stated
126	Michelle Laugie	Not stated	156	<b>Kevin O'Connell</b>	Not stated
127	Phil Cocksedge	Not stated	157	Patience Ojukwu	Not stated
128	Maria Cocksedge	Not stated	158	Hatice Atmaca	Not stated
129	I	Not stated	159	S.C Allen Ms.	Not stated
130	Aleisha Miller	Not stated	160	Seray Mertdjan	Not stated
131	Maciej Poplawski	Not stated	161	Zenni Yaman	Not stated
132	Wayne Walters	Not stated	162	A Antonicu Ms	Not stated
133	Jill Webb	Not stated	163	Martin & Phoebe & Ashley Burrows	Not stated
134	14 Person Petition	Not stated	164	Desmond McLeod	Not stated
135	166 Person Petition	Not stated	165	Alfred Weeks	Not stated
136	19 Person Petition	Not stated	166	Rudolph Singh	Not stated
137	499 Person Petition	Not stated	167	S Tewogbade	Not stated
138	Wendy Charlton	Not stated	168	Ann McTaggart	Not stated
139	Tom Theodoulou	Not stated	169	Caesar Lalobo	Not stated
140	Ed Spring	Not stated	170	Hasibe Guler	Not stated
141	B Parsons	Not stated	171	Khiry Pascal-Joseph	Not stated
142	Joanna Hawkes	Not stated	172	Victoria Andoh	Not stated
143	M V Ellis	Not stated	173	Huseyin Ualcin	Not stated
174	Hasan Eric	Not stated	205	Rev Paul Nicolson	Not stated
175	Hediye Aydemir	Not stated	206	Richard Bagnall-Oakley	Not stated
176	Gulten Yilzirim	Not stated	207	Susan Ellis	Not stated

177	Suzanne Bright	Not stated	208	Tamsyn Wills	Not stated
178	Shengul Elmaz	Not stated	209	Jasper Murphy	Not stated
179	M Williams	Not stated	210	Sallyann Bradman	Not stated
180	Alqa Khayium	Not stated	211	Jennifer Kitchen	Not stated
181	Asalet Yuksel	Not stated	212	Selen Mertdjan	Not stated
182	Orhan Yuksel	Not stated	213	Eva Atkins	Not stated
183	Saime Coulcroy	Not stated	214	Bargaret Burr & Noel Treacy	Not stated
184	Ozgul Aslan	No	215	Fiona English	Not stated
185	Benneth Dake	Not stated	216	Khiry Pascal-Joseph	Not stated
186	Adjoa Wiredu	Not stated	217	Mr & Mrs Yaman	No
187	J E Badu	Not stated	218	Environment Agency	No
188	Rose Adomako	Not stated	219	Gardens Residents Association	Not stated
189	Wilhemina Bruce	Not stated	220	Amec Foster Wheeler on behalf of National Grid	Not stated
190	Doris Tagoe	Not stated	221	Campaign to Protect Rural England	Not Stated
191	Faustina Blackstock	Not stated	222	I Love Myddleton Road	Not stated
192	Abeba Eyasu	Not stated	223	Ashley Joan Burrows	Not Stated
193	Eleaner Schling	Not stated	224	Martin Burrows	Not Stated
194	Asli Mehari	Not stated	225	Maliah Ali	Not stated
195	Eileen McGrath	Not stated	226	Ellis Gardner	Not Stated
196	Shirley Maynard	Not stated	227	Our Tottenham	Yes
197	Andrew St John	Not stated	228	CGMS on behalf of Hadley Property Group	Not stated
198	Ruby Earle	Not stated	229	London Borough of Hackney	Not stated
199	Augustine Amo Anyimadu	Not stated	230	Greater London Authority	Not Stated
200	J Anuimadu	Not stated	231	Transport for London	Not Stated
201	Jose Luis Diaz Navas	Not stated	232	Historic England	Not stated
202	Mary Swift	Not stated	233	Michael Burroughs Associates on behalf of Omved international Ltd	Not stated
203	Inga Bystram	Not Stated	234	Councillor Clive Carter	Not stated
204	<b>Broadwater Farm Residents' Association</b>	Yes	235	Pinkham Way Alliance +1,488 supporters	Not stated

## Appendix I: Responses to the Pre-Submission Site Allocations DPD Consultation – Respondent Order

### Respondent 1: Montagu Evans obo LaSalle Investment Management

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	RSA1	SA 3 Fig 1.9	No	No	<p><b>Montagu Evans act on behalf' of La Salle Investment Management</b>, the fund managers for Coal Pensions Property Ltd, the freehold owners of the Arena Shopping Park. We consider that the draft Site Allocations Development Plan document is <b>“unsound” on the basis</b> that it proposes to exclude the Arena Shopping Park from the Green Lanes District Centre.</p> <p>Site Description</p> <p>Arena Shopping Park is located towards the southern end of Green Lanes district centre with a <b>Sainsbury's supermarket and a McDonald's restaurant</b> located adjacent to the shopping park with vehicular access from Williamson Road. Green Lanes District Centre is a long established shopping street, comprising a number of restaurants, cafes, takeaways and convenience shops reflecting the diverse community which reside in the area. The shopping park has good public transport accessibility with Green Lanes overground station located immediately to the north of the shopping park. Manor House underground station is located approximately 500 metres to the south of the shopping park and there are also substantial bus routes passing along Green Lanes and well situated bus stops located close to shopping park. The shopping park has</p>	Retention of Arena Shopping Park within Green Lanes District Centre as identified on the attached plan.  (Council note: see original representation for attached plan).	<p>The change in question sought not to reduce the overall quantum of activity, or indeed commercial floorspace on this site, but rather seeks to establish a new urban form along Green Lanes, creating a <b>“High Street”</b> frontage, rather than the set-back, car-dominated typology that exists at present.</p> <p>Currently there is a presumption that the creation of this new typology in the long term, will</p>

				<p>a very good level of accessibility with a PTAL rating of 6. the highest ranking of public transport accessibility.</p> <p>The shopping park provides an important contribution to the district centre with a diverse retail offer including the recent opening of TK Maxx in the former Royal Mail unit. The majority of the shopping park benefits from unrestricted open A1 retail use together with complementary cafés and a health and fitness use on the first floor. It is considered that the nature and composition of the shopping park together with this prominent location in Green Lanes provides a robust case for Arena Shopping Park to remain within the designated Green Lanes District Centre.</p> <p>Policy background</p> <p>The boundary of Green Lanes District Centre was amended to include the Arena Shopping Park within the defined district centre in the Haringey Unitary Development Plan (UDP) which was adopted in July 2006. The UDP recognised that opportunities to accommodate additional retail provision in the district centre was limited to small infill however the inclusion of Arena Shopping Park into the district centre offered an opportunity for greater diversity in terms of retail offer. Arena Shopping Park is also defined within Green Lanes <b>district centre in the Haringey’s Local Plan: Strategic Policies</b> (formerly Core Strategy) 2012,</p> <p>We note that that Policy SP10: Town Centres seeks to promote and encourage the development of retail, office, community, leisure, entertainment and cultural uses in district centres the council continues to support the importance of having service centres to meet peoples day-to-day needs and that the council take a</p>		<p>mean that the town centre boundary will shift to reflect this. There is however no need for the town centre boundary to reduce to meet the aims of the policy. Indeed a range of activity being achieved <b>“behind the High Rd”</b>.</p> <p>We agree with the respondents that there is no need to reduce the overall amount of retail floorspace in Green Lanes District Centre. It is at present a very successful centre with low vacancy, and vibrant daytime, and evening economies. The Council would expect any proposal that comes forward on this site to further</p>
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				<p>proactive approach to reinvigorating the town centres, widening their offer, developing their identities, <b>improving the public 'calm and accessibility to the shopping park.</b> In relation Green Lanes District Centre Policy SP10 acknowledges that the centre includes the Arena Shopping Park which is a more recent addition and that the centre provides for a diverse community, with a large bulk of national multiple outlets located in the Arena Shopping Park.</p> <p>The National Planning Policy Framework (NPPF) March 2012 provides guidance from central Government in respect of inter alia, the preparation of local plans.</p> <p><b>Paragraph 157 states that local plans 'should</b></p> <ul style="list-style-type: none"> <li>• <b>plan positively for the development and infrastructure</b> required in the area to meet the objectives, principles and policies of this framework; <ul style="list-style-type: none"> <li>- be drawn up over an appropriate timescale, preferably a 15 year timeline, to take account of longer requirements, and be kept up to date.</li> <li>- be based on cooperation of neighbouring authorities, public, voluntary and private sector organisations.</li> <li>- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale and quantum of development where appropriate.</li> </ul> </li> </ul> <p>With regard to business needs Paragraph 160 states that local planning authorities should have a clear understanding of business needs within the economic market operating within and across the area. To achieve this they should:</p> <ul style="list-style-type: none"> <li>- prepare and maintain a robust case to understand both the existing business needs and likely changes to</li> </ul>		<p>contribute to this.</p> <p><b>As such, and noting the co-ordinated responses from landowners on SA29, the Council will amend the Town Centre boundary on the proposed Proposals Map, so that it matches that in the current adopted 2013 Proposals Map.</b></p>
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				<p>the market;</p> <ul style="list-style-type: none"> <li>- work closely with business communities to understand the changing needs and identify and adjust barriers to investment, including lack of housing, infrastructure or viability.</li> </ul> <p>Paragraph 161 states that local planning authorities should use an evidence base to assess, inter alia, the capacity of existing centres to accommodate new town centre development and the need for floorspace and economic development for all foreseeable types of economic activity over the plan period including full retail and leisure development.</p> <p>Planning case for Arena Shopping Park to remain within the Green Lanes District Centre</p> <p>We consider that the Arena Shopping Park provides a positive contribution to Green Lanes District Centre and to exclude it from the designated district centre boundary could restrict and stifle future development in terms of changing retailer representation which we consider would be contrary to the NPPF.</p> <p>We consider that this is of even greater significance given the size and importance of Arena Shopping Park in the context of Green Lanes District Centre. Potentially stifling sustainable economic development born such a large part of the district centre could in turn have a detrimental effect on sustainable economic development across the whole of the district centre. Moreover we note that the Council has long term aspirations for comprehensive redevelopment of the site and wider area to deliver additional housing in the Borough and consider that removing Arena Shopping Centre from the district centre designation will reduce</p>		
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				<p>the ability to attract retail to this area and consequently hinder the ability to develop future redevelopment options for the site (including high density residential use) which is likely to be supported by retail development.</p> <p>We note that it is the Councils intention to extent the length of Green Lanes District Centre further to the south to provide scope for a more linear frontage and to develop more high street shops. However, we do not consider retaining Arena Shopping Park within the district centre boundary will prevent retail development of the high street further south in a linear form.</p> <p>It is considered that the proposed removal of the shopping park from the designated district centre could have detrimental long term impacts on the ability to continue to diversify the retail offer which may change over time subject to tenant demand and change in retailer representation.</p> <p>On the basis of the above we do not consider that there are any sound planning reasons given the highly sustainable location, unrestricted A1 retail use of the park and potential for future <b>'redevelopment opportunities that the shopping park</b> should be excluded front the defined Green Lanes District Centre.</p> <p>In light of the above evidence we are of the view that the boundary of Green Lanes District Centre is amended to include Arena Shopping Park as identified on the attached plan.</p> <p>(Council note: see original representation for attached plan).</p>		
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Respondent 2: Sainsbury's Supermarkets Ltd

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	RSA2	SA14	No	Not stated	<p>The preferred strategy for this site, which incorporates the existing <b>Sainsbury's store, is to provide for the mixed-use redevelopment of the site to comprise town centre retail uses at ground and first floor level with residential uses above.</b></p> <p>As currently drafted, we object to this proposed allocation. Whilst <b>Sainsbury's would be happy to explore options to contribute to the redevelopment of this site, the current wording provides no security to Sainsbury's that any redevelopment would re-provide a foodstore on the site.</b></p> <p><b>The Sainsbury's store at 54 Wood Green High Road is a key anchor store for the Wood Green Metropolitan Centre having opened in 2003. As such, any proposed policy must allow for the continued use of the site as a foodstore.</b></p> <p><b>Recognition of Sainsbury's occupation of the site, its important anchor role within the Metropolitan</b></p>	<p>As such, we consider that the use allocation for this site must be amended to state:  <i>Comprehensive redevelopment of current High Road frontages for mixed use development consisting of town centre uses at ground and first floor level, including the suitable re-provision of the existing supermarket on-site, with residential above, and a potential new Crossrail 2 station entrance onto Wood Green High Road.</i>                      The above wording will incorporate sufficient flexibility into the allocation to ensure it is aspirational yet realistic in accordance with national guidance.</p>	<p>SA14 is located within the Metropolitan town centre and has a designated primary frontage onto the High Street. The site is therefore suitable for the full range of town centre uses, including A1 uses, which will be required and prioritised at ground floor level. Ultimately however, it will be for the detailed planning application(s) to establish the development use on site, including retail provision, having regard to commercial and viability considerations. It is therefore not appropriate for the allocation to safeguard any specific A1 use for re-provision on the site.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					Centre, and the potential for this convenience retailing use to continue, is fundamental in the formation of a robust and ultimately sound policy.	Importantly, the amended allocation would specifically ensure that a supermarket use can continue during the lifetime of the DPD. However, the wording will also ensure that the sustainable redevelopment of the site can come forward if viable.	
2	RSA3	SA3	No	Not stated	<p>In respect of the Green Lanes District Centre, Policy SA3 proposes the reduction of the town centre boundary to reduce the envelope from that of the existing Retail Park to the Green Lanes frontage.</p> <p>In addition, the preferred allocation (SA29) for the Arena Retail Park provides for the long-term potential for redevelopment of the existing retail park but does not specifically provide for the retention of the existing <b>Sainsbury's store on the site.</b></p> <p>We are surprised and concerned at the approach that the Council is taking to these two policies given the undoubted importance of the</p>	<p>Given this, and in accordance with the definition of a District Centre, the <b>Sainsbury's</b> store must remain within the town centre boundary. It is the only logical approach which will be found sound at Examination.</p> <p>In short, the current text regarding the boundary for the Green Lanes District Centre should be deleted. In accordance with the evidence base, the boundary for the</p>	<p>The change in question sought not to reduce the overall quantum of activity, or indeed commercial floorspace on this site, but rather seeks to establish a new urban form along Green Lanes, creating a <b>"High Street" frontage</b>, rather than the set-back, car-dominated typology that exists at present.</p> <p>Currently there is a presumption that the creation of this new typology in the long term, will mean that the town centre boundary will shift</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><b>Sainsbury's store</b> in serving the local community but also in helping the Green Lanes District Centre fulfil its retail function.</p> <p>Town Centre Boundary</p> <p>In short, we consider that there is no justification to support this proposed amendment to the town centre <b>boundary as the Council's own</b> evidence base does not support this approach.</p> <p>The NLP Retail and Town Centres Study (2013) does not recommend this change. Indeed, paragraph 15.26 of the Study clearly identifies that (our emphasis):  <i>We consider the <b>town centre boundaries</b> and primary/secondary shopping frontages <b>to be appropriate</b> for <b>Wood Green, Muswell Hill and Green Lanes</b>, having regard to both the existing situation and the identified site allocations for potential development within them.</i></p> <p>To clarify, the Council's own up-to-date evidence base is recommending</p>	<p>District Centre should be retained as currently provided by Haringey policy ie the Arena Retail Park and the <b>Sainsbury's store on Williamson Road</b> should be included.</p>	<p>to reflect this. There is however no need for the town centre boundary to reduce to meet the aims of the policy. Indeed a range of activity being achieved "<b>behind the High Rd</b>" would be supported.</p> <p>We agree with the respondents that there is no need to reduce the overall amount of retail floorspace in Green Lanes District Centre. It is at present a very successful centre with low vacancy, and vibrant daytime, and evening economies. The Council would expect any proposal that comes forward on this site to further contribute to this. The Council is however, concerned that the long-term vitality of the centre is affected by traffic caused by the car-dominant retail park.</p> <p><b>As such, and noting the co-ordinated responses</b></p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>that the current policy position, with the Arena Retail Park and the <b>Sainsbury's store</b> included within the boundary of the Green Lanes District Centre, should be retained. Given this, the amendments proposed by policy SA3, in respect of Green Lanes, are entirely unsound. It is simply unjustified and inconsistent when <b>viewed in the context of the Council's</b> own evidence base and national planning policy.</p> <p>Furthermore, Paragraph 15.17 of the NLP Study advises that district centres will usually comprise groups of shops often containing at least one supermarket or superstore while the London Plan suggests district centres traditionally provide convenience goods and services for more local communities and are accessible by public transport, walking and cycling.</p> <p><b>The Sainsbury's store is the key</b> supermarket within the District Centre. NLP clarify that the Iceland store is only 530 sqm (net sales), which is only slightly above the offer of a convenience store, with Tesco only operating an Express format store. At <b>4,341 sqm, the Sainsbury's store is by</b></p>		<p>from landowners on SA29, the Council will amend the Town Centre boundary on the proposed Proposals Map, so that it matches that in the current adopted 2013 Proposals Map.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					far the largest convenience store within the centre and, given the size of other units, is the only store which provides a true supermarket offer within the context of providing a main convenience goods shopping destination within Green Lanes.		
2	RSA4	SA29	No	Not stated	<p>In addition to the above points which are again relevant here, the NLP Study highlights a number of other key points which lend further credibility to the argument that the Council should recognise the existing <b>Sainsbury's store as a</b> key anchor for the district centre. These include:</p> <ul style="list-style-type: none"> <li>• <b>The centre serves an important local</b> function to shoppers from the borough and the Haringey locale (paragraph 9.1); and</li> <li>• <b>Paragraph 9.6 confirms that the</b> district centre primarily serves a convenience shopping destination and only has a limited selection of comparison shops.</li> </ul> <p>It is clear that the Green Lanes District Centres serves an important convenience shopping destination in the borough and, as a key anchor store, <b>the Sainsbury's store will be</b> critical in ensuring that the centre continues this role. As such, it seems remiss that specific provision is not</p>	<p>The proposed Site Allocation for SA29: Arena Retail Park should be amended to state:</p> <p><i>Long-term potential for redevelopment of the existing retail park to produce access improvements to Haringay Green Lanes station and Finsbury Park, reconfigured road layout, and new residential and commercial development, including the suitable re-provision of the existing supermarket on-site</i></p>	<p>The Council recognises that specific levels of comparison and convenience retail will need to be reprovided on this site in order to ensure the ongoing viability of the centre. While this may include re-provision of a supermarket, it will be for the detailed planning application(s) to establish the development mix on site, including scale, orientation, unit floorplate sizes for the replacement retail provision, having regard to commercial and viability considerations. It is therefore not considered appropriate for the allocation to safeguard any specific A1 use for re-provision on the site.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					made for the retention of the store as part of any potential redevelopment of the site. It is important to emphasise that <b>Sainsbury's is keen to explore options</b> which could allow for the redevelopment of the Retail Park, if redevelopment is deemed appropriate and suitable. However, the current wording again provides no security that a foodstore would be part of the scheme. This does not seem an effective or justified approach.		No change

### Respondent 3: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RSA5	SA4	Not stated	Not stated	In their representations dated 26 March 2015, THFC objected to the safeguarding of 44 White Hart Lane under this policy ( <b>Attachment 1</b> , paras. 18 – 22). THFC stated in March 2015 that they intended to use this site to facilitate the construction of the stadium and the wider development and that the current occupiers of the site (Redcorn Limited) were relocating their current vehicle dismantling business to their site in Brantwood Road. In effect, the relocation of the business would not result in any net reduction in the processing of waste on the basis that Redcorn Limited business operations would be relocated in	Removal of safeguarding of 44 White Hart Lane site.	While it is noted that the licensed waste capacity has been transferred onto the Brantwood Rd site, the Council is still waiting on demonstration that the actual maximum waste throughput capacity from 44 White Hart Lane can be accommodated for

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>their entirety. The relocation of Redcorn Limited to Brantwood Road has now been completed.</p> <p>As set out in paragraph 6 above, on 16 December 2016 Haringey's Planning Sub Committee also resolved to grant planning application HGY/2015/3002 for temporary planning permission for the use of 44 White Hart Lane as a construction compound for the stadium development for a period of 3 years. The decision notice was issued on 12 February 2016. The Planning Sub Committee Report describes how the last use of the recently vacant site was as a vehicle recovery facility (para. 6.16) and notes Recorn's relocation to the Brantwood Road site (para. 11.1.4). Paragraph 6.17 of the Committee Report describes how the 44 White Hart Lane site is within the High Road West site allocation in the emerging Tottenham AAP and states:</p> <p><b><i>"The High Road West regeneration area envisages a comprehensive redevelopment creating residential led mixed use neighbourhood including a new public realm linking White Hart Lane Station and a redeveloped football stadium and an expanded local shopping centre on the High Road opposite the football stadium including the new public square. A master plan for the High Road West area has been prepared, in consultation with local residents and businesses and was considered by Cabinet at its meeting on the 16 December 2014. The Council's Strategic</i></b></p>		<p>through the facility at Brantwood Road. Until such time as this is demonstrated, the Council is not in position to remove the waste safeguarding from 44 White Hart Lane.</p> <p>No change</p> <p><b>NB: Table 2 on p15 of the Site Allocations DPD has been updated to reflect the maximum throughput capacity achieved at each of the identified waste sites, using EA data from the past 5 years or more. This is in preference to the licensed waste capacity, for which the banding is not reflective of actual capacity. This approach accords with the methodology of the</b></p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><i>Regeneration Framework envisages that High Road West will play a key role in delivering the aspirations for regenerating the area.”</i></p> <p>The Planning Sub Committee Report goes onto state (para. 11.1.5):  <b><i>“The principle of an alternative use of the application site for non-waste use is in accordance with development plan policy because <u>the previous waste-handling capacity of the application site has been transferred.</u> In addition the use proposed is only temporary and, following the cessation of the temporary use of the site will be available for redevelopment in accordance with site allocation NT5 or to be returned to waste use subject to the outcome of the North London Waste Plan.”</i></b>  <i>[our underlining]</i></p> <p>In addition, THFC have been liaising with the Environment Agency with regard to waste operations at the 44 White Hart Lane site. Correspondence from THFC to Harginey planning officers to explain the background is included at <b>Attachment 2</b>. It explains how the permitted waste capacity of 44 White Hart Lane (75,000 tonnes per annum) has effectively been transferred to Brantwood Road and as such there is no longer a requirement and therefore it is not justified to safeguard the 44 White Hart Lane site.</p>		<p>North London Waste Plan and ensures baseline consistency across Local Plan documents.</p>

Respondent 4: Tottenham & Wood Green Friends of the Earth

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA6	Decentralised energy	Not stated	Not stated	We welcome the inclusion of this in the guidelines for most large sites. Our concern is whether this is strong enough –	Should it be in the requirements rather than guidelines to give it better purchase?	The policy requiring connection to an existing or emerging network is DM22, this only represents a cross-reference.  No change
4	RSA7	SA4	Not stated	Not stated	<b>We note that the O'Donovans</b> site in Markfield Road will be affected by Crossrail 2, and recommend that a site is safeguarded in a more suitable location for the business to relocate. The draft N London Waste Plan proposes sites in the NE Tottenham industrial area.	Not specifically stated	Both the London Plan (Policy 5.17) & NLWP require that, if for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved. The onus will be upon the developer (in this case Crossrail) to find a new site prior to any redevelopment.  No change
4	RSA8	SA5	Not stated	Not stated	We welcome proposals to develop the car-parking area. In general reducing car-parking capacity will reduce the number of car journeys and encourage alternative modes of travel.	Not specifically stated	Noted.
4	RSA9	SA7	Not stated	Not stated	We welcome the proposed green chain through this site and ask that it should be as ecologically rich as possible so	Not specifically stated	Support for the Green Link is noted but it is unlikely that the requirement for this to be a wildlife corridor is unlikely to

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					it is a wildlife corridor not just a pleasant walking route.		materialise given the site's location within the town centre and its proposed use.  No change
4	RSA10	SA17	Not stated	Not stated	a) We welcome the requirement to enhance the ecological corridor at this site. b) the potential to provide heating via a heat pump in the New River should be explored.	Not specifically stated	It is not clear how a ground source heat pump is particularly appropriate on the New River.  No change
4	RSA11	SA9	Not stated	Not stated	We support the idea of deculverting the Moselle on this and other sites (eg SA11, SA12, SA21, SA61).	Not specifically stated	Noted.
4	RSA12	SA22	Not stated	Not stated	We welcome the proposed improvement to the pedestrian and cycling route to the Penstock Tunnel. The development should not just open up but also improve the ecological corridor along the New River.	Not specifically stated	Support is noted. With respect to the ecological corridor, such improvements are likely to fall to CIL – being outside of the development boundary - rather than as a requirement on the development.  No change
4	RSA13	SA23	Not stated	Not stated	Development should add to and enhance the ecological corridor on its western edge.	Not specifically stated	Improvements to the ecological corridor are likely to fall to CIL – being outside of the development boundary - rather than as a requirement on the development.  No change
4	RSA14	SA25	Not stated	Not stated	We welcome the proposal that the development should	Not specifically stated	The Council considers that a guideline that supports

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					enhance the ecological corridor. Should this be made a site requirement?		enhancement is sufficient.  No change
4	RSA15	SA27	Not stated	Not stated	We support the requirement to preserve and enhance the ecological corridor, but we <b>think the words “where possible” should be removed</b> to strengthen the requirement.	Not specifically stated	The Council consider that it is important to ensure there is flexibility to enable delivery of sites. Any potential applicant will be required to justify what they can (or cannot) achieve in this regard.  No change
4	RSA16	SA28	Not stated	Not stated	We support the requirement to enhance the SINC in the south of the site. We support the requirement for a north-south route through the site but ask that this should be an ecological corridor not just a walking/cycling route, to provide a link between the railway corridor and Chestnuts Park.	Not specifically stated	The connection is through to the street network and is primarily intended to improve accessibility for cyclists and pedestrians. There may however, be potential for this to form part of a wider green grid network once the connection route is established.  No change
4	RSA17	SA29	Not stated	Not stated	We support proposals to increase density and reduce parking capacity on the site, and to create a continuous SINC from the slopes into Finsbury Park.	Not specifically stated	Noted.
4	RSA18	SA30	Not stated	Not stated	We support the proposal for a connection under the railway to <b>the St Ann's site; and the</b> enhancement of the ecological	Not specifically stated	Noted.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					corridor at the north of the site; and the new green chain linking the 'slopes' towards Finsbury Park.		
4	RSA19	SA31	Not stated	Not stated	We welcome the proposed connection of the green grid network, and improvements to the SINC on the west of the site.	Not specifically stated	Noted.
4	RSA20	SA32	Not stated	Not stated	We welcome the proposed improvements to the SINC on the west of the site.	Not specifically stated	Noted.
4	RSA21	SA34	Not stated	Not stated	We welcome the proposed pedestrian and cycling route. The development should not just open up but also improve the ecological corridor along the New River.	Not specifically stated	Improvements to the ecological corridor are likely to fall to CIL – being outside of the development boundary - rather than as a requirement on the development.  No change
4	RSA22	SA52	Not stated	Not stated	We recommend that the employment use designation should be removed and the site should become wholly a SINC. If development does take place then the potential to deculvert the stream should be included.	Not specifically stated	The Council believes it is necessary to preserve this site for employment use in the future in order to meet identified employment demand.  It is considered that a deculverting of the site may not be possible due to the complexities created by the site's historical use.  No change
4	RSA23	SA58	Not	Not stated	We welcome the proposed	Not specifically	The open space on site needs to

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
			stated		extension of the open land and ask that this should be ecologically enhanced.	stated	work in tandem with the management of the adjoining open space and should meet deficiencies in open space function in the area. This may or may not include ecological enhancement.  No change
4	RSA24	SA60	Not stated	Not stated	We oppose any encroachment on the MOL.	Not specifically stated	The policy requires any impact to be carefully mitigated, which is an appropriate position to ensure the site comes forward in the most suitable way.  No change
4	RSA25	SA61	Not stated	Not stated	We welcome the proposed deculverting of the Moselle here, especially as it is just upstream from the deculverted stretch in Lordship Rec.	Not specifically stated	Noted.
4	RSA26	SA63	Not stated	Not stated	Existing community uses should be re-provided, including the wood recycling facility. And development should provide a green link to the Weir Hall Open Space.	Not specifically stated	Noted. Policy DM49 provide protection against the loss of community facilities and any proposal would need to meet the requirements therein.  No change
4	RSA27	SA65	Not stated	Not stated	Any development should provide a green frontage to the river, helping link Markfield Park to the Springfield Park site to the south.	Not specifically stated	It is considered that the safeguarding of the riverside foot/cycle path is appropriate on this site to enable this link.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
							No change
4	RSA28	Table 5	Not stated	Not stated	We ask for an added view, Lee Valley to Alexandra Palace. This view links two important areas of open space, it links the east and west of the borough, and provides a link from	Not specifically stated	<p>It is not clear where this view would be, and additionally how it would affect deliverability of the plan, as it potentially stands to be quite wide at the Lee Valley park end, which is close to a number of the <b>Plan's growth areas</b>.</p> <p>It is noted that there is one protected view from Watermead Way railway bridge, which is Lee Valley adjacent.</p> <p>No change</p>

#### Respondent 5: GL Hearn Limited obo Capital and Regional Plc

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
5	RSA29	SA 11	No	No response given	<p>Capital and Regional (C&amp;R) is one of the leading community shopping centre owners in the UK and currently operates eight major centres. C&amp;R acquired The Mall at Wood Green in 1996, since which time it has made substantial investment to modernise both the malls and car park and to broaden the range of uses, introducing a cinema and restaurants.</p> <p>C&amp;R has been a major investor in Wood Green for 20 years and is committed to further investment in the Mall to improve both the quality and range of its</p>	<p>We would recommend that the second bullet point under Development Guidelines should be reworded as follows:</p> <p><b>“Development on parts of the site directly opposite</b></p>	<p>It is agreed that the <b>development guideline can be improved as suggested: “Development heights on parts of the site directly opposite residential</b></p>

				<p>offer to visitors. C&amp;R is a therefore a major landowner in Wood Green Town Centre and a key stakeholder in plans to bring forward development in the town centre.</p> <p>The proposals in respect of the Wood Green Library site location incorporate a significant area of land that is in the ownership of C&amp;R. Our client is currently in discussions with the Council to bring forward development to facilitate provision of a national brand food retailer within the Mall to be served by a surface level car park making use of the former petrol filling station site on the corner of Mayes Road and Caxton Road. These proposals will provide for much improved public realm in this location with enhanced pedestrian route to the frontage of the site along Caxton Road and improvement and active frontage to the Mall along Mayes Road. The proposals have also been designed to allow for longer term residential development above what will the surface level car park to serve the new food store.</p> <p><b>The Council’s development aspirations for the site</b> allocation are set within the policy including site requirements and development guidelines. Delivery of these aspirations would rely on the involvement of a number of landowners across a range of different land uses. Some sites are identified for substantial new development, whilst others would provide the public spaces, infrastructure and facilities that are necessary to facilitate it. There is no detail of how delivery of these aspirations would be coordinated or financed in a comprehensive and equitable way and we recommend that consideration needs to be given to these aspects.</p>	<p>residential buildings on Caxton and Mayes Road should respect their residential amenity”</p> <p>We would also recommend that a further bullet point is added under development guidelines as follows:</p> <p><b>“Having regard to</b> the different ownerships across the site, consideration will be given to phasing of development which contributes to the overall site allocation objectives as development site opportunities come <b>forward”</b>.</p>	<p><b>buildings on Caxton and Mayes Road should respect their residential amenity.”</b></p> <p>Regarding site delivery, it is noted that there are policies in the DMDPD which seek to co-ordinate delivery of more complicated sites, and that therefore the added statement is not required.</p> <p>It is noted that the Council is at present in the process of developing a Wood Green AAP, with a linked delivery framework.</p>
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					<p>Having regard to the different site ownerships and <b>our client's current development</b> proposals noted above, we consider that the potential for phasing of <b>development to realise the Council's</b> objectives should be recognised in the policy. Without such a reference, the policy is unlikely to be effective in delivering the site allocation and is unsound on this basis.</p> <p>We also consider that the reference to restriction on height at bullet point two under Development Guidelines may serve to unnecessarily restrict the development potential of the site in this location. Height is a relative term and whilst development will need to respect the amenity of nearby residential properties, appropriate height and relationship to adjoining sites will be a matter for detailed design and testing. We therefore consider that the policy is not effective in this regard and unsound on this basis.</p>		
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**Respondent 6: GL Hearn on behalf of Wood Green Investments Ltd.**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RSA30	SA15	Not stated	Not stated	Wood Green Investments Ltd ('the client') has an investment in relation to properties 4, 6, 8, 10, 12 and 14 High Road within the proposed site allocation area 'SA	Haringey's vision for SA 15, as an area for <i>"Redevelopment of existing town centre buildings to create a landmark building marking Turnpike Lane Crossrail Station, with town centre uses at ground and first floor levels and residential above"</i> (Paragraph 2.43) is welcomed and supported by Wood Green Investments Ltd.	Support for the allocation is noted, as is the willingness to work with the Council to realise the development potential of the site.  <b>It is agreed that the</b>

				<p>15: Westbury &amp; Whymark Aves' and therefore has an aspiration to bring forward and encourage the development of this area. These aspirations have been discussed with the Council on 20th August 2015 led by Matthew Patterson, Head of Strategic Planning, Transport &amp; Infrastructure in regards to the upcoming Wood Green AAP.</p> <p><b>Site Allocation Particulars</b> The Current/Previous use of the site is described within the document as being <b>'Predominantly Residential'</b>. It should be noted that the current use of the site offers principally retail units at ground floor with some residential units above and therefore it is suggested that</p>	<p>1.10 As was mentioned in the representations previously submitted on the <b>'Preferred Options Site Allocations DPD'</b>, whilst it is understood that that the Crossrail 2 proposal is clearly a strong instigator for development, our client would look to ensure that development is encouraged on this site regardless of whether Crossrail 2 is formally announced to be aligned with Turnpike Lane Station. Re-development in this area would significantly regenerate the area positively irrespective of whether Crossrail 2 does come through this station. We would like to ensure that this is reflected within the text at paragraph 2.42.</p> <p>1.11 In recognition of the above our client proposes the following new wording for the text at Paragraph 2.42: <b>"Redevelopment of existing town centre buildings to create a landmark building marking Turnpike Lane Crossrail Station, with town centre uses at ground and first floor levels and residential above."</b> The re-wording of paragraph 2.4 will also sit in line with the reference to the station within the Commentary.</p> <p>1.12 This proposed re-wording would not compromise the opportunity to redevelop the site if Crossrail 2 does come forward on this basis would support development of the site in either instance. <b>Commentary</b> 1.13 The re-wording of paragraph 2.4 will</p>	<p><b>current/previous use can be updated to reflect the mixed use town centre nature of the site at present.</b></p> <p>The Council has used a consistent approach in calculating the indicative minimum development capacities for each allocation. This is to show that together, the site allocations can meet the objectively identified housing need in the Borough. The aim is not to limit capacity on each of the sites. The actual quantum of development that comes forward on each site will be determined through a design-led analysis of applications using the principals set out in the Site Allocation, and the DMDPD.</p> <p><b>It is considered that, although the plan continues to be predicated on the</b></p>
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				<p>this be amended.</p> <p>It is stated that the indicative development capacity for Town Centre uses is approximately 742 sqm. Having done some measurements of the existing site, the existing ground floor area totals approximately 3000sqm. As the Council have indicated that they would preferably like to see town centre uses at ground and first floor levels, this would potentially amount to a maximum capacity of approximately 6000 sqm. On this basis Wood Green Investments Ltd would request that the figure be revised to consider this.</p> <p><b>Conclusions</b> Our client supports the aspirations behind the proposals</p>	<p>also sit in line with the reference to the station within the Commentary (Paragraph 2.43) which describes the station as ‘Turnpike Lane tube station’.</p> <p>1.14 In addition, it is noted that the ‘<b>Timeframe for Delivery</b>’ of redevelopment of the allocated site is marked for 2020 onwards. It has been reasonably assumed that this is to be in line with the proposed delivery of Crossrail. Wood Green Investments Ltd would suggest that this timeframe may restrict development opportunities on the site.</p> <p>It is stated within Paragraph 2.43 that redevelopment will be encouraged through a ‘<b>comprehensive development</b>’. However due to the complex land ownership, especially on Westbury Avenue, this would result in a comprehensive delivery being unlikely. Therefore the delivery of this site should be encouraged to come forward in a phased or incremental approach over the time period from 2015-2020 and onwards.</p> <p>1.16 It is therefore suggested that the text at Paragraph 2.43 be amended to read: “... <b>New town centre</b> uses, an improved public realm, and residential development will be encouraged through either a comprehensive or phased development in line with a <b>site-wide masterplan.</b>”</p> <p>1.17 In recognition of the above, Wood Green Investments Ltd seeks to work together with LB Haringey to progress a</p>	<p><b>potential introduction of a Crossrail 2 station at Turnpike Lane, the development would continue to be acceptable in light of proposed upgrades to the Piccadilly Line, and that therefore the change, to increase flexibility, and therefore deliverability is acceptable.</b></p> <p>Regarding timeframe, it is considered that of the options, this is the most realistic. However, the timeframes are indicative and as such it is not a restriction on development, but a guide for stakeholders/ residents/ infrastructure providers. If an application comes forward before 2020 then this would effectively represent a ‘<b>credit</b>’ on the delivery</p>
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				<p>for SA 15: Westbury and Whymark Aves, specifically in relation to properties 4 – 14 High Road, Wood Green; however there is concern that delivery of the site could be compromised by policy in its current form due to the restrictive time pressures, the requirement for a comprehensive rather than incremental development and the suggested close alignment with the proposed Crossrail 2 delivery which has not yet been confirmed.</p> <p>Our client would like to work collaboratively with LB Haringey to ensure a strategy is adopted for the site that ensures a viable and successful area within an appropriate timetable regardless</p>	<p>comprehensive strategy for the site however not a comprehensive delivery. Prescriptive policy is inappropriate in this instance and likely to restrict and unduly delay future development proposals.</p> <p>1.18 The importance of viability is enshrined in para.173 of the NPPF which states:</p> <p><i><b>“Plans should be deliverable. Therefore the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”</b></i></p> <p><b>Site Requirements</b></p> <p>1.19 Our client welcomes the Site Requirements and supports the proposed requirement of ground and first floor town centre uses fronting the High Road as well as the proposed fulcrum of tall buildings at Turnpike Lane.</p> <p>1.20 It has been noted that the specificity of tall building development in terms of height and design of the building that was <b>included within the ‘Preferred Options’</b> document has been removed, and this is supported by our client.</p> <p>1.21 The document states at bullet point <b>three “Ground floor and town centre uses will also be expected on the north side of Westbourne Avenue.” It is believed that the reference to Westbourne Avenue has been</b></p>	<p>of the later years of the Plan.</p> <p>It is considered that the first site requirement already contains flexibility, <b>citing “co-ordinated development on other land parcels”</b> within the Allocation.</p> <p><b>It is agreed that “Westbourne” should read “Westbury”.</b></p> <p>The Council consider that the principal of having a tall building marking Turnpike Lane Station is only appropriate if it is in close proximity to Turnpike Lane Station.</p>
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					<p>of whether Crossrail 2 comes into fruition or not.</p> <p>made in error and that it should read either <b>“Whymark Avenue” or “Westbury Avenue”</b>. For the avoidance of doubt it would be useful if this could be clarified and amended accordingly.</p> <p>1.22 The policy states at bullet point four that <b>“Development will accommodate the fulcrum of the Turnpike Lane tall buildings cluster facing the High Road opposite Turnpike Lane station”</b>. The specificity of this may restrict development options, and therefore our client would suggest rewording the sentence to remove <b>“opposite Turnpike Lane station”</b>.</p> <p><b>Development Guidelines</b></p> <p>1.23 Our client welcomes and supports the majority of the development guidelines, especially the creation of a high quality frontage to the High Road and the opportunity to provide additional town centre uses at first floor level.</p> <p>It is however noted that in relation to the <b>text stating that “Height should fall away from its peak at the frontage to Wood Green High Road along Whymark Avenue”</b>, that this is neither clear in terms of how this would work with multiple development options, nor is it worded in such a way which allows for development flexibility in <b>terms of where the ‘peak’ of development should be located</b>.</p> <p>1.25 In relation to the above, it is suggested</p>	
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						that the sentence should be reworded to read: "Height should fall away from its peak on the High Road towards the east of the site".	
6	RSA31	SA3	Yes	Yes	Wood Green Investments Ltd supports the expansion of town centre boundaries within the borough, particularly in Wood Green.		Noted.

#### Respondent 7: Fairview Homes

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
7	RSA32	SA17	Not stated	Not stated	<p>Fairview wish to promote the Hampden Road site as part of the emerging Draft SADPD consultation for a residential-led mixed use redevelopment to deliver up to 182 new homes and commercial floorspace, with the aspiration to deliver the new homes and commercial space within the next 3 years.</p> <p>However, Fairview have a number of <b>concerns with the Council's proposed</b> submission version of the Draft SADPD and the assessment and commentary that is included within the draft policy. These concerns are outlined in further detail below.</p> <p>Net Residential Units</p>	<p>In light of the foregoing, it is recommended that the text at paragraph 2.46, which provides a summary of the site allocation, should be amended to read as follows: <i>"Residential-led mixed use development securing, where feasible, improved pedestrian and cycling link to Hornsey rail station"</i></p>	<p>The Council has used a consistent approach in calculating the indicative development capacities for each allocation. This is to show that together, the site allocations can meet the objectively identified housing need in the borough. The aim is not to limit capacity on each of the sites. The actual quantum of development that comes forward on each site will be determined through a design-led</p>

				<p>The draft SADPD makes reference to an indicative development capacity of 56 no. residential units. Notwithstanding this is described as <i>“an indicative minimum, not prescriptive”</i>, this provision is well below the development capacity of the site and would not represent an efficient or effective use of previously developed brownfield land for housing delivery, as emphasised at all levels of planning policy, particularly at a national level and within the London Plan.</p> <p>This number of units would represent a density of 80 units per hectare. Whilst the PTAL rating of the site is 4, the site is located adjacent to Hornsey Train Station (served by a number of regional trains with services into Central London) and Turnpike Lane Underground Station (served by the Piccadilly Line and possibly a Crossrail 2 station in the future), as well as number of local bus services available along Turnpike Lane. It is therefore felt that <b>the Council’s assessment of development capacity</b> is not considered sound or appropriate.</p> <p>Policy 3.4 of the London Plan (Further Alterations: March 2015) relates to Optimising Housing Potential which provides a density matrix at Table 3.2 for new development in London based on PTAL ratings and the setting of the new development. Based on <b>the site’s PTAL and ‘urban’ location, Table 3.2 states a</b></p>	<p><i>and the west of the borough, and improvements to the New River Path, where feasible.”</i></p>	<p>analysis of applications using the principals set out in the Site Allocation, and the DMDPD.</p> <p>It is not considered that <b>the addition of “where feasible” to the allocation</b> is of benefit. All applications are required to have regard to feasibility.</p> <p>No change</p>
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					<p>density range of 45 to 260 units per hectare. For the Hampden Road site this would translate to between 32 units and 182 units being considered appropriate within the London Plan specific density ranges.</p> <p>Fairview have held a pre-application meeting with Officers at the GLA. Officers raised <b><i>“no specific strategic issue in terms of proposed building heights”</i></b>. Officers further advised that the density matrix within the London Plan should not be applied mechanistically and promoted a design-led approach to residential density. <b>Owing to the site’s location adjacent to a train station, no impact on daylight/ sunlight/ overshadowing, Growth Area allocation of the site, and <i>“highly accessible location”</i></b> (as stated in the draft SADPD), the site is considered to be appropriate for the delivery of a high density residential-led development. In this regard, it is proposed that the indicative <b>capacity be changed to <i>“up to 182 units”</i></b> to reflect this.</p>		
7	RSA33		Not stated	Not stated	<p>Employment Floorspace Reprovision</p> <p>The draft SADPD makes reference to an indicative development capacity of 930 sqm of new employment floorspace. The site does not sit within a designated Defined Employment Area and does not form part of any local or strategic employment area designation.</p>	<p>On this basis, the level of employment floorspace to be re-provided on the site as part of any redevelopment (particularly in respect of the 3 year timescale for delivery of the</p>	<p>The council has a requirement to plan proactively for economic growth in the borough so that development meets emerging employment need. The Councils policy position is that on former employment</p>

				<p>Fairview are proposing to deliver development on this site within three years. Whilst the Haringey Employment Land Study (February 2015) does indicate there is demand for employment floorspace, the study assesses this demand up to 2031. In respect of office accommodation, the study states that <b>“Haringey has a relatively weak office market”</b> and the low level of demand tends to be for smaller sized units up to 185 sqm.</p> <p>In addition, the study states that the development pipeline for office floorspace indicates there will be a substantial net gain in the amount of office accommodation in the borough.</p> <p><b>Whilst Fairview’s emerging proposals for</b> the site are likely to incorporate nonresidential employment floorspace, the quantum of this should be realistic and based upon market demand in the local area.</p> <p>Fairview have taken advice from leading commercial agent Jones Lang LaSalle who have experience in the local market. They have advised that there is very little demand for office floorspace in this location, which is a position that is unlikely to change in the next 3-4 years.</p> <p>JLL have advised that the provision of 10,000 sqft of office floorspace at this location, as proposed by the draft SADPD,</p>	<p>scheme) should be based upon market evidence and the likelihood of the floorspace being occupied upon completion. The 930 sqm (10,000 sqft) quoted within the emerging draft SADPD is not considered a sound, reasonable or realistic quantum to be provided on the site as part of any redevelopment, with little apparent justification for this significant quantum of employment floorspace. On this basis, it is strongly suggested that this figure be reduced to 150 sqm.</p>	<p>sites, and sites with good public transport access, new employment floorspace should be provided to meet job growth in the borough. Furthermore the Workspace viability study suggests that the provision of appropriate workspace (not necessarily just office floorspace), can be cross- subsidised by residential development.</p> <p>This site has a great number of positive attributes (excellent public transport access, close proximity to Wood Green town Centre, amenity from the New River, and that as such a meaningful amount of employment floorspace should be sought.</p> <p>It is recognised that the indicative development capacity for each site is a guide to show how housing and employment needs can</p>
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					would be entirely inappropriate and have advised that a lower provision of approximately 1,000 to 2,000 sqft would be more appropriate, but that it may still struggle to find an occupier.		be met across the borough. Developments will be determined on a site-by-site basis, having regard to viability and feasibility.  No change
7	RSA34				<p>New River Path</p> <p>Bullet point three under the heading Site Requirements on page 51 states <b><i>‘enhancement of the New River Path should be provided as part of the development’</i></b>. Under the heading Development Guidelines on page 51, bullet points four and five state that the development should create access to the New River and that opportunities should be explored to enhance access, safety and appearance of the New River.</p> <p><b>Fairview support the Council’s aspirations</b> to facilitate the New River Path and improvements to the New River, recognising the benefit this will have on the redevelopment of the site. However, the land and the river are not within the control of Fairview and the entirety is in third party ownership. Fairview therefore have no legal right to provide or promote access onto this land or to provide a path.</p> <p>Any requirement on Fairview to facilitate access onto third party privately-owned</p>	Remove requirements on the development to create access to the New River and opportunities to enhance access, safety and appearance of the New River.	<b>This point is agreed. It is proposed that it is more appropriate to require “consultation with Thames Water regarding the potential for enhancements to the New River path” would be more appropriate.</b>

					land and to deliver a path would therefore be <i>ultra-vires</i> . On this basis, the development cannot provide enhancement of the New River Path or promote access to the New River as stated within the draft SADPD. It is therefore strongly recommended that the above significant constraints are recognised and these requirements are removed from the site allocation or amended to recognise these significant issues.		
7	RSA35		Not stated	Not stated	<p>The draft SADPD states that “<b>development should be used as an enabler to improve access to the bridge</b>” which would involve “<b>improvements to Hampden Road and consideration of how access to Hornsey Station can be made more accessible</b>”. The draft SADPD further states that “<b>the pedestrian bridge over the rail line should be improved to create improved access across the railway line</b>”.</p> <p>Fairview support the Council’s aspirations to facilitate enhanced access to Hornsey Station and improvements to Hampden Road, recognising the benefit this will have on the redevelopment of the site. However, Hampden Road and the pedestrian foot bridge across to Hornsey Station are not within the ownership or control of Fairview and they are both within third party private ownership. Any requirement on Fairview to provide enhancements to the road or pedestrian footbridge is beyond the control of Fairview and would be <i>ultra-vires</i>. In this regard, it is strongly recommended</p>	In this regard, it is strongly recommended that these constraints are recognised and the requirements are removed from the site allocation or amended to recognise these significant restrictions to deliver enhancements.	It is considered that this site is a key opportunity to create accessibility improvements to and at Hornsey station, but the authority responsible for making the physical improvements is Network Rail. As such, ensuring that Network Rail are consulted should be the key aim of the site requirement.

					that these constraints are recognised and the requirements are removed from the site allocation or amended to recognise these significant restrictions to deliver enhancements.		
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**Respondent 8: Rapleys LLP on behalf of LaSalle Investment Management**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
8	RSA 36	SA18 Para 2.48	No	Not stated	<p>We support the principle of the allocation of the site for future redevelopment, which is <b>consistent with Haringey's</b> Strategic Policies for the Wood Green Growth Area. However, we <i>object</i> to the wording of the proposed allocation, as it allocates the site for <b>"enhancement of the cultural quarter with the provision of a new link" and does not expressly</b> allocate the site for redevelopment notwithstanding the indicative development capacity for net residential units (89) and employment (3,061 sq.m) in the table.</p> <p>The NPPF required Local Plans to <b>"allocate sites to promote development and flexible use of land, bringing forward new land where necessary"</b> (Paragraph 157). Furthermore, the NPPF states that <b>"Local Plans should set out the opportunities for</b></p>	<p>Furthermore, it is considered necessary to allocate the site for <b>"mixed use development to include residential use", in</b> order to ensure the effectiveness of the Local Plan as a whole, and to be consistent with the proposed Development Management Policy DM10 (A) states that <b>"the Council will support proposals for new housing on sites allocated for residential development, including mixed use residential development within the Site Allocations Local Plan and Area Action Plans"</b>.</p> <p>Proposed Site</p>	<p>This is agreed. The Site Allocation can be expanded to include reference to mixed-use development, which is consistent with the mix of uses set out in the Appendix to the Sites DPD.</p> <p>In line with other DEA site allocations, including this one, the mix of uses will be expected to be employment- led, with residential being used to cross-subsidise, subject to the other aims of the policy (enhancing the cultural quarter and creating a new link to Wood Green Common).</p> <p>To make this consistent with SA19, the addition of <b>"Comprehensive redevelopment of the site for employment-led mixed</b></p>

				<p><i>development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan</i>" (Paragraph 154). We therefore consider that the proposed wording of the site allocation is ambiguous and does not positively support regeneration of the site. It is also unclear how the indicative development capacity has been identified, for which we would request a further opportunity to comment once clarified.</p> <p>It should be noted that the site is within the strategic growth area and a Regeneration Area of the <b>Local Employment Area ('LEA')</b>, where uses appropriate in a mix use development include residential uses (Policy SP8). As such, the site allocation should be made clear that the site is allocated for a mixed use development, to include, inter alia, residential use and employment generating uses, in line with the strategic policy objectives. Our <b>view is reinforced by the Council's</b> preferred option expressed in the emerging AAP (February 2016), which envisaged residential use as part of the mixed use</p>	<p>Allocation (Paragraph 2.48)  <b>"mixed use</b>  <i>redevelopment to include residential and/or student accommodation and employment generating uses, which would enhance the Wood Green Cultural/creative Quarter, including an opportunity for a new north south pedestrian/cycle link between Clarendon Road and Wood Green Common".</i></p>	<p><b>use development with residential" will be added.</b></p>
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					development of the site.		
8	RSA 37	SA18 Para 2.49	No	Not stated	<p>We are concerned with the draft commentary for the allocation, which states that <i>“the redevelopment of the existing employment area will play a key role in supporting the realisation of new employment floorspace in the Borough through attractive and complementary employment uses with ancillary residential use.”</i> We <i>object</i> to the reference to <b>“complementary employment uses with ancillary residential use.”</b> The term <b>“complementary employment uses”</b> should be amended to <b>“employment generating uses”</b> in order to ensure that a wide range of economic use can be considered. The term ‘ancillary residential use’ appears to suggest that residential accommodation ancillary to commercial uses e.g. <b>manager’s flat/</b> accommodation ancillary to public house use. This is contrary to the strategic growth and regeneration objectives.</p>	<p><b>“The Wood Green Cultural Quarter</b> represents a significant opportunity for improvement in the greater Wood Green Area. The redevelopment of the existing employment area will play a key role in supporting the realisation of new employment <i>opportunities floorspace</i> in the Borough through attractive and complementary employment <i>generating</i> uses with <del>ancillary</del> residential use. Development will create a high quality public realm which supports opportunities to visit and gather. <i>In order to facilitate</i> a new connection from the Cultural Quarter towards Alexandra Palace Station, <i>a new pedestrian/cycle link</i> should be <i>designed created</i> as part of comprehensive <i>or</i></p>	<p>It is noted that this can be made clearer. The aim is to enable a range of commercial opportunities on the site, with residential to provide the land value necessary for the development to proceed. <b>The term “ancillary” is ambiguous and will be removed.</b></p> <p>It is considered appropriate that the employment uses are complementary to its location in the Wood Green Cultural Quarter, and that reference to this, as well as reference to realising new employment floorspace are appropriate.</p> <p><b>As all development is expected to be feasible and viable, it is not considered that it is necessary to add these terms into the commentary. A reference to the masterplan as set out in the site requirements) is appropriate however.</b></p>

						<i>otherwise phased development on this site to be delivered by a masterplan approach, where practically feasible and viable.”</i>	
8	RSA 38	SA18	No	Not stated	<p>We are also concerned with the <b>reference to “comprehensive redevelopment on the site,”</b> as the allocation is in two separate ownerships, and it may not be feasible to deliver a comprehensive scheme, depending on circumstances in the future.</p> <p>Whilst we do not object to the aspiration to deliver a comprehensive site wide scheme, we consider that the policy should be sufficiently flexible to allow an individual plot to be brought forward independently, in the event that comprehensive redevelopment is not achievable, particularly as the allocated site is identified as long term potential. We therefore request that there is flexibility to allow for phased development to be delivered by a masterplan approach.</p> <p>As expressed in the previous representations, the site is also considered appropriate for student accommodation if a</p>	<p>Site Allocation Boundary</p> <p>The site allocation boundary for SA18 should be amended so that there is no overlap between different ownerships with other allocated sites SA19 and SA18. Specifically, both the eastern and western boundaries <b>(within LIM’s interest as shown on the site location plan at Appendix 1)</b> are not drawn correctly. We request that allocation maps are amended to reflect the correct ownership boundaries in each site allocation.</p>	<p>Policy DM55 adequately addresses the concerns over the requirement for ‘<b>comprehensive development</b>’.</p> <p><b>After reviewing the site plan attached, the alteration of the site boundary to include the small patch of land behind Guillemot Place is acceptable. SA19 will also be modified to reflect this.</b></p> <p>Policy DM15 sets the locational requirements for when student housing may be acceptable. It is not considered necessary to include this on site allocations.</p> <p>The new route through the site is proposed to be a cycle and pedestrian link, and is not considered to be overly onerous.</p>

					<p>requirement for further student accommodation is identified in the future. It is noted in paragraph 3.21 of the Proposed Submission Development Management document that Haringey has a role to play in fostering relationships with existing higher education institutions and in meeting the needs for purpose built student accommodation. In this respect, Policy DM15 specifically refers to Haringey Growth Areas and within or at the edge of a town centre as being suitable locations for future student accommodation, where <b>required. As the site's</b> redevelopment is a long term opportunity, we consider it appropriate to allow for flexibility to facilitate student accommodation in the allocation, in line with Policy DM15. In terms of creation of a new north south link, it is understood that the aspiration is to provide permeability by way of a new pedestrian/cycle link. We consider that this should be specified in the wording of the allocation for clarity.</p>		
8	RSA 39	SA18	No	Not stated	<p>Site Requirements The first bullet point (a site wide masterplan approach): We support the site wide masterplan approach as the allocation is in</p>	<p>Suggested Wording of Site Requirements/Development Guidelines We consider that there</p>	<p><b>It is confirmed that it is a new cycle/pedestrian link to be proposed and that this be included at the beginning of bullet point 3.</b></p>

				<p>multiple ownerships. This approach would facilitate the delivery of regeneration of the site in a coordinated manner without undermining the delivery of part of the allocated site to come forward first. However, it is considered that minor amendment is necessary to ensure that the policy can facilitate phased delivery.</p> <p>The third bullet point (pedestrian and cycle link): The requirement is <b>ambiguous as to whether “an extension” of Clarendon Road is an aspiration to be provided in the form of an extended “road” or a “pedestrian/cycle link.”</b> It is our understanding from discussions with the Planning Policy Team that it is the latter which is also clarified in Development Guidelines. We would strongly object to the provision of a road through the allocated site, as such a requirement would seriously undermine the viability of the future redevelopment opportunity of the site, as it will take up a significant proportion of the development land, and there are normally substantial costs associated with the construction of roads. We <i>object</i> to the current wording as it could be interpreted to mean an extended vehicular</p>	<p>are a number of combined <b>“requirements” and additional guidelines</b> which would make the redevelopment of the site unviable. Policies should positively support redevelopment and provide details to guide/enable development in line <b>with the Council’s objectives and visions</b> as far as possible. Accordingly, we consider that the Site Requirements and Development Guidelines should be consolidated as <b>“Development Principles and Guidelines,” as follows:</b> Development Principles and Guidelines <i>Development proposals will be required to be accompanied by a site wide masterplan, showing how the land included <del>meets this</del> policy and does not compromise co-</i></p>	<p>The redevelopment of the site is predicated on it helping to achieve the wider regeneration of the Wood Green Area.</p> <p>The absence of the cycle/pedestrian link would mean the site fails to deliver a significant part of its contribution to that regeneration story and would render any proposal unacceptable being harmful to the realisation of wider regeneration benefits. Given that the proposed cycle/pedestrian route goes through the site, the design must enable this and as such is a development cost.</p> <p>Likewise, each site within Wood Green has a role to play and the mix of uses suitable to each relate to meeting area wide objectives where growth and intensification apply as much to employment growth and intensification as they do to residential growth and intensification. As an existing employment site with Regeneration Area</p>
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				<p>road, and is not sufficiently clear. Whilst we support the aspiration to create a pedestrian/cycle link through the site, it may not be feasible to deliver such a pedestrian/cycle link due to viability and it is not clear whether the job centre site (which will be required to provide a link) will become available for redevelopment over the lifetime of this Plan and the emerging AAP. Therefore, such an aspiration should not be identified as a <b>“requirement,” and we request that this is identified as “an opportunity subject to feasibility and viability”</b>.</p> <p>Furthermore, the provision of a pedestrian/cycle link will be for the benefit of the wider public and the regeneration of Wood Green/Heartlands, rather than to serve the development of the allocated site alone. As such, the developers of the site should not be expected to fund the provision of the link, and such infrastructure should be funded by the CIL, as otherwise the regeneration of the site may become undeliverable due to viability issues.</p> <p>Accordingly, the provision of a new pedestrian and cycle network should be designed in as part of any masterplan for the wider area,</p>	<p><i>ordinated development on the other land parcels or phased delivery within the Allocation.</i></p> <p><i>The Wood Green job centre and Guillemot Place are of limited architectural quality, and will be permitted for redevelopment.</i></p> <p><i>Tall buildings on the site are supported in order to maximise the site’s redevelopment potential and increase the development capacity, subject to the required assessment under Development Management Policy DM6.</i></p> <p><i>The opportunity to extend Clarendon Road as a pedestrian and cycle link through the site allocation to link with Wood Green Common should be explored as part of the Masterplan, subject to feasibility and viability, and funding available</i></p>	<p>designation, the role of this site is to help deliver the former.</p> <p>The reference to tall buildings is not supported by the UCS. While the site is within the growth area the site is not recommended as a tall building location. As such there will not be a reference within this policy, and the height of development permitted on the site will be determined in line with DM6.</p> <p>This site is not within a town centre, and as such the plan will not be seeking town centre uses on the site, which could fall under a <b>“commercial” banner</b>. Uses which are employment generating, and/or contribute to the cultural quarter being supported is considered appropriate. The phrase <b>“subject to viability”</b> is not required as all developments will be subject to viability.</p> <p>It is considered that active frontages, whatever the use, should be encouraged on</p>
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				<p>or in the emerging AAP, for <b>including in the Council's</b> Infrastructure Delivery Plan, and the Regulation 123 list, to secure the delivery.</p> <p>The fourth bullet point (active frontages): We note the aspiration to create an enhanced public realm at the south of the site which is intended to act as a focal point of the Cultural Quarter. However, we are concerned with <b>the 'requirement' to provide active frontages</b> to both sides of Clarendon Road to contribute to this vision, as it is prescriptive in the absence of a scheme/masterplan for the adjoining site and how it would relate to a scheme for the site. Whether active frontages can be provided or is appropriate will depend on the type of uses, layout and relationship with adjoining developments. In order to ensure flexibility and that the delivery of a viable scheme is not compromised, it should be identified as a guide rather than a site requirement.</p> <p>The fifth and sixth bullet points (employment floorspace and cultural quarter): We welcome the removal of the previous criterion setting a target of 33%</p>	<p><i>through CIL to deliver the link.</i></p> <p><i>Active frontages to the potential new pedestrian link should be explored, having regard to the site's mix of uses and relationship to the enhanced public realm envisaged at the south of the allocated site, which will act as the focal point of the Cultural Quarter.</i></p> <p><i>As part of mixed use development, the maximum quantum of commercial/ employment generating floorspace feasible should be provided on this site, having regard to the type of uses which would contribute to the regeneration of the cultural quarter and job creation subject to market demand and viability.</i></p> <p><i>Residential</i></p>	<p>the site. It is important that this area is busy during the day, and into the evening, and active frontages will help to achieve this.</p>
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				<p>employment floorspace, and are generally supportive of the amended criterion which seeks to secure the maximum quantum of employment floorspace feasible from redevelopment. However, in order to achieve strategic growth objectives, the type, quality and <b>mix of employment ‘generating’</b> uses will be taken into account in the consideration of the viability of <b>the site’s redevelopment options</b>. This should also be considered in <b>the context of the Council’s</b> aspiration for uses which would positively support and enhance the cultural quarter.</p> <p>Redevelopment of the site to provide new employment/ commercial uses and residential use would support the improvement and enhancement of the cultural quarter including public realm and visual appearance.</p> <p>We consider that the requirement <b>for the provision of “employment floorspace”</b> is ineffective and does not provide sufficient flexibility to facilitate the delivery of redevelopment. The NPPF states that the Local Plan should allocate sites to promote development and flexible use of land. Therefore, all employment generating uses and</p>	<p><i>development will be supported in order to facilitate the regeneration of the site and in line with the strategic objective for Wood Green Growth Area.</i></p> <p><i>Part of the site is located within Wood Green Common Conservation Area and any development should make a positive contribution to the setting of the Conservation Area, in particular Alexandra Primary School and 109 Mayes Road.</i></p> <p><i>The site is identified as being an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network, subject to feasibility and viability.</i></p>	
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				<p>economic development, as defined by the NPPF, should be considered for an appropriate mix of uses to deliver a viable regeneration scheme, subject to occupier interest and market demand at that time, which would result in contributing to the enhancement of the cultural quarter.</p> <p>The seventh bullet point (residential development): This requirement is unsound, as there is no justification and is contrary to the strategic growth and regeneration objectives for the area. It implies that residential development is conditional on the provision of new workspace. The <b>site's strategic designation</b> and objective does include both job and housing growth, the term <b>'subsidise' new workspace</b> for which no definition is give, is contrary to the strategic policy and national policy which requires Local Plans to secure sustainable development – positive growth. Residential development may be necessary to ensure viability of the regeneration scheme, depending on the market conditions and type of uses being proposed. However, as the site is designated in an area of growth and intensification,</p>	<p><i>Studies should be undertaken to understand what potential contamination there is on the site prior to any development taking place.</i></p> <p><i>A piling statement will be required prior to any piling taking place.</i></p> <p><i>Applicants must consult with Thames Water regarding wastewater and water supply capacity upon the preparation of a planning application</i></p>	
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				<p>it should not be expressed as conditional on the provision of a particular type of commercial uses.</p> <p>The eighth bullet point (masterplan/AAP): It requires that development of the site follow the principles set out in any future Council-approved masterplan for the area and/or the emerging AAP. A masterplan is already required as part of redevelopment of the site (as per the first bullet point). As such, it is not clear what any future Council approved masterplan is. In addition, the emerging AAP states that once adopted this site allocation will be superseded. We therefore do not consider this requirement is necessary.</p> <p>The ninth bullet point (capped commercial rents): We <i>strongly object</i> to the requirement of <b>“capped commercial rents”</b> as such a requirement would, fundamentally, constrain the deliverability of the regeneration scheme. There is no definition of and justification (including viability evidence) for the requirement to cap commercial rents. In principle, the requirement for capping the commercial rents goes beyond the purpose of the Local Plan, and</p>		
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				<p>it is a concern as there is no clear policy objective and justification as stated. Fundamentally, this requirement, as currently drafted, will make any scheme unviable, as <b>not only it is unrealistic to “cap”</b> rents commercially, but it will act as an impediment to securing the necessary inward investment towards the regeneration of the area, particularly where there are substantial costs associated with redevelopment.</p> <p>We therefore strongly object to the capped rent requirement as it is not justified and would fundamentally affect the deliverability of regeneration of the site.</p> <p>Development Guidelines  The first bullet point (pedestrian and cycle link): The Development Guideline states that Clarendon Road will be extended as a pedestrian link through Guillemot Place and the Job Centre site. For the reasons we state at paragraphs 4.13 and 4.15, such an expectation requires careful wording, so as to ensure that the delivery of the regeneration of the area is not constrained by the expectation of the policy, if it is not practically feasible or viable to provide the pedestrian/cycle link</p>	
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				<p>through the site, and if it cannot be delivered by the CIL.</p> <p>The second bullet point (a new junction): This guideline suggests that a new junction at Mayes Road, Western Road and the aspirational extension of Clarendon Road is expected. Whilst a cycle and pedestrian link through the allocation site may be appropriate, subject to feasibility and necessary funding, the provision of a road through the site will make the redevelopment of the site unviable, as it would take up a significant proportion of the development site, and there are normally substantial costs associated with the delivery of a road/junction. <b>The site's</b> redevelopment should only be expected to design a pedestrian/cycle link within the site, where feasible and viable, that would connect to the existing Mayes Road.</p> <p>The third bullet point (decentralised energy network): We would comment that any requirement for the site to provide an easement for the work should be deleted, where an existing network does not exist or it is not practically feasible or financially viable. This point is supported by</p>	
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				<p>the London Plan Policy 5.5 which states that boroughs should require developers to prioritise connection to existing or planned decentralised energy network, <u>where feasible</u>. As worded, the requirement to provide connection adds an unnecessary cost to the development, which could make the scheme unviable.</p> <p>Tall Buildings – Previously there was a criterion which supported the principle of tall buildings. Whilst we objected to the limitation of the height, we were supportive of the principle of tall <b>buildings on the site. The site’s</b> strategic designation is for growth and intensification and in order to increase the development capacity by making efficient use of the site, the policy should encourage and support the principle of tall building.</p> <p>In respect of identifying tall building clusters, Paragraph 2.10 refers to the Urban Characterisation Study (2015) (UCS). As we commented in the previous representations, we are concerned with the recommended approach for Wood Green in this document. It recommends that heights should be greatest along the railway line (mid to high rise)</p>	
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					stepping down to mid-rise towards the existing 2-3 storey building and terraces that line Hornsey Park Road and Mayes Road. We are concerned with this approach, as there are no development sites available or allocated along the eastern area of the railway line when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. We therefore <i>object</i> to the reference to this document unless it is updated as further work is undertaken, as evidence base for tall buildings or a material consideration in the determination of planning applications.		
8	RSA 40	SA21 Para 2.54	No	Not stated	We support the principle of the allocation of the Bittern Place site for a mixed use redevelopment, which is consistent with <b>Haringey's Strategic Policies for Haringey Heartland/Wood Green Metropolitan Town Centre</b> as a Growth Area, and an Intensification Area in the London Plan. It is however considered that the focus of the allocation should <b>be to maximise the site's</b> development opportunity in line with the Strategic Policy SP1. This allocation site lies within a	Accordingly, we request that the wording of the site allocation and commentary is amended as follows: Proposed Site Allocation (Paragraph 2.54) <i>"Mixed use redevelopment to include employment generating uses (including town centre uses), and residential</i>	This site is both identified as a designated employment area, and as a town centre site. As such the Council will seek to promote employment uses which are also town centre suitable. This will generally be high density employment uses.  As the route (Brook Rd) is already a road, and there is no plan to stop this up, it is not considered appropriate to make reference to only a

					<p>Regeneration Area of the Local Employment Area ('LEA') (which permits a wide range of uses including residential), and the Wood Green Metropolitan Town Centre. As such, a wide range of employment generating uses and residential development should be considered appropriate in order to facilitate regeneration. We therefore <i>object</i> to mixed use <b>development being “employment-led” in a sustainable town centre</b> location, as a suitable mix of uses and quantum of each use should be considered based upon the marketing demand/need, viability and design/layout which promotes the efficient use of land.</p> <p>It is unclear how the indicative development capacity (net residential units – 195 and employment – 6,734 sq.m) has been identified, for which we would request a further opportunity to comment once clarified.</p>	<p><i>use and/or student accommodation, and the creation of a pedestrian/cycle link between Wood Green and Clarendon Square, with a legible streetscape, subject to feasibility and viability.”</i></p>	<p>pedestrian/cycle link through this site. What the Council is seeking is a high quality cycle and pedestrian route between Wood Green and Clarendon Square.</p> <p>Adding subject to feasibility and viability to the Site Allocation is considered unnecessary. The Council will work with landowners/developers to optimise outcomes on sites, with viability being considered on a case by case basis</p> <p>No change.</p>
8	RSA 41	SA21 Para 2.55-2.56	No	Not stated	<p>Paragraph 2.55 states that the future development will cross subsidise a safe pedestrian and cycle link from Wood Green to Alexandra Palace Park via the Heartlands area and Cultural Quarter. Whilst we support the aspiration to create a</p>	<p>Commentary (Paragraph 2.55-2.56) 2.55 This site plays an important role in linking the Haringey Heartlands area to Wood Green High Rd. The future</p>	<p>The redevelopment of the site is predicated on it helping to achieve the wider regeneration of the Wood Green Area.</p> <p>The absence of the cycle/pedestrian link would</p>

				<p>pedestrian/cycle link, it should be aligned utilising the existing road, as otherwise it would minimise the development area which would make the redevelopment of the site unviable.</p> <p>Furthermore, we <i>object</i> to the draft policy which seeks the future <b>development to ‘cross subsidise</b> the pedestrian and cycle link, as the provision will be for the benefit of the wider public and the regeneration of Wood Green/Heartlands, rather than to serve the development of the allocated site alone. As such, the developers of the site should not be expected to fund the provision of the link, and such infrastructure should be funded by the CIL, as otherwise the regeneration of the site may become undeliverable due to viability issues.</p> <p>Accordingly, the provision of a new pedestrian and cycle network should be designed utilising the existing road in as part of any masterplan for the wider area, or in the emerging AAP, for including <b>in the Council’s Infrastructure</b> Delivery Plan, and the Regulation 123 list, to secure the delivery of the provision.</p> <p>As expressed in the previous representations, the site is also</p>	<p>development <i>should explore opportunities to facilitate the delivery of <del>will cross subsidise</del></i> a safe pedestrian and cycling link from Wood Green to Alexandra Palace Park via the Heartlands area and Cultural Quarter <i>through utilising the existing road in the masterplan.</i></p> <p>2.56 New commercial and residential development <i>and/or student accommodation</i> will be permitted along this route.</p>	<p>mean the site fails to deliver a significant part of its contribution to that regeneration story and would render any proposal unacceptable being harmful to the realisation of wider regeneration benefits. Given that the proposed cycle/pedestrian route goes through the site, the design must enable this and as such is a development cost. The use of the term cross-subsidise is appropriate within this context.</p> <p>The Council has a policy which it will determine applications for student accommodation against (DM15). While this site fits a number of the criteria included in DM15, preference will generally be for more conventional housing types. The Council will determine applications for student accommodation on an ongoing basis, having regard to demand, rather than allocating it on particular sites.</p> <p>No change</p>
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					<p>considered appropriate for student accommodation if a requirement for further student accommodation is identified in the future. It is noted in paragraph 3.21 of the Proposed Submission Development Management document that Haringey has a role to play in fostering relationship with existing higher education institutions and in meeting the needs for purpose built student accommodation. In this respect, Policy DM15 specifically refers to Haringey Growth Areas and within or at the edge of a town centre as being suitable locations for future student accommodation, where <b>required. As the site's</b> redevelopment is a long term opportunity, we consider it appropriate to allow for flexibility to facilitate student accommodation in the allocation, in line with Policy DM15.</p>		
8	RSA 42	SA21 Site Requirements	No	Not stated	<p>Site Requirements The first bullet point (a site wide masterplan approach): We support the side wide masterplan approach as the allocation is in multiple ownerships. This approach would facilitate the delivery of regeneration of the site in a coordinated manner without undermining the delivery of part of</p>	<p>Suggested Wording of Site Requirements/Development Guidelines We consider that there are a number of combined <b>“requirements”</b> and additional guidelines, particularly the</p>	<p>Regarding the alignment of the enhanced cycle/pedestrian link, the Council believe that as direct a route as possible is the most beneficial possible. This may or may not be along the alignment of one of the existing routes.</p>

				<p>the allocated site to come forward first. However, it is considered that minor amendment is necessary to ensure that the policy can facilitate phased delivery.</p> <p>The third and sixth bullet points (pedestrian and cycle link): These criterion states that a pedestrian <b>and cycle link along the “entire length of the site” and “the east-west linkage should be as straight as possible between Wood Green High Road and Clarendon Square.” We consider that this</b> should be clarified as an alignment utilising the existing road.</p> <p>The fourth bullet point (employment floorspace): We welcome the removal of the previous criterion setting a target of 33% employment floorspace, and requirement to specifically provide Class B1 a and c uses. We are generally supportive of the amended criterion which seeks to secure the maximum quantum of employment floorspace feasible from redevelopment. However, in order to achieve strategic growth objectives, the type, quality and <b>mix of employment ‘generating’</b> uses will be taking into account in the consideration of the</p>	<p>prescriptive design requirements for the new pedestrian and cycle link, which would make the redevelopment of the site unviable. Policies should positively support redevelopment and provide details to guide/enable development in line <b>with the Council’s</b> objectives and visions as far as possible. Accordingly, we consider that the Site Requirements and Development Guidelines should be consolidated as <b>“Development Principles and Guidelines,” as follows:</b> Development Principles and Guidelines <i>Development proposals will be required to be accompanied by a site wide masterplan, showing how the land included <del>meets this</del> policy and does not</i></p>	<p>The requirements for employment (rather than commercial) floorspace, and active frontages along the new/enhanced route, are considered clear and appropriate. The contribution of this existing employment designed site is to provide for more intensive employment use – the maximum feasible.</p> <p>The site is currently designed for employment use, and the allocation for mixed use provision seeks an intensification of employment use. It is noted that capped commercial rents will have an impact on viability, but it is also noted that they will help to ensure long term viability of businesses in the borough helping to deliver sustainable development.</p> <p>The site is within the envelope of the potential tall buildings area, as set out in DM6. This site is not identified in the UCS as a specific location suitable for a tall building. As such there</p>
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				<p>commercial <b>viability of the site's</b> redevelopment options. We consider that the requirement <b>for the provision of "employment floorspace"</b> is ineffective and does not provide sufficient flexibility to facilitate the delivery of redevelopment. The NPPF states that the Local Plan should allocate sites to promote development and flexible use of land. Therefore, all employment generating uses and economic development, as defined by the NPPF, should be considered for an appropriate mix of uses to deliver a viable regeneration scheme, subject to marketing demand and commercial viability.</p> <p>This criterion also requires maximum employment feasible to <b>be provided on site 'once the connection has been secured.'</b></p> <p>We object to this as it is not sufficiently clear or justified. The fifth bullet point (active frontages): We are concerned with <b>the 'requirement' to provide active frontages</b> to both sides of a new pedestrian/cycle link, as it is prescriptive in the absence of a scheme/masterplan for the adjoining site and how it would relate to a scheme for the site. Whether active frontages can be</p>	<p><i>compromise co-ordinated development on the other land parcels or phased delivery within the Allocation.</i></p> <p><i>No buildings are required to be retained.</i></p> <p><i>Tall buildings on the site are supported in order to maximise the <b>site's redevelopment potential and increase the development capacity, subject to the required assessment under Development Management Policy DM6. Height of new buildings where they back onto the residential properties on Hornsey Park Road should be considered carefully to respect their residential amenity.</b></i></p> <p><i>The opportunity to create an east/west pedestrian and cycle link with appropriate landscaping, utilising</i></p>	<p>will not be a reference within this policy, and the height of development permitted on the site will be determined in line with DM6.</p> <p><b>The "framing the space"</b> guideline is considered to be appropriate to creating a new edge-of-centre location in Wood Green.</p> <p>The Council will continue to support the flexibility built into the development guideline governing decentralised energy infrastructure.</p> <p>PTAL of the site is 4, and with Piccadilly Line improvements, will only improve. The site is also within the Metropolitan Town Centre boundary. Consideration for car free development in this circumstance is considered appropriate.</p> <p>No change</p>
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				<p>provided or is appropriate will depend on land uses, layout and relationship with adjoining developments. In order to ensure flexibility and that the delivery of a viable scheme is not compromised, it should be identified as a guide rather than a site requirement.</p> <p>The seventh bullet point (capped commercial rents): We strongly object to the requirement of <b>“capped commercial rents”</b> as such a requirement would, fundamentally, constrain the deliverability of the regeneration scheme. There is no definition of and justification (including viability evidence) for the requirement to cap commercial rents. In principle, the requirement for capping the commercial rents goes beyond the purpose and scope of the Local Plan, and it is a concern as there is no clear policy objective and justification is stated. Fundamentally, this requirement, as currently drafted, will make the scheme unviable, as not only it is <b>unrealistic to “cap” rents</b> commercially, but it will act as an impediment to securing the necessary inward investment towards the regeneration of the area, particularly where there are</p>	<p><i>the existing road should be considered as part of a Masterplan, subject to feasibility and viability, and funding available through CIL to deliver the link.</i></p> <p><i>Active frontages to the potential new pedestrian link should be explored, having regard to the site’s mix of uses and relationship to the enhanced public realm envisaged at the south of the allocated site.</i></p> <p><i>As part of mixed use development, the maximum quantum of commercial/employment generating floorspace feasible should be provided on this site, having regard to the type of uses which would contribute to the regeneration of the town centre site and job creation subject to market demand and viability.</i></p>	
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				<p>substantial costs associated with redevelopment.</p> <p>We therefore strongly object to the capped rent requirement as it is not justified and would fundamentally affect the deliverability of regeneration of the site.</p> <p>Development Guidelines</p> <p>The first bullet point (height of buildings): We support the amendment made to the consideration given to the height of new buildings which backs onto the residential properties on Hornsey Park Road.</p> <p>Previously there was a criterion which supports the principle of tall buildings on the site. Whilst we objected to the limitation of the height, we were supportive of the principle of tall buildings on the <b>site. The site's strategic</b> designation is for growth and intensification and in order to increase the development capacity by making efficient use of the site, the policy should encourage and support the principle of tall buildings.</p> <p>The second bullet point (framing the space): It is considered that this requirement is unnecessary and too prescriptive as it would depend on the alignment of the</p>	<p><i>The Moselle River runs in a culvert under this site, and as been identified as being in a potentially poor condition. Any development of this area should ensure that as a minimum the culvert is made safe, and ideally the potential for the Moselle to be deculverted is expected.</i></p> <p><i>The site is identified as being an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network, subject to feasibility and viability.</i></p> <p><i>Studies should be undertaken to understand what potential contamination</i></p>
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				<p>link and should be considered as part of masterplanning of the allocated site.</p> <p>The fourth bullet point (decentralised energy network): We would comment that any requirement for the site to provide an easement for the work should be deleted, where an existing network does not exist or it is not practically feasible or financially viable. This point is supported by the London Plan Policy 5.5 which states that boroughs should require developers to prioritise connection to existing or planned decentralised energy network, <u>where feasible</u>. As worded, the requirement to provide connection adds an unnecessary cost to the development, which could make the scheme unviable.</p> <p>The eighth bullet point (new street trees): We consider that the provision of new street trees is too prescriptive, as it should be considered as part of masterplanning and detailed landscape design.</p> <p>The ninth bullet point (car free development): It is considered that car free development <i>may be</i> appropriate for the site in the future when Crossrail 2 becomes operational (although we</p>	<p><i>there is on the site prior to any development taking place.</i></p> <p><i>A piling statement will be required prior to any piling taking place.</i></p> <p><i>Applicants must consult with Thames Water regarding wastewater and water supply capacity upon the preparation of a planning application.</i></p> <p><i>The provision of car parking will be assessed as part of the Transport Assessment or Statement. The site may be <del>is</del> suitable for car free development due to its good, and improving public transport access in the long-term, which will be assessed in line with the London Plan and the Development Management Policy DM32.</i></p>	
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					<p>understand from the emerging AAP that it is to be delivered in the latter half of 2020s).  Fundamentally, parking provision for any development proposals should be assessed as part of the Transport Assessment or Statement based on the London Plan's parking standards and in line with the Development Management Policy DM32. As such, we consider that minor amendments to the criterion are necessary for clarity and consistency with Policy DM32.</p>		
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**Respondent 9: Barton Willmore on behalf of Workspace**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RSA43	SA19	Not stated	Not stated	In accordance with the NPPF, local plans should be based on a strategy that seeks to meet objectively assessed needs. The most up to date housing and employment requirements for London are set out in the London Plan (2015). This identifies an increased annual housing requirement for Haringey of 1,502 (up from 820 houses per annum in the previous version of the London Plan, 2011) and a 29.5% increase in jobs (the greatest increase of any	To accord with the growth strategies, SA19 should seek to encourage growth and optimisation of site potential. At present SA19 seeks <b>'enhancement' and 'improvement' of the area.</b> It identifies its aim as to <b>'increase employment uses'</b> and that some residential will be permitted. In our	The site allocations within the Local Plan make sufficient provision to meet and exceed the minimum strategic housing requirement for the Borough as set out in the London Plan. As set out in the representation, the London Plan also sets the Borough an ambitious and challenging jobs growth target. This site is designed for employment

				<p>London borough). The requirements set out in the London Plan are expressed as minima and, furthermore, represent a constrained approach having regard to the evidence base documents. Haringey should therefore be aiming to exceed the requirements for both housing and employment provision within the borough. To achieve this, Haringey needs a positive and robust strategy for growth.</p> <p>2.2 Workspace welcomes the alterations to the Strategic Policies DPD in response to the London Plan, including the identification of Haringey Heartlands / Wood Green as a ‘Growth Area’ where site opportunities are to be maximised and 13,500 dwellings are to be provided (up from 5,000 previously) (Policy SP1); the increased housing requirement for Haringey Heartlands of 2,145 dwelling per annum (expressed as a minimum) up from 1,430 (Table 2); and the classification of Wood Green as a Regeneration Area appropriate for a mix of uses (Policy SP8). However, Workspace does not consider that Site Allocation SA19 has evolved sufficiently to reflect the growth strategies of the</p>	<p>view this is not sufficiently positive and forward-looking to satisfy the NPPF test. The site allocation should be updated to reflect the growth strategies. It should seek to maximise the capacity of the site and optimise its potential to deliver an increased quantum and improved quality of employment floorspace along with an increase in residential as part of a vibrant and viable mix of uses appropriate to the area. Indicative capacity should be expressed as a minimum as per the London Plan and proposed alterations to Table 2 of the Strategic Policies DPD and in acknowledgement of the significant growth required to address housing and employment needs in the area.</p>	<p>use. Both the designation and allocation seek to promote the intensification of employment use on the site, maximising its contribution to delivering <b>the Borough’s jobs</b> target. The Council acknowledges that a mixed use development may be required to help achieve this. The optimum capacity of the site will be determined by through a design-led approach in accordance with Policy DM1, having regard to the indicative capacities set <b>out in the site’s allocation</b> which accord with capacities set out in the London Plan.</p> <p>NB: The housing figures in column 1 of Table 2 are total housing figures for the whole plan period, as shown by the 5 year delivery breakdown in the remaining three columns. The minimum housing requirement for the Haringey Heartlands/Wood Green area is 4,600 homes net</p>
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					London Plan (2015) and draft alterations to the Strategic Policies DPD.		additional homes, and not 13,500 as suggested.
							No change
9	RSA44	SA19	Not stated	Not stated	In testing whether a plan is justified the NPPF identifies that the plan should be the most appropriate strategy when considered against reasonable alternatives and based on proportionate evidence. 3.2 The site allocation seeks <b>‘comprehensive redevelopment.... for employment-led mixed use development with residential’</b> . It goes on to clarify that a coordinated approach to development will be expected. Workspace has prepared an illustrative masterplan to demonstrate how the area could be comprehensively redeveloped and to show that the detailed proposals on Workspace land will not fetter or prejudice the redevelopment of the wider allocation and adjoining allocations (namely SA18 and SA20). Workspace welcome acknowledgement that land parcels may come forward separately provided that they are compatible and result in a coherent redevelopment. It is considered that this approach to	At present site allocation SA19 only includes land to the east of Western Road. Workspace considers that the land to the west of Western Road (Quicksilver Place) should also be included within SA19 as this land falls within the Cultural Quarter, represents an opportunity for further improvement and increase of employment floorspace and will be an integral part of the forthcoming planning application proposals on Workspace land. It would be justifiable in the context of the strategy for the regeneration and growth of the area to allocate this additional land for redevelopment as part of SA19.	The site to the west of Western Road is also allocated under Site Allocation SA25. The Council maintains that each allocation has a distinct role to play, in providing the right type of uses, to achieve sustainable development and regeneration objectives across the area as a whole. Each site must therefore seek to deliver, in accordance with the allocation, the uses proposed on that site. Only in exceptional circumstances would off-site delivery be considered appropriate (i.e. where it can be demonstrated that off-site provision would result insignificant beneficial gain). Such an approach however, would require consideration of the site development <b>potential off the ‘off-site’</b> site to be assessed in the first instance, and this to

				<p>the redevelopment of the area is justified and appropriate.</p>	<p>The site allocation refers to the Wood Green Cultural Quarter <b>and encourages 'Uses that positively support enhancement of the cultural quarter'.</b> However, 'cultural quarter' is not defined in the document and a list of uses appropriate to a cultural quarter is not provided. Without this clarification it is not possible to say whether such uses are justified.</p> <p>The redevelopment of the Chocolate Factory site is complex, not least as it involves the retention and refurbishment of the original Chocolate Factory building, provision of high quality public realm and remediation works <b>owing to the site's</b> industrial past. It is also located adjacent to a conservation area and careful consideration will need to be given to</p>	<p>be accounted for across both sites.</p> <p>Cultural Quarter is defined in the London Plan.</p> <p>The Council acknowledges that a mixed use development may be required to help achieve the intensification of employment outcomes from this designated employment site. This is recognised through the designation as an Local Employment Area – Regeneration Area. The optimum capacity of the site will be determined by through a design-led approach in accordance with Policy DM1, having regard to the indicative capacities set out in the <b>site's allocation which</b> accord with capacities set out in the London Plan.</p> <p>No change</p>
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						<p>the impact on character in this regard. Owing to this, viability will be a key consideration in developing the proposals for the site. The strategy for the site should therefore provide for a mix of uses including <b>'higher value' uses such as</b> residential to allow for enhanced employment provision and the site-specific requirements. In our view, the site allocation should be updated to encourage the quantum of residential and other appropriate uses required to achieve this rather than seeking to <b>limit it to 'some residential' as</b> currently worded.</p>	
9	RSA45	SA19	Not stated	Not stated	<p>In testing whether the policy is effective, we suggest that the test is whether the wording of the site allocation is sufficiently flexible and the level of prescription appropriate to allow the site to be delivered within the timescales envisaged.</p>	<p>The benefit of connecting to a decentralised energy network is recognised. There is not currently a network in place within the local area. Should one become available the aspiration would be</p>	<p>The policy test for effectiveness is set out in the NPPF and is whether what is proposed is <b>'deliverable' not whether the wording is 'flexible'</b>.</p> <p>Any unforeseen issues will be an exceptional site</p>

				<p>4.2 Whilst, in our view, the level of prescription is appropriate and assists in outlining the vision for the area, we consider that additional flexibility could be embedded within policy wording to account for, inter alia, unforeseen issues and changes to market demand. For example, we support the retention of the Chocolate Factory and Workspace is committed to securing its long-term future. There are no known structural issues with the original buildings. However, should these be discovered, it may no longer be viable or feasible to retain the building. The policy should allow for such circumstances.</p> <p>4.3 Additionally, Workspace is committed to providing employment space where viable. Workspace has concerns with the provision of capped commercial rents both in policy SA19 and the Development Management policy DM38 (separate representations have been prepared addressing DM matters). There is no supporting evidence looking at viability and we consider that its inclusion goes beyond the spectrum of planning and would be particularly hard to enforce. It is noted that draft Policy</p>	<p>to connect to this. However, it is not considered reasonable to seek land owners to relinquish part of the site to provide an easement for such a network, nor in our view should this be necessary. We consider this element of the site allocation is overly prescriptive and should be omitted.</p>	<p>circumstance, and will be a material consideration.</p> <p>The site is currently designed for employment use, and the allocation for mixed use provision seeks an intensification of employment use. It is noted that capped commercial rents will have an impact on viability, but it is also noted that they will help to ensure long term viability of businesses in the borough helping to deliver sustainable development.</p> <p>Capped rents are not considered to be outside the scope of the Local Plan is required to help meet local business needs and economic regeneration of an area of the Borough.</p> <p>The redevelopment of the site is predicated on it helping to achieve the wider regeneration of the Wood Green Area, this includes provision of a cycle/pedestrian crossing</p>
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				<p>DM38(c) (iv) gives consideration to viability when determining affordable rents. Workspace requests that at a minimum viability matters should be expressly noted in the site allocation. If LBH seek to minimise rental income, this will be to the detriment of the type employment space that Workspace deliver and would create unnecessary uncertainty.</p> <p>Workspace supports the provision of a dedicated cycle and pedestrian crossing of Western Road as envisaged in SA19. The site allocation states that this will be secured through development contributions. Haringey has an adopted Community Infrastructure Levy ('CIL') Charging Schedule (2014) which generates funds to support the delivery of infrastructure in the borough. The updated Infrastructure Delivery Plan (2013) ('IDP') which supports the local CIL includes projects such as transport and highway safety improvements, and the 'Heartlands east-west cycle route' (see Table 4). By requiring development contributions alongside local CIL, there is a risk</p>	<p>of Western Road to make the scheme acceptable in planning terms. As such, this is considered a requirement of the development and a development cost.</p> <p>The Council will continue to support the flexibility built into the development guideline governing decentralised energy infrastructure.</p> <p>No change</p>
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					<p>of ‘double charging’. The Council should ensure that this does not occur. Furthermore, by expressly requiring development contributions to one item, the site allocation appears to prioritise this above any other works that may be required. We suggest that the policy is reworded to clarify that this will be balanced against other funding priorities at the time. This recognises that priorities may change as the area evolves and allows for additional flexibility in this regard.</p>		
9	RSA46	SA8	Not stated	Not stated	<p>Workspace supports the broad principles of redevelopment included within draft policy SA8. In particular, the acceptance that all buildings on the Site can be demolished and that this is a suitable location for a tall building are welcome. Given the excellent existing PTAL and the likelihood of Crossrail 2 coming in the future, this is considered an important Site that can deliver a notable number of new homes and commercial space over the next plan period and in accordance with the growth strategies of LBH and the London Plan. Furthermore, this is a prominent site within Wood Green Town Centre and presents a key</p>	<p>The draft allocation should be amended to advise that the redevelopment of SA8 should not fetter or prejudice the future redevelopment of SA7 but that the development potential of SA7 does not need to be included in the masterplanning exercise.</p>	<p>Noted, however, this is an exceptional and unique circumstance as the Bus Garage is likely to remain on the neighbouring site with development potential being realised by bridging over the existing facility. As such, it is appropriate that the redevelopment of SA8 have regard to the likely future form of any redevelopment of SA7.</p> <p>No change</p>

					<p>opportunity to enhance the character, visual amenity and function of this part of the Town Centre.</p> <p>Notwithstanding the above, Workspace raises the following comments in respect of policy SA8:</p> <p>1) The draft site allocation requires a masterplan which includes consideration of the potential redevelopment of the Wood Green Bus Garage site. The Wood Green Bus Garage site is identified separately as draft Site Allocation SA7. Whilst there is merit in an illustrative masterplan to demonstrate how Site Allocation SA8 could come forward in a coordinated manner, it is not considered reasonable to require the masterplan to extend to an adjoining site allocation.</p>		
9	RSA47	SA8	Not stated	Not stated	<p>2) The Site is currently occupied by employment generating uses. The draft site allocation seeks to introduce town centre uses to the ground and first floor of any redevelopment proposal which could potentially include an element of employment. However, the <b>'Development Guidelines'</b> advise that a net loss of employment floorspace would trigger a financial contribution in</p>	<p>The requirements of Policy SP9 and the Planning Obligations SPD should be waived as a reduction in employment floorspace is in line with the <b>Council's development</b> aspirations for this key town centre site. At the very least they should be subject to viability.</p>	<p>The policy requirement is that the employment floorspace on this site be re-provided as part of any mixed use redevelopment. Provision is however made for retail and other town centre uses at ground and first floors, as well as replacement employment floorspace. The allocation also recognises that the</p>

					line with Policy SP9 and the Planning Obligations SPD. This approach is inconsistent. On one hand LBH is seeking to limit the re-provision of employment floorspace but on the other is seeking a financial contribution to compensate for any loss. It would be more appropriate to require a mix of uses suitable for the town centre location including the provision of employment and residential. This provides greater flexibility and would allow the allocation to adapt to changing market conditions, for example.		site lends itself to residential use. The balance between residential and replacement employment floorspace will likely be determined by issues of layout, bulk, mass, height and viability. If employment floorspace is lost, this will need to be compensated for through a financial obligation.  <b>Amend paragraph 2.28 to include 'replacement employment floorspace'</b>
9	RSA48	SA8	Not stated	Not stated	3) The draft allocation seeks a <b>'finer-grain street layout'</b> with north-south and east-west pedestrian links. The Site is relatively narrow which presents difficulties in delivering an appropriate quantum of development (responding to the excellent PTAL and appropriate density range as set out in the <b>London Plan</b> ) and a <b>'finer-grain street layout'</b> . The area is not typified by a fine-grain street layout and whilst there will be benefits to the north-south and east-west pedestrian links, the requirement a fine-grain street layout is considered neither practical nor	The requirement for a <b>'finer-grain street layout'</b> should be removed from the allocation	The Council considers that the site, which already has two streets accessing it, is large and would benefit from a finer grain street layout, than is currently present on site.  No change

					justified. Moreover, this level of prescription does not provide for a flexible or positively prepared policy.		
9	RSA49	SA8	Not stated	Not stated	4) The identification of the Site as suitable for a tall building is welcomed and the suggested location at the junction of Wood Green High Road and Station Road is agreed. It is likely that heights on the remainder of the Site will be lower but the approach to heights on the remainder of the Site should be design-led (responding to emerging Policy DM6) and take into consideration a range of factors including local character. In our view the allocation should not require a reduction in height. Rather, it should advise that heights should be justified in the context of local character.	In our view the allocation should not require a reduction in height. Rather, it should advise that heights should be justified in the context of local character	The entire redevelopment will need to accord to the other relevant policies of the Plan, including Policy DM1 (design-led approach) and DM6 (building heights). However, the provision of a landmark building on the corner of Wood Green High Road and Station Rd necessitates a stepping down in heights across the rest of the site, especially along Station Road in particular and this is a long linear frontage.  No change
9	RSA50	SA8	Not stated	Not stated	5) The draft allocation requires the provision of open space on the Site <b>that connects to a 'green chain'</b> . The merit of providing open space on the Site is acknowledged. However, the form and quantum would need to be carefully considered in the context of design, and balanced against other requirements of the allocation (e.g. fine-grain street layout, pedestrian	Not specifically stated	Noted.

					links and potential access to Site SA7).		
9	RSA51	SA8	Not stated	Not stated	6) The Development Guidelines suggest that consideration should be given to providing private courtyards 'fronting onto Station Road and Wood Green High Road'. The Station Road and Wood Green High Road sections of the Site are identified as primary frontages on the adopted Policies Map (2016). The provision of courtyards in the suggested locations would undermine the aspiration for active town centre frontages. Courtyards could be provided on upper floors but this would need to be considered in the context of the overall design approach. This level of prescription is not appropriate and directly conflicts with other aspirations of the draft allocation.	Not specifically stated	The Council considers that <b>the 'new private'</b> courtyards could work with town centre ground floor uses, providing relief from the traffic environment, whilst adding to the activity at street level. This would not conflict with the frontage designation but could work in tandem with it. It may also be suitable for commercial and or residential development on upper levels.  No change
9	RSA52	SA8	Not stated	Not stated	7) It is unclear from the draft wording as to whether access for bus stabling at the adjacent Site SA7 is expected to be delivered through Site SA8. This should be clarified. In the event that access to Site SA7 is envisaged through Site SA8, Workspace would strongly object to this. It would be unreasonable and unenforceable to require such access through this Site and could severely compromise its future	In the event that access to Site SA7 is envisaged through Site SA8, Workspace would strongly object to this.	Noted, however, this may be necessary to facilitate comprehensive development across both sites.  No change

					development. Access to SA7 should be provided from a suitable point to the north from a highway adjacent to that site.		
9	RSA53	SA8	Not stated	Not stated	8) The benefit of connecting to a decentralised energy network is recognised. There is not currently a network in place within the local area. Should one become available the aspiration would be to connect to this. However, it is not considered reasonable to seek land owners to relinquish part of the site to provide an easement for such a network, nor in our view should this be necessary.	We consider that this element of the site allocation is overly prescriptive and should be omitted.	The Council will continue to support the flexibility built into the development guideline governing decentralised energy infrastructure.  No change
9	RSA54	SA8	Not stated	Not stated	To summarise, the broad principles for redevelopment of the Site as outlined in the emerging site allocation SA8 are welcomed. However, the burden of requirements/ guidelines set out in the allocation (including the provision of a fine-grain street layout, pedestrian connections, open space and potential access to Site SA7) are likely to present difficulties in delivering an appropriate quantum of development and may impact on development viability. Moreover, several provisions are in direct conflict with one another (e.g. active town centre frontages and private courtyards, reduction in		The site is a large, well located site within the Metropolitan town centre. There is already a precedent of a tall building on the site and taller buildings both on and neighbouring the site. The Council is content that site requirements and guidelines are not burdensome but will help deliver a high quality mixed use development on the site that achieves the indicative development capacity set out.  No change

					<p>employment floorspace and a financial contribution to compensate for a loss of employment). Additional flexibility and a lesser degree of prescription should be embedded within the allocation to allow a high quality design-led and viable redevelopment.</p> <p>Workspace commit to working with London Borough Haringey and surrounding landowners to bring forward comprehensive redevelopment of SDA8 for both employment and residential purposes.</p>		
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**Respondent 10: Fiona Carson**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RSA55	SA20	No	Not stated	<p>In your plans you mention the Cultural Quarter many times. For the last 19 years I have been <b>part of that as a “creative” in Chocolate Factory One</b>. Today (4<sup>th</sup> March) I and 42 others lost our tenancies to the landlords Workspace because of an unrealistic rent hike and sleight of hand. Your failure to support and stand behind collage arts endeavours over the last 30 years to nurture this sector (which they have been totally committed to doing) is driving small business and artists out of the borough and out of London. I spent 40 years educating creatives in</p>	Not stated	<p>This representation does not relate to the Plan, but rather to a commercial decision by a landowner. While the Council is keen to secure an increase in creative workspace on this site, and to cap rents to levels local businesses and enterprises can afford, currently the Council has no influence over such matters. These are</p>

					East London and maintaining a vibrant art practice while doing so (in art collages and universities). I doubt in the future the next generation will be able to afford the housing or studio space to do so – they are moving to Amsterdam and taking their media skills with them. The creative industries have thrived in non-**** parts of London and contributed to their regeneration only to be priced out by developers and rapacious landlords. This <b>cannot be good for London’s position as a key player</b> in the creative industries without realistic rents and ownership of buildings the cultural quarter will not thrive.		however, certainly a consideration on redevelopment of the site in accordance with the site allocations and other relevant Local Plan policies.  No change
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Respondent 11: Billfinger GVA on behalf of Safestore Ltd

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
11	RSA56	SA20	No	Not stated	Overall, we welcome the Wood Green Cultural Quarter (East) site allocation designating the site for employment-led mixed use development with residential accommodation. However, we are of the opinion that the <b>bullet points outlined under the ‘Site requirements’ section are restrictive and</b> there is a lack of clarity with how the overall Cultural Quarter area could come forward for comprehensive re-development. As such, we have outlined our comments against the relevant bullet points of the proposed site allocation	Clarify who would co-ordinate the site wide masterplan	The Site requirements state that development proposals should be accompanied by a masterplan proposal. It is considered that this is clear, that when an applicant (i.e. the landowner, their agent or a developer) seeks consent for this allocation, that they will need to prepare a masterplan for the site addressing the

				<p>policy below;  <i>'Development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets this policy and does not compromise co-ordinated development on the other land parcels within the Allocation'</i></p> <p>The Site Allocations DPD does not specify who would co-ordinate the site wide masterplan and to date, Safestore as a significant landowner within the area has not participated nor been consulted on the preparation of any masterplan prepared by or for the LB Haringey. It is unclear who will bring forward the masterplan. If the Council intends to bring forward a masterplan for the area itself then Safestore would welcome the opportunity to engage pro-actively and collaboratively with the Council in this process.</p> <p>We appreciate that a Masterplan could be a very effective method to aid the delivery of the comprehensive re-development of the site, however it is essential that landowners such as Safestore have the opportunity to participate in its formation. As such, we suggest that additional clarification is added to this policy on how the Council will seek to deliver a Masterplan.</p> <p><i>'Development should follow the principles set out in any future Council-approved masterplan'</i></p>		<p>issues identified in the allocation, as well as other policy requirements as set out in the DMDPD.</p> <p>No change</p>
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					As outlined under the first bullet point the Site Allocations DPD does not specify who would co-ordinate the site wide masterplan. Safestore have not participated nor been consulted on the preparation of any masterplan prepared by or for the LB Haringey and would welcome the opportunity to become actively involved in this process.		
11	RSA57	SA20	No	Not stated	<p><i>'The aim of this allocation will be to increase employment use on this site. Some residential will be permitted to enable increases in employment floorspace and jobs creation in the area'</i></p> <p>Employment uses are the established land uses for this part of Wood Green. As such, we understand the proposals to increase employment use on the site to improve employment facilities and job creation for the benefit of the borough overall. However, we consider that the text, as drafted, is restrictive in nature and may not allow for the redevelopment opportunity of the site to be optimised.</p> <p>The NPPF states that Local Plans should be positively prepared, seeking opportunities to meet needs in their area. There is currently a clear growth agenda at a national and regional level seeking to optimise economic development, as well as housing. The NPPF sets an overarching emphasis on encouraging new development, ensuring it is not overburdened by the planning process, with a presumption in favour of</p>	Given the clear need for new housing, as well as employment facilities, we consider it restrictive to limit the residential development to only the quantum required to allow for the maximum employment floorspace. Rather, we consider that the policy should be more aspirational in order to deliver the optimum amount of commercial and	<p>The Council notes that the NPPF promotes growth of all forms of development, not just housing. The position set by the Council on employment led allocations, and non-allocated employment sites, is that it will approve schemes which come forward to bring new employment floorspace to Haringey which will support jobs growth. To enable this, in appropriate locations, such as the site in question, residential will be approved to sustain values to enable commercial floorspace. This is considered to be positively planning for sustainable growth.</p> <p>No change</p>

				<p>sustainable development at its heart.</p> <p>Redeveloping brownfield employment sites such as this one is considered sustainable development and in accordance with the NPPF.</p> <p>The London Plan outlines that a rigorous approach should be taken to industrial land management to ensure a sufficient stock of land and premises is retained to meet the needs of different types of industrial and related uses. Where compatible the London Plan states that the managed release of surplus industrial land should be undertaken especially to provide more housing in appropriate locations, but ensure a sufficient stock of land and premises is retained to meet the future needs of industrial and related uses in different parts of London.</p> <p>The proposed site allocation does not seek to extinguish the existing employment use, but re-provide enhanced employment floorspace enabled through the provision of residential development.</p> <p>The policy as drafted seeks to ensure that employment uses are maximised and would only allow for a limited amount of residential development which would be required to enable the commercial aspects of the scheme to come forward. However, this may not allow for the optimisation of the residential development as required by the NPPF and London Plan Policy 3.3.</p>	<p>residential development (or any other use considered acceptable as the uplift).</p>	
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					Given the clear need for new housing, as well as employment facilities, we consider it restrictive to limit the residential development to only the quantum required to allow for the maximum employment floorspace. Rather, we consider that the policy should be more aspirational in order to deliver the optimum amount of commercial and residential development (or any other use considered acceptable as the uplift). These comments also apply to emerging Policy DM38.		
11	RSA58	SA20	No	Not stated	<p><i>'Capped commercial rents will be expected in this area in line with Policy DM38'</i></p> <p><b>Draft Policy DM38: 'Employment-Led Regeneration' within the Development Management DPD (Pre-Submission Stage)</b> states that employment-led regeneration should provide demonstrable improvements <b>in the site's suitability for continued</b> employment and business use, having regard to the provision of an element of affordable workspace where viable. However, draft Policy DM38 does not make <b>any specific reference to "Capped Commercial Rents"</b> and therefore this reference within proposed SA20 is unclear.</p> <p>We previously submitted representations, on behalf of Safestore, in March 2015 to the Site Allocation (Regulation 18) Consultation. Our previous representations outlined that applying a blanket policy of capped</p>	We consider that Policy SA20, as drafted, should be expanded confirming that any capped commercial rents are subject to viability considerations.	All development proposals will be subject to viability consideration. It is accepted that the provision of affordable commercial rent will compete for scheme value with other factors such as affordable housing. The Council considers it is important to have a range of policy tools to ensure that a mix of affordable housing, and affordable commercial rents come forward in appropriate locations across the borough, to meet identified local employment and housing needs.

					<p>commercial rents in the area would be contrary to the London Plan unless it was subject to viability considerations.</p> <p><b>Within the Council’s response to the Regulation 18 consultation exercise it is stated that, “The Council is cognisant of the need for developments to be viable, and welcomes a range of approaches to delivering workspace that enables economic growth in Haringey”. In light of this response, and due to the lack of clarity regarding the policy position on ‘Capped Commercial Rents’, we consider that Policy SA20, as drafted, should be expanded confirming that any capped commercial rents are subject to viability considerations.</b></p> <p><b>Summary</b> Overall, Safestore supports the Wood Green Cultural Quarter site allocation designating the site for employment-led mixed use development with residential accommodation. However, we propose that <b>the ‘Site Requirements’ discussed in the bullet points above are amended as set out above.</b></p> <p>Safestore are keen to continue positively engaging with the Council throughout their review of the Local Plan and would welcome the opportunity to discuss this matter further.</p>		No change
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**Respondent 12: DP9 obo Oceanwave Estates Ltd**

ID	Rep	Allocation	Sound	Legally	Reason	Change	Council’s Comments
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	ID	/ Policy / Figure / Para		Compliant		Sought	/ Response
12	RSA59	SA 21	No response given	No response given	<p>We write on behalf of our client, Oceanwave Estates Ltd. in relation to Haringey's Local Plan Site Allocations DPD Pre-Submission Version (January 2016), with particular regard to site allocation reference SA21 (Clarendon Square Gateway).</p> <p>In March 2015 we responded to the 'Site Allocations DPD Consultation Document (February 2015)' which included SA26 (now renumbered as SA21). Our comments focused on the following two key items:</p> <p>1. The height should not be limited to seven storeys; instead the site should be promoted with a range of heights which acknowledge both existing and emerging developments; and</p> <p>2. The suitability of provision for light industry on this site was questioned; it was recommended that if Haringey wanted to create a new link between Wood Green and Clarendon Square, which included a legible streetscape, then uses such as A1/A3/A4 should also be included.</p>	Not stated	Noted.
12	RSA60	SA 21	No response given	No response given	<p>Having reviewed the SADPD Pre-Submission Version document, we note that the proposed allocation has been altered; height is no longer 'limited to 7 storeys'. Instead it states where buildings back onto residential properties on Hornsey Park Road they should carefully consider and respect the residential amenity. This is welcomed.</p>	Not stated	Noted.
12	RSA61	SA 21	No response	No response	<p>In addition, we note that the extent of the site allocation has been extended which has resulted</p>	Not stated	Noted.

			given	given	in an indicative development capacity of 195 residential units and 6,734sqm employment space to be provided on the site. This is greater <b>capacity than our client's initial assessment</b> of the site in which considered that 148 units could be provided on the site. The allocation for a greater number of residential units is therefore also welcomed and whilst we acknowledge the indicative provision of employment space to be provided, we still consider that the site should be a residential led mixed use development.		
12	RSA62	SA 21	No response given	No response given	In light of the above, we therefore support the continued allocation of Site SA21 (formerly SA26) for mixed use redevelopment. Our client is keen to bring forward proposals for the redevelopment of the site and welcomes the opportunity to work alongside Officers at Haringey to ensure that the overall vision for redevelopment of Wood Green is achieved.	Not stated	Noted.
12	RSA63	Wood Green AAP	No response given	No response given	Finally, the Wood Green Area Action Plan Issues and Options Document which is currently out for consultation until 20 March 2016, makes reference to Clarendon Square Gateway as site allocation SA26; this is the old allocation reference and so for consistency purposes, we would recommend that the reference is updated to SA21 as detailed within the Site Allocations DPD Consultation Document.	Wood Green AAP to make reference to SA21 and not the old SA26	Noted. The next iteration of the Wood Green AAP will take this into account – but it may be that a new site reference is required, reflecting any changes as a result of the more detailed AAP.

**Respondent 13: Quod on behalf of St. William**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RSA64	SA1	Not stated	Not stated	Excludes reference to the "Option Via Wood Green" Crossrail 2 option (Autumn 2015). This option should be included, and is an option that St William support.	Not specifically stated	<p>The Council supports the "option via Wood Green" however, at the time of publication, and submission, there had not been an announcement by TfL/DOT that this option has been approved.</p> <p>It is noted that the Wood Green AAP is going to refresh the allocation in this area, hopefully based on an updated commitment to Crossrail 2 serving Wood Green.</p> <p>No change</p>
13	RSA65	SA3 Fig 1.5 & Fig 1.8	Not stated	Not stated	Excludes Clarendon Gas Works. Given the permitted uses to the north of the site, and the emerging objectives of the Wood Green AAP, it may be prudent to extend the Wood Green Metropolitan Boundary to cover the north of the Clarendon Gas Works. Site allocation SA21: Clarendon Square Gateway directly to the east, for example, is included in the allocation.	Not specifically stated	<p>The Council does not believe that there is sufficient evidence to justify increasing the extent of Wood Green Metropolitan Town Centre.</p> <p>It is acknowledged that the emerging Wood Green AAP will go into more detail regarding what the uses on an enhanced link between Wood Green and Haringey Heartlands/Alexandra Palace will be, and offer an opportunity to alter town centre boundaries as necessary to reflect these.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
							No change
13	RSA66	Fig 2.3, Para 2.10-2.12	Not stated	Not stated	The identification of Wood Green as a Tall Building Growth Area and a location for tall buildings is supported. St William agrees that high rise buildings will mark the area as a location for people to visit, invest in, and navigate around. These urban regeneration objectives has been identified by CABE and English Heritage. Whilst paragraph 2.11 includes reference to “Penstock foot tunnel” as a suitable location for tall buildings “signalling the connection between Wood Green and Alexandra Park” we believe that this reference should include Clarendon Gas Works and be expanded to reference wayfinding to a new urban (employment). Tall buildings are defined in the Strategic Policies Local Plan as being buildings 10 storeys and over. Given the recent planning permission at Clarendon Gas Works we would expect this site to be referenced at Paragraph 2.11 certainly as the Haringey Potential Tall Buildings Locations Validation Study (2015) confirms that tall buildings up to 10 storeys high	We consider that the allocation should refer to the provision of tall buildings on site	<p>It is considered that the indicative tall building growth area map at Figure 2.3 of the document, when used in conjunction with DM6 of the DMDPD established an appropriate framework for analysing the suitability of tall buildings in Wood Green. The references in the UCS are examples of potentially suitable tall building locations, within the defined area, and the document acknowledges these.</p> <p>The extant permission is for ‘taller’ buildings but not for a tall building.</p> <p>It is acknowledged that the gas holders are tall, but the ability to see, in part, through them creates a noticeably different impact on <b>it’s surrounding urban realm</b> than a solid building of the same size would. Any proposals for the holders replacements will be based on the quality of design of the proposed development, not the height of the gasholders.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>(permission granted 21/03/12) have been approved at this site. It should also be noted that the Issues and Options Wood Green AAP states that <b>"The redundant gasholders on the Clarendon Road development site are also highly visible, and their removal may emphasise the need for a landmark or significant building in this location as a wayfinding device"</b>. Finally the Haringey Urban Character Study refers to the existing scale of the Gasholders as one of only 11 buildings in the borough of 39m (13 storeys) plus, and therefore the existing site contains defined tall buildings. Reference to Tall Buildings at Clarendon Gas Works appears an incorrect omission.</p> <p>6.7 We do consider that the allocation should refer to the provision of tall buildings on site, certainly in light of the scale of the existing gasholder, the extant permission for tall buildings, Paragraph 2.21 reference to the tall buildings cluster at the junction of Western and Coburg Roads, and the commentary within the Issues and Options Wood Green AAP. It should</p>		No change

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					be noted that the consented building heights for the majority of the site are significantly above those recommended at Page 156 of the 2015 Urban Character Study.		
13	RSA67	Para 2.19-2.21	Not stated	Not stated	The spirit of the text at Paragraph 2.19 to 2.21 is supported however the factual discrepancies need to be amended – 2012 not 2011 and 10 storeys not 9 storeys. St William <b>support the consideration that “It may be possible to add a tall buildings cluster at the junction of Western and Coburg Roads to mark the entrance to Wood Green from Alexandra Park and the west of the Borough” and would like to work with the Council to consider this detail further in respect of Clarendon Gas Works.</b>		<p>The Council are happy to amend the stated consent year and the 10 storey building height.</p> <p>It is considered that the indicative tall building growth area map at Figure 2.3 of the document, when used in conjunction with DM6 of the DMDPD established an appropriate framework for analysing the suitability of tall buildings in Wood Green. The references in the UCS are examples of potentially suitable tall building locations, within the defined area, and the document acknowledges these.</p> <p>No change</p>
13	RSA68	SA21	Not stated	Not stated	St William supports the redevelopment of this site as part of Wood Green Metropolitan Town Centre so long as it delivers the fundamental role of creating a new extended High Street to Wood Green and a gateway to Clarendon Road	We consider that the extension of the Metropolitan Town Centre boundary	Noted. However the Site Allocations does not promote a high-street typology for this site, but a mixed use development including employment. The connection through to Clarendon Square is required though.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					Gasworks. The site should importantly compliment site SA22.	along the northern edge of the site may be of benefit to deliver the objectives of bringing forward town centre uses in this location, and tying the site into Allocation SA21 Clarendon Square Gateway adjacent.	It is noted that the mix of uses will be reviewed in the emerging Wood Green AAP.  No change
13	RSA69	SA22	Not stated	Not stated	St William support the mixed use proposed site allocation, and reference to the extant planning permission. Given the scope to consider an alternative masterplan at this site, as previously discussed in these representations, it is considered that the site allocation be appropriately refreshed to ensure a deliverable alternative to the extant permission. St William support the <b>proposed allocation of "residential, employment, a new urban square,</b>	Education use should be removed from the proposed site allocation.	The need for additional primary school capacity has been identified in the Infrastructure Delivery Plan and in the Issues & Options draft of the Wood Green AAP.  No change

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					and improved linkages through the area” however question the inclusion of “education uses”. There is no evidence base to suggest that this use should be accommodated at this site, and therefore education use should be removed from the proposed site allocation.		
13	RSA70	SA22	Not stated	Not stated	<b>In respect of the ‘Site Requirements’</b> Allocation SA22 states that development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets the allocation policy and does not compromise co-ordinated development on the other land parcels within the Allocation. We accept that any future masterplan will need to be considered holistically both for this site, and adjacent sites, however we would not expect a separate masterplan to be adopted as a policy/planning brief, particularly given this allocation and the emerging AAP.	Not specifically stated	Noted. The intention is that the masterplan would support a planning application, showing how this site responds to its surroundings.  No change

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RSA71	SA22	Not stated	Not stated	Finally it is considered that this site comprises a Central location for the purposes of London Plan Table 3.2. Policy 3.4 of the London Plan requires development to optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the London Plan. Wood Green is defined as only one of a handful of Metropolitan Boroughs within London and is a Central location, namely an area with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of a Metropolitan town centre (Notes to Table 3.2). Clarendon Road Gas Works benefits from a current PTAL of 3-4 within this Central location, albeit this will increase with the arrival of Crossrail 2. The London Plan Table 3.2 would support a density range up to 1100hr/ha or 405u/ha in such locations subject to local context. We consider that this classification should be confirmed to cover the Clarendon Gas Works site.	Consider that a 'Central' classification should be confirmed to cover the Clarendon Gas Works site.	Central density assumptions have been made regarding the indicative site capacities of development in Wood Green. It is noted however, that these are indicative capacities assumptions, and developments will be considered on a case-by-case basis.
13	RSA72	SA24	Not	Not stated	The site lies adjacent to Olympia	This site be	It was not included in SA22 as

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
			stated		Trading Estate. It is located within a Local Employment Area: Wood Green Regeneration Area (unlike Clarendon Gas Works). The site <b>allocation seeks "new high density employment-led mixed use development with residential"</b> . In addition <b>"Capped commercial rents will be expected in this area in line with the Policy DM38" and the "The maximum quantum of employment floorspace feasible should be provided on this site."</b> The development guidelines recognise <b>that the site is "identified as potentially suitable for a tall building"</b> as part of the Coburg/Western Roads tall building cluster. St William supports this allocation. Should this site be included within the wider redevelopment of SA22, then it should be recognised that the land use objectives for this site could be consumed within the wider masterplan and visa versa.	included within the wider redevelopment of SA22	SA22 has an extant planning permission and therefore the allocation seeks to bring forward this additional parcel of land outside of that permission. Should St William acquire the land interest, the Council would support a planning application that included both SA22 and SA24 and could then recognise that the land use objectives for both sites could be met within the one overarching masterplan. At present however, it is appropriate that the sites remain in two allocations.  No change
13	RSA73	SA22	Not stated	Not stated	We are not convinced that the <b>"straightening" of the "existing kinks in Clarendon Road/Mary Neuner Way" is necessary either in urban design or highway design terms, and it seems an unnecessary requirement</b>	Requirement to straighten the existing kinks in Clarendon Road/Mary	At present the unnecessary <b>"shicane" along Mary Neuner Way</b> is significantly sub-optimal in highway and urban design terms, and should be replaced in any future development on the

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					which the extant permission does not deliver. This element should be deleted.	Neuner Way should be deleted	Clarendon Square work.  No change

Respondent 14: Chris Williams

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
14	RSA74	SA29	Not stated	Not stated	<p>It is correct that <b>the land may be toxic, and it is also not stable</b>. The site comprises artificial Victorian mounds and slopes, and there is subsidence in gardens and roads. (The Arena was apparently built on dumped material from railway excavations, and rubbish from potteries.). This is probably why current developments are lightweight and low-level.</p> <ul style="list-style-type: none"> <li>- It is likely that 9 stories is too high on this unstable land, and new buildings should be closer to the height of surrounding buildings.</li> <li>- Plans must take account of possible damage to exiting housing during and after building work. For example, excavations for basements, or large infrastructure, could create substance problems for existing buildings at the time or later.</li> </ul>	Not specifically stated	<p>Noted. Building heights are not prescribed in the allocation and the height of any new buildings will require assessment against policy DM6. This and the other matters raised are considered to be the detailed issues that will need to be addressed and managed through the planning application process.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
14	RSA75	SA29	Not stated	Not stated	<b>Mature trees in the Arena/St Anne's</b> Village development should be retained, and plans should be policed and enforced. These trees are part of the original Arena/slopes history, and <b>contribute to the 'village' personality.</b> They are probably holding together some very unstable ground. (As a result of the recent Hermitage Road development, mature trees were cut down, despite being marked for retention. I reported this to Haringey Planning, and no action was taken.)	Not specifically stated	Noted, Local Plan policy SP13 seeks to protect trees within the borough, especially those of high amenity value.  No change
14	RSA76	SA29	Not stated	Not stated	It is correct that there is <b>no need for a big car park</b> , as transport links are (potentially) very good. The present car park is a disaster, especially at weekends. However, the buses are often not as reliable as the schedules may suggest, because the Green Lanes traffic bottle-neck causes delays and bunching.	Not stated	Noted.
14	RSA77	SA29	Not stated	Not stated	The <b>public footpath rights of way</b> from Finsbury Park Avenue/St Annes village, to Green Lanes and the Overground station should be preserved. The housing area is essentially a large cul-de-sac, and these foot routes avoid large detours, and the likely overuse of cars to <b>"get anywhere"</b> .	Not specifically stated	Noted. Increased pedestrian permeability is supported by the Allocation.  Emergency access requirements will be considered through the masterplanning process. It is considered that access to Finsbury Park Avenue meets necessary

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>Plans should consider the <b>access of emergency vehicles</b> to the present St Anne's housing development, as there is currently only one narrow vehicle entrance (Finsbury Park Avenue), which is sometimes obstructed by poor parking. The existing flats are quite densely populated. The site is <b>surrounded (the 'slopes')</b> by long grass and bushes which is a fire hazard in summer.</p> <p>Development plans should take account of the <b>maintenance of the whole (new and present) site</b>. Currently St Anns is maintained by L&amp;Q Housing Association, and the service has been very poor for the past 20 years.</p>		standards however.  No change
14	RSA78	SA29	Not stated	Not stated	There is a mystery about <b>who owns the 'slopes'</b> - land running from the start of Finsbury Park Avenue, to Surrey gardens. L&Q deny responsibility, but cannot tell me who owns this, although I think L&Q sold it to the current owner. The result is lack of maintenance, dumping, and dangerous areas, e.g. when fences fall down exposing potential areas for rape and mugging, which make	Not stated	The allocation seeks to preserve and enhance this piece of land.  No change

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					women nervous. (There was a rape in this area in 2000.) Can the development plans investigate and embrace this land?		
14	RSA79	SA29	Not stated	Not stated	There has been a very impressive recent restoration of a building in Green lanes opposite the Arena/MacDonalds – <b>The Tramp restaurant</b> . (The owner was apparently a Greek refugee working in the original Arena, and squatting in this building. Decades later, having become very successful, he has returned and contributed a great deal to Green Lanes by funding this restoration.)The restoration is exemplary, and this building is nicely matched by the (less well-maintained) pub on the opposite corner. Can these two buildings become a core feature of the aesthetic of the new development, by being highlighted and inspiring good design? (In contrast, the shoddy new building opposite the Salisbury Hotel/pub, is	Not stated	It is considered that the existing buildings on the western side of Green Lanes will remain largely as they are. It is hoped that any potential traffic improvement will benefit the amenity of users of these buildings. The design of any new development should take its inspiration from high quality development surround it. This would accord with Policy DM1.  No change

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					poor and represents a missed opportunity to enhance Green Lanes.) Sorting this out is very welcome and, and well overdue!		
14	RSA80	SA30, SA31, SA32	Not stated	Not stated	<p>Increased housing will be welcome, but will put further stress on <b>parking in Hermitage Road</b>. The current on-pavement systems is poor, and does not leave room for pedestrians to pass one-another with a reasonable distance. Women point out that this could lead to harassment, and it makes opportunistic mugging easy. Wheelchairs and buggies etc often cannot pass, if hedges are overgrown.</p> <p>The <b>proposed footpath</b> from the Overground land into Finsbury Park Avenue (between 80-82) is interesting, but this needs to be planned with L&amp;Q</p>		<p>Impact on parking will be minimised through requiring maximum parking ratios. As this site has a high PTAL, parking for residents will be limited.</p> <p>It is noted that Hermitage Rd is already a Controlled Parking Zone. As such it would be possible to restrict new permits being given to occupants of the new site.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					Housing, and adjacent residents need to be consulted. The path could create security risks as the back gardens of houses will become vulnerable, and ways for residents to improve or maintain fencing need to be considered.		
14	RSA81	SA29	Not stated	Not stated	<p>Extra housing will put further pressure on transport. TfL should consider improvements to (the potentially large) <b>Manor House underground station</b>, particularly disability lifts, which would be easy to install. (These are few-and-far-between along this section of the line.) This would benefit everyone – this is the Kings Cross/St Pancras and Heathrow line. People struggling with large suitcases a common sight.</p> <p>There should be a <b>security assessment</b> for the whole site. There has been a rape and several killings on this development. An assessment should have happened as part of the Hermitage Road development, but it <b>did not</b>. The <b>'slopes'</b> nature of the site makes houses vulnerable, there have been burglaries resulting from neglect, and crime prevention police have noted the problems are caused by the surrounding wasteland. There is also</p>	Not specifically stated	<p>The Council would support improvements here, and note that the Piccadilly Line is being upgraded in terms of frequency and capacity of services. TfL have proposals to make more underground stations fully accessible but this is subject to financing proposals.</p> <p>Any proposal for the site will undergo scrutiny by the Met <b>Police's Secured</b> by Design officer to ensure that the proposal has regard to the safety of future users.</p> <p>Materials and detailed architectural design are matters for the planning application process.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>informal use of wasteland, including footpaths, gardening, and chickens. This is not necessarily bad, but needs proper planning and management. Problems on L&amp;Q land have been ignored. Following years of complaints, improvements are now promised, but should be coordinated between Haringey and L&amp;Q. Part of the solution may be to extend private gardens, so that some of the waste land comes into personal control.</p> <p>Can the aesthetic of the whole development reflect <b>the former 'potteries' history</b> of Green Lanes, e.g. good high quality brick buildings, tiles, and pottery chimney design. Pottery and kilns could be a cultural factor linking traditional London and the newer Turkish/central Asian communities. The kiln chimneys are remarkably like the Turkish bread ovens, and clay cooking pots. Other local history contributions include the use of the sports arena in the first UK Olympics, and the dog track having one of the first electro-magnetic "tote" computers. Perhaps the new shopping development could have art reflecting these factors, or museum</p>		

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					objects in display cases. (Photos exist. Local historians have more information.)		
14	RSA82	SA 33, 34, 35, 36	Yes	Not stated	No response	No response	No response.

**Respondent 15: Planware on behalf of McDonald's Restaurants Ltd**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
15	RSA 83	SA29	Not stated	Not stated	<p><b>Planware Ltd acts on behalf of McDonald's Restaurants Ltd. The McDonald's restaurant is located to the North West corner of the current development site at Arena Retail Park Haringey, to which the above policy relates. We have considered the above policy and supporting text with regard to the principles set out within the Framework and associated Local Plan. Local Plans should plan positively for development; be justified, effective and consistent with the Framework.</b></p> <p><b>Planning Policy</b>  <b>National Planning Policy Framework</b>  The National Planning Policy Framework 'forward' confirms that sustainable development is about positive growth, making economic, environmental and social progress for future generations.  The Policy is not consistent with para 19 and</p>	We cannot support this policy or the reconfiguration of the town centre Boundary to exclude the Arena Shopping Centre.	<p>The change in question sought not to reduce the overall quantum of activity, or indeed commercial floorspace on this site, but rather seeks to establish a new urban form along Green Lanes, creating a "High Street" frontage, rather than the set-back, car-dominated typology that exists at present.</p> <p>Currently there is a presumption that the creation of this new typology in the long term, will mean that the town centre boundary will shift to</p>

				<p>21 of the Framework. Para 19 states:</p> <p><i>‘Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.’</i></p> <p>Furthermore, para 157 highlights the guidelines to which Local Plans should be based on. These include:</p> <p><i>‘Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework.’</i></p> <p>It is considered the Policy is contradictive of the guidelines set out within the NPPF. Not only will the Policy disrupt the sustainable development of the town centre, but also act as an impediment to economic growth within the town Centre.</p> <p>No consideration has been given to the potential negative impact the policy may have on the local community, employment provision or to sustainability.</p> <p>The Planning System should contribute to building a strong and competitive economy ensuring it supports growth and innovation.</p> <p>In essence, an overriding presumption in favour of sustainable development is threaded throughout the NPPF and should be considered effectively in all Local Development Plans.</p> <p>Policy SP0: Presumption in favour of</p>		<p>reflect this. There is however no need for the town centre boundary to reduce to meet the aims of the policy. Indeed a range of activity being achieved “behind the High Rd”.</p> <p>We agree with the respondents that there is no need to reduce the overall amount of retail floorspace in Green Lanes District Centre. It is at present a very successful centre with low vacancy, and vibrant daytime, and evening economies. The Council would expect any proposal that comes forward on this site to further contribute to this.</p> <p><b>As such, and noting the co-ordinated responses from landowners on SA29, the Council will amend the Town Centre boundary on the proposed Policies Map, so that it matches that in the current Policies Map.</b></p>
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				<p>sustainable development states:  <i>'The Council will always work proactively with applicants to find solutions, which mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in Haringey.'</i>  Policy SP10: Town Centres states:</p> <p><i>'The Council will promote and encourage development of retail office, community, leisure, entertainment facilities, recreation uses, arts and cultural activities within its town centres according to the borough's town centre hierarchy. The district town centre of Green Lane will continue to be supported and strengthened as important shopping and service centres to meet people's day-to-day needs.'</i></p> <p>It is therefore considered Policy SA29 is contradictory of adopted Policy SP10, which does not support the retention of Green Lane District Centre. Arena Shopping Park contributes to economic vitality and viability for the town providing a variety of services for its residents. The Council have indicated in <b>Policy SP10 that they wish to</b> 'where possible secure development that improves the economic, social and environmental conditions in Haringey'; it is considered Policy SA29 is also contradictory of Policy SP0, as the removal of the Arena Shopping Park from the town centre will negatively impact its economic, social and environmental viability.</p>	
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					<p><b>Reasoned Justification</b></p> <p>Removing the Arena Shopping Centre from the town centre would lead to long term loss of economic prosperity and loss of a long term assured sustainable asset.</p> <p>Removing the retail park from within the town centre boundary will further disrupt the legibility and walkability of the town centre. Not only will the removal of the retail park from the town centre effect local residents, it will reduce the attractability of the centre, therefore causing a loss of appeal to the surrounding town thresholds.</p> <p>No consideration has been given to the viability of the Arena Shopping Centre and the potential negative impact the policy could have on the local community.</p> <p>We have demonstrated above that the policy is not consistent with National Planning Policy and contradicts Policy adopted in the Haringey Local Plan Strategic Policies (Adopted March 2013). The proposal does <b>not accord with the 'golden thread' running through the Framework</b> which seeks to build a strong competitive economy.</p> <p>In light of the above, we cannot support this policy or the reconfiguration of the town centre Boundary to exclude the Arena Shopping Centre.</p>		
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Respondent 16: CGMS on behalf of Provewell

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure / Para					
16	RSA 84	SA30	No	Not stated	ProveWell strongly objects to the designation of SA30: Arena Design Centre as a Local Employment Area: Regeneration Area. The site has no previous employment designation and no reasonable prospect of being used for employment purposes. The evidence base for the employment designation is unsound, unjustified, and as it fails to distinguish fundamental differences between the sites within the Haringey Warehouse district, is flawed.	Not specifically stated	The site at present has an existing Site Specific proposal stating its existing use as “ <b>industrial, live/work</b> ”, and a proposed use of “ <b>Employed led mixed use development</b> ”. As such, it is currently allocated for employment use, akin to a Regeneration Area, despite not being designated employment land. While it is noted that a number of the sites have become occupied by residential uses, the site is historically an industrial location, and still retains an element of employment use.  No change
16	RSA 85	SA30	No	Not stated	This site is not currently allocated as designated employment land within existing adopted Local Plan, including the Haringey UDP and Proposals Map 2006 and Core Strategy (2011). 4.3 Indeed Policy HSG 1, and UDP allocates Arena Business Centre as a Housing Site its. <b>Paragraph 4.9 states the housing sites “are considered suitable for housing”</b>  Further, the nature of the site has changed considerably between 2006 and 2016, as a significant proportion of the site now has an	Not specifically stated	The site at present has an existing Site Specific proposal stating its existing use as “ <b>industrial, live/work</b> ”, and a proposed use of “ <b>Employed led mixed use development</b> ”. As such, it is currently designated for employment use, despite not being a DEA. While it is noted that a number of the sites have become occupied by residential uses, the site is

					<p>established residential use. Only 10% of the site floorspace remains in employment use, with only 5 jobs as confirmed by our survey (Appendix E). Further details on the nature of the site at present are contained within our previous representations (see Appendix C).</p> <p>The Core Strategy Policy SP8 defines Local <b>Employment Areas as “local employment generating sites in the borough that need protection”</b>. The newly proposed designation of Arena Design Centre as an employment area therefore does not reflect this definition nor the purpose of LEAs in the Core Strategy, or the true nature of the site.</p>		<p>historically an industrial location, and still retains an element of employment use.</p> <p>The Council is proposing to allocate this site for a mix of employment and residential (including warehouse living) uses, and as such, the most appropriate designation for this site is Regeneration Area, as it is the only designation within SP8 that offers protection (and potential expansion) to employment uses, and permits residential.</p> <p>No change</p>
16	RSA 86	SA30	No	Not stated	<p><b>National Planning Policy on Employment Designations</b></p> <p>The proposed employment allocation at Arena Design Centre conflicts with paragraph 22 of the NPPF, which states: <i>“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.”</i></p> <p>Arena Design Centre is predominantly in lawful residential use currently with very limited employment use. Only Units D and E are in an employment use supporting 5 jobs, their leases come to an end in 2017 when they will be looking to relocate.</p>	Not specifically stated	<p>With regard to the stock, and existing uses on the site, the Council is not proposing a restrictive or overly protective allocation.</p> <p>The policy position put forward enables opportunities for redevelopment, where it can be demonstrated that the proposed use will deliver sustainable outcomes in terms of both existing residential communities, and the local economy.</p>

				<p>An assessment of lettability and demand for Units D and E at Arena Design Centre was undertaken in April 2015, by Currell Commercial surveyors (see appendix F). The letter concludes that the buildings are unlettable in their current state and less desirable than neighbouring units as a result of the conditions of accommodation and location. The letter concludes that the buildings are unlettable in their current state and less desirable than neighbouring units as a result of the conditions of accommodation and <b>location. The letter states that “even if the buildings could be refurbished to create high quality commercial space it will not be simple to secure a commercial occupier due to the off pitch location problematic access and mainly residential nature of the Arena Estate.”</b></p> <p>For these reasons it is evident Arena Design Centre has little prospect of being an employment site and therefore should not be constrained by an allocation that protects it long term. The current Consultation on the proposed changes to national planning policy proposes to amend paragraph 22 of the NPPF to further reduce restrictions on unviable and underused employment land, emphasising that this land should be released unless there is significant and compelling evidence to justify why such land should be retained for employment use. Clearly the allocation of Arena Design Centre for employment use does <b>not accord with the government’s aspirations</b> for such land, with no significant and</p>		<p>The Council does not expect that the current residual employment floorspace has a great deal of demand in the marketplace, but the Workspace viability study does set out that if new employment floorspace is provided in this location, that it can be filled. Furthermore, the good, and improving residential amenity in the area, may be of benefit in achieving this.</p> <p>The Council does not wish to simply protect old industrial units for industrial purposes in this area, but does wish to be proactive in setting a policy position which will permit mixed use development in the area.</p> <p>No change</p>
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					<p>compelling evidence justifying its retention.</p> <p>Also of relevance is the Appeal Decision for Appeal refs APP/Y5420/C/14/2212163 and APP/Y5420/C/14/2212166, dated 25th September 2014 (see Appendix G) at units on the neighbouring Eade Road site where the inspector considered that despite the allocation of the wider site as a LSIS, the premises were no longer suitable for business and no longer met the needs for modern industry should be released for more appropriate uses. Part of the justification for this the number of neighbouring residential units that had changed the character of the area.</p>		
16	RSA 87	SA30	No	Not stated	<p>Evidently, the allocation of the site does not reflect the character of the site, and is unjustified, given that there is little prospect of this allocation being realised.</p> <p>We have met with the Council and raised this issue on a number of occasions, listed below, yet this has not been taken into consideration through the development of the Local Plan:</p> <p><b>i. Representations to Haringey’s Local Plan, Site Allocations DPD Preferred Options and Development Management Policies DPD Preferred Options March 2015</b></p> <p>ii. Representations to Site Allocations DPD (Reg 18) Consultation Document March 2014</p> <p>iii. Meeting with Haringey Council officers to discuss the masterplanning of Eade Road and Arena Design Centre sites to inform representations to the Site Allocations DPD July 2014</p>	Not specifically stated	<p>The Council disagrees, and would cite the recent development of early masterplanning options as evidence that the landowner is engaging with the emerging policy framework.</p> <p>The Council has, and will continue to seek an appropriate balance of development and consolidation within the area, to produce balanced employment and residential outcomes for existing residents, and to help meet housing need.</p>

					<p>iv. Meeting with Haringey Council officers to discuss the mixed-use development potential of Eade Road and Arena Design Centre and the Site Allocations Preferred Options Document Consultation August 2014</p> <p>v. Meeting with Haringey Council officers to present typologies of various development options of the live/work concept for the masterplan and the viability of the proposed masterplan September 2014</p> <p>vi. Meeting with Haringey Council officers to present typologies of various development options of the live/work concept for the masterplan and the viability of the proposed masterplan September 2014</p>		No change
16	RSA 88	SA30	No	Not stated	<p>The Evidence Base documents used to inform the site designations include the Sustainability Appraisal (SA) of the Site Allocations DPD, the Haringey Employment Land Study Final Report 2015 and the Workspace Viability Assessment 2014. The SA sets out a systematic process of outlining and <b>G a set of “rules to establish suitable site uses.</b> Paragraph 10.2.5 states that:</p> <p><input checked="" type="checkbox"/> <i>A site is potentially suitable for <b>residential</b> development unless it is a Designated Employment Area (DEA: LSIS/EL/SIL)</i></p> <p><input checked="" type="checkbox"/> <i>A site is potentially suitable for <b>employment</b> development where it is a DEA, in a town centre, or where PTAL is good (4 or above).</i></p> <p>4.13 Table 10.1 of the Sustainability Appraisal sets out to identify potentially suitable sites based on this set of rules, and concludes that Arena Design Centre as a site that is</p>	<p>The site allocation for Arena Design Centre should be amended to solely a “<b>residential</b> allocation”</p>	<p>The Council commissioned the SA to examine the draft plan for potential sustainability impacts, not as an evidence document.</p> <p>The appropriate evidence documents to quote are the Employment Land Review, and the Workspace viability Assessment.</p> <p>As pointed out above, the Council considers this site to have an existing employment designation, but recognises that it is not a DEA. As such it was not assessed through the Employment Land Study (ELS). The designation is in</p>

				<p>□potentially suitable for housing, and not suitable for employment□ (see <b>Appendix H. Evidently, using the Council’s</b> own preferred methodology from the evidence base demonstrates that Arena Design Centre is not an appropriate location for employment, and is more suitable for residential development.</p> <p>4.14 On this basis, Arena Design Centre should be designated for residential development, as identified by the Sustainability Appraisal.</p> <p>The Site Allocations SA states in paragraph 14.8.5 that <i>PTAL is a key factor that has influenced the approach taken for particular sites. Generally, an increase in jobs is only sought on sites with a PTAL rating above 3 (i.e. accessible sites), whilst a decrease in jobs is only acceptable on sites with a PTAL rating of 3 or below. The SA then “notes” in paragraph 14.8.7 that the PTAL rating for Arena Design Centre is low, yet it fails to justify why this is considered to be an acceptable employment location regardless.</i></p> <p>Appendix A of the Haringey Employment Land Study 2015 shows a map of Defined Employment Areas (DEAS), and illustrates Arena Design Centre as being located within <b>DEA1 “Regeneration Area”</b>. However, the land area for DEA1 (1.6ha) clearly corresponds to Crusader Industrial Area only, and the analysis of DEA1 at paragraph 5.13-5.17 explicitly</p>	<p>part informed by the ELS however, having reference to the significant need to increase B1 floorspace in the borough.</p> <p>Work was commissioned in the form of the Workspace Viability Assessment to understand the range of potential outcomes for the site. This showed that with some cross subsidy from residential uses, commercial floorspace could be activated within this area.</p> <p>The policy additionally seeks to improve connectivity within and around the site through enabling the unblocking of the adjacent railway tunnel, and improving walking links through the area towards Manor House.</p> <p>No change</p>
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				<p>excludes Arena Design Centre. Therefore, whilst an in-depth analysis was carried out for the re-designation of Crusader Industrial Estate from LSIS to RA, no such examination was undertaken for Arena Design Centre. The proposed allocation of Arena Design Centre as LEA: RA has therefore not been tested by the evidence base, and is therefore flawed and unsound, and as such should be removed from an employment allocation.</p> <p><b>In addition the London Borough of Haringey’s Workspace Viability Assessment 2014 provides an analysis on Arena Design Centre, as a workspace cluster grouped with Arena, Crusader and Omega Industrial Estate. The assessment incorrectly states that Arena Design Centre is mainly used as offices, but recognises that “sections of Arena Business Centre have been in live/work for a long period, and a return to commercial use is not considered likely”. Given this recognition, the designation as an employment area is therefore contradictory, the substantial level of residential accommodation on the site (as highlighted above), has not been reflected in the designation. It should also be noted that the Workspace Viability Assessment concludes that Cluster 1 (where both sites are located) offers a good opportunity to provide new workspace with value achieved from cross subsidies from residential development, yet this analysis uses an assumed housing mix that does not correspond to the needs of the borough</b></p>		
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					For the reasons set out above together with previous representations, it is considered that the proposed employment designation at Arena Design Centre is flawed, as there is no sound justification for the designation of Arena Design Centre as an employment area within the evidence base. The site allocation for Arena Design Centre must therefore be <b>amended to solely a “residential allocation”</b> .		
16	RSA 89	SA30	No	Not stated	<p><b>Differentiation of Estates</b></p> <p>4.19 The Council negates the initial findings of the SA, and proceeds to select Arena Design Centre under the broad grouping of Haringey Warehouse District, to establish an alternative use for the wider site. This method of grouping the individual sites within the area ignores the individual characteristics of each site, failing to distinguish key differences between the sites. It fails to recognise that Arena Design Centre is a predominantly residential area, with approximately 275 residents living on site, and has only two commercial units employing 5 people.</p> <p>In contrast, Crusader Industrial Estate directly to the south is solely in commercial use, and has good public transport links and parking provision.</p> <p>4.20 The methodology used in the SA simply provides two options to Haringey Warehouse District. Option 1- <b>“Allow a mix of uses including residential”</b> or Option 2- <b>“Maintain as employment, reflecting</b></p>	Not specifically stated	<p>It is considered that the Warehouse Living Policy (DM39) offers, through the requirement for masterplanning of sites within the Haringay Warehouse District, there is ample opportunity for site specific design consideration.</p> <p>The allocating of these sites as employment land within the Local Plan is proposed in order to protect the vulnerable uses (both employment and warehouse living) from being lost in favour of the strong local residential market.</p> <p>No change</p>

				<p><b>employment designation.” Considering Arena Design Centre is not an existing designated employment area, it clearly does not fit with this approach. Moreover, paragraph 14.8.10 of the SA states that “the plan is set to deliver on ambitious jobs growth targets through a focus on increasing the employment density at a range of existing employment sites” Arena Design Centre has not fully been taken into consideration, as there has been no justification or detailed recognition of Arena Design Centre becoming an allocated Employment Area.</b></p> <p>4.21 Furthermore, it should be noted that whilst site SA35: Land between Seven Sisters and Tewkesbury Roads is allocated within Haringey Warehouse District, it is not proposed as a Designated Employment Area accordingly allowing for a greater residential mix, to reflect the existing characteristics of the site. We consider that given the individual nature of Arena Design Centre, a similar methodology of approach should be applied to SA30.</p> <p>4.22 Clearly there are vast dissimilarities between the sites, within Haringey Warehouse District that are not acknowledged under the proposed LEA: RA designation. Policy needs to allow for the differentiation between estates to ensure that site allocation aspirations can reasonably and realistically be achieved, and ultimately Arena should not be included with the employment area designation.</p>		
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16	RSA 90	SA30	No	Not stated	ProveWell disagree with the methodology for calculating densities in the Appendix to the Site Allocations. (see Section 4 of response 1/6 for more details.	As outlined above and evidenced in Appendix K, the Overbury and Eade Road site has 226 existing lawful residential units, and as such this should be the minimum indicative figure for site redevelopment, as any lesser figure would result in the loss of housing in the borough.	The capacities included in the appendix are included to demonstrate that the development allocated in the Plan meets the overall need in the borough. Actual capacities will differ, and will depend on the design on each site.  No change
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**Respondent 17: Friends of Finsbury Park**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
17	RSA91	SA36	No	Not stated	We are grateful to Councillor Demirci and his	Not	1. The Council's

				<p>Planning Department colleagues for meeting with the Friends of Finsbury Park on Tuesday 13<sup>th</sup> October 2015 to discuss our concerns over this proposed development. We were very pleased to receive assurances from Councillor Demirci that the Site Allocations document had been amended to remove all areas of Finsbury Park, (i.e. including all Metropolitan Open Land (MOL) and Parkland Walk land), from inclusion in the proposed development.</p> <p>We were further heartened to receive undertakings from Councillor Demirci that, if the plan to redevelop the Rowans site were to go ahead, no part of Finsbury Park would, even temporarily, be used for access to, or as part of, any construction site. The Friends of Finsbury Park are concerned about the potential detrimental impact on Finsbury Park arising from any major redevelopment of this site. We consequently wish to formally OPPOSE the proposed development on the following grounds. (Our comments refer to the latest version of the plan)</p> <p>1. All reference to the height of the proposed buildings has been removed, <b>other than where you state that “taller buildings will be permitted on either side of the new entrance.....This site may be suitable for a tall building if designed in accordance with DM6”</b>. It is our view that any building higher than the low-level barrel-roofed Rowans would lead to a</p>	specifically stated	<p>evidence study sets that Finsbury Park station is a potentially suitable location for a tall building. Any proposals for a tall building within a suitable location will need to demonstrate that it will exhibit excellent design, and any negative externalities are appropriate, and appropriately managed and mitigated.</p> <p>The Council has removed prescriptive height limits from the document in favour of managing the heights of developments on a case-by-case basis, having regard to the specifics of each site and the requirements set out in Policy DM6.</p> <p>2. (and 3) There are no detailed plans of the proposed new entrance to the Park from Finsbury Park. While it is highly unlikely that the bus stopping areas outside the rail station will change, there is ample space on the site to create a high</p>
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				<p>loss of amenity to the users of Finsbury Park. A tall building on this site would dominate Finsbury Park. This is the only point on the entire perimeter of Finsbury Park where a building (Rowans) directly borders the park and the replacement of Rowans with any higher structure would clearly adversely affect the park. The markedly increased overshadowing resulting from such a development would be very detrimental to the park amenity and would seriously compromise options for full use of this area of the park.</p> <p>2. The new vaunted entrance to Finsbury Park is represented as some sort of ‘Champs de Finsbury’. In reality, it would, if the previous plan is anything to go by, be a narrow wind corridor which would predominantly serve as a service/access road to the proposed new buildings. The claim that it would provide an improved and more direct access to Finsbury Park from Finsbury Park Station would only be correct if it was very much wider and if TFL abandoned Station Place and it were turned into a pedestrian piazza. This is a wonderful prospect but clearly one that cannot be realised as TFL have made it clear that they will not be giving up Station Place and that they see it as essential to the smooth running of bus services from Finsbury Park Station. As this is likely to remain the case, the most direct pedestrian route into Finsbury Park</p>	<p>quality new public realm, which complements the Park successfully.</p> <p>4. It is noted that Rowans is valued locally. The Plan requires provision of a new leisure facility on the site.</p> <p>5. It is not agreed that Rowans makes a positive benefit to Finsbury Park at present. The current <b>building turns it’s back on</b> the Park, and contributes very little to enclosing the space within the Park.</p> <p>6. A construction statement setting out how these issues will be managed will be included with any application.</p> <p>7. As stated above, heights will be considered as designs come forward using DMDPD design policies. It is not considered illogical that height could be greatest proximate to the rail line.</p> <p>8. A tri-borough Finsbury Park SPD has been adopted by all of the three boroughs. Additionally, all consultation on the Local</p>
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					<p>from the Station is the existing one via the entrance adjacent to the cycle park. Access via the newly sighted entrance would require a longer walk. There is also a false impression created that, under the proposed development, a greener prospect would confront people as they exit the Station. In fact, the present tree canopy clearly visible above Rowans presents a much greener outlook than the one achieved once tall buildings blocked out most of the tree canopy and it was replaced with just a limited and narrow view at the end of the proposed new entrance. The artists impression (given with earlier designs for the site) seeks to enhance this view by miraculously removing the extensive metal canopy from the front of the station; a most unlikely prospect, and markedly exaggerating the width of the new entrance.</p> <p>3. The absence of a more detailed plan makes it very difficult to visualise what is proposed and therefore it is more difficult for us to make any detailed or fully informed comment on any design or overlooking issues.</p> <p>4. The loss of the Rowans leisure amenity (even if only during the construction phase) would be regrettable; particularly as Finsbury Park is lacking many such facilities.</p> <p>5. <b>Rowans is a 'Landmark' building which</b> (with its low barrel-roof) provides a</p>	<p>Plan have been carried out in accordance with the <b>Council's Statement of Community Involvement.</b></p> <p>No change</p>
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					<p>harmonious transition from the built environment to the Park environment. It does not significantly overshadow the Park or intrude sufficiently to have a seriously detrimental effect on the Park amenity.</p> <p>6. The noise, dust and pollution from construction vehicles immediately adjacent to the park would blight this end of Finsbury Park for its users for a lengthy period.</p> <p>7. <b>We wonder why the ‘stepping-down’</b> of height levels (under earlier drafts) was more marked toward Seven Sisters Road than where the proposed buildings would directly overlook the park. The impact of the buildings is clearly greatest where they meet the park perimeter.</p> <p>8. In an earlier draft of the Site Allocations Document we noted that the site was listed as not having attracted a significant number of responses. We wonder whether this is mainly attributable to the fact that there is very low awareness of this proposal among local communities. That the site is at the junction of three boroughs is clearly also a factor. The Tri-Borough Regeneration initiative started well, with presentations including representatives of all three boroughs. Unfortunately, this tri-borough approach was quickly abandoned and this must have had some impact on awareness and thus responses. At a recent meeting of the Finsbury Park Station Users Group, it</p>	
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					was clear that very few local people were aware of the proposed redevelopment of the Rowans site. We suggest that Haringey consults much more widely with Hackney and Islington residents to establish a better understanding of community feeling.		
17	RSA92	SA29	Not stated	Not stated	Our concerns here relate to the inclusion of the corner of Finsbury Park at the junction of Green Lanes and Endymion Road. Is this for a proposed new entrance? We have ourselves regularly proposed the creation of a new entrance gate near this junction. Why is Finsbury Park related in any way to the proposed Arena Park Development? We would robustly oppose any proposed loss of Finsbury Park Land (MOL) resulting from this proposal or any use of park land to facilitate the Arena development. Please can you confirm that there will be no loss of MOL.	Not specifically stated	There is no proposal for loss of MOL at this location. The proposal in this site allocation is to provide a new entrance to the Park at the north-eastern corner, to enable park users easy access to/from Harringay Green Lanes station. As and when a redevelopment of this site comes forward, the inclusion of this will ensure that opportunities to improve this access are not overlooked.  No change
17	RSA93	SA30	Not stated	Not stated	Our concerns here centre on the height and scale of the proposed development as it will be clearly visible from Finsbury Park. We would like to see some reference inserted <b>along the lines that 'Any proposed</b> development should consider the impact, in terms of height, scale and massing, on nearby Finsbury Park to ensure that the development does not adversely impact the amenity provided by this Metropolitan Open	We would like to see some reference inserted along the lines that <b>'Any</b> proposed development	Paragraph 7.56 of the London Plan states that MOL is to be treated equally as Green Belt. Paragraphs 79-92 of the NPPF outlines the five purposes of Green Belt: - to check the unrestricted sprawl of large built-up areas;

				<p><b>Land'. A development which harmonised with the height and mass of the recent nearby Jones Bros development would probably be acceptable. We are surprised that Finsbury Park is not mentioned under the 'Planning designations' section. Could 'Adjacent to Finsbury park which is Metropolitan Open Land', or something similar, be added please?</b></p> <p>Please provide clarification as to whether the London Plan includes any guidelines on the development of sites immediately adjacent to Parks.</p>	<p>should consider the impact, in terms of height, scale and massing, on nearby Finsbury Park to ensure that the development does not adversely impact the amenity provided by this Metropolitan Open Land'.</p>	<ul style="list-style-type: none"> <li>- to prevent neighbouring towns merging into one another;</li> <li>- to assist in safeguarding the countryside from encroachment;</li> <li>- to preserve the setting and special character of historic towns; and</li> <li>- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p>The principal requirements for development <u>within</u> Green Belt (MOL) are that it must preserve the openness of the Green Belt and does not conflict with the purposes of including land within it. There is nothing in the NPPF or London Plan that requires development adjacent to MOL to have regard to the amenity of MOL. The implication is that development can directly abut Green Belt without impacting on its purpose. The addition of the requirement suggested would therefore be at odds</p>
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							with Green Belt (MOL) policy. Given the above, the suggested addition to the 'planning designation' section would have little bearing on the future redevelopment of SA30.  No change
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Respondent 18: Susie Barson

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
18	RSA94	SA36	Yes	Yes	I am unhappy with a specific part of the site allocation part of the Local Plan. This is the Rowan's site at the sw corner of Finsbury Park. Rowan's is an historic building - an early cinema dating from the early 20th century and altered for various entertainment purposes. It now contains Rowan's famous bowling alley and rooms for hire above, some with the original plasterwork. The building is much used by locals and visitors. The site allocation proposes a tall building on the site, perhaps going up to 15 storeys. Rowan's is a designated community asset, and we should like to see it retained as such. A tall building in that tight space near the station would be out of place and overbearing. It would prevent views of the trees in the park. We	Not stated	Regarding the heritage value of the building, it is neither listed, nor locally listed, and additionally is considered to make a poor impression on the Park, when viewed from within the Park.  It is noted that Rowans is valued locally. The Plan requires provision of a new leisure facility on the site. Additionally the value associated <b>with Rowan's ACV status will be</b> taken into account at the time a planning application comes forward as a material consideration.  <b>The Council's evidence study sets</b> that Finsbury Park station is a potentially suitable location for a tall

					<p>already have two tall buildings going up at City North, which as a resident, I totally oppose, as it will have a negative visual impact on the low rise Victorian suburb that is Finsbury Park. They should not form a precedent for more new buildings in the area. We are in the process of setting up a Finsbury Park Neighbourhood Forum and preparing a Neighbourhood Plan, so will have ideas for the use or re-use of the Rowan's site which does not include a new tall building. We should like to engage with the council's planning department, and Councillors to work on something appropriate for this site.</p>		<p>building. Any proposals for a tall building within a suitable location will need to demonstrate that it will exhibit excellent design, and any negative externalities are appropriate, and appropriately managed and mitigated.</p> <p>The Council will of course engage with and assist with the establishment of a Finsbury Park Neighbourhood Forum.</p> <p>No change</p>
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**Respondent 19: CGMS obo Parkstock Ltd**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RSA95	SA3	No	Yes	<p>Policy SA3: Changes to Town Centre Boundaries</p> <p>Parkstock Ltd are the freeholders of both 10 Stroud Green Road and 269 – 271 <b>Seven Sister's Road located</b> within Finsbury Park.</p> <p>We are supportive of Policy SA3 and the proposed designation of Finsbury Park as a District</p>	<p>In order to make the Site Allocations DPD sound we recommend that the text and associated plans for Policy SA3 are aligned in terms of the use of terminology for town centre designations.</p> <p>We also recommend that the proposed secondary frontage at 236 to 271 Seven Sisters Road is instead proposed as a</p>	<p>The Council considers that the policy text and associated figures are clearly aligned with each figure stating the town centre designation, <b>with the exception that SA3 should be amended to state that the primary shopping areas are shown as</b></p>

				<p>Centre. We consider that it is important to secure Finsbury Park as a District Centre to both ensure consistency with adjoining boroughs but also to provide the required status of the Centre as an area where mixed use regeneration, in the most accessible and appropriate locations, is supported by the Council.</p> <p>However, we do not consider that the accompanying figures (1.6 – 1.10) are effective or clear. Figures 1.6 – 1.10 show a mixture of district and metropolitan centres, whilst all of these centres are shown as town centres on Figure 1.5. We think that this labelling is confusing and unhelpful, and therefore does not deliver an effective plan. Furthermore, Policy SA3 notes that primary shopping areas are shown yellow on the above figures, when this is not the case.</p> <p>Furthermore, within Figure 1.10 we are supportive of the primary frontage designation from the corner of Seven Sisters Road (no. 263) to 10 Stroud Green Road. We also note that a</p>	<p>primary frontage to ensure an effective strategy is delivered.</p>	<p><b>blue dotted areas and not yellow on the figures.</b></p> <p>The differentiation between primary and secondary is not to do with quantity of activity, or footfall, or development aspiration, it is concerned with the management of ground floor retail uses. It is considered that this frontage represents the start of the edge of the town centre, and not the primary shopping area within the centre.</p>
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					<p>secondary frontage is proposed along 236 to 271 Seven Sisters Road and along the new route proposed through the Finsbury Park Bowling Alley (SA36). Whilst we welcome these frontage designations we question why 263 to 271 is a secondary, rather than primary, frontage given the level of activity and footfall along this part of Seven Sisters Road. To deliver an effective strategy we consider that 263 to 271 should be a primary frontage to assist with the delivery of a vibrant and active district centre.</p>		
19	RSA96	SA 36	No	No	<p>SA36: Finsbury Park Bowling Alley</p> <p>Parkstock Ltd are the freeholders of both 10 Stroud Green Road and 269 – 271 <b>Seven Sister's</b> Road located within Finsbury Park. Overall we are supportive of SA36 which includes these sites.</p> <p>We have the following comments:</p> <p><b>Site Requirements:</b> the first bullet point includes the provision of a site wide masterplan to accompany</p>	<p>Please see modifications outlined in Section 5 above.</p> <p>(Council note: these have been repeated from comments in previous column).</p> <p>Site requirements (1<sup>st</sup> bullet) The policy should make it clear that individual applications for different parcels of land are appropriate in order to ensure a sound and effective plan.</p> <p>Site requirements (6<sup>th</sup> bullet) We consider policy should provide the flexibility to allow the provision of an appropriate</p>	<p>The purpose of including a requirement for a masterplan is to ensure that when an application for one land parcel on a site comes forward, others are not compromised. It is considered that stating that applications may come forward separately is redundant in this context.</p> <p><b>For clarity, reference to a new community facility will be removed from the Site</b></p>

				<p>development proposals, to demonstrate how proposals do not compromise other land parcels. Whilst we can understand the benefits of a masterplan approach and demonstrating how individual submissions would not compromise future proposals, it would not be appropriate for this policy to require one masterplan or submission to cover the whole site given the different land operations and ownership. Such an approach would hamper delivery and not be effective. The policy should make it clear that individual applications for different parcels of land are appropriate in order to ensure a sound and effective plan.</p> <p><b>Site Requirements:</b> the sixth bullet point notes that an appropriate leisure / community facility use to replace the <b>existing Rowan’s bowling alley</b> must be provided. In addition, the text within 2.105 under <b>‘commentary’</b> notes that a new leisure facility should be provided, but this text does not make reference to a community facility. It is important to ensure</p>	<p>leisure <b>or</b> community facility, depending on demand and commercial requirements. We therefore recommend that the text within 2.105 under <b>‘commentary’</b> is amended to state <b>‘a new leisure or community use ...’</b> to ensure the plan is sound and consistent.</p> <p>Site requirements (7<sup>th</sup> bullet) We recommend that the red line is amended to include the cycle facility to ensure the effective delivery of the policy objectives.</p> <p>Development guidelines - The wording of the 11th bullet point should therefore be changed to note that development <b>should ‘preserve or enhance’</b> the setting of the conservation area and registered park to ensure it is legally compliant.</p> <p>Indicative residential capacity - If this standard methodology is applied we consider that at the very least, to ensure the plan is sound, the explanation contained within Appendix 4 in terms of this approach should be stressed at the front end of</p>	<p><b>requirement.</b></p> <p>It is agreed that the <b>potential for a more comprehensive development exists if the cycle parking area is included within the development.</b></p> <p>It is agreed that the <b>11<sup>th</sup> bullet point under ‘Development Guideline should be amended to read ‘preserve or enhance’.</b></p> <p>The indicative capacity has been identified to show that the suite of sites in the Local Plan documents meet Local Plan needs over the plan period. Capacities on sites will inevitably differ from the indicative capacities, and will be identified through a detailed design-led process.</p>
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				<p>consistency so future requirements are clear. We consider policy should provide the flexibility to allow the provision of an appropriate leisure <b>or</b> community facility, depending on demand and commercial requirements. We therefore recommend that the text within 2.105 under <b>'commentary' is amended to state 'a new leisure or community use ...' to ensure the plan is sound and consistent.</b></p> <p><b>Site Requirements:</b> the seventh bullet point notes that the existing cycle parking facility will be replaced and enhanced. However, the red line on page 92 now excludes the cycle facility (the previous version of the plan included the cycle facility within the red line). We therefore question how the cycle facility can be effectively replaced and enhanced if it is not included within the site allocation. We therefore recommend that the red line is amended to include the cycle facility to ensure the effective delivery of the policy objectives.</p> <p><b>Development Guidelines:</b> the</p>	<p>the document so all readers are clear on the approach.</p> <p>In addition, a note should be <b>added to the 'indicative development capacity' table</b> on page 92 for SA36 which states that the development capacity, for both residential and town centre uses, is an indicative minimum to ensure consistency with Appendix 4 A.</p>	
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				<p>11th bullet point notes that new development should enhance the setting of the conservation area and the registered park. This is contrary to the Planning (Listed Buildings and Conservation Areas) Act 1900 which states that the character and appearance of conservation areas should be preserved or enhanced. The wording of the 11th bullet point should therefore be changed to note that development should <b>'preserve or enhance' the setting of the conservation area and registered park to ensure it is legally compliant.</b></p> <p><b>Indicative Residential Capacity:</b> the indicative net residential capacity notes 71 units for the site in totality. Through design studies we are of the opinion that between 80 – 150 residential units could be delivered on the Stroud Green Road site and between 20 – 40 residential units on 269 – 271 <b>Seven Sister's Road.</b></p> <p>We have reviewed Appendix 4 A: Methodology for Assessing the Capacity of Allocated Sites and note that for sites without</p>	
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				<p>planning permission or which are not subject to pre-application discussions, a standard methodology has been applied which assesses the site capacity. We note that paragraph 4.4 on page 174 indicates that the development capacity attributed to each site using this methodology is an indicative minimum, and not prescriptive, and that the number of dwellings that may be achieved will be determined by many considerations such as design and layout, the size and type of the units, relevant development management policy requirements, site constraints, scheme viability, the site area and the PTAL.</p> <p>Whilst we fully acknowledge the above we are concerned that the standard approach which has been applied could be misleading and ineffective, particularly since the text indicating that a standard approach has been taken, and that the targets are minimums, is included within an appendix. We are concerned that by only including minimum residential units within the site allocations,</p>		
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					<p>this will cause unrealistic expectations for future planning applications and the policies will not effectively maximise development or assist delivery.</p> <p>If this standard methodology is applied we consider that at the very least, to ensure the plan is sound, the explanation contained within Appendix 4 in terms of this approach should be stressed at the front end of the document so all readers are clear on the approach.</p> <p>In addition, a note should be added to the <b>'indicative development capacity' table</b> on page 92 for SA36 which states that the development capacity, for both residential and town centre uses, is an indicative minimum to ensure consistency with Appendix 4 A.</p>		
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**Respondent 20: Lloyd Gee**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
20	RSA97	SA 39 2.163	No	No	The consultation is a sham. Even doing this form is not at all user friendly and uses language that is not at all resident friendly. As someone who worked in local authority for 22 years, I am	The only way to make it compliant is to restart the	Consultation has been carried out in line with the relevant Local Planning regulations,

					struggling already. The consultation has failed to meet the Statement of Community Involvement on several counts. For example • By targeting consultation to make sure that relevant stakeholders are involved. • By ensuring the consultation methods used are appropriate in engaging affected parties. Also the stated process shows stakeholder involvement at an much earlier stage. There has been a major omission of stakeholder involvement with the proposal for the Professional Development Centre - none of the residents in Belmont Avenue that back on to the site have been informed. It is by chance that I saw a small notice tied to the railings outside the building. Apparently you carried out a public consultation on the four draft Local Plan documents in 2015. If this contained plans for the site adjacent to our properties, again we were totally missed out. This is unacceptable.	consultation ensuring that you do your duties to involve stakeholders.	<b>and the Council's</b> Statement of Community Involvement. The form used for the consultation is that set out by the Planning Inspectorate in their guidance to Local Planning Authorities and ensure all relevant information is provided at this formal stage in the plan-making process.  No change
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**Respondent 21: Sarah Wrightson**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
21	RSA98	SA39	Not stated	Not stated	I have noticed a printing error in your Site Allocations DPD pre-submission version Jan 2016. In the Highgate Section, the text on pp 100,101 has been transposed with that on pp102,103. This means that the maps SA 39 & 40 do not match the printed text. I feel sure that you will want to remedy this before Submission!	Correct the maps	It is accepted that the maps for SA39 and SA40 have been swapped over. This is a publishing error, and will be included for modification by the Inspector.

Respondent 22: Tony Rybacki BA MBA

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RSA99	SA38 – SA 45 & 2.108 to 2.128	No	Not stated	<p>The Highgate Site Allocations do not comply with <i>London Plan Policy 7.7 – Location and design of tall and large buildings</i> and are inconsistent with Haringey <i>Strategic Policy 11 – Tall Buildings</i>.</p> <p>Part E London Plan Policy 7.7: <b>“E) Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks.” Also: “7.25 Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline.”</b></p> <p>Historic England Advice Note 4 Tall Buildings: <b>“2.3 An up-to-date local plan based on a sound evidence base will contain enough detail to allow the significance of heritage assets to be assessed and to secure a commitment to high quality design (paragraphs 169-170). This will help local planning</b></p>	<p>a) The Site Allocations DPD should record on Page 96, in preface to Highgate Sites, that:</p> <p><b>“On London Plan Policy 7.7 Haringey Council is required within Local Plans to identify areas that are inappropriate for tall and large buildings. The Highgate Conservation Area is identified by this Local Plan as inappropriate for new tall and large buildings, these being buildings that are substantially taller than their surroundings which cause a significant change to the skyline.”</b></p>	<p>The relevant policy in this regard is DM6 of the DMDPD, which identifies areas which may be suitable for tall buildings – building over 30m (the equivalent of a 10 storey building). It is noted that Highgate is not included as a location suitable for a tall building. Large buildings are those that are two storeys higher than the surrounding building heights. It is not considered appropriate to identify locations within the <b>Borough for ‘Taller’ buildings as taller buildings are considered suitable across the entire borough, including within conservation areas, subject to meeting the criteria set out in Policy DM6.</b></p>

				<p>authorities to identify in local plans areas where tall buildings would not be appropriate because of their adverse impact <b>(paragraph 157)”</b></p> <p>The 2015 Preferred Options DPD set maximum heights of up to 7 storeys and would have produced buildings out of sympathy with the surrounding Conservation Area (eg, <b>Policy 7.8, London Plan; 132, NPPF</b>).</p> <p>In the revised Jan 2016 Site Allocations DPD, max height limits have been omitted for Highgate sites. The lack of limits will trigger applications for inappropriately sized apartment blocks. This expectation is justified by events and by supporting documents. Eg: The Council has approved a new seven-storey block at SA45 despite objections from local residents and stakeholders such as the Corporation of London</p> <p><b>The "Evidence Base" (2015</b> Highgate Urban Character Study - HUCS) proposes five, six, seven - and even 9-storey blocks at Highgate sites and claims it determines maximum building height limits for the Conservation Area.</p> <p>Sample :  <i>"At the Aylmer Road and Archway</i></p>		No change
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				<p><i>Road gyratory, there is opportunity to create a cluster of taller buildings as a way-finder into the neighbourhood and to create an attractive gateway. These should be seven to nine storeys in height”</i>  <i>p 215, HUCS</i></p> <p><b>This is not "evidence".</b> The target development outcomes in the Character Study conflict with Haringey/London Plan/NPPF policies on tall building location, heritage protection etc. Historic England Advice Note 4, Tall Buildings:</p> <p><b><i>“3.1 In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of the local plan. Techniques such as characterisation and building height studies provide evidence to support a local height definition for tall buildings and the identification of appropriate locations in local plans. This can be used to create clear core</i></b></p>	
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				<p><i>strategic policies, site allocations and development management policies, supported by supplementary planning advice where appropriate.”</i></p> <p>These sites’ appropriate scale and form has not been assessed, max local height definitions have not been set/supported. Inappropriate locations have not been identified as required (London Plan 7.7, E). London Plan Policy 7.8:</p> <p><b>“Heritage assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.”</b></p> <p>Haringey Strategic Policy SP11:</p> <p><b>“6.1.15 Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough and 3-4 storey development in its town centres. The exception is Wood Green town centre, where buildings within its core area range between 4-9 storeys</b></p> <p><b>6.1.16 The Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their</b></p>	
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					<p><b>neighbours”</b> And:  <b>6.1.18 The Council considers that currently only two areas, Haringey Heartlands/Wood Green and Tottenham Hale, have sites that may be suitable for some tall or large buildings... Elsewhere tall buildings are considered inappropriate to Haringey’s predominantly 2-3 storey residential suburban character.”</b>          Despite SP11, the Evidence Base and DPDs could provide a basis to allow tall/large buildings at the Highgate sites (as has already happened at SA45.)</p>		
22	RSA100	SA38	No	Not stated	<p><b>The Site Allocations DPD needs amendment to conform with London Plan Policies 7.17, 7.8 and NPPF 132 and Strategic Policies SP 11,12 &amp; 13</b> with regard to the following sites:</p> <p>SA38 is adjacent to Highgate Woods where existing development has intentionally preserved valuable historic open local views to/from Highgate Woods MOL</p> <p>Views from Archway Road, across SA38, toward Highgate Woods are not as far reaching. However, there are wide gaps between the sheds and this has preserved an open aspect. The views explain why the</p>	<p>The DPD needs amending so the Local Plan meets the requirements of the London Plan and the NPPF for the preservation of the Conservation Area &amp; the openness of the MOLs and for the appropriate location of tall buildings and to meet Strategic Policies 11, 12 &amp; 13:</p> <p>a) For SA38: Delete whole second paragraph under <b>“Development Guidelines”</b> heading and insert the following sentence:</p> <p><b><i>“The site is adjacent to Highgate Wood</i></b></p>	<p>The Council feel that the key issue regarding the interface between this site and Highgate Woods is ensuring that the amenity of users within the Woods is not overly compromised by the development, and this is referenced in the policy.</p> <p>Neither the NPPF or Policy 7.17 address development adjacent to Green Belt/MOL nor a requirement therein to preserve its openness. By</p>

				<p>143 bus stop is named “Highgate Wood”, not “Wellington Gyrotory”. Views should not be jeopardised by tucking new tall/large high-density blocks into an unsuitable location. The lack of DPD clarity about building scale, form and height limits in the Conservation Area results in uncertainty about the proposals’ impacts.</p>	<p><i>designated Metropolitan Open Land (MOL). To meet London Plan requirements and SP12/13 any development proposed must ensure the existing overall level of openness of the Highgate Wood MOL is maintained, viewing from and to Archway Road.”</i></p> <p>b) Add the following two new paragraphs below:</p> <p><i>“Half the total gross site space will be allocated to garden/green amenity space for occupant use - and to ensure that the existing overall level of openness of the Highgate Wood MOL is maintained, when viewing from and to Archway Road.</i></p> <p><i>The Site is on a Red Route with the highest recorded continuous pollution levels in Haringey and next to a busy, complex gyratory system with a high accident frequency and</i></p>	<p>inference, such consideration is not consistent with the purpose of MOL.</p> <p>It is not considered that the views from Archway Rd, as they are at present, are sufficiently valuable to protect, and indeed that redevelopment on this site could be of benefit to the character of the area.</p> <p>The suggested further additional paragraphs are considered onerous. The first paragraph is not in keeping with a design-led approach as advocated in the NPPF and provided for by Policy DM1. Parking standards will be set in line with Policy DM32 and the London Plan.</p> <p>No change</p>
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						<i>regular` traffic delays. Development at this Site will be car-free to help meet sustainability objectives.”</i>	
22	RSA101	SA43	No	Not stated	<p>SA43 is adjacent to Queens Wood MOL where the existing development at SA43 also allows outstanding historic open views both towards and from the Queens wood MOL.</p> <p>Inadequately specified constraints in the DPD will foster development adversely impacting the openness of the MOL and the existing character of the Conservation Area.</p> <p>Queens wood is:</p> <ul style="list-style-type: none"> <li>• known to have been present continuously since 1600</li> <li>• likely to have been present since prehistoric times</li> <li>• the most centrally placed ancient woodland in London (<i>Bevan 1998</i>)</li> </ul> <p><i>London Plan Policy 7.17 - Metropolitan Open Land</i>  <b>“A The Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL. AND: Planning decisions</b></p>	<p>Delete the fourth paragraph on page 109 under the “Site Requirements” heading and insert the following paragraphs instead:  <b>“The site is adjacent to Queens wood designated Metropolitan Open Land (MOL).  To meet London Plan requirements and SP12/13 any development proposed must ensure the existing level of openness of the Queens wood MOL is maintained, with no loss of existing views from and to Muswell Hill Road. No buildings will be permitted directly fronting Muswell Hill Road. No buildings will be permitted that protrude above the level of existing buildings or that reduce or impair existing views of the MOL from Muswell Hill</b></p>	<p>Neither the NPPF or Policy 7.17 address development adjacent to Green Belt/MOL nor a requirement therein to preserve its openness. By inference, such consideration is not consistent with the purpose of MOL.</p> <p>It is not considered that the views from Muswell Hill Rd, as they are at present across the site, are sufficiently valuable to protect, and indeed that redevelopment on this site could be of benefit to the character of the area.</p> <p>Height limits in the Site Allocations document have been removed in favour of a design-led approach as set out in Policy DM1 and the</p>

				<p><i><b>B The strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt.”</b></i></p> <p>Both sites provide important views towards, and out from, the wooded MOL. This openness is integral to <b>the area’s character</b> - a key aspect of the heritage asset to be preserved.</p> <p>The view from above SA 43 on the Muswell Hill Road provides a far-reaching <b>panorama</b> over Queen’s wood and beyond to Epping Forest and the Essex hills. The present view only survives because the whole of the existing Builders Merchants was constructed on the slope beneath Muswell Hill Road street level.</p> <p>Existing buildings are largely below ground level as far as public views and landscaping are concerned. It is of immeasurable benefit to the conservation area that there are no buildings on this site fronting Muswell Hill Road at street level.</p> <p>The 2015 Draft DPD was couched in terms of <b>“limiting”</b> development fronting Muswell Hill Road to four</p>	<p><i><b>Road, Summersby Road and South Close. New building heights will preferably be lower to enhance the Conservation Area. New buildings on the site shall occupy no greater overall area in total than the site buildings removed. Remaining unbuilt site space shall be allocated to garden/ amenity space for occupants’ use and to preserve the openness of the MOL. Development at this Site will be car-free to help meet sustainability objectives.”</b></i></p>	<p>policy criteria of Policy DM6 of the DMDPD. This, it is hoped, will give greater ability to determine applications based upon the site-specific issues on each site.</p> <p>The indicative capacities included in the appendix to the site are modelled on the site size and public transport access level. The actual number of units that can be delivered on the site will be determined through a design-led approach.</p> <p>The suggested <b>replacement ‘site requirements’</b> are considered onerous, especially as the current use of the site is as a building merchants, with limited buildings on site of very modest heights – lower even than the surrounding buildings.</p>
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				<p>stories. This would still annihilate the open views. It talked in terms of allowing seven storey blocks here without regard to the local context/impact.</p> <p>The present DPD now offers no intelligible constraints to insensitive redevelopment of SA43. Eg <b><i>“The impact of the development on the Queen’s Wood should be minimised”</i></b></p> <p><i>And:</i> <b><i>“It is considered that higher buildings would be more appropriate at the east and south ends of the site.”</i></b></p> <p>“Higher” than what? How “minimised”?</p> <p>The Local Plan should preserve the openness of the MOL and the fine views which have remained unspoilt for hundreds of years. This is a key part of what makes the area worth conserving.</p> <p><i>NPPF 132</i> <b><i>“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.”</i></b></p> <p><i>And:</i> <i>London Plan Policy 7.8</i> <b><i>“Heritage assets such as</i></b></p>		No change
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				<p><i>conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.”</i></p> <p>The Council says in SP12:  <b>“6.2.19 The Council will seek to protect locally important views that contribute to the interest and character of the borough. These may include:</b></p> <ul style="list-style-type: none"> <li>•<b>Views of and from large parks and open spaces.</b></li> <li>•<b>Views into, within and from Conservation Areas”</b></li> </ul> <p>Specific measures should be taken in the DPD to protect these views.</p> <p><b>How many units?</b>  The approved plan for SA45 allowed over 80 new residential units on a 0.5 Ha site. SA38 is almost twice this size. The Local Plan gives an indicative development capacity of only 72 units. SA 45 is virtually four times the size of SA 45: it has an indicative capacity of only 45 units. Are these definite limits or not?  If the DPD has not set definite limits to size, scale (or described development form) these “indicative” capacity figures will be</p>	
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				<p>subject to pressure. As there are no maximum site heights, why would approvals not be sought for six, seven or more-storey blocks? (As was seen with SA45).</p> <p>The 2015 Highgate Urban Character Study (“Evidence Base”) does not set “maximum building heights” for these sites to correspond with the existing site heights.</p> <p>If new development was proportional with the level permitted at SA45, the result would be around 165 units at SA38 and 320 units at SA43.</p> <p>The addition of 500 new homes to the area would have significant new resource impacts, from education to health to road safety. (Both SA38 and SA43 are located on busy main roads close to common junctions that jam up routinely; SA 38 is located on the most polluted road in Haringey.</p> <p>Crashmap.co.uk shows that the sites - particularly SA38 - are located at accident black spots.</p> <p>The future of these sites needs fuller explanation and planning.</p> <p>NPPF Guidance - Local Plans - Preparing a Local Plan (Paragraph: 006) says:</p> <p><b>“Where sites are proposed for allocation, sufficient detail should</b></p>	
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					<p><i>be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)”</i></p> <p>The required information re nature and scale is missing.</p>		
22	RSA102	SA44	No	Not stated	<p><b>The plan for SA44</b> in the Site Allocations DPD aims to squeeze an unspecified number of blocks into existing open space at the Hillcrest Estate – in an area already identified by Fig 6.4 of the Council’s Strategic Policies as an area of <i>Existing Open Space Deficiency (SP13)</i></p> <p><i>SP 13 says:</i></p> <p><b>“Developers will need to demonstrate ..How they will secure new open spaces and SINC’s, through identifying and securing funding to purchase and enhance such sites in areas of deficiency, such that there is a net increase in provision.”</b></p> <p>Despite this requirement, the Council’s plan and 2013 PRP consultants study actually proposes a <i>net reduction in provision of open space</i> at Hillcrest via the construction of up to three or more new blocks. Three years on, the plans remain unclear. The idea that this plan is a</p>	<p>The modification needed to achieve compliance with <b>The Council’s own Policies</b> is the deletion of SA44 in its entirety and all references to it within the DPD/Evidence Base.</p>	<p>The allocation seeks to make the best use of this publically-owned housing site, acknowledging that development may be possible, and that a master planned approach will be required to ensure that the most sustainable approach can be arrived at.</p> <p>Regarding the “communal garden land”, there are a number of estates with large landscaped areas across the borough (and London), which while valued by residents, can also accommodate new much needed housing. The Plan seeks to protect open spaces,</p>

					<p>legitimate use of “surplus” or “spare” land between the existing blocks on the Hillcrest estate does not stand scrutiny.</p> <p>The land is described by the Plan merely as “gaps” (page111, DPD). However, it has been in continuous use by residents for over sixty five years. It is communal garden and amenity space. Generations of estate children – and their friends from neighbouring streets - have played games and sports here. Its <b>“Current Use”</b> use is wrongly described by the DPD as <b>“Residential”</b> because this “site” is a <i>Communal Garden</i> (and used by the wider community’s children). Three private housing estates border the Hillcrest Estate - Southwood House Estate. Would they be permitted to build new 7-storey blocks in their communal gardens?</p> <p>The extent of new affordable housing units here is not stated by the DPD. Assuming 40%, on the <b>“indicative” numbers, perhaps 12</b> or so new small flats would be built on the gardens of the existing 200 or so residents. The equation fails to offer any worthwhile net benefit to the wider</p>		<p>particularly designated open spaces, while meeting the housing and employment needs of the borough’s residents.</p> <p>The issue of this site being publically owned is considered mute. If proposals were to come forward on privately owned sites, they would be determined in line with the policies in the Local Plan in the same way as Hillcrest.</p> <p>No change</p>
22	RSA103	SA39	No	Not stated	Site Allocation SA39 (Gonnerman and Goldsmiths Court) in the DPD	The following modifications should be	It is accepted that the maps for SA39 and

				<p>signally fails to point out that the main component of this site fronting the Archway Road consists of an <i>extant small Public Park, Coleridge Gardens...</i></p> <p>Although the existence of this park space goes unacknowledged, the DPD says:</p> <p><b><i>“The highest part of the site should be at the corner of Shepherd’s Hill and Archway Rd. Heights should drop off from this point to the allotments and the existing pub to the south.”</i></b></p> <p>It can only be concluded that Council wants to demolish and build over the Public Park. To replace it with a new, tall residential block. This would be in direct conflict with other policies:</p> <p><b>London Plan Policy 7.4 - Local Character</b> – this existing green space makes a strong and very important positive contribution to character of this place, marking the commencement of Shepherds Hill, the first break in the brickwork for miles heading north, an open green view of the junction and providing essential pedestrian relief from the traffic, noise, pollution and dangerously narrow pavements of Archway Road.</p> <p><b>London Plan Policy 7.5 – Public Realm</b> – This Plan appears intent</p>	<p>made:</p> <p><b>Re Diagram on page 100, Site Allocations DPD:</b></p> <p>a) The red ink boundary on Site Plan for SA 39 on page 100 of the Site Allocations DPD must be redrawn so the boundary of any intended development site clearly excludes the entirety of the extant Coleridge Gardens and does not include any other open public space (including any paved or asphalted seating areas).</p> <p>b) The boundaries between the remaining freeholds under different ownerships should be clearly demarcated on the plan, so:</p> <p><b>it is possible to</b> distinguish which land is private (separately label the Goldsmith Court and Gonnerman land areas) and which is in public ownership;</p> <p><b>the document can explain</b> what development is being considered on which</p>	<p><b>SA40 have been swapped over. This is a publishing error, and will be included for modification by the Inspector.</b></p> <p>The proposed amendments regarding height cannot be accepted.</p> <p><b>Gonnermann’s</b> in particular is a single storey building in a 2/3 storey area, so limiting heights to the existing is not appropriate.</p> <p>The Council believe it is appropriate that the Coleridge Gardens are considered with the developments site to ensure flexibility and to enable a more comprehensive development to take place. DM20 of the proposed Local Plan offers protection for open spaces such as Coleridge Gardens. Similarly, SP13 will need to be accorded with. It is considered</p>
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				<p>on obliterating one of this Road's scant green assets. The small Park is the only thing that prevents this from becoming just another faceless and dirty London A-road. The Park visually and acoustically softens and moderates what can at peak times be an exceptionally busy and extremely dangerous road junction. It deserves to retain every calming feature and green border it has had the luck to retain (against very slim odds) this far into the 21st Century.</p> <p>What is needed to make the Park even more beneficial for the many gardenless local flat dwellers to enjoy during the road's regular quiet periods (eg summer weekends and evenings) is its restoration, and reinstatement of the three missing wooden benches.</p> <p>This would help meet London Plan objectives:  <b><i>"7.16 The quality of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, public and private open spaces, and the buildings that frame those spaces, should</i></b></p>	<p>area/s of land – where are how many residential units being proposed.</p> <p>c) The text on page 100 should be amended to put beyond doubt that the site excludes Coleridge Gardens. Under the heading <b>"Commentary"</b> add the following end paragraph:</p> <p><b><i>"Coleridge Gardens, the existing Public Park between the Site and the Archway Road, will be retained and restored, with new flowers planted and public benches replaced and its asphalted pathways resurfaced."</i></b></p> <p>d) The text on page 101 under the heading "Development Guidelines" should be amended to delete the second paragraph in its entirety (since the Park will not be obliterated by an apartment block, it is redundant).</p> <p>e) The final para under</p>	<p>that this gives the Garden significant protection in the event of redevelopment.</p> <p>No change</p>
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				<p><i>contribute to the highest standards of comfort, security and ease of movement possible. This is particularly important in high density development (Policy 3.4). Open spaces include both green and civic spaces, both of which contribute to the provision of a high quality public realm".</i></p> <p>Policy 7.7 Location and design of tall and large buildings means SA38 is the wrong place to put a new block. Such buildings should <b>"only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building."</b></p> <p>The tall/large building design implicit within the DPD would obliterate the Park – and the feel and character of this junction, which has surprisingly retained a pleasant and open suburban character. It is sheer luck these few spare square feet of green and tree-lined space have not been allowed to become another struggling shop – or heavily polluted apartment block. (See also Policy 7.14 below).</p> <p><b>London Plan Policy 7.8 Heritage assets and archaeology</b> – The Council Plan has failed to give any reason why it should sweep up and</p>	<p>Development Guidelines" on heights to be deleted and the following inserted in its place:</p> <p><b>"The height of any new residential buildings proposed on either the Gonnerman or Goldsmiths Court land identified in the overall site called SA 39 shall not be materially greater than the height of any current building on each site area in order to preserve and protect the existing character of the Highgate Conservation Area."</b></p>	
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				<p>dispose of an existing Public Park – a heritage asset – within some third-party scheme/s. There is no justification or explanation how this action could serve the public interest.</p> <p><i>D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.</i></p> <p>This requirement is unmet as far as Coleridge Gardens is concerned since, if the Local Plan is not modified, this Public Park will cease to exist. NPPF 132 has bearing given the lack of any justification for its destruction:</p> <p><b><i>“132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”</i></b></p>	
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				<p>Furthermore:  <i>132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.</i></p> <p>Policy 7.14 Improving air quality –  The site is situated within an AQMA. The Council's own 2013 Air Quality Progress Report found  <i>"Monitoring results continue to show exceedences of the hourly NO2 objective along the A1/ Archway road location."</i></p> <p>Use of this site for residential purposes would not <i>"minimise the increased exposure (of its new occupants) to poor air quality"</i> as required by the London Plan. The exact opposite would occur; the <i>use of this site for residential would MAXIMIZE the exposure of occupants to poor air quality – with the worst measured results in the entire Borough</i>, found here on Archway Road. Furthermore, redevelopment of the Public Park would deprive the area of precisely the kind of <b>"buffer zone" space</b> that the London Plan advocates to help mitigate the air quality risks endured by present residents and local workers.  The proposal conflicts with the</p>	
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					<p>Council's own Strategic Policies as demonstrated by SP 13,  <b>"Protecting our open spaces":</b>  <b>"6.3.3 The Council will protect the borough's designated and other open spaces as well as other suitable land with the potential to be used as open space. Development will not be permitted on these open spaces, unless it is for limited small scale development ancillary to an existing use on the land and for which there is a demonstrable need.</b>  <i>The Council will only allow development on designated open spaces or sites adjacent to an open space that respects the size, form and use of that open space and does not detract from the overall openness and character of the site, the appearance and historical significance of the setting, or harms the public enjoyment."</i></p>		
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Respondent 23: N A Gonnermann

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
23	RSA104	Para 2.109	No	Yes	On page 96 under the sub-index para 2.109 the property is described as "Gonnermann	Correction required	It is accepted that the maps for SA39 and SA40 have been swapped over. This is a publishing error, and

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					Antiques Site" and listed as site SA40 and the "Former Highgate Rail Station" is listed as site SA39.		will be included for modification by the Inspector.
23	RSA105	SA39	No	Yes	On the map on page 100 the site shown and described as "Gonnermann Antiques and Goldsmith's Court" and is listed as site SA39.	Correction required	It is accepted that the maps for SA39 and SA40 have been swapped over. This is a publishing error, and will be included for modification by the Inspector.
23	RSA106	SA40	No	Yes	On the map on page 102 the site shown and described as "Former Highgate Rail Station" and is listed as site SA40.	Correction required	It is accepted that the maps for SA39 and SA40 have been swapped over. This is a publishing error, and will be included for modification by the Inspector.

#### Respondent 24: CBRE on behalf of Highgate School

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
24	RSA107	SA41	Yes	Yes	Page 104 of the Site Allocations DPD wrongly includes the terrace of cottages in Castle Yard as <b>part of the School's estate.</b>	The red line around Castle Yard on page 104 should be removed.	This information is noted, and it will be removed. Additionally, the map of P104 needs to be <b>"zoomed out" to identify both precincts of Highgate School.</b>

#### Respondent 25: Harington

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Para					
25	RSA108	SA 42	No response given	No response given	<p>The Harington Scheme wishes to comment only on the Site Allocations DPD – specifically on SA 42 covering the Highgate Bowl.</p> <p>We are pleased to note that the map now includes the whole of the site occupied by the Harington Scheme within the red line, i.e. the area to be defined as Significant Open Land. In the previous draft the central area where we have our main classroom and office buildings was excluded from the red-lined area. Can you please confirm that this means that you will not allow commercial or residential development on our site; but that you might be ready to grant planning permission for development to expand the existing horticultural/educational use provided such development complied with other planning policies e.g. on heights of buildings?</p> <p>If the SLOL were to be redefined to exclude the central area of our site, as in the previous consultation document, we would need to ask for additional protections for the activities of the Harington Scheme. For example, no development should be allowed that would have a detrimental effect on the Harington Scheme. We would also point out – in the light of comments by Savills on the draft Highgate Neighbourhood Plan – that the walled garden which is very much part of our</p>	Not specifically stated	<p>To clarify, the Plan now protects the non built-up part of the Bowl as SLOL from being developed for buildings.</p> <p>Development outside of the SLOL boundary will be subject to the remainder of the policy, although any development will be required to show how it retains the existing education/ horticulture use.</p> <p>The Walled Garden has been included in the SLOL, while the yards have not, giving them clear separation in planning terms.</p> <p>No change</p>

					operations is locally listed, was never part of “the yards”, and in our view should be forever preserved from residential or commercial development		
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Respondent 26: Savills on behalf of NHS Property Services

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
26	RSA109	SA42	Not stated	Not stated	<p>Land Uses</p> <p>Aside from identifying the draft Allocation as open space, which is discussed in greater depth below, the emerging policy also supports the principle of some residential development within the boundaries of the allocation, focussed towards Townsend and Duke's Head yards.</p> <p>Within the previous draft of the SA DPD (February 2015), there was support for residential development along the fringes of the allocation to provide circa 4,500sqm residential in total. To provide more flexibility and ensure that small scale, new residential development can be delivered on fringe location brownfield sites</p>	<p>On the basis of the comments made above, and in addition to the graphical modifications proposed at <b>Appendix 3</b>, the following modifications are proposed to ensure that the policy is sound and consistent with national, regional and local planning policy.</p> <p><i>Proposed Site Allocation</i></p> <p><i>Protection of the Highgate Bowl as open space, and improvement of public access <del>to it</del> through with limited residential redevelopment of Townsend and Duke's Head yards and at the built up area of The</i></p>	<p>The Council feels that the policy is appropriate in that it protects both the SLOL use of the horticultural use, and protects the redevelopment of the building which would compromise the horticultural/ education use. <b>The Council's view is that a development may be possible, but the horticultural/ educational use should be protected, including their need for indoor space during and after the construction.</b></p> <p><b>It is noted that the SLOL designation has not appeared on the published Policies Map. This is a publishing error, and will be recommended</b></p>

				<p>(other than on the two yards), these fringe locations should include the built up area of the NHSPS site.</p> <p>Accordingly, proposed revisions to the wording of the draft Allocation are proposed below. Flexibility is required within this policy wording in order to maximise the designation of suitable land for housing development in accordance <b>with the FALP's increasing housing target for Haringey and the NPPF's presumption</b> in favour of sustainable development.</p> <p>Significant Local Open Land These representations are in general support of the preservation and protection of the open space character of the Highgate Bowl, however concerns are raised about the designation and boundaries of the proposed Significant Local Open Land within the boundary of draft Allocation SA42.</p> <p>As raised below, SLOL is not one of the open space typologies identified within FALP Table 7.2, nor is an adequate definition provided</p>	<p><b><i>Harington Scheme site, as brownfield sites at fringe locations to the Bowl as identified on the site plan for SA42.</i></b> <i>Site Requirements</i></p> <p><i>The buildings facing the High Street, and their burgage plots should be retained.</i></p> <p><i>Highgate Bowl itself will be redefined as Significant Local Open Land.</i></p> <p><i>Limited redevelopment of the garages and workshops in the two yard areas <del>will be allowed</del> and at the built area of The Harington Scheme site to create a range of house types to include flats and mews-style residential development. This should not involve the loss of employment floorspace on the site.</i></p> <p><i>Enhanced access to the Bowl will be provided through the arch of Duke's Head Yard, and through Townsend Yard.</i></p> <p><i>Public routes through the various land parcels that make up the Bowl will</i></p>	<p><b>for inclusion as a modification.</b></p> <p>The SLOL extent will continue to include the Walled Garden, which is contiguous with the remainder of the open space, and is used by the same users.</p> <p>The Council do not feel it is necessary to add specific reference to new residential units being flatted rather than traditional houses. This is a detailed planning matter that will be dealt with upon receipt of a planning application.</p> <p>It is considered that the wording recommended in relation to access to the bowl is appropriate.</p> <p>Height limits have not been included in the publication version of the document. This is a conscious decision by the Council that the heights of new developments will be assessed against the relevant Local Plan policies,</p>
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				<p>in any adopted or emerging regional or local policy. There also does not appear to be any evidenced recommendation for the designation of a large part of the Bowl area as SLOL. Within the Preferred Options SA DPD, whilst the part of site that currently accommodates the buildings associated to THS was excluded from the SLOL designation, the walled garden, which is essentially a private garden with built footprint within it, and the grass verges on the southern side of the access road were included within the SLOL designation.</p> <p>Under the Pre-Submission draft SA DPD, such a boundary distinction is not made, with the text of the <b>policy stating that 'Highgate Bowl itself will be redefined as Significant Local Open Land'</b>. The map within draft Allocation SA42 removes the previous green boundary line that distinguished between the SLOL designation and the fringe areas of the bowl that may be suitable for</p>	<p><i>need to be introduced to unify the open space, <b>subject to the operational requirements of existing landowners and/or occupiers.</b></i></p> <p><i>The site lies within the Highgate Conservation Area and development should preserve or enhance its appearance as per the statutory requirements.</i></p> <p><i>Development Guidelines</i></p> <p><i>Where new development takes place, heights should be subsidiary to those on the High Street, <b>being generally up to 4 storeys following the precedent of "The Studio" site at Duke's Head Yard.</b></i></p> <p><i>Due to the proximity of public amenity offered by the newly designated open space, development can occupy most of the available space, reflecting a mews-typology <b>and flat-led schemes.</b></i></p> <p><i>The entrances to the yard roads should signal the open space behind, with a</i></p>	<p>including Policy DM6, when detailed proposals are received – enabling the circumstances of each site to be considered.</p> <p>All development will be subject to viability, and so it considered that adding reference to viability considerations into each site allocations would be superfluous.</p>
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				<p>modest development. The removal of this boundary is inconsistent with the second draft Neighbourhood Plan, which under its policy for Key Site 3 (Highgate Bowl) outlines a clear boundary demarking fringe areas for future development from the wider open land area of the Bowl that is to be protected. It is therefore suggested that the submission version of the SA DPD includes a clear definition of the boundaries of the SLOL and the developable fringe areas, in accordance with the emerging Neighbourhood Plan.</p> <p>As described under our previous representations, the built up area of the NHSPS site should be clearly removed from the SLOL designation. Notwithstanding the lack of definition of what constitutes SLOL, the walled garden (which is not available to the public) and the grass verges do not make the same contribution to the protection of open space as the main area within the Bowl and</p>	<p><i>visual link established where feasible.</i></p> <p><i>New users of the open space will be encouraged, while generally keeping it open for public use.</i></p> <p><i>Part of the site has a Local SINC designation, and this should be protected.</i></p> <p><i>Thames Water should be consulted with regards to <b>the</b> capacity of existing drains to move waste water from the site.</i></p> <p><i>Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition of planning consents.</i></p> <p><i>In line with policy SP9, if redevelopment results in a net loss of employment floorspace, it will be expected to be re-provided on site, where possible, or a financial compensation will be required as set out in the Planning Obligations SPD, <b>where viable.</b></i></p> <p><i>Studies should be undertaken to understand</i></p>	
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				<p>these should therefore be removed from the proposed designation.</p> <p>The difference in character and function of the built up area, walled garden and verges, in comparison to the wider areas of the NHSPS site within the Bowl area, is emphasised by the fact that in the first version of the draft SA DPD, published in January 2014, did not even include the built up area, walled garden and verges within the boundary of the draft Allocation, which was then known as HG4.</p> <p>On the basis of the comments made above, a revised map is included for draft Allocation SA42 at <b>Appendix 3</b> which indicates the altered boundary for the SLOL designation within the Bowl area, removing the fringe developable areas of the Bowl. No other changes have been made.</p> <p>Access Through the Bowl  One of the site requirements set out for draft Allocation <b>SA42 states that</b> “<i>public routes through the various land parcels that make up the</i></p>	<p><i>what potential contamination there is on the yards portion of the site prior to any development taking place.”</i></p>	
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					<p><i>Bowl will need to be introduced to unify the open space</i>". This includes access into the Bowl through the site via Cholmeley Park.</p> <p>Whilst these representations support the general principle of improving pedestrian and cyclist access through the Bowl area, acknowledging the benefits that this could provide to the wider area, the aspirations and operational requirements of THS or another suitable user will need to be taken into account. A permanent pedestrian and cycle through-route might have a significant effect on the character and security of the site for the continuation of the existing or new community use, if it were to run through the site. It is noted that these routes are no longer indicated on the site plan under draft Allocation SA42 and we are supportive of this.</p>		
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**Respondent 27: Highgate Neighbourhood Forum**

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Para					
27	RSA110	SA 44 / Policies map	No	Yes	<p>This site allocation (SA44 Hillcrest) is in potential conflict with the emerging Highgate Neighbourhood Plan Policy 0S3 (Local Green Space).</p> <p>Specific open spaces on Hillcrest, lying within the boundary of SA44 have been allocated in the HNP as Local Green Spaces in accordance with NPPF 76 and NPPF 77. This designation in the Highgate Neighbourhood Plan has been subject to an independent SEA, which finds that designation of these areas of Hillcrest as Local Green Space is the most appropriate strategy when considered against the alternative (designation as housing land).</p> <p>The designation of these areas on Hillcrest as Local Green Space is robustly supported by credible evidence to demonstrate that the designation meets each criteria of NPPF 77 (proximity, specialness and local significance)</p> <p>The allocation of the entire Hillcrest site as a potential site for new housing conflicts with the</p>	<p>Hillcrest (SA 44) should be deleted as a Housing allocation and put forward as a local green space allocation in conformity with Para 76 of the NPPF. As SA44 designated the whole of Hillcrest as a housing site, it is unclear whether the local green space designations (which are redlined in the neighbourhood plan) could co exist with the housing allocation. If SA44 is not deleted it should be modified to show the boundaries of the housing allocation, which should not encroach on the designated local green spaces.</p>	<p>The NPPF requires Neighbourhood Plans to be in conformity with strategic policies included in Local Plan documents.</p> <p>On this site there is a difference of opinion between the Neighbourhood Forum and the Council regarding how the site should be allocated.</p> <p><b>The Council's position is that</b> there is potential for the site to accommodate new residential development which will help to <b>meet the borough's housing need.</b></p> <p>As this site is in public ownership, it represents a particularly valuable opportunity to help deliver affordable housing outcomes in the borough, and it is considered deliverable for new housing to be delivered within the spaces between the existing buildings.</p> <p>It is noted that there is local opposition to development on the site, and that the Neighbourhood Forum are seeking to protect the existing</p>

					<p>local green space designation and is unsound in that it is:</p> <p>Unjustified: (It is not the most appropriate strategy when compared against reasonable alternatives)</p> <p>Inconsistent with National Policy: The plan does not, as required in Paragraph 76 of the NPPF, support the ability of local communities to designate areas of particular local importance as local green spaces.</p>		<p>open spaces on the site through the Neighbourhood Planning process. It is noted that a Neighbourhood Plan has been consulted on, but has not been examined, or adopted thus far.</p> <p>The Council is committed to seeking to achieve a housing outcome on the site, and will expect that the Neighbourhood Plan to conform to the strategy included in the Local Plan to achieve this.</p> <p>No change</p>
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#### Respondent 28: Hillcrest Residents Association

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
28	RSA111	SA 44	No	Yes	<p>We consider that the Haringey Local Plan Site Allocations DPD in its current form fails to meet some of the basic conditions and is unsound, for the following reasons</p> <p>- The inclusion of SA44 (Hillcrest) in the site allocations DPD is not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements (is not positively prepared)</p>	<p>The following offers suggested amendments, in order to help ensure that the plan is sound:</p> <p>Hillcrest (SA 44) should be deleted as a Housing allocation and put forward as a local green space allocation in conformity with Para</p>	<p>There are not at present any designated open spaces on this site. The Neighbourhood Plan-proposed open spaces are proposals, and have not been formally, published, examined, or adopted.</p> <p>The Council has objected to these proposed designated</p>

				<p>- SA44 is not the most appropriate strategy when considered against reasonable alternatives (is not justified)</p> <p>- SA44 is inconsistent with provisions of the NPPF (is not consistent with National Policy)</p> <p>The evidence for these conclusions is laid out below.</p> <p><b>The Plan is Not Positively Prepared</b> SA44 proposes the allocation of Hillcrest housing estate and the surrounding woodland as a potential site for new housing. The allocations says that the new buildings will be placed 'in the gaps that exist between the existing buildings.'</p> <p><b>The 'gaps' on the estate consist of</b> well-used amenity areas. One of these is an informal football pitch, supplied with goalposts and very heavily used for ball games. Additional housing on Hillcrest would almost certainly result in the loss of the informal football pitch. The impact of this loss on the health and wellbeing cannot be assessed as the council have not included in its evidence base a full open space strategy and playing pitch strategy. The existing open space and biodiversity study shows that Hillcrest (SA44) is in an area of deficiency for several</p>	<p>76 of the NPPF. As SA44 designated the whole of Hillcrest as a housing site, it is unclear whether the local green space designations (which are redlined in the neighbourhood plan) could co exist with the housing allocation. If SA44 is not deleted it should be modified to show the boundaries of the housing allocation, which should not encroach on the designated local green spaces and should not lead to the loss of designated or undesignated amenity/recreational green space.</p>	<p>open spaces, and as such there is a disagreement on this issue between the Neighbourhood Forum, and the Council in regard whether the parts of the site in question should be allocated with the potential for housing, or as open space. After consultation with the <b>Council's housing</b> enabling team, the Council as the landowner of the site continue to believe this is an opportunity to provide additional housing in the borough.</p> <p>The Council and the respondent are in agreement that the SINC area around the perimeter of the site should be preserved and enhanced. It is considered that it is appropriate that this part of the site is included so that any design is comprehensive and</p>
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				<p>categories of open space and play space, and the previous playing field study (Atkins 2008) revealed Hillcrest to be on the border of the area deficient in playing fields.</p> <p>Without an up to date playing field strategy the proposal to allocate an existing kick-about area for housing cannot be considered to be positively prepared. It is our understanding that Haringey is undertaking an open space and playing field study, but for the plan to be sound the evidence should come <i>before</i> the site allocations are made and not used to retrospectively support an allocation. The plan should be evidence led.</p> <p><b>The plan is not justified (does not provide the most appropriate strategy when considered against reasonable alternatives.)</b></p> <p>Site allocation SA44 in the Site allocations DPD is shown to include the whole of the Hillcrest Estate as well as the surrounding, SINC designated woodland. The site requirements say that the new buildings will be placed in the gaps between existing buildings on the site. The indicative capacity is given as 34 units.</p> <p><b>It must be presumed that the ‘gaps’ in</b></p>	<p>responds to the whole of the site.</p> <p>The kick-about area is <b>as stated ‘informal’ and</b> would therefore not appear in a playing pitch strategy. The area concerned is also not designated open space.</p> <p>It is noted that draft the Neighbourhood Plan seeks to protect the existing open spaces on the site. However, it is also noted that the Neighbourhood Plan has been consulted on, but has not been examined, or adopted thus far.</p> <p>The Council is committed to seeking to achieve a housing outcome on the site, and will expect that the Neighbourhood Plan to conform to the strategy included in the Local Plan to achieve this.</p> <p>No change</p>
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				<p>question include the estate amenity areas. These areas have been chosen by the local community (Highgate <b>Forum Area</b>) as a 'Local Green Space' in accordance with NPPF 76 and 77, this designation has been included as Policy OS3 in the emerging Highgate Neighbourhood Plan, which has been written in general conformity with the Strategic Policies of the emerging Local Plan.</p> <p>The neighbourhood plan and its Policy OS3 (Local Green Spaces) has been subject to an independent sustainability appraisal (AECOM 2016). The full appraisal can be read here:</p> <p><i>(Web-link included but has been removed for formatting reasons – see original response for full web-link).</i></p> <p>The appraisal determined the preferred option for Hillcrest to be allocated as Local Green Space:  <i>“Protecting the existing open and green space in the long term could lead to wide ranging benefits. Most significant are benefits to existing residents of the estate (which comprises social housing), but there are also notable benefits from a heritage and biodiversity perspective. As such, a policy to designate Local Green Space (Option 1) is the preferred</i></p>	
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				<p><i>option when considered in terms of the majority of sustainability objectives.”</i></p> <p>The evidence in support of the allocation as Local Green Space is <b>included in the ‘2<sup>nd</sup> Draft</b> for consultation (Dec 2015) of the Highgate Neighbourhood Plan and can be read here:</p> <p><i>(Web-link included but has been removed for formatting reasons – see original response for full web-link).</i></p> <p><b>The Plan is not Consistent with National Policy</b></p> <p>The NPPF requires that:  <i>76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them.</i></p> <p>The allocation of Hillcrest (SA44) for housing is not consistent with this policy.</p> <p>The NPPF requires that (155) <i>A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable</i></p>	
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					<p><i>development of the area, including those contained in any neighbourhood plans that have been made.</i></p> <p>Hillcrest is within the area of the Highgate Neighbourhood Forum (HNF). HNF contributed significantly to the previous draft of the Site Allocations DPD through the 'Call for Sites' process. The forum has worked hard with Haringey and Camden Councils <b>meet the borough's housing targets</b> while reflecting the vision for the area as laid out in the neighbourhood plan. Hillcrest was not included as a site by HNF because Hillcrest is not believed, by the forum, or the Highgate Community, to be a suitable site for sustainable development.</p>		
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**Respondent 29: Paul Secher**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
29	RSA112	SA45	Not stated	Not stated	I have recently moved into the area [Church Road/Talbot Road, Highgate N6] and have just read a notice informing me about consultation in relation to SA45 Highgate Magistrates Court site. The notice refers me to your site allocations document which I have now accessed online. I note	Not specifically stated	It is correct that some allocations in the Local Plan will have existing planning consents. This is perfectly normal. The reason for this is that planning permission is usually granted for a period of three years, after which it expires. The allocation would guide any alterations, or any new applications

					<p>that consultation is open until early March.</p> <p>However, I note that planning permission for the SA45 site has been granted and that development has already begun. I am therefore wondering what scope there may be for meaningful consultation with regard to the SA45 site? Perhaps you could advise me – or give me the name and telephone number of someone I can telephone so that I have a better understanding of the consultation process.</p>		<p>on this site, should the extant planning permission not be implemented.</p> <p>No change</p>
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**Respondent 30: Anne Bentham**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
30	RSA113	Site Allocations DPD: SA 43: Summersby RD/ Chapter 02: Para beginning at 2.123 and seq: Page 108 -109	No	No response given	I would question the soundness of the plan in relation to the requirement for a proper assessment of the site as it is now defined in the Site Allocation DPD pre-submission version 2016 following changes as a result of the previous consultation, and how this relates to the stated site requirements and development guidelines on page 109. Firstly, I note that although the development area is now smaller, there has been no change to the hectare size of the area, which is still 1.7 hectares. If the previous information was correct,	In the last section I set out some alternatives as it made more sense to do it there but as your form asks for it again in this section I will repeat them. 1. Alteration to include the correct size in hectares of the area of the development site. 2. Proposed Alterations to site requirements and guidelines as follows:-	<p><b>The size of the site will be updated in the document.</b></p> <p><b>It is considered appropriate that the residential properties on Summersby Rd are mentioned in the same comment as Muswell Hill Rd</b></p>

				<p>the size should now be 0.50 hectares as it was on the first 2013/14 map. This has significance in relation to how to the figure for the density of units that is considered appropriate for the size of the site is assessed. Secondly, in respect of the development that would be allowed on the site, the flats on Summersby Road are not afforded equivalent protection to that afforded the homes on Muswell Hill Road. As regards to the need to consider the amenity of neighbouring properties, the only neighbouring properties mentioned are specified as 28-36 Muswell Hill Rd, while the Summersby Road flats are excluded. To apply criteria to some neighboring properties but not to others, is not justified and does not fulfill the duty of the Local Plan to contain objectively set requirements. It could not be described as a sound plan if the effects of any development on neighbours are not given either appropriate or equal treatment. - This is what SA43 states now: “The site slopes significantly from west (high) to east (low). It is considered that higher buildings would be more appropriate at the east and south ends of the site. Development adjoining the properties at 28-36 Muswell Hill Rd should be designed with regard to the amenity of neighbouring properties”. - I suggest that a more reasonable and appropriate</p>	<p>a) This is what SA43 states now: “The site slopes significantly from west (high) to east (low). It is considered that higher buildings would be more appropriate at the east and south ends of the site. Development adjoining the properties at 28-36 Muswell Hill Rd should be designed with regard to the amenity of neighbouring properties”. I suggest that a more reasonable and appropriate alternative last sentence would be to state as a requirement that: “Development adjoining the properties at 28-36 Muswell Hill Rd and 33–44 Summersby Road, and across the narrow access road from the properties at 1 -33 Summersby Road, should be designed with regard to the amenity of these neighbouring</p>	<p>properties. Regarding light and “good neighbour” building, it is considered that all development will be appraised for these issues under policy DM1. This applies to all development in the borough.</p>
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				<p>alternative last sentence would be to <b>state: “Development adjoining the properties at 28-36 Muswell Hill Rd and 33–44 Summersby Road, and across the narrow access road from the properties at 1 -33 Summersby Road, should be designed with regard to the amenity of these neighbouring properties”.</b> <b>Thirdly,</b> a proper assessment of the site as it is in the Site Allocation DPD pre-submission version 2016, would show that it is the case that the site slopes down from west to east, but to say that the higher buildings would be more appropriate on the south end of the site is to ignore the significance of this for those who live in the blocks of flats on Summersby Road who are neighbours on that side. A more reasonable alternative would be to also include additional clauses under <b>the ‘site requirements’ and ‘development guidelines’ in relation to protecting the light of these neighbouring homes and what would be the appropriate style of ‘good neighbour building’ in this regard.</b> Fourthly, the site is accessible by road from Muswell Hill Road and only a small portion of it is accessible by way of Summersby Road. Summersby Road is narrow cul-de-sac, there are many families, some with children living in the <b>blocks of flats and there is a children’s playground (recently refurbished) at the</b></p>	<p><b>properties”.</b> <b>b) To include as a requirement clause protecting the light of these neighbouring homes and stating what would be the appropriate style of ‘good neighbour building’ in this regard.</b> c) To include a specific clause in the site requirements to ensure that any development does not affect the <b>resident’s use of their access road,</b> Summersby Rd. d) To include clauses under the development guidelines that any development should not compromise the appearance and setting of the existing surrounding buildings, and that development should not impact on the residential and neighbourhood amenity of the adjacent blocks.</p>	
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					<p>bottom. It is therefore, a vital artery of access to those who live there. Given these facts it would be appropriate to include a specific clause in the site requirements to ensure that any development does not affect the <b>resident's use of their access. Fifthly,</b> given the particular position of this site, i.e. in a Conservation area, partially surrounded by dense residential buildings, being blocks of flats on Summersby Road and South Close, which are all of a pre WWII character that sit well together architecturally, there are insufficient clauses under the site requirements and guidelines that recognise the peculiarities of this site and its spatial context. In this respect, it would be justified and not disproportionate to include clauses under the site requirements and development guidelines that any development should not compromise the appearance and setting of the existing surrounding buildings, and that development should not impact on the residential and neighbourhood amenity of the adjacent blocks. Such specific clauses have been included in the Site Allocation Document for other sites in the Highgate Neighbourhood area i.e. SA42 and 44.</p>		
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Respondent 31: Icen Projects obo Oakforest Properties Ltd

ID	Rep ID	Allocation	Sound	Legally	Reason	Change Sought	Council's Comments /
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		/ Policy / Figure / Para		Compliant			Response
31	RSA114	SA 47	No	Yes	<p>We write on behalf of Oakforest Properties Ltd the applicant for a planning application submitted on Land to the East of Cross Lane, Hornsey (HGY/2016/0086) for the <b>'erection of a part six storey, part seven storey development (plus basement parking) to create 79 residential dwellings and 1,274 sq m of flexible business (B1a) floorspace with associated access, landscaping, car parking and other infrastructure'</b>.</p> <p>This site is included in the emerging Site Allocations DPD under Policy SA47 – Cross Lane. We do not consider that the allocation is sound for the following reasons.</p> <p><b>Replacing existing floorspace</b> The policy proposes 1,386 sq m of employment floorspace on site and that <i>'the existing floorspace should be replaced within the development site'</i>. The proposal to ensure there is no net loss of employment space on site is not considered justified as it does not take account of the higher level of job creation from B1 floorspace in comparison to the B8 floorspace.</p>	<p>We recommend that the site allocation states that proposal seeks to deliver a significant increase of jobs on the existing proposal and the target level of employment space on site and the requirement to replace existing floorspace are removed.</p>	<p>The principal that this site allocation seeks to achieve is that the maximum amount of employment growth comes forward on the site. In return for that, the Council is willing to accept a level of residential development to cross subsidise the less viable use. While it is considered that replacement of the existing floorspace is a good starting benchmark, it is recognised that this may not be possible on all sites, notably larger office redevelopments. <b>To ensure consistency with other policies, the site requirement will be amended to require the maximum amount of employment floorspace deliverable on the site, as cross subsidised by a higher value use.</b></p> <p>The capacities quoted in the appendix to the Site Allocations document sets out a modelled capacity for</p>

				<p>The existing B8 units are not fully let and only support 13 full-time employees (FTE), however the proposed 1,274 employment space would deliver in excess of 150 FTE, despite the net loss of around 500 sq m of employment floorspace. In terms of developing an effective employment strategy for the site, we consider that this approach is of far greater economic value than re-providing floorspace that is proven to be unsuitable and poorly equipped to sustain jobs. Even if the units were fully let, which they are not, the proposal still equates to a very significant uplift of jobs on the site.</p> <p>The proposed policy allocation is not considered to be sound on the basis that it is neither justified nor appropriate</p> <p><b>Proposed residential units</b> The policy states that the indicative capacity of the site is 40 residential units. This figure is well below the proposed capacity on the site and we understand it was formulated without reference to the proposals for the site. No one within the project team was consulted on the figure that was used and we understand that officers within the</p>		<p>the site based only on its PTAL and site size. The capacity of the site once completed may well differ from that included in the Appendix, which is only to demonstrate that the allocations in the document can meet the overall housing need for the borough over the plan period.</p> <p>It should also be noted that the Planning application referred to has not yet been determined by the Council. It cannot and should not therefore form the basis for the development capacity of this site. Only once a planning permission has been granted should the application details form the basis of the allocation.</p>
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					<p>development management team working on the application site were not approached either.</p> <p>We therefore conclude that the indicative figure used in this policy is not based on a reliable assessment <b>of the site's capacity and cannot be</b> considered sound on the basis that it is not justified or based on a robust evidence base.</p> <p>We trust the above comments will be taken in to account within the submitted version of the plan and we would be happy to engage with plan makers to agree suitable and appropriate rewording of the allocation.</p>		
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**Respondent 32: Katharine Ward**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
32	RSA115	SA 48	No response given	No response given	If there is to be development of the above site, it should only be permitted if: (a) it is of limited scale - and in particular limited height - so as to be consistent with the fabric, and preserve the amenity, of the neighbouring residential streets (b) it is not of an intensity	As set out in the representation	It is considered that height and intensity issues will be addressed at the design stage using Policy DM1, having regard also to the planning permissions previously granted for the site, which although not implemented, set the precedent of what it considered acceptable development on this site.

					such as to result in unreasonable demands on local infrastructure, including parking and (c) it results in (at least) the replacement of green space lost with space of equivalent amenity		Regarding open space, SP13 and DM20 will ensure consideration of this issue will be given in determining any future applications.  No change
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**Respondent 33: Simon and Stephanie Puleston Jones**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
33	RSA116	SA 51	Not stated	Not stated	<p>Pursuant to the above, I write to provide you with our feedback on the proposed development of Cranwood Care Home and 102-116 Woodside Avenue, Muswell Hill N10 (reference: SA51).</p> <p>Our key concerns relate to increase in traffic, further problems for on-street parking in the surrounding streets, and the urgent need for a CPZ in Woodland Rise and neighbouring streets. The new buildings must also be low rise (no more than 5 storeys) in order to fit in with the local period housing.</p> <p>We live at and own 3</p>	<p>Accordingly, <b><u>it is imperative that there be at least one designated on-site parking space available for each unit of accommodation at Cranwood and that there also be adequate provision for visitor parking too</u></b>, so as to avoid a further increase in the demand for car parking in the area.</p> <p><b><u>We are also extremely supportive of any proposal to create a controlled parking zone for the benefit of residents in Woodland Rise, N10.</u></b> We understand that there will be a consultation on this in due course.</p>	<p>Concerns are noted. It is considered that Policy DM1 will ensure that the development is designed in such a way that is in keeping with the character of the surrounding area, including acceptable building heights.</p> <p>Parking standards will be provided in line with the London Plan. CPZ implementation is not an issue for the Local Plan.</p> <p>No change</p>

				<p>Woodland Rise, London N10 3UP, which is approximately 150 yards from the site of the Cranwood Care Home. As you will be aware, now that the St Luke's redevelopment has been approved by the council and is in the process of construction, there is already going to be a significant increase in the number of residents and, in particular, in the volume of car transport and demand for car parking spaces in the immediate area. As a part of the St Luke's consultation, we repeatedly expressed our concerns that insufficient consideration was being given to the impact on the availability of parking spaces, both for residents of the new development, for residents in the surrounding streets and their respective visitors.</p> <p>There is no CPZ in the surrounding roads of Woodland Rise, Woodland Gardens, Onslow Gardens or Cranley Gardens. The area is extremely popular already with those who are visiting Highgate Wood, the shops on</p>	<p>Finally, it is imperative that any new building be sympathetic to its surrounding environment of Edwardian terraced properties. To that end, the new buildings must be low rise and no more than 5 storeys in height.</p>	
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				<p>Muswell Hill Road/the Broadway and those from outside of London whom have discovered that those streets contain the nearest parking areas to Highgate underground station that are not subject to a residents parking scheme.</p> <p>Accordingly, we and our neighbours are already often finding it difficult to park within 150 yards of our front door on Woodland Rise. There are a number of families (including ours) with young children and disabilities, for whom this is a huge and unnecessary inconvenience.</p> <p>Whilst the number of new residences proposed for Cranwood is smaller than St Lukes, it will still have an impact on the local demand for parking and the absolute amount of traffic in area. It is not only the residents of the new development that will want to park in surrounding streets, but also their visitors. Accordingly, <u>it is imperative that there be at least one designated on-site parking</u></p>		
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					<p><u>space available for each unit of accommodation at Cranwood and that there also be adequate provision for visitor parking too</u>, so as to avoid a further increase in the demand for car parking in the area.</p> <p><u>We are also extremely supportive of any proposal to create a controlled parking zone for the benefit of residents in Woodland Rise, N10</u>. We understand that there will be a consultation on this in due course.</p> <p>Finally, it is imperative that any new building be sympathetic to its surrounding environment of Edwardian terraced properties. To that end, the new buildings must be low rise and no more than 5 storeys in height.</p>		
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**Respondent 34: North London Waste Authority**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
34	RSA117	SA4	Yes	Yes	North London Waste Authority notes that <b>'the waste sites identified in the</b>	No modification to this section	Noted. NB A minor modification is proposed to

					schedule below (Table 2 in the document) will be safeguarded for waste use until alternative provision <b>has been made.</b> The Reuse and Recycling Centres (RRCs) at Western Road and Park View Road which are managed by the Authority are contained in table 2. The specific notification of the protection afforded to waste sites is welcomed and the Authority supports the inclusion of section SA4.	considered necessary.	Table 2 to replace the licensed waste capacity with the maximum throughput capacity achieved to align with the baseline data underpinning the emerging North London Waste Plan.
34	RSA118	SA52	No	Yes	<p>North London Waste Authority supports the proposed planning designation for this site.</p> <p>However we remain concerned about the requirements to optimise pedestrian and cycling connectivity through the site as part of any new development, including from the existing estate on Alexandra Road to New Southgate station, which Crossrail 2 is proposed to be connected to.</p> <p>The site is not accessible at present to members of the public, (it is securely fenced off). Therefore, whilst we are pleased to see that a proposed route through the site has been removed from the site diagram in this version of the Site Allocations DPD the proposal that pedestrian and cycling connectivity through the site should</p>	<p>NLWA proposes that the development guidelines for the site SA52 be amended as follows (with proposed amendments in bold italics):</p> <p>Pedestrian and cycling connectivity <i>from either side of</i> <del>through</del> the site, including <i>from</i> the existing estate on Alexandra Road, to New Southgate station, which</p>	<p>Agreed in part. It is important that the Council seek opportunities to promote access to areas of nature as well as to future growth areas and Transport nodes.</p> <p><b>Amend to read: The design of any new development should have regard to the opportunity to provide a pedestrian and cycle connection from the existing estate on Alexandra Road, to New Southgate station, which Crossrail 2 is proposed to be connected to.</b></p>

					<p>be optimised as part of the design of any new development is opposed by NLWA as an absolute requirement.</p> <p>Such access could severely compromise the development of the site for employment use. If the site was used for waste management purposes for example, then health and safety constraints would be most likely to prevent pedestrian and cycling access. Any such route through the site would in any case have to be so fenced in (for health and safety reasons) as to be at best an unwelcoming route, and at worst an unsafe route from a crime perspective.</p>	<p>Crossrail 2 is proposed to be connected to, should be optimised as part of the design of any new development <i>if it is safe to do so, recognising that the route and nature of any connectivity optimisation will depend upon the nature of the development.</i></p>	
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#### Respondent 35: Freehold Community Association

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
35	RSA119	SA52	No	No	<p>Haringey's allocation of the land at Pinkham Way based on the evidence of a draft Strategic Flood Risk Assessment is of some concern. This concern is then heightened by the statement made by JBA Consulting in their Executive Summary that the assessment <i>"looks exclusively at flood risk within the London Borough of Haringey."</i> As required under the NPPG Haringey must use the Strategic Flood Risk Assessment to determine flood risk to and from surrounding areas in the same flood catchment. In the case of Pinkham</p>	<p>Not specifically stated</p>	<p>In preparing the Local Plan, the Council has undertaken two sequential tests, and a Strategic Flood Risk Assessment. These note that Pinkham Way is partially in an area of flood risk. In the development guidelines to the allocation it is noted that a Flood Risk Assessment will be required to show how</p>

				<p>Way part of the surrounding area lies in London Borough of Barnet and the land is situated within the Bounds Green Brook flood catchment and working collaboratively with other authorities, local planning authorities Haringey can develop a Strategic Flood Risk Assessment covering a wider area and at a river catchment level.</p> <p>The question that Haringey has to answer is "Will development of the land at Pinkham Way increase flood risk elsewhere". The only way they can answer this question is with a non-isolationist and compliant Strategic Flood Risk Assessment that assesses, in detail, the geology and hydrology of the allocated land and identifies where the sources of flood risk from the land, if any, will impact elsewhere.</p> <p>If the assessments prove that flood risk will be increased then development cannot be permitted and the risks must be eliminated and or managed by means of Strategic Flood Risk Infrastructure that will guarantee the safety of the people, property and essential infrastructure so affected.</p> <p>If the flood risks will occur in two or more LPA's outside Haringey then they have a "Duty to Co-operate" with those LPAs and prove that such co-operation has been ongoing and meaningful. Failure to meet this requirement will mean that Haringey's Local Plan will be unsound.</p> <p>Our Strategic Flood Risk Assessment of the</p>	<p>development will ensure that there is no increase in risk of flooding either on or off the site.</p> <p>The Council are surprised that given there is no detailed proposal for development, that a FRA has been prepared which "clearly demonstrates that development will increase flood risk elsewhere and the impacts of those risk will be felt in both the London Borough of Barnet and the London Borough of Enfield and the other LPA's downstream in the Lower <b>Lea River network</b>"</p> <p><b>It is the Council's view that</b> the site, if developed, presents an opportunity to improve drainage within the area, and mitigate drainage rates to Greenfield levels. Indeed, if development is to proceed, it will be required to demonstrate that flood risk has not been increased in accordance with the policies set out in the Development Management Policies DPD.</p>
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				<p>land at Pinkham Way clearly demonstrates that development will increase flood risk elsewhere and the impacts of those risk will be felt in both the London Borough of Barnet and the London Borough of Enfield and the other LPA's downstream in the Lower Lea River network.</p> <p>Haringey Planning has the information requested because it has published a Strategic Flood Risk Assessment and this should, if sound, have identified the drainage outfall route for the area identified. See the following:-</p> <p><i>" NPPF Section 100. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe <b>without increasing flood risk elsewhere.</b> Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:</i></p> <ul style="list-style-type: none"> <li><i>. applying the Sequential Test;</i></li> <li><i>. if necessary, applying the Exception Test;</i></li> </ul>		No change
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					<p><i>. safeguarding land from development that is required for current and future flood management;</i></p> <p><i>. using opportunities offered by new development to reduce the causes and impacts of flooding;</i></p> <p><i>and</i></p> <p><i>. where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations."</i></p> <p>A critical part of the SFRA is to produce evidence to identify areas/land/sites which can be developed " <b>without increasing flood risk elsewhere</b>".</p> <p>We therefore request that you answer our question based <b>on Haringey's Strategic Flood Risk Assessment</b> as stated in our original email of 30-08-15.</p>		
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**Respondent 36: Alexandra Park and Palace Conservation Area Advisory Committee**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
36	RSA120	SA 25	No	Not stated	<b>1. This is described as "Creation of employment-led mixed use development with residential, including a <u>landmark building</u> marking the entrance to Wood Green from Alexandra Palace and the west of the Borough".</b>	While the APPCAAC welcomes stronger links between Alexandra Palace Park and Wood Green, we object to a tall building at this location and recommend the	The Council is proposing a significant quantum of growth in the Haringey Heartlands area, which will noticeably change the character of the area east of the rail line, all of which

					<p>2. The stated guidelines include: <b>“A new building</b> on the corner of Coburg and the Penstock path should form part of the Coburg/ Western Roads taller building cluster. This could potentially be <u>a tall building</u>, complementing the development across Western Rd to the west. It should be designed in such a way <u>to be visible from Alexandra Palace Park</u>, acting as a way marker, while respecting the <b>setting of the Park.”</b></p> <p>3. The APPCAAC’s objection is that a <b>“landmark tall building”</b> at this site is unsound in the context of its adverse impact on the Alexandra Park and Palace Conservation. Such a building would be intrusive and alien in the landscape and views from and in within the conservation area. It would be in conflict with DM5, Locally Significant Views and Landscapes.</p>	<p>words and references be deleted from the SA25.</p>	<p>is currently visible from much of Alexandra Palace Park.</p> <p>No change</p>
36	RSA121	SA 53	No	Not stated	<p>1. Ownership of the site is <b>indicated as being “unified public ownership”</b>. This claim is misleading and unsound because the whole of Alexandra Park and Palace (the site) is owned under trust law by the</p>	<p>The APPCAAC recommends ownership to be corrected to <b>“Alexandra Park and Palace Charitable Trust”</b>.</p>	<p>The statement is not considered to be incorrect, and is consistent with the referencing of the rest of the document.</p>

					Alexandra Park and Palace Charitable Trust.		No change
36	RSA122	SA 53	No	Not stated	2. Under the heading 'Site Requirements' there is a claim: "The site is the centrepiece of the Alexandra Palace Conservation Area ..." Again, this is misleading and unsound – it suggests the site is simply a part (albeit centrepiece) of a conservation area. In fact, Alexandra Park and Palace comprises a designated CA	The APPCAAC recommends the seventh bullet point under Site Requirements be amended to show the conservation area comprises the totality of the Park and Palace.	It will be clarified that the Palace is the centrepiece of the Conservation Area, which includes the Park.
36	RSA123	SA 53		Not stated	3. Under the heading 'Development Guidelines' there is an absence of any reference to the fact that the Palace is listed by Historic England as Grade II, which limits the scope of development and change to the fabric of the building. This needs to be corrected	The APPCAAC recommends an additional bullet point here to show: Alexandra Palace is listed Grade II and as such there are conditions and restrictions on the form and development of changes that may be considered.	This is set out in the list of 'Planning designations'  No change

#### Respondent 37: Lynne Zilkha

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
37	RSA124	SA 53	Not stated	Not stated	It is clear that the palace and grounds should be preserved and that only this would be consistent with the Council's	1) address is incorrect 2) planning designations header should include 'Grade 2 listed Historic <i>Park</i> ' (palace	1. The address will be modified to reflect the Palace and the Park.

				<p>sustainability policy in relation to open spaces. Preservation includes of its environs and views.</p> <p>There should be no major change to Alexandra Park and Palace without full London-wide consultation, since the amenity and its preservation are London-wide, if not national, concerns and enshrined in its own statutes. I note that there is a further consultation being carried out in relation to Wood Green (Area Action Plan), which includes consideration of where the Cross Rail 2 stations might be. It is difficult properly to comment when two consultations overlap and in my view it is relevant to the Local Plan and the future of Alexandra Palace and Park and to air quality in the area that there should be excellent public transport links. For that reason the preservation of Alexandra Park and Palace should include enhancing access for the public and planning for a new station there.</p> <p>No decisions which affect the Wood Green area should be</p>	<p>is mentioned but not the park)</p> <p>3) 'unified public ownership' should be clarified. It is very important to understand that it's a charitable trust <i>for the benefit of the people of London</i> and governed by its own statutory instruments. It is for that reason that the Council should or will have to consult more widely on changes which have a major effect on the Palace and Park.</p> <p>4) Where it is said "Indicative Development Capacity- none identified" – this should be changed to make it clear that none is appropriate for the Palace and Park.</p> <p>5) Clause 2.151 any works to open space must be consulted upon London wide according to dedicated Acts of Parliament. Improvement should be subject to taking on board the advice of the <b>Garden History Society, as it's</b> a listed historic garden as statutory consultees. Works should have a historic restorative context.</p> <p>6) 'opportunities to improve open space will be supported' - again as above, subject to it's historic designation,</p>	<p>2. <b>This is agreed for clarity.</b></p> <p>3. The statement is not considered to be incorrect, and is consistent with the referencing of the rest of the document.</p> <p>4. It is not correct that there will be no development, there will be heritage-led development to ensure sustainable uses are found for the existing Palace buildings, and Park.</p> <p>5. This is noted, but there is not considered to be a need to go into this level of detail in the commentary to this policy.</p> <p>6. As above, it is not necessary to go into this level of detail regarding legislative requirements. They will be required as per the legal requirements.</p> <p>7. <b>It will be clarified that the Palace itself is the</b></p>
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				<p>taken without waiting for the full responses to the relevant consultation later in March. Furthermore, full account should be taken of the fact that consultations have been held on Cross Rail stations, and a station at Alexandra Park and Palace is supported, as is stated in the Sustainability Appraisal of Site Allocations document pages 28, 31, 32. Page 33 para <b>10.14.6 “will help to ensure the regeneration of Alexandra Palace...given the introduction of CR2, to support the development of restaurant and hotel”</b>.</p>	<p>listed status and guidance from the Garden History Society. 7) "the site is the centrepiece of the Alexandra Park and Palace Conservation Area.." This is not strictly correct and indicates an insufficient understanding of the APPCA. The site is not the centrepiece, but is one and the same as the APPCA. 8) "Alexandra Park is a historic park and opportunities to enhance its setting should be explored". I would support enhancing its setting - subject to the restoration or conservation guidelines of The Garden History Society and Historic England. For this reason, developments which are detrimental to the view from and of the Park should not be permitted.</p>	<p><b>centre piece of the Conservation Area</b> 8. Support for enhancement is noted. The Council will continue to work with Historic England. Views to and from the Park are protected in the DMDPD.</p>
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**Respondent 38: Joseph Catlin**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
38	RSA125	SA54	Yes	Yes	Not stated	None	Noted.

**Respondent 39: Liz Avital**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
39	RSA126	SA 54  Para 2.148-2.149	No	Yes	The plan is contradictory: on the one hand it says 'no additional capacity identified' and then it talks of 'potential for intensification'. It is unclear as to what this means as the impact of increasing the population on the local environment needs to be considered; schools, footfall, traffic, healthcare. It does not note that development should respect the back gardens of the properties on Wroxham gardens that are adjacent, nor the effect on the houses on Blake Road. There are three surrounding roads that are effected Winton Avenue, Wroxham Gardens and Blake Road and all three need to be acknowledged. The border that has been drawn is right on the line of Wroxham Gardens which is currently a no through road. On numerous occasions the Council has clearly stated that this would be retained as it is too dangerous to have the road as a cut through. How this will be retained is worryingly unclear. One of the mature trees referred to that 'should be retained where possible' is integral to this being a no through road. It is therefore	Please see previous comments.	The Council do not believe that this is contradictory. This site has been identified as potentially requiring the replacement of the existing housing, which due to their construction, are considered to be defective. No additional housing is proposed in this document, and a detailed timeframe is not known, but it is considered that some redevelopment may happen over the Plan period.  Should some or all of the properties require replacement, given the current housing pressures in London, intensification will be considered. This policy does not state that it will happen, but it is considered sound that this is considered.  <b>It is agreed that reference to adjoining properties on Blake Rd and Wroxham Gardens can be added to the first Development Guideline.</b>  The Council is comfortable with its development guideline regarding potential heights of development,

				<p>requested that the document states that all the mature trees should be retained where possible.</p> <p>The document states:  'Development should reflect the existing suburban character of the site, and any replacement housing should retain the rhythm of the housing in the area. Some intensification may be possible, but development above 3 storeys would need to be very carefully justified'. Development about 2 storeys would be out rhythm of the housing in the area and thus 3 storeys is way out of keeping. There is no mention that this site is on elevated land as it is on top of a hill and therefore it is imperative that a low build is maintained and thus in keeping with the housing in the area. Compliance with the adjacent residents right to light is also affected by the site elevation.</p> <p>The process thus far does not seem compatible with the statement of community involvement i.e the extent to which local residents that will be affected have been communicated with. In addition, this is a very complex document to feed back on, it is clearly not intended for lay people as it does</p>	<p>and the protection of trees, noting that any development will need to accord to all relevant policies set out in the Local Plan.</p> <p>Consultation has been in <b>accordance with the council's</b> Statement of Community Involvement.</p>
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					not appear to comply with the Plain English Campaign. Whilst it is appreciated that there have been 'drop in sessions' these are not accessible by all, and thus the transparency of this process is questionable. Local stakeholder have not been openly and sufficiently consulted with in regards to the rebuilding of Tunnel Gardens. When talking of stakehodlers I am referring to the immediately adjacent streets and thus the residents of; Blake road, Winton Avenue and Wroxham gardens.		
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**Respondent 40: Savills obo Catalyst Housing Group**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
40	RSA127	SA 55	Not stated	Not stated	On behalf of our client, Catalyst Housing Group (CHG), we submit formal planning representations in <b>response to the Council's</b> draft Site Allocations DPD, specifically to draft Policy SA55 concerning the draft allocation of Coppetts Wood Hospital (CWH). CHG are the freeholders of the site having acquired the property from the NHS. We object to the following points identified in draft SA55: <b>1. The site's assumed PTAL 1 rating.</b> <b>2. The cited net development capacity of 21 units across the former hospital site and</b>	As set out in the representation	Noted.

					<p>former school.</p> <p>3. That both the former hospital and school sites are being considered together as a single allocation.</p> <p>4. The citing of testing for hospital uses on the CWH part of the site.</p> <p>5. The citing of the retention of the mortuary building within the CWH site.</p>		
40	RSA128	SA 55	Not stated	Not stated	Site has been redundant now for many years, since 2000.	<p>For clarification purposes, under the site description "<i>current/previous use</i>" CWH should be referred to as a "<i>former</i>" hospital given the site has been redundant now for many years, since 2000.</p>	<b>Noted, this will be amended.</b>

	RSA129	SA 55	Not stated	Not stated	<p><b>1. The Site's PTAL Status</b></p> <p><b>Within the Site Allocations DPD, the site's PTAL rating is incorrectly cited as PTAL rating 1. The PTAL rating is based on the site's accessibility to a range of public transport modes (bus, rail and tube), which are discussed below and which draws from transport advice taken from CHG's appointed transportation consultations who have undertaken a specific PTAL analysis.</b></p> <p>There are a range of local facilities within Muswell Hill that are within an acceptable walking and cycling distance with the local infrastructure supporting safe and convenient movement. Furthermore, Finchley, Barnet and Highgate are all within an acceptable cycling distance with suitable, supporting infrastructure.</p> <p>The nearest bus stops are the Coppetts Wood Hospital bus stops located on Coppetts Road, just beyond the eastern site boundary. These bus stops offer Route 234, which operates between Barnet and Highgate providing regular daily services. An additional four services can be accessed along Colney Hatch Lane, within an easy walking distance of the site and along well-lit routes.</p> <p>New Southgate Rail Station is approximately 2.2 kilometres east of the site in addition to Alexandra Palace, approximately 2.5</p>	<p>Planning approvals in the past for residential redevelopment at the CWH site had been consented on the basis of the site benefiting from a PTAL 2 urban setting and thus alteration to draft Policy SA55 should be amended to reflect this.</p>	<p>The site is predominantly within PTAL 1 as can be <b>shown using TfL's</b> online PTAL analysis toolkit. So little of the site is within 2 that changing this is not merited. The setting of this area has been identified in the Urban Characterisation Study as being suburban in character.</p> <p>No change</p>
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					<p>kilometres to the east. These stations offer three trains an hour in either direction including services to central London.</p> <p>With regards to the London Underground Network, the site is located centrally to multiple stations offering services along the Northern and Piccadilly Lines. The nearest London Underground station is East Finchley, a Northern Line Station operating between High Barnet and Morden offering fast connections to key locations in central London. East Finchley Station is within a 2.6 kilometre walking distance of the site. Alternatively, the Route 234 bus provides a direct connection from the site to the station. It is therefore concluded that the site is readily and safely accessible by foot and cycle to local services, as well as being accessible to fast and frequent public transport services linking with wider destinations that provide excellent access to employment, education, healthcare and retail. There can be no doubt, therefore, that the site has a PTAL 2 rating at this location based on its public transport accessibility.</p>		
40	RSA130	SA 55	Not stated	Not stated	<p>2. The Proposed Net Residential Development Capacity</p> <p>For a site with a PTAL 2 rating and within an urban location (such as CWH), the London Plan density matrix recommends a range between 200-450 habitable rooms per hectare.</p> <p>Of relevance, the planning permission</p>	<p>We therefore recommend that a density range of 200-450 habitable rooms per hectare is cited for the <b>site's</b> development</p>	<p>Notwithstanding that the Council disagrees with the assumptions for density calculation as suggested, the indicative capacities as set out in the Appendix to the Site Allocations document is not a limit</p>

				<p>granted at Coppetts Wood Hospital in 2010 (referenced HGY/2008/2196) was approved <b>on the basis of an officer’s report at the time citing that the “London Plan sets densities for development in urban areas and recommends a density range of 450-700 habitable rooms per hectare. Policy HSG9 states that residential development in the borough should normally be provided at a density of between 200-700 habitable rooms per hectare” which relates to a higher density</b> range than the above London Plan guidelines. For the avoidance of doubt, this approved scheme concerned the hospital site only.</p> <p>Draft Policy DM11 of the Pre-Submission Development Management DPD (January 2016) states that “the Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach.” The London Plan (2015) identifies that the density matrix are guidelines only and should not be applied mechanistically where a design led approach should be taken with again the aim to optimise housing potential. Furthermore, one of the core planning principles within the NPPF (paragraph 17) is the need to encourage the effective use of land by re-using land that has been previously developed (i.e. brownfield land such as the former hospital site).</p> <p>In view of the above, we strongly object to</p>	<p>capacity in relation to the CWH part of the site only, in line with adopted and emerging policy.</p>	<p>for development on the site. The amount of development permissible will depend on a rigorous design-led analysis, detailing how the proposed development responds to local site circumstance. The indicative capacity is there to show that the suite of allocations within the Local Plan will meet objectively identified need across the borough.</p> <p>No change</p>
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					the cited net development capacity of 21 units across the former hospital site and former school. This density of development is entirely contrary to adopted and emerging local policy and would fail to optimise the <b>site's development potential which is</b> contrary to draft Policy DM11, London Plan policy and the NPPF/ NPPG guidelines.		
40	RSA131	SA 55	Not stated	Not stated	4. Single Allocation  It is unclear as to why both the former hospital and school sites are being considered together as a single allocation. The sites are under separate ownership and the former hospital site, which is owned by CHG, is vacant and has been for the many years. We understand the school site is currently in use and likely to be retained in education use.	The sites should, therefore, be considered individually and the timeframe for delivery of the former hospital site should be cited as deliverable within the next five years (2015-2020).	It is not considered that by allocating these sites together it reduces deliverability. Conversely, it does ensure the opportunity for more comprehensive development is adequately considered and assessed.  No change
40	RSA132	SA 55	Not stated	Not stated	4. Testing Hospital Use  Our comments in this respect relate to the former hospital site only, which is within <b>CHG's ownership</b> .  There is no dispute that residential redevelopment is acceptable on the site. The site has been vacant for many years and there has been no interest in it for continued hospital use. The site has a planning history of recent planning permissions which establish the residential land use; and in	In the light of the above, it has already been established that there is no demand for the continued use of the site as a hospital and that residential development, a priority use, is acceptable. We	Noted. This case will be made upon receipt of any subsequent planning application.  No change

					particular the Council granted planning approval in 2010 for the change of use to residential to provide 55 dwellings, where it <b>was cited within the officer's report that "The Royal Free Hampstead NHS Trust seeks to transfer its unit at the Coppetts Wood hospital a former infectious disease hospital closer to the Royal Free Hospital. As such the site provides the opportunity to provide much needed new housing in the Borough."</b>	therefore recommend that this is reflected in draft SA55.	
40	RSA133	SA 55	Not stated	Not stated	5. Retention of Mortuary Building  On behalf of CHG, Turley Associates have undertaken an independent Heritage Assessment which concludes that the mortuary building does not contain any special architectural or historic interest in the national or local context. Retaining the mortuary building would create design difficulties in bringing forward a viable residential redevelopment of the site forward to optimise its housing potential at this important site location. This aspect is also a specific, detailed matter which requires evidential justification at the planning application stage and is not in our view a consideration for draft policy S55 without the Council providing their own evidence to support the statement.	We propose this matter is dealt with correctly through the planning application process.	Noted.

**Respondent 41: Barbra Carlisle**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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41	RSA134	SA56	No response given	No response given	I don't know if the plan is legally compliant or 'sound' whatever that means. We are directly affected by the proposals at tunnel gardens living on the adjoining street and not once have we been notified by Haringey as to the proposed ideas or plans for the site. I am therefore assuming that the development proposal will have NO IMPACT WHATSOEVER on my family, my neighbours my home, my noise levels, my quality of life, the resale value of my home, my ability to take my children to school on blake road, the feel of the street. The plan is full of jargon - so i cant comment on whether I approve or have concerns about 'uplift' 'restrictive covenant impact. Intrigued by the statement 'suburban nature of scheme will not change' - the whole neighbourhood is semi detached homes with gardens... that is the suburban nature of the neighbourhood. This does	Better communication accountability and transparency in plans consult with people likely to be affected - if I am not affected I apologies for wasting your time Do as you have done in Highgate - build to sell. build and sell a portion to private market - homes here go for c£1m so you can get a fair bit of money to build more properties elsewhere and to retain the 'suburban nature of the neighbourhood'	The Council considers that the allocation has been drafted to ensure any future redevelopment will have regard to the need to protect residential amenity of neighbouring properties, while making the best use of the site. Based on the location of this site there is potential for some uplift in housing numbers, but this will be managed in a way that ensures good quality reprovision for existing residents, and minimal disruption for the wider area. Any change to the density or mix of housing on this site will need to be supported by detailed reports, including a transport assessment, which will assess any impact on the surround road network and whether mitigation measures are required.  No change
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					not align with the 'flats' proposition mentioned briefly in the site section.		
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Respondent 42: Francis Spinks

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
42	RSA135	SA56	No	No	<p>The present density of housing in this area is already unsustainable – mixture of houses/maisonettes/flats <b>built on “RAMUS TILE” site/n</b>ow known as Baily Close. Replacement of static portacabin type homes next to Aneurin Bevan recently demolished and flats built on it.</p> <p>Family houses that have been split into 2 or more accommodations, Rental/bedsit properties by private landlords/ with or without the necessary planning permission/ nearby family houses with 10-12 bell-pushes and a plethora of wheelie-bins on frontage. Hedges cut down for hard-standing for 1/2/more vehicles. Bounds Green school so over-subscribed already with children from Muswell Hill/also houses split <b>into 2/3 accommodations that can't</b> get places in Muswell Hill schools/ Rhodes Academy etc.</p>	<p>When Park Court was re-roofed and had double-glazing fitted, <b>why wasn't</b> Park Grove and Durnsford Rd (and Tunnel Gardens) included when the works would have been far cheaper in labour and materials than <b>today's estimates.</b></p> <p>We as a collective of free-holders/ lease holders and tenenets have visited homes in Chingford that were upgraded by Waltham Fores Council, Individuals given a choice of upgrade and finish to the exteriors of their homes to make them warmer/ cheaper to heat/improve the exterior insulation/ new doors/ porches and windows, upgrade the bathrooms and kitchens, without the added <b>expense of decanting”/paying</b></p>	<p>Regarding infrastructure, the Council has published an Infrastructure Delivery Plan, which identifies how education and health facilities will need to expand to meet the needs of a growing population.</p> <p>The nature of the Orlit housing means that further retrofitting is not cost effective. It is considered that the majority of the remainder of this representation</p>

				<p>Even with the expansion of classes <b>being “added” on the play-ground</b> of Bounds Green Infant &amp; junior school to double or triple the number of dwellings on this site will be adding to an even greater problem for the future. If made into a ¾ form entry then the similar number of secondary places would need to be made available in the future. Many parents locally are not getting any of their school choices for their secondary aged children! But allocated another not even on their preferred option list!</p> <p>How can this be considered acceptable practice when year on year so many families are disappointed and so many more are going through the appeal process route?</p> <p>When children with additional special needs/ medical physio/ speech and language plans etc are being placed in main-stream schools under <b>“Integration and inclusion” banner</b>. When statements of special needs (that were legally binding) are now being monitored and the money <b>devolved down to the schools’</b> budget- whether or not that particular <b>head is a good “budget-manager”</b> and actually ring-fences that money</p>	<p>compensation to/ rehousing people whilst works were carried out.</p> <p>It took 10-12 weeks by companies employed to do the upgrades. The people could remain in their homes whilst it was being done, so therefore no need for compensation/ removal fees/ payments for moving utility companies/ TV company etc.</p> <p>People reported to be very happy with the look of their homes/ the upgrades/ their cheaper gas and electricity bills.</p> <p>Some people had private surveys done if they bought under the right to buy Thatcher legislation. Although the Council are now saying <b>the properties are “defective” and “not mortgageable”</b>, people have been given mortgages on some houses quite recently. Different and conflicting information has been given to different families.</p> <p>Some misinformation and</p>	<p>relates to management issues outside the scope of the Local Plan.</p> <p>No change</p>
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				<p>to meet the individuals needs/ care-plans- input from other <b>“professionals”/ physio/speech and language etc.</b></p> <p>Many autistic and aspergers spectrum diagnosed children are <b>being “looked after” by people</b> untrained to meet their complex and varied medical and social needs. <b>Basically because it’s cheaper that a residential/ home tuition/ “special-school” placement.</b></p> <p>This practice is derisory/ discriminatory against often single-parent family members and with the withdrawal of benefits/ introduction of universal credits etc/ bedroom tax etc. Is again causing more stress and family-breakdown and added financial problems. The closure of day-centres/ luncheon-clubs/ community centres having their funding cut year on year only adds to the continued pressure and when housing needs/ the disability needs of young adults as well as the elderly in our community. When these relationships break-down as the carers of their loved ones are under constant pressure 24/7 there is no respite for them. The woefully funded mental-health budgets and the <b>inadequate “care in the community”</b></p>	<p>conflicting advice from different people, even within the same department.</p> <p>If as the Council has stated that they were declared defective why has the Council been moving new people with young children and babies into the properties in this area. Their children are now settled in local schools and do not wish to unsettle them by a major move.</p> <p>We have been told over the years we were included in the decent homes programmes for window-renewal given a time-line for the upgrades/ then it not happening-<b>“next year”, “next year”, but it never happened!</b></p> <p>Many of us have spent our own money making these houses safe and warm for our families and are even being <b>told “unless you’ve kept all your receipts for building materials/ paint/ wallpaper/ new toilets/ showers/ kitchen-units etc, then you cannot be compensated for your loss.</b></p>	
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				<p>at present being provided by the private sector agency staff on 10-15 minute time slots is woefully inadequate and leaves many vulnerable people open to physical/ emotional/ financial and neglectful abusive behaviour by largely untrained staff. It is in fact illegal for someone not medically approved to give out and administer medications!</p> <p>People working for minimum wages to sustain their own cost of living expenses. Many part-time students subsidising their own rental/ utility bills/ food prices etc whilst also studying in whatever field they wish.</p> <p>The onus put on the agencies to check-out their employment record/ previous experience and training etc, <b>visa status etc. It's been proved that many such persons are "under the radar"/ have false documents etc.</b></p> <p>Whilst our own children and grandchildren will have to move out of London to afford to get on the property ladder and afford a family home of their own to start a family, unable to afford to buy even a 1 bedroom studio flat in the town of their birth!</p> <p>Local people feel marginalised and</p>	<p>Haringey Council failed in their duty of care to us tenants – they did nothing to the properties before we moved in as we were working parents.</p> <p>We had no choice but to do the work ourselves or pay someone to do it for us. As our landlord the London Borough of Haringey failed to maintain and repair the properties to a safe standard.</p> <p>Ever since this proposed process started we were told <b>to "still report" repair jobs and</b> there would be no difference to how and how quickly it should be dealt with!</p> <p><b>In reality even "emergency" crisis problems, a leaking roof or burst pipes were not dealt with quickly or efficiently. Often weeks even months of waiting in for workmen that don't turn up/ contractors that claimed for jobs they hadn't done!</b></p> <p>Because no one was checking up on them on completion.</p>	
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					<p>have to make the difficult choices of moving away from family and friends or emigrating to get the quality of life our generation took for granted.</p> <p>Leaving new-built properties for rich outsiders/ young professionals/ city-workers/ and investment funds from abroad to replace our local families with young children/ students/ to never be in a financial position to buy or even rent at today's expensive prices.</p>	<p>A simple job often necessitates 2/4/6 different operations and outside contractors for a simple repair.</p>	
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**Respondent 43: Alda Terracciano**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
43	RSA 136	SA59	Not stated	Not stated	<p>I am writing with regards to the Haringey development plan document and in particular to the proposed site allocation for the Haringey Professional Development Centre on Downhills Park Road N17. Indeed, it was rather disquieting to discover that the consultation process with regards to future uses of this space had closed in March 2015 without any adequate publicity being given to it with local residents in the area. It seems that the only opportunity we now have is to comment on the legality of the plan as consultation is now closed. This is utterly unacceptable considering that Haringey's policy document "Statement of Community Involvement" details more efficient ways of involving the local community in the</p>	<p>Retain the use of the identified Haringey Professional Development Centre for educational purposes and in particular its destination should be a secondary school.</p>	<p>The consultation has been carried out in accordance with the <b>Council's Statement of Community Involvement</b>, and the relevant regulations.</p> <p>It is noted that the site requirements in the policy protect the existing building for a potential education use, subject to need being identified in the IDP. It is noted that the</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>democratic decision making process relating to the life of the community.</p> <p>More specifically, local residents believe that the site where the Haringey Professional Development Centre currently resides should continue to serve educational purposes in consideration of the growing needs to schools in the area as a result of current and future increase in residential homes.</p> <p>Indeed, while the number of primary schools in N17 and N15 is rather substantial, there are only 2 secondary schools in the area, a number clearly inadequate to serve its growing youth, forcing young people to travel to other areas of the borough which makes them feeling often uncomfortable and not well received.</p> <p>Primary schools in the area include:  Brook House Primary School, Bruce Grove Primary School, Chestnuts Primary School, Crowland Primary School, Devonshire Hill Primary School, Earlsmead Primary School, Ferry Lane Primary School, Park View, Tottenham UTC</p> <p>Secondary schools:  Harris Academy Tottenham, Northumberland Park Community School</p> <p>In light of the above it seems crucial to retain the</p>		<p>Plan at present provides sufficient sites to accommodate current demand for primary and secondary school places.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>use of the identified Haringey Professional Development Centre for educational purposes and in particular its destination should be a secondary school. This is especially important considering the increasing number of future teenagers as a result of young families having moved to Turnpike Lane in recent years. Future transport connections will also facilitate recruitment of members of staff and facilitate the production and fruition of cultural activities in the area, which is currently lacking.</p> <p>Indeed, the need for residual community infrastructure in the area is of great importance. While the local artist and professional community is growing in numbers, there are currently no facilities to capitalise on such presence and promote activities that would increase the economic development of an area where a substantial number of vulnerable disadvantaged young people live. The current car park area would be an ideal location for a community infrastructure that could play an important synergic role in linking up school provision with other socialising and professionally qualifying opportunities for the young.</p> <p>In light of the above I would strongly recommend the council to review the use of the site in question, in line of the educational needs of its fast growing population.</p>		

Respondent 44: Michele Bowers

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
44	RSA137	SA59 Haringey professional development centre	No	No	As a local resident directly affected by the plans in Sa59 in the sites allocation development plan, I was not informed or consulted on the matter by Haringey council. The council should follow their guidelines specified in Haringey's Statement of Community Involvement otherwise their proposal is not legal.	Inform residents affected by the proposal directly in writing to allow them to react to the proposal in a timely manner. Otherwise the plans go ahead without residents having an opportunity to contest it.	The consultation has been carried out in accordance <b>with the Council's</b> Statement of Community Involvement, and the relevant regulations.  No change

Respondent 45: Susannah Haiste

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
45	RSA138	SA59 The Site Allocations Development Plan Document // Policies Map Code 1	No	No	I write with specific reference to pages 144-145 of the Site Allocations DPD, covering SA59, the Professional Development Centre (PDC) on Downhills Park Road. I dispute most strongly the legal compliance of the Local Plan on a number of grounds, most specifically that none of the consultation has been done properly, as at no point were any of the residents to be most affected informed. I live on Belmont Avenue, overlooking the site covering SA59, and after checking with other	I feel very strongly that no proper consultation has been undertaken with those who will be most affected by these proposed changes. I would therefore argue	The consultation has been carried out in accordance <b>with the Council's</b> Statement of Community Involvement, and the relevant regulations.  No change

				<p>residents who overlook the site, all were completely unaware of the plans and consultation under taken last year, which these current plans seem to suggest was undertaken. In some communication with Erik Nilsen, who works in Planning Policy at Haringey, he quotes: "For this site, and all others included in the draft Plan, notification letters have been sent to owners and occupiers of buildings and land within the identified site allocation boundary. As agreed in the draft Statement of Community Involvement update, we have also posted notices around the sites to inform the wider community about the consultation." We have received no such notification, neither about this year's consultation, nor about the initial consultation that was done last year. Is Mr Nilsen suggesting that a letter was sent to the PDC itself? This would make very little sense! It is the properties on the boundaries of the site allocation that should have received these letters - these were not sent last year or this year. Regarding notices, none have been posted in our street at any point and none were posted outside the PDC last year. We have checked Ivatt Way, which is the other side of the boundary and no notices were posted there either. This year's notices consist of 2 small pieces of paper at the entrance to the PDC. If a resident of Belmont Avenue's commute does not take them past the entrance to the PDC, how are they to know about the consultation process? Yesterday morning we received a letter about</p>	<p>for a new consultation process.</p>	
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					<p>the proposed changes to the CPZ with a chance to comment on these. This is a simple and direct approach that works. So one part of Haringey considers this necessary to fulfil their obligation of consultation whilst another in effect hides something from local people that would have a far bigger impact on our lives than where we park our cars. The LDP is a complex set of documents that are not easy to plough through for the average person and it takes some effort to even find the allocations document on the website yet alone SA59. And if we don't even know that we should be looking for this, what chance do we have to comment? To really do what it says you should do in the Statement of Community Involvement, a copy of SA59 should have been posted through our doors with a covering letter in February 2015. For this, I maintain that there has been a failure in your consultation process that invalidates the consultation and therefore the proposals.</p>		
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**Respondent 46: G Holt**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	RSA139	SA61 Site Allocations Development.	Not stated	Not stated	We have been successfully living within site SA61 since we gained planning permission in early 2013 to convert our building into a live/work residence. We run 2 viable design businesses on the ground floor on this site as well as living on the first floor. Some of the local industries all sited within SA61, including Barber Wilsons & Co Ltd have supplied bespoke	Not stated	This site has been allocated on the basis of enabling a new pedestrian and cycling link between Wood Green and Tottenham via Lordship Rec.

				<p>fixtures and fittings for our design projects. This local proximity to industry is vital not only to us but to other creative industries working within London, as well as internationally. We serve both local and overseas clients as do Barber Wilsons &amp; Co Ltd. ENVIRONMENTAL Townscape and Cultural Heritage (SA Report 10.14) - Preserve or enhance buildings and areas of architectural and historic interest Industry has existed and flourished within this site since the late 18th century. Although this site is not within a conservation area many of these buildings are an asset to Haringey and express architecturally our great industrial heritage. Whilst a provision has been added to the site requirements to preserve the frontage of Barber Wilsons &amp; Co Ltd many of the other buildings on this site deserve and should be preserved too. We should be protecting and enhancing our natural, built and historic environment with care. ECONOMY Economic Growth (SA Report 10.9) - Retain existing local employment and create local employment opportunities. There appears to conflicting demands within the local plan; create more homes but at the cost of viable employment land? <b>We shouldn't be obliterating credible (and in the case of Barber Wilsons &amp; Co Ltd, world famous and Royal warranted) businesses employing many local people who in turn supply many other local businesses in favour of creating more housing. We should be promoting mixed used sites not wholly residential sites that become densely populated without adequate employment or longterm contribution to the</b></p>	<p>There are policies in the Local Plan which protect employment land, and that aim to ensure that new sites deliver employment outcomes through redevelopment. It is considered that these policies strike an appropriate balance regarding meeting the <b>borough's</b> identified employment needs.</p> <p>This allows sites such as this to come forward to create other beneficial outcomes, such as the new link.</p> <p>The Council notes that this allocation is not a requirement for comprehensive redevelopment. It is considered that a number of proposals could come forward in a co-ordinated manner, to meet the</p>
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					economy. Employment land should be protected. Progress should be made but not at the cost of employment, heritage and community. The aim of this policy (point 2.168) to allow residential use to enable creation of a new pedestrian and cycle route seems rather weak; as residents and business owners we are in favour of this green link but feel that residential development is not needed to enable this.		requirements of the policy.  No change
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**Respondent 47: Health and Safety Executive**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
47	RSA140	SA22	Not stated	Not stated	<p><b>Encroachment of Local Plan Allocations on Consultations Zones – Hornsey Holder Station</b></p> <p>We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones. The land allocation that could be affected is the mixed use class allocation SA22 – Clarendon Square, Hornsey Park Road/Mayes Road/Clarendon Road, N8 (Haringey Heartlands). This allocation encroaches upon the inner, middle and outer consultation zones of the Hornsey Holder Station, Clarendon Road, Hornsey, N22 6UG operated by National Grid (HSE Ref. No. H1755).</p> <p>You are reminded that HSE has previously given relevant advice on this matter which has been included as a condition to planning application HGY/2009/0503 for the development of land at Haringey Heartlands, between Hornsey Park Road,</p>	Not stated	<p>It is noted that the Clarendon gas holder is at the centre of already consented planning application.</p> <p>In this regard it is considered that the advice given on 21/03/2012 is extant.</p> <p>No change</p>

					<p>Mayes Road, Clarendon Road and the Kings Cross / East Coast Mainline. In the Decision Notice to the application dated 21-03-2012, and with regards to the matter of revocation of consent for land at the Hornsey Holder Station, condition 71 states:</p> <p><i>No part of the development shall be occupied until The Hazardous Substances Consent for the gasholder station has been revoked or varied in accordance with the Planning Hazardous Substances Act 1990, as amended, such that the Health and Safety Executive (HSE) does not advise that permission should be refused on safety grounds, and written confirmation of the necessary revocation or variation has been issued by the London Borough of Haringey as local planning authority. Reason: In the interests of health and safety, it is necessary to ensure that the adjoining gas infrastructure will not present a risk to safety.</i></p>		
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**Respondent 48: Sport England**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
48	RSA 141	SA62	Not stated	Not stated	<p>Further to our email dated 20th March 2015, Sport England is pleased to note the removal of playing field land as part of the Broad Water Farm area allocation (SA 62).</p> <p>Please note that Sport England along with Public Health England has recently <b>launched its revised guidance 'Active Design'</b>. It may therefore be useful to provide a cross-reference (and perhaps</p>	<p>Sport England believes that being active should be an intrinsic part of <b>everyone's life</b> pattern. As such, Sport England would expect to see the principles on Active Design embedded in</p>	Noted.

					a hyperlink) to <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a> for allocations involving leisure uses.	development guidelines.	
48	RSA 142	Whole Document	Not stated	Not stated	Sport England has no specific comments to make on the Alterations to the Strategic Policies (DPD) January 2016. It is not obvious that the proposed changes relate directly to any sporting matters.	No comment	Noted.

**Respondent 49: SMART Urban Ltd obo Selby Trust**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
49	RSA143	SA 63	Not stated	Not stated	The Selby Centre is a unique and high performing community hub run by the Selby Trust. Sometimes the actual quality of the Selby's work is underestimated and undervalued because the project is judged by its environment and not its achievements. The Selby Centre is a colocation of 100+ social action organisations who between them deliver health, education, employment, social enterprise, voter engagement, democracy, recycling, sports, youth, safe cycling, refugee support, food bank, advice, community debate and cultural events and projects all from this site. The net worth of these projects is cautiously estimated at £3.5 million per annum and all those benefiting are people living in the surrounding deprived communities. There are 217 FTE staff on site and projects support further jobs in the community. Appendix 1 sets out the current annual estimate of value created by the Selby Trust in a year.	SUMMARY OF REQUESTED CHANGES FOR SA63:  Page Site requirements, p153, - First bullet point to be amended as follows: The future consolidated re-provision of all the existing community uses should be secured as part of redevelopment providing a	It is considered that the policy, along with policies SP16, and DM49 seek to ensure that appropriate community uses are protected, and provided on all sites.  It is not considered that the engagement

				<p><u>SITE DESCRIPTION AND CONTEXT</u>  The site is an old school site located in a cul-de-sac at the end of Selby Road on the northernmost boundary of the borough. The land is owned by the Council but transferred on a long lease to The Selby Centre in 1997. To the north is a playing field located in Enfield but also owned by the London Borough of Haringey called Bull Lane and this may provide some further development opportunity to the site as mentioned in the SSAD.</p> <p>The site is 10 minute walk from Tottenham High Road and equidistant from Great Cambridge Road and is rated PTAL level 2. It is also a 6 minute walk from White Hart Lane Station.  The Site is registered as an Asset of Community Value.</p> <p><u>RESPONSE TO SITE ALLOCATION</u>  We have made comments on previous drafts of the SSAD and we acknowledge that some changes have been made in response to those comments (corrected description of current use; inclusion of the need to consolidate community use; inclusion of status as asset of community value, concur that site capacity is still to be determined). While we acknowledge the principle of development that inclusion of a site in the SSAD confers we do not consider the draft SSAD goes far enough to ensure the long term sustainability of the community asset and the value it delivers for the community.</p> <p>There are four main issues we will raise that We consider will improve the site proposals and we will</p>	<p>replacement community asset in a manner that secures flexible, sustainable space ideally within the existing site  - And to also include a third bullet point as follows:  Employment levels currently on site to be retained at existing levels and potentially maximised</p> <p>Page Development Guidelines, p153, to also include  - The Community should be a key partner to the development process to ensure that community development activities remain at the heart of the site  - There is potential for all or part of the development</p>	<p>of the Selby Trust as a delivery partner is an issue that the Local Plan has control over.</p> <p>Regarding employment, the site is currently considered to be in community use. While it is noted that this use is a creator of employment locally, it is the community use that is to be protected, not an employment one. As such, it is hoped that the re-provision of the community use will</p>
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				<p>provide evidence to support our points, this being one of the key tests for further changes at this stage of the process. The points we will address are:</p> <ul style="list-style-type: none"> <li>- Importance of replacing community asset in a manner that secures flexible, sustainable space to deliver a growing range of community services to the people of Tottenham in order to improve Social Value</li> <li>- Approach to development needs to engage the Selby Trust as a community partner</li> <li>- Additional mention to be added in relation to maintaining and increasing job numbers on the site</li> <li>- Retaining a proportion of community greenspace as open space</li> </ul> <p><u>Importance of replacing community asset in a manner that secures flexible, sustainable space to deliver a growing range of community services to the people of Tottenham in order to improve Social Value</u></p> <p>The current Selby Centre delivers a lot of social value into the very deprived communities in east Haringey. However, the current buildings, while offering varied space for a range of projects also cause problems as they are old and inefficient to run. The heating, insulation and repair bills alone cost the organisation in excess of circa £100,000 a year. Monies which could otherwise be put to good use supporting community development. New, flexible, sustainable space would enable improved and increased service delivery in the area.</p> <p>Haringey Local Plan Policy SP16:</p>	<p>to be brought forward under the Community Right to Build</p> <ul style="list-style-type: none"> <li>- Retention of a significant amount of open space should be included in the new development to support the community use</li> </ul> <p>The Selby Trust understand the need for development and in fact see it as part of the solution for them to move from old, inefficient space to modern, flexible, energy efficient facilities fit for the future. However, as it remains important to ensure that this unique and valuable community asset continues serving the population of Tottenham, we</p>	<p>ensure that employment numbers are replaced in the consolidated facility.</p> <p>It is considered, in the context of the site being surrounded by open space, that the non-designated open space on this site does not require specific protection in the Plan, and that doing so may compromise a potential development of the site.</p> <p>No change</p>
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				<p>COMMUNITY FACILITIES states that <i>'the Council will work with its partners to ensure that appropriate improvement and enhancements, and where possible, protection of community facilities and services are provided for Haringey's communities. This will be based on the programming, delivery, monitoring and updating of the Infrastructure Delivery Plan and Schedule which cover projects for:</i></p> <ul style="list-style-type: none"> <li>• <b>Health (see also SP14);</b></li> <li>• <b>Education;</b></li> <li>• <b>Social care;</b></li> <li>• <b>Libraries and Museums (see also SP15);</b></li> <li>• <b>Open Spaces and environmental improvements (see also SP13);</b></li> <li>• <b>Community and youth facilities;</b></li> <li>• <b>Play facilities (see also SP13);</b></li> <li>• <b>Leisure (see also SP 15);</b></li> <li>• <b>Emergency Services;</b></li> <li>• <b>Transport (see also SP7);</b></li> <li>• <b>Waste (see also SP5);</b></li> <li>• <b>Water Supply and Sewerage (see also SP5);</b></li> <li>• <b>Towards a low carbon borough (SP4);</b></li> <li>and</li> <li>• <b>Energy and Telecommunication Services.</b></li> </ul> <p><i>The Council will:</i></p> <ul style="list-style-type: none"> <li>• <i>Expect development that increases the demand for community facilities and services to make appropriate contributions towards providing new facilities or improving existing facilities;</i></li> <li>and</li> <li>• <i>Promote the efficient use of community facilities and the provision of multi-purpose community facilities.'</i></li> </ul> <p>As the description of services provided by the Selby has shown the Trust deliver not just a single community function but multiple functions covering many of the above services. Therefore we consider the SSAD needs to be explicit in stating what form of community provision needs to be protected in any redevelopment.</p> <p>In addition Local Plan Policies SP14: HEALTH AND WELL-BEING states that <i>'the Council will seek to</i></p>	<p>consider that the SSAD needs to highlight the community role in planning and delivering redevelopment with the Council and any future development partner and that further protection is afforded to employment levels on site.</p>	
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				<p><i>improve health and wellbeing in Haringey. The Council will: • Work with NHS Haringey in its goal to reduce health inequalities in the areas with poorest health; .....; • Prioritise interventions and resources to those areas of the borough where health inequalities are <b>greatest; and • Support the integration of community facilities and services, i.e. health, education, cultural and leisure in multi-purpose buildings.</b></i></p> <p>And SP15: CULTURE AND LEISURE <i>'The Council will safeguard and foster the borough's cultural heritage and promote cultural industries and activities through: ....3. Protecting and enhancing, where feasible, existing cultural facilities and access to cultural heritage throughout the borough. The Council will safeguard and foster the borough's existing recreational and sporting facilities through: • The protection and enhancement of sporting and <b>leisure facilities in areas of deficiency; and • The dual use of the borough's cultural assets, such as land and buildings to meet the needs of local communities, for example meeting space, arts and leisure activities, opportunities for recreation and sport.'</b></i></p> <p>The Social Value of community activity is highlighted in numerous policy papers but two examples are provided here as evidence to support the Selby Trust's position. The NIACE [National Institute of Adult Continuing Education - now part of the Learning and Work Institute] briefing paper on the social value of adult learning 2010 concludes that adult learning can impact on health, well-being and building stronger communities in a very specific and</p>		
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				<p>measurable way. The benefits include residents gaining new skills, feeling less isolated, being involved in the community, taking up volunteering, neighbourhoods feeling safer and improved partnership working. The Selby Centre projects deliver many of these outcomes and more.</p> <p>The full briefing paper can be found at the link below: (Council note: web link has been excluded for formatting reasons - see original response for link).</p> <p>The Arts Council have also assessed the benefit of Arts and Culture on people's lives and claim key benefits for the economy, health and wellbeing, society and education. The Selby Centre is an arts and cultural organisation for that most disadvantaged sector of the community for whom traditional arts centres seem inaccessible and inappropriate. To that extent we make the case that the same benefits are achieved by the Selby for a very impoverished sector of the community. The full 2014 paper can be found here: (Council note: web link has been excluded for formatting reasons - see original response for link).</p> <p><u>Approach to development needs to engage the Selby Centre as a community partner</u></p> <p>The Selby Trust are concerned that new proposals by the Council as to how community groups shall be granted leases mean that after the end of their current long lease in six and a half years they will only be granted a short term lease. Further that as the Council owns the freehold the Selby Trust will not have enough 'interest' in the site in commercial terms to be an equal development partner. We</p>		
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				<p>realise landlord and tenant law are not the proviso of Planning so we will not go into details and are not expecting this process to comment on that, however, for information the report is attached as Appendix 2. What we are seeking is that the SSAD is clear that the community benefits on this site are a function of the community itself and not just that land and that to ensure the ongoing services are still delivered the community should be a key partner to the development process.</p> <p>The evidence we provide to support this case is even contained within Town Planning legislation - the principle that communities and neighbourhoods are better designed if the community is engaged. This case is made strongly by Locality in their documentation. (Council note: web link has been excluded for formatting reasons - see original response for link).</p> <p>While the Trust is not seeking to develop a neighbourhood plan for the area many of the principles of neighbourhood planning apply to the Selby Centre site and with appropriate wording in the SSAD to strengthen the role for community engagement in the redevelopment of the site we consider a much improved outcome will be achieved.</p> <p>The Selby Trust is applying to Big Potential Advanced to secure funding to help it become investment ready. As a partner in the development process the Selby Trust can ensure the needs of the community are correctly specified; ensure the further development will be appropriate; secure funding and resources not available to the private and public</p>		
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					<p>sectors.</p> <p>The Selby Centre was conceived in 1986, making 2016 its 30th year as a community space. The Trust has retained a focus on its mission of providing affordable community space, successfully and consistently generating over 75% of its income from these activities. The Selby Trust itself has been delivering services from the site for 23 years and aim to continue as long as the community has need of the Centre.</p> <p>Furthermore the site is registered as an Asset of Community Value and this gives at least five years of protection to the role of the community in future land transactions.</p> <p>The Selby Trust would like to call on provisions in the Localism Act which provide for a route to development known as the Community Right to Build and which are vested by way of an order. We would like the SSAD to highlight this as a potential route to development for the Selby Centre. We understand that a Community Right to Build Order is a form of Neighbourhood Development Order and would require a referendum to take place but that if successful it could offer an alternative to traditional planning processes. The Selby Trust are at an early stage in establishing their own understanding of the site, the future community use needs, investment mechanisms etc and at this stage we are ambitious but not unrealistic. We simply wish to formally acknowledge this as a potential route for the future transformation of all or part of the site.</p>		
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				<p><u>Additional mention to be added in relation to maintaining and increasing job numbers on the site</u></p> <p>The site is currently host to 217 FTE jobs on site and we do not wish to see employment levels fall either on this site or in the wider deprived community of White Hart Lane ward. Therefore we are seeking that the SSAD mention the need to retain and, ideally, enhance the jobs levels on site. White Hart Lane ward is the second most deprived ward in Haringey and amongst the 5% most deprived wards in the country. The employment level in White Hart Lane ward is 54.8% compared to 67.5% in Haringey and 69.2% in London [2011 Census data]. More ward level data compared to the borough can be found here (Council note: web link has been excluded for formatting reasons - see original response for link) and the figures highlight the deprivation levels locally and the need for a project such as the Selby Centre.</p> <p>The site currently is host to 100+ organisations who are regular users and on licenses from the Selby Trust (the head lessee) and who all provide valuable services within the local economy and a number of jobs to the local community. There is a continued need for a mixed range affordable workspace on this site and the variety of jobs these sites offer. The Haringey Core Strategy Policy SP9: IMPROVING SKILLS AND TRAINING TO SUPPORT ACCESS TO JOBS AND COMMUNITY COHESION AND INCLUSION states that 'The Council will seek to address unemployment by facilitating training opportunities for the local population, increasing the employment offered in the borough and allocating land for employment purposes. The Council will encourage the provision and growth of education</p>		
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				<p>and training facilities within the borough in areas such as Haringey Heartlands and Tottenham Hale and areas of high unemployment. The Council will promote the diversification of the borough's economy and support new and expanding employment sectors such as green industries, small and medium sized enterprises. The Council will secure financial contributions from development that results in a net loss of employment floorspace to invest in training and other initiatives that seek to promote employment and adult education in the borough.'</p> <p>The Federation of Small Businesses and the New Economics Foundation both regularly make the case for retention and improvement of workspace for small businesses through the JustSpace Campaign <a href="http://www.justspace.org">http://www.justspace.org</a> . This site identifies an ongoing campaign by small businesses and other stakeholders not to see the continual erosion of industrial and employment land in London and in particular looks at ways the planning system currently contributes to the issue and how it can be used as a solution not a cause.</p> <p>London's Industrial Land: Cause for Concern is a working paper produced by Jessica Ferm and Edward Jones of the Bartlett School of Planning UCL in February 2015 (Council note: web link has been excluded for formatting reasons - see original response for link). The authors of this study conclude on pages 37-39 that development pressure and planning policy have played a role in the loss of employment land as well as deindustrialisation, exacerbated by the Government's permitted</p>		
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				<p>development rights facilitating the conversion of industrial land to residential. Ferm Jones go on to say that 'in contrast to what downward spiralling projections suggest evidence on the ground indicates that manufacturing is changing but not dead'. The articulate that 'hidden industrial sites house businesses that are part of the local economic ecosystem and that relocation of these businesses is more problematic than often appreciated' a point we would reiterate. The allocation of this site for a mix of residential and employment uses will likely result in a further loss of employment land above the planned level of release intended for London and Haringey.</p> <p>Haringey's own Employment Land Study (February 2015) provides an analysis of the local property market. Due to its size this site is not classified as a Defined Employment Area within the borough but it is an employment area nonetheless. At 3.7 on page 13 the report notes ' there is a perceived lack of supply of build developments catering for industrial and warehousing uses, local commercial agents noted there was high occupancy in the existing protected areas. The stakeholder consultees identified the Borough was suffering from limited Industrial stock and competing pressure from other uses e.g. residential'.</p> <p>At 3.18 the report notes there is 'a lack of suitable B1c/B2 stock across the borough. There is an insufficient supply of employment locations with enough capacity to accommodate additional B1c/ B2 industrial (Uses across the Borough. Local commercial agents consider that additional sites need to be brought forward ...in order to</p>		
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				<p>accommodate SMEs.' Figure 5.1 in the report shows there has been a steady decline in industrial floorspace since 2004.</p> <p>If employment numbers were lost on the Selby Centre site those community organisations would be seeking land in industrial and other lower value sites but as these sites are already in demand it is likely that the community would struggle to find alternative suitable accommodation. For this reason we would like the SSAD to protect and potentially enhance employment numbers on this site. Protecting the levels of employment also works to protect the volunteering, learning and training opportunities available on the site.</p> <p>With the opening of four Crossrail 2 stations in Haringey in the coming years employment land will be in even greater demand. This is supported by recent research from Bilfinger GVA on Economic Growth Forecasts over the next 20 years. They predict that by 2036t jobs growth in zones one and two will reach an average of 16%, compared to 13% in zone one with Haringey forecast to see a 23% increase in jobs.</p> <p><u>Retaining a proportion of community greenspace</u> The SSAD makes no particular mention of the importance of open space; neither to the existing community activities nor to the future redevelopment.</p> <p>The Council's Local Plan Policy SP13: Open Space and Biodiversity states that 'New development shall protect and improve Haringey's parks and open</p>		
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				<p>spaces. All new development shall:</p> <ul style="list-style-type: none"> <li>•<b>Protect and enhance, and when and where possible, extend the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development;</b></li> <li>•<b>Provide amenity space in accordance with the Council's Open Space and Recreational Standards Supplementary Planning Document (SPD);</b></li> <li>• <b>Manage the impact of such new developments in areas adjacent to designated open space;</b></li> <li>• <b>Secure Improvements, enhancement and management in both quality and access to existing green spaces;</b></li> <li>• <b>Seek on-site or financial contributions towards open space from new developments as set out in the Open Space and Recreational Standards SPD;</b></li> <li>•<b>Seek to secure opportunities for additional publicly accessible open space especially in those identified areas of Open Space deficiency .....</b></li> </ul> <p>Haringey's Open Space and Recreation Standards SPD (March 2008) highlights areas where there is an open space deficiency. The SPD sets out areas of open space deficiency in Map B.1 and this identifies parts of White Hart Lane ward as deficient, albeit not the area of the site. Despite this maintaining an open space on the site available to the wider community will be an important contribution to standards as future intensification takes place. It will also be important to support future housing and affordable housing that may be developed on site.</p>	
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					<p>The Selby Trust has recently developed a Global Garden project financed through a crowdfunding scheme which raised £11,000 and which creates a garden for the community, providing local amenity, supporting small wildlife and delivering positive community led outcomes in terms of food growing, mental health, exercise and training.</p> <p>The project is run by volunteers, both local and corporate. The positive outcomes delivered by this scheme are dependent on an amount of open space being available to the community. We are therefore seeking that the SSAD safeguard an amount of open space on site for community use.</p> <p>(Council note: See original response for <a href="#">Annexes</a> referred above)</p>		
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**Respondent 50: Tottenham Civic Society**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
50	RSA144	SA64	Not stated	Not stated	<p>I am writing on behalf of Tottenham Civic Society regarding this site, 315 Roundway, which is included in your plans as a potential redevelopment site, with flats of several storeys. Picture attached with view from the west.</p> <p>The view of our Society has always been that this site is not at all suitable for tall buildings.</p>	As set out in the representation	<p>Policy DM6 of the DMDPD sets out areas in which tall buildings will be acceptable, with this not being one. The potential intensity of development on this site will be required to have reference to its surrounding context in accordance with Policy DM1.</p> <p>Regarding the petrol station site, it is considered that the approach proposed allows flexibility within</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>It is bounded on all sides by low rise, two storey buildings, including cottage garden estates, and the slightly higher buildings of Bruce Castle, All Hallows Church, the Emhurst pub, and Risley Avenue School. All of these buildings are in conservation areas and some are nationally listed, and together they form the centre of medieval Tottenham and one of its cultural hearts.</p> <p>To impose a large new residential structure in the middle of this situation would be to compromise all of the other heritage buildings and be to the detriment of the surrounding conservation areas. Church Lane, which bounds the site to the east, is a road of great character and seclusion in this part of the borough.</p> <p>We understand that it is proposed to include the petrol station in the development area, and the acquisition costs of this would therefore mandate an intensive use of the site. We would argue</p>		<p>the scheme, and if the sites are in separate ownership, this would not transfer the financial burden of acquiring one part of it onto the design of another in the manner inferred. Instead, if one section of the site comes forward, the applicant will be required to show how the proposal can be compatible with the remainder of the site.</p> <p>The Council agree that other areas should be, and are the focus for regeneration within the borough, but believe this is a suitable site for redevelopment.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>that it would be simpler to exclude the petrol station from the development area, and to therefore make a less intensive land use more achievable, realistic and affordable.</p> <p>We have previously argued against a large block of flats on this site and the matter has been taken to the Planning Inspectorate, which agreed with us. The developer subsequently produced a new plan for two storey houses, which unfortunately never came to fruition but which we believe is the best possible solution to this site. We would consider three storeys the absolute maximum justified in this sensitive location.</p> <p>We would also argue that there are many other areas within Haringey that have the potential for more intensive but less intrusive development and we will be writing further on this in due course.</p>		

Respondent 51: Canal and River Trust

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
51	RSA145	SA 65	Not stated	Not stated	This site has a significant boundary with the River Lee Navigation and its towpath, which is owned and managed by the Trust. The site currently has a very poor relationship with the waterspace.	We would like the allocation detail to be amended to require more emphasis on improving the openness of the site to the towpath, and enhancing the waterside environment. This would be through the site layout, and also appropriate landscaping. We would also request that any future developer be encouraged to consult at a very early stage of their site design with the Canal & River Trust. We would also request they contribute to improvements to the towpath and accesses.	Agreed in part – propose a minor modification to the first site requirement to include the Canal and River Trust and to the 4 <sup>th</sup> bullet point to refer to the towpath. Within the Development Guidelines, at the 6 <sup>th</sup> bullet point, add a reference to London Plan policies 7.28: Restoration of the Blue Ribbon Network and 7.30: London's Canal's and other River and Waterspaces.

Respondent 52: Hannah Ward

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
52	RSA146	SA65/ 2.176	No	No	I am a leaseholder of a flat in Leabank View and Lemsford Close (SA65). There is no reason given in the Site Allocations DPD for the destruction of the estate aside from the potential for more housing stock, however there is also a recognition that this	Remove SA65 from the site allocation DPD. The	The potential public benefit that the redevelopment will serve is through the

					potential is limited due to height restrictions. Adding a small number of properties does not justify the considerable distress and disruption of destroying people's homes (not to mention the disruption to the neighbourhood). Furthermore there is no suggestion that any new homes would benefit local residents in housing need. The estate is very quiet and has no social problems. The neighbours are friendly and on good terms. There are areas where children play and the park is next door. It feels safe. The buildings are in good condition and have recently undergone a number of improvements. I live in a block of six flats and it is sturdy, functional and secure. Many of the residents have lived here for extended periods (I know at least two of my neighbours in my block alone have lived here for more than 15 years each). To destroy people's homes for little overt benefit is wholly unsound.	DPD does not provide sound reasons for such a wholesale destruction of people's homes.	creation of additional affordable homes in the borough.  The allocation identifies an indicative net capacity for the site of 65 units, which it is considered can make a significant contribution to meeting housing need locally.  No change
52	RSA147	SA65	No	No	Further to my previous submission, I would also like the following to be noted. I bought my flat in Leabank and Lemsford in August 2015. I am the leaseholder with Haringey Council owning the freehold. The Local Plan and its potential impact on my property was NOT disclosed by Haringey Council either as part of <b>the Local Search or in the Landlord's Information Pack</b> ahead of the purchase. I have since become aware that the plans were made available to residents in February 2015 when the original consultation took place. I would argue this lack of disclosure is both not legally compliant and also fails in the duty to co-operate. Such a lack of openness and transparency at this early a stage suggests that the intention for co-operation with residents is unlikely to be fulfilled and in fact wholly undermines it.	Remove SA65 from the Site Allocation DPD	Unfortunately it is not considered that this is an issue regarding the duty-to-cooperate.  Land charges are outside the scope of the Local Plan.  No change

Respondent 53: Mavis McLean

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
53	RSA148	SA65	Not stated	Not stated	I think it is very unfair to ask normal citizens about topics/situations like this, who would know about whether a local plan is legally compliant, all I know is that I love living here and would not want to move to make way for future development.	Not specifically stated	Noted.

Respondent 54: Visna Macpherson

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
54	RSA149	SA65	Not stated	Not stated	In reply to your letter regarding estate renewal program, I would like to remind you that Leabank View and Lemsford Close was improved under Decent Homes Programme few years ago, and the Council spent millions of pounds on the works, so to demolish the estate is a waste of money and the sheer lunacy. I'm totally against your plans to demolish perfectly adequate flats and houses, and replace them with some high rise building that will be at odds with the area. Haringey needs to build more council properties, but to get rid of good accommodation is totally wrong. Stop destroying good housing, and start building somewhere else.	Not specifically stated	Objection is noted.  The potential public benefit the redevelopment will serve is through the creation of additional affordable homes in the borough.  The allocation identifies an indicative net capacity for the site of 65 units, which it is considered can make a significant contribution to meeting housing need locally.  No change

Respondent 55: Savills on behalf of Kennet Properties Ltd

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
55	RSA150	N/A	Not stated	Not stated	<p>These representations are made on behalf of Kennet Properties Ltd in relation to land at Hornsey Water Treatment Works. They are in <b>response to London Borough of Haringey's</b> consultation on their Site Allocations Development Plan Document (DPD) Preferred Options consultation.</p> <p>1.2 Kennet Properties is a subsidiary development company within the Thames Water Group. Its remit is to identify land that is surplus, or could become surplus, to the operational requirements of Thames Water Utilities Limited and to promote it for alternative use.</p> <p>1.3 The London Borough of Haringey commenced preparation of their Site Allocations DPD in 2013 by carrying out a Call for Sites consultation. At this time Kennet Properties Ltd promoted the Hornsey Filter Beds site which comprises of an area of 0.7 Ha in size.</p> <p>1.4 In January 2014 Haringey published their Site Allocations DPD Regulation 18 consultation within which the Hornsey Filter Beds site was identified as site HO2. Kennet Properties Ltd responded to this consultation supporting the allocation.</p> <p>1.5 The current Site Allocations DPD identifies the site as site SA48, Hornsey Water Treatment Works</p>	Include the Hornsey Filter Beds site in the Site Allocations DPD	<p>The Council have identified sufficient sites to meet the <b>Borough's</b> objectively identified housing need, and London Plan housing target. This has been achieved without needing to develop MOL within the borough.</p> <p>It is noted that this site was included in earlier versions of the document, but was removed after consultation responses, including from the GLA, who formally designated for Metropolitan Open Land, raised objection to its inclusion.</p> <p>It is considered that in order for a reallocation of MOL at any point in the future, that in</p>

				<p>(WTW). The proposed site allocation does not include the whole WTW site but only the southern two filter beds, as identified by the location plan in Appendix 1. For clarity the site is therefore referred to within this consultation response as Hornsey Filter Beds.</p> <p>1.6 Kennet Properties Ltd continue to maintain that the Hornsey Filter Beds are suitable for residential use. In response to the current consultation stage for the Site and Allocations DPD these representations:  review housing need in Greater London and specifically the London Borough of Haringey  review the proposed site and its surroundings;  present a case for the need to redefine the Metropolitan Open Land boundary; and address some additional considerations including a new proposed footpath through Hornsey WTW and concerns with Odour.  Housing need in Greater London</p> <p>2.1 In 2013 The Department for Communities and Local Government (DCLG) and Greater London Authority (GLA) released official housing statistics through the London Strategic Housing Market Assessment (SHMA) which <b>revealed that London's housing need was greater</b> than was thought.</p> <p>2.2 <b>It showed that London's population has grown</b> more over the last ten years than at any time in the capitals history and that housing supply has not kept up with this growing demand.</p>	<p>addition to the case being made that the land itself does not provide a MOL-appropriate use, there would need to be significant strategic benefit gained through the rezoning (above and beyond simply housing need, which has demonstrably been met on non-MOL sites), and will make a positive benefit to the surrounding MOL, Conservation Area, and other surrounding uses.</p> <p>No change</p>
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					<p>2.3 With the capitals population expected to reach nine million by 2020, current housing supply levels suggest that there will be a deficit of 559,000 homes by 2021.</p> <p>2.4 In order to be able to keep up with this demand, and to address the current deficit, 809,000 homes need to be built in London by 2021.</p> <p>Housing Need in the London Borough of Haringey</p> <p><b>2.5 The GLA’s 2013 mid-year population estimates, which remain the most up-to-date projections available, estimates that the London Borough of Haringey’s population stood at 262,797 in 2013 and it is expected to grow to 293,748 people by 2026.</b></p> <p>2.6 In order to meet this additional need the GLA in their Further Alteration to the London Plan (FALP) (2015) document set a challenging housing target for the Borough. Over the Plan period 2011 – 2026 they are required to deliver 19,802 new additional homes. This equates to 1,502 new homes per annum.</p> <p>2.7 The Council has prepared the Tottenham Area Action Plan and the Site Allocations DPD which had identified sites for only 18,656 net additional dwellings. The Council is there not yet able to demonstrate that it can meet its full housing requirement and as a consequence it is imperative that those site suggested for allocation are carried</p>		
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				<p>forward to adoption.</p> <p>How can Hornsey Filter Beds contribute to <b>Haringey's Housing Target</b></p> <p>2.8 The Hornsey Filter Beds site will help to address the housing need in Haringey by delivering approximately 40 units, on a site which has been previously developed, is in a sustainable location and is well related to the existing residential neighborhood.</p> <p>The Site and its Surroundings</p> <p>3.1. Hornsey Water Treatment Works (WTW) is located immediately west of the East Coast Main Line Railway, south and east of Alexandra Park, north of Newlands Road, the Campsbourne Estate and the New River Village.</p> <p>3.2 The water works contain 4 concrete lined filter beds, a new water treatment facility and a open storage reservoir to the north of the site. The site proposed for allocation consists of the two most southern filter beds which sit adjacent to Newlands Road.</p> <p>3.3 Alexandra Park, just to the north-west of the site, is a public recreation space. It is designated a Site of Borough Grade I Importance for Nature Conservation, and a Historic Park. Both the park and the water works, including the filter bed site, are designated Metropolitan Open Land (MOL).</p>		
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				<p>3.4 To the south of the site beyond Newlands Road and to the east of the site beyond the East Coast Main Line Railway are existing built up areas consisting of both residential houses and apartments and other industrial and commercial uses.</p> <p>3.5 The Penstock footpath is a pedestrian and cycle link connecting Wood Green and Haringey Heartlands with Hornsey and Alexandra Park. It turns off Newlands Road at the southern edge of the site, runs east along the edge of the New River, then turns north beside the New River, before passing under the railway in a short underpass. At no point does the footpath cross through the WTW site.</p> <p>Due to the challenging housing targets set by the GLA and the capacity constraints experienced by the London Borough of Haringey, it is considered necessary for the London Borough of Haringey and the GLA review the Metropolitan Open Land (MOL) designation at the Hornsey Filter Beds.</p> <p>4.2 The Hornsey Filter Beds site is currently designated as MOL. This designation was included as part of the previous statutory plan for the Borough – the Unitary Development Plan – which was adopted on 1 November 2006.</p> <p>In November 2006 permission was granted for the erection of a new water treatment works comprising of four new buildings. Prior to this development the WTW site was considerably</p>	
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				<p>more open. The development of the buildings in the center of the site separates the large MOL designation which extends through Alexandra Park and Palace and the proposed allocation of the filter beds.</p> <p>4.4 The decision notice for the new works stated that: <b><i>“The proposals are inappropriate development within the Metropolitan Open and (Policies OS2 Metropolitan Open Land, OS4 Alexandra Palace and Park) and some harm would be caused to the open character of the land...”</i></b></p> <p>4.5 Due to the introduction of the new WTW at the site and the consequential notable change to the open character of the site, it is considered that a review of the MOL designation at this location is warranted. The London Plan in Policy 7.17 states that any alterations to the boundary of the MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities. In the context of the pressing need to increase the supply of housing in Haringey it is considered an appropriate time for this review.</p> <p>4.6 Policy 7.17 of the London Plan goes on to state that land designated as MOL should satisfy one or more of the following criteria:  Land that contributes to the physical structure of London by being clearly distinguishable from the built-up area;  Land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London;</p>	
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				<p>Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level;</p> <p>Land that forms part of a Green Chain and meets one of the above criteria.</p> <p>4.7 Therefore in order to establish whether or not the Hornsey Filter Bed site should be removed from the MOL the site needs to be assessed against the above.</p> <p><b>Case for the removal of Hornsey Filter Beds from the MOL</b></p> <p>Land that contributes to the physical structure of London by being clearly distinguishable from the built-up area</p> <p>4.8 Hornsey WTW is split into two key areas. To the north of the site there is a open storage reservoir and located to the southern end of the site is the operational works. The area covered by the operational works is wholly made up of hard standing with 4 large operational buildings standing 44.70 meters high.</p> <p>4.9 The wider MOL designation includes Alexander Palace and Park. The proposed Filter Beds site is separated from the Palace and Park by these large operational buildings resulting in there being an disconnection between the proposed site and the wider MOL designation.</p> <p>4.10 The proposed filter beds site sits adjacent to</p>		
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				<p>the residential estate of Campsbourne to the south. Due to the site having an existing urbanised character and its location next to an existing built up area the site is considered to be further disconnected from the wider MOL, and better related to the surrounding residential neighborhood.</p> <p>4.11 The proposed allocated site cannot therefore be clearly distinguished from the built up area and therefore does not contribute towards the physical structure of London.</p> <p>Land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London</p> <p>4.12 The proposed filter bed site as described above is wholly made up hard standing. The site does not currently provide open air facilities of any description as it is an operational works. For health and safety reasons it is not (and has never been) accessible by the general public. Its operational use also makes it unsuitable as a site for leisure, recreation, sport, arts or cultural activities use.</p> <p>4.13 Should the site be removed from the MOL there will be no net loss of open land as the site does not currently provide open public space.</p> <p>Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or</p>		
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					<p>national level.</p> <p>4.14 The filter beds and other structures on the site are locally listed. A request was made to English Heritage to list the whole site including the filter beds. English heritage have produced their factual report which assesses the site historical significance. Thames Water instructed Montagu Evans to review this report and respond on their behalf.</p> <p>4.15 Their response to the report, which is submitted in full in support of these representations, concludes that the site and associated Sluice House do not have the requisite special interest  <b>to warrant inclusion on the Secretary of State's list of buildings as per s.1(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</b> As such it is considered that the site does not contain features of historical value.</p> <p>4.16 The site is located within a conservation area. Any future development on the site, will need to respect and enhance the character of the conservation area, and mitigate against any potential impacts. Given the distance to Alexandra Palace and the presence of the water treatment works in between it is not considered that redevelopment of the filter beds will ultimately be harmful to the Conservation Area.</p> <p>Land that forms part of a Green Chain and meets one of the above criteria</p>		
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				<p>4.17 The London Plan 2013 defines Green Chains as: <i>'areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian cycle routes.'</i></p> <p>4.18 The site at present would not be considered to form part of a Green Chain as the site is not assessable by the public. It also has a developed character and does not represent an area of open space.</p> <p>4.19 Should the site come forward by way of an allocation any proposed development will improve the current accessibility and Green Chain by providing access through the site to the Alexander Park and Palace.</p> <p>Summary of the case for removal from the MOL</p> <p>4.20 As demonstrated it is considered that the proposed Hornsey Filter Bed site no longer <b>satisfy's the London Plan criteria as land which</b> should be designated MOL. As such the proposed alteration of the MOL boundary is therefore acceptable at this location.</p> <p>Footpaths</p> <p>5.1 The Council have expressed a desire for Thames Water to provide access across their site in order to create a more direct route from the New River Path Subway to the Alexander Park. Unfortunately Thames Water are unable to grant access across an operational site due to health</p>		
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					<p>and safety issues.</p> <p>5.2 As mentioned above any proposed development at the site could provide a better link between the Newlands Road the Alexander Park and Palace by way of a public footpath through the development.</p> <p>Odour</p> <p>5.3 The proposed allocation will result in residential dwellings being located in close proximity to an operational works. As the works are a Water Treatment Works there is no concerns with regards to Odour.</p> <p>Reinvestment into infrastructure</p> <p>5.4 Thames Water regularly identifies surplus land which can be sold for other uses. Thames Water Utilities Regulator OFWAT monitors and reviews all non regulatory business to ensure that all profits are invested back into the regulatory business. As such any profit made from development and subsequent sale of the site will be re invested into Thames Waters existing infrastructure.</p>		
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**Respondent 56: Friends of the Parkland Walk**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
56	RSA151	SA40	Not stated	Not stated	The Friends of the Parkland Walk object to a practice that it regards as unsound of having	We have mapped the modifications	The published red line boundary intentionally

					the notation of a housing development site shown outlined in red on the policies map over an area of Metropolitan Open land, Nature Reserve, Green Chain, green corridor and SINC. A similar objection has been made to the Highgate Neighbourhood Plan and the view expressed there and repeated here, is that the developable land should be the site designated and allocated (in this case as SA 40 – in the case of the Neighbourhood Plan, KS5) and that the link referred to should be a different notation (in this case it could be the Green Chain notation to cover the desired link between the walkable part of the Parkland Walk and the connections to the north (in this case the footpath adjacent to Highgate Library).	which would be necessary to make the Local Plan map legally compliant and sound. The consultation response software doesn't allow Friends of the Parkland Walk's map with the suggested revisions to be uploaded. We await instructions on how to send it.	includes a section of the Parkland Walk within the site boundary as a key part of the policy seeks to extend the walking route of the Parkland Walk. Not including this section of MOL would not enable sufficient consideration of how the site can come forward comprehensively.  No change
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**Respondent 57: Diana Thomas**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
57	RSA 152	SA 49	No response given	No response given	<p>Whilst there have been some small changes made to this proposed development since it was known as SA 51, I still object to the proposal as it stands on the following grounds:</p> <p>Above all, there are only actual plans/elevations to comment on for the Park Road part of this area, owned by Orantes...all we are told about the area known as the privately-owned Courtyard is that nothing is to</p>	Not specifically stated	<p>Heights will be determined based on the design of the development when a planning application comes forward.</p> <p>The retention of the trees is a clear presumption that the open space will be</p>

				<p><b>be retained and that ‘Heights should be restricted to protect the amenity of properties on The Grove, and heights should be restricted to the north of the site to protect the setting of the church, and preserve the amenity of the back gardens on Palace Rd.’</b> This leaves the proposed height subjective and undefined. The sheltered homes are still vulnerable.</p> <p>As far as the council-owned Grassed area it states that <i>‘the site contains a number of mature trees and these should be retained on site where possible.’</i> This allows the trees to be moved to another part of the area...possibly out of general public access as it is now.</p> <p>Apart from this there are other considerations such as:</p> <p>The extra school places that will be needed in already bulging classes. <b>Doesn’t LB Haringey have a policy with restrictions governing expanding schools and building new schools?</b></p> <p>The pressure on the traffic flow at an already dangerous junction and part of Park Road. At present, Lynton Road is blocked off at the Park Road end, providing a safe and quiet harbor for the people in the 2-story sheltered accommodation in The Grove. For the safety of this small area, young and old, this road block must be continued?</p>	<p>preserved.</p> <p>The number of school places has been modelled in the School Place Planning report, and sufficient new classes to meet need planned for.</p> <p>Details of access and parking will be required at the time of planning application in line with <b>the Council’s DM</b> Policies.</p> <p>Any development on this site will be assessed having regard to the Conservation Area adjacent.</p> <p>No change</p>
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				<p>Where will these new residents park their inevitable number of cars?</p> <p>Assuming these new residents have jobs, there will be more pressure on the transport system. Have you seen the queues for the W7 bus in the morning?</p> <p>The extra pressure on other public <b>services...doctors, refuse collections, the ailing sewers and drainage in the area.</b></p> <p>Crouch End has now a good reputation for its thriving, villagey feel with its small independent shopkeepers attracting people <b>into the area for an 'alternative to huge shopping mall' afternoons shopping.</b></p> <p>This scheme will seriously detract from the neighbouring Crouch End Conservation Area. The fact that mistakes have already been <b>made (see 6 Middle Lane for example)...it doesn't mean that more can be made in the future.</b></p> <p>Please, continue to reconsider this scheme with a little more sensitivity. I would also appreciate being kept informed about your further thoughts on this matter.</p>		
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Respondent 58: Claire Palmer

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Para					
58	RSA153	SA49	No response given	No response given	<p>I am a business owner, and I currently rent office space at the Courtyard, Lynton Road.</p> <p>I have been contacted by local residents and forwarded the proposal document. (Regulation 19 Site Allocations DPD).</p> <p>We currently employ 17 professionals and are planning to expand this number to 40 by the end of 2017. I strongly object to the redevelopment of the site for a number of reasons.</p> <p>1. We have not been directly consulted and according to your consultation document we should have been, we have had no opportunity to object to these plans or even study them in any detail.</p> <p>2. There is a dire lack of office rental space in Crouch End suitable for our consultancy. There are a number of suitable sites in Haringey for building new apartments as identified in your <b>document which don't involve turfing out local SME's who support the local economy.</b></p> <p>3. The majority of our staff currently live in Haringey close to the office, we have worked hard to cut travelling time for all</p>	Not specifically stated	<p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations <b>and the Council's</b> Statement of Community Involvement.</p> <p>No change</p>

					<p>of our staff according to our company environmental policy.</p> <p>4. This proposal is causing business uncertainty which is also damaging to <b>the growth plans of the SME's in the courtyard most notably ours.</b></p> <p>I look forward to receiving consultancy documents in due course, to enable our business to object using the proper channels.</p>		
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Respondent 59: Philip Harland

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
59	RSA154	SA 49	No response given	No response given	<p>Proposed development site at 72-96 Park Road N8</p> <p>In reference to the Development Guidelines on page 125.</p> <p>I understand that the Plan is open to public consultation to March 4th, which I take to mean it may still be</p>	<p>I would respectfully suggest that the present draft Guidelines for the site at 72-96 Park Road be amended to take into account the following 4 points.</p> <p>1. The Guidelines say <b><i>"Heights and elevation details should respond to the Park Road frontage and the established rhythm."</i></b> The 72-96 site frontage has an established height of <b>2 storeys</b>. The Park Road frontage houses opposite the site are all <b>2 storeys</b>. Yet the proposed scheme for the</p>	<p>1. The height and design guidelines in the policy are designed not to be prescriptive in terms of design of new buildings on the site. Consideration of design will be had upon receipt of a planning application.</p> <p>2. The retention of the trees is a clear presumption that the open space will be preserved.</p>

					<p>revised.</p> <p>site shows <b>5 storeys</b> (or by some accounts 4). This would in no way respond sympathetically to the existing frontage height.</p> <p>The Guidelines go on to say <b><i>“Higher elements may be possible on Park Road marking the entrance to Crouch End District Centre”</i></b>. This is at odds with the preceding Guideline, which stipulates that heights should respond (by implication sympathetically) to the existing frontage. In any case the existing Murray Arms Pub and the building opposite already do the <b>job of “marking the entrance”</b> to the Crouch End Conservation Area perfectly well. A building that is anything over 2-storeys at 72-96 Park Road would considerably detract from the entrance to Crouch End village.</p> <p>(The Veryan Court building to the north of 72-96 should not be taken into account in terms of its height because it is set back a significant distance from Park Road and has its own access road off Park Road. It should not count as Park Road frontage in the same way as 72-96 and the houses opposite. In any case this bland, uninspiring building should not be counted as</p>	<p>3. See answer to 1.</p> <p>4. Parking will be provided in line with the <b>Council’s DMDPD</b>.</p> <p>No change</p>
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						<p>a model for anything other than to do something different - more in sympathy with the established 2-storey Edwardian and Victorian character of the original housing in the streets around.)</p> <p>2. The Guidelines state that <b><i>“the site contains a number of mature trees and these should be retained on site where possible”</i></b>. The existing green space should be retained unequivocally and, indeed, enhanced. It forms a necessary breathing space that benefits local families, individuals, businesses and people passing through alike.</p> <p>3. The proposed scheme for more housing is overall too big, too ambitious. It would spoil the existing character of the area and in particular detract from the amenities of elderly people living in The Grove.</p> <p>4. There is nowhere near enough provision for new parking spaces in the scheme. There is already too much pressure on existing parking space.</p>	
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Respondent 60: Alan Whitehouse

ID	Rep ID	Allocation / Policy / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments /
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		/ Para					Response
60	RSA155	SA 49	No response given	No response given	Reference SA 48. I would like to be added to the list of names on the petition objecting to the building on the green space at the junction of Lynton Road and The Grove.	Not specifically stated	Noted.

#### Respondent 61: Carol Jones

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
61	RSA156	SA 49	No response given	No response given	Reference SA 48. Please add my name to the petition objecting to the building on the green space on Lynton Road at the junction with The Grove.	Not specifically stated	Noted.

#### Respondent 62: Jennifer Collins

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
62	RSA157	SA 49	No response given	No response given	I am writing to issue my objections to the above proposal. As the owner of one of the flats at Truro Court the proposed building work referenced as SA49 would have a severe negative impact on myself and the local area.  Firstly the proposal of a 5 storey block of flats backing directly onto my garden would not only be a huge invasion of the privacy as any windows at the rear of the building would directly look into my property.	Not specifically stated	The height and design guidelines in the policy are designed not to be prescriptive in terms of design of new buildings on the site. Consideration of design will be had upon receipt of a planning application.  Parking will be provided in <b>line with the Council's DMDPD.</b>

				<p>Currently there are only roof windows and therefore any change to this would be an absolute invasion of my privacy.</p> <p>Secondly it would block out the natural light we get into the back of our flat which, even with the current building is limited, any building higher than this would completely block out natural light, making our flat dark and arguably unhealthy increasing the risk of damp, especially with the blinds/screens we would have to install and used to have for privacy.</p> <p>Thirdly, the proposed number of flats would put a huge strain on the already limited parking. It is often extremely hard to park on Palace road and the surrounding roads, in the proposed plans there seems to be inadequate space to cater for the number of cars there may be which will therefore without doubt negatively impact the surrounding areas. In addition to this local transport is already stretched during peak time travel. additional flats in the area would put further strain on the local bus links which already cannot cope with the volume of use.</p> <p>Lastly, I moved to Crouch End as it is a charming area with beautiful characterful and historic buildings one of which is the old piano factory which</p>		No change
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					my property backs onto. In the short time I have lived here the landscape of Crouch End has changed with modern, unsympathetic buildings being squashed between historic buildings. I feel strongly that we should be preserving the historic buildings which are being used for small local businesses and that all efforts should be made to retain these characterful buildings.		
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**Respondent 63: Monika Szlenkier**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
63	RSA158	SA 49	No response given	No response given	<p>I am writing to highlight my concerns about this proposed development.</p> <p>I strongly object to any destruction of the green space and trees at the corner of Lynton Road.</p> <p>Any new buildings should definitely not be any higher than 4 stories and preferably lower.</p> <p>Work spaces for existing business should be retained.</p>	Not specifically stated	<p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>The height and design guidelines in the policy are designed not to be prescriptive in terms of design of new buildings on the site. Consideration of design will be had upon receipt of a planning application.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>No change</p>

Respondent 64: Susan Scott Hunt

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
64	RSA159	SA49	No response given	No response given	<p>As a resident of Lynton Road I object to the inclusion of this site within the Local Plan Site Allocation document. The council has suggested that they would 'if possible' modify the site plan so as to protect the established trees on the green at one corner of the site, across from The Grove, but this is not reflected in the plan. It makes no sense to have a vague undertaking to save the trees without any express intention to preserve the green space on which they grow. Keeping this space green is vital to preserve the public's need for some even minor relief from the intensity of the built environment in the area, which would be significantly increased by the development of the site.</p> <p>A second reason is that the massive building contemplated would compromise the privacy of</p>	<p>Point 1: Drawing the site so as to eliminate this space would exacerbate the ugly imposition of a very large building on what has been a pleasant part of the area early because it preserves small scrapes of green and open space that can be used by the public. This incorporation of the green space is in my opinion the worst feature of the SA48 plan. However, there are many other reasons to require the modification of the plan.</p>	<p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>The height and design guidelines in the policy are designed not to be prescriptive in terms of design of new buildings on the site. Consideration of design will be had upon receipt of a planning application.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>No change</p>

				<p>residents of The Grove, a sheltered community of vulnerable people, as well as imposing significantly upon the homes on the Park Road end of Lynton Road and to some extent also upon the rest of the surrounding area of Lynton Road, which is a conservation area. The development would bring an abrupt change in character from small cottage-type Victorian terraces, within a conservation area, to a huge towering intensively populated block building of 4-5 storeys.</p> <p>A third reason is that the plan would needlessly wipe out valued non-retail industrial space that is integrated into the community and not relegated to ugly 'industrial zone'. It is a better mix of use to preserve some non-retail commercial property situated within residential areas. Doing so encourages low environmental impact employment because people employed there can continue to walk to work as many in the courtyard area do now.</p>	
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					<p>This type of commercial space is greatly diminished throughout Haringey. In addition, the plan would destroy attractive Victorian architecture in the courtyard.</p> <p>Fourthly, the plan does not realistically take into account the impact of adding a large number of flats with no additional provision for parking, not even for potentially disabled residents. It is nonsensical to assume that future residents will not own cars. As far as I am aware, car ownership is not yet illegal and not yet entirely preserved to the wealthy. The failure of the plan adequately to take into account the provision of additional car parking shows how little real evaluation has gone into its inclusion in the site allocation document.</p>		
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Respondent 65: Sophie Laws

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
65	RSA160	SA49	No	No	I am writing to ask the Planning Inspectorate	I hope the Planning	Heights will be

			response given	response given	<p>to challenge this plan. I am very concerned that despite so many comments submitted, even though consultation was not at all transparent, it appears the local authority intends to continue with this development. It does not seem that consultation was carried out properly and did not result in local people being listened to. Surely the planning/development process should take more account of the following issues:</p> <p>The effect on the vulnerable residents of The Grove, who are housed there because they have high needs, does not appear to have been considered at all. The height of any new building could have a very oppressive effect for them, as would the disruption of the work, the increased parking problems etc. The issue of the height of the building does not seem to have been properly dealt with as no clear decision is recorded for maximum height to be allowed.</p> <p>The loss of green space should be looked into, and does not appear to have been – the small green space there is valuable relief in a built up area. I believe it is listed as green space in Haringey’s strategy to have such spaces, allowing a less built-up environment for us all. Surely it has some legal protection?</p> <p>I cannot understand why the very interesting old buildings currently there are not protected by law, nor why it would make any sense to destroy six working businesses, all so someone can profit from building flats.</p>	<p>Inspectorate will prevent Haringey from making this negligent set of decisions – local people have seen no evidence of adequate care being taken, with a sense of overwhelming pressure to increase housing at any cost.</p>	<p>determined based on the design of the development when a planning application comes forward.</p> <p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>Details of access and parking will be required at the time of planning application in line with the Council’s DM Policies.</p> <p>No change</p>
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					<p>The employment provided is important in this area, and good evidence of its rarity was submitted to the LA. Even if such spaces were replaced, the disruption and extra cost would be enough to destroy at least some businesses.</p> <p>Parking problems here are already very real - it is usually necessary to park far from our front door – this is a very large number of new dwellings, and the idea that they won't have cars is absurd.</p> <p>The sheer density of the proposed development is surely unacceptable.</p>		
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Respondent 66: Will & Nicola Spokes

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
66	RSA 161	SA49			<p>Haringey Council has pulled together 3 separate sites to make up this allocation as follows:</p> <ul style="list-style-type: none"> <li>a) 72-96 Park Road owned by an independent freeholder (Orantez), there are 4 businesses on this site, plus some residential units. There is an extant planning permission on this site to add an additional 2 stories to the existing two storey building (Haringey Planning ref: <a href="#">HGY/2006/1839</a>).</li> <li>b) The Courtyard industrial estate on Lynton Road (owned by a second independent freeholder; all 9 businesses on the site lease their premises)</li> <li>c) Green space on the corner of Lynton Road and The Grove, owned by Haringey Council.</li> </ul>	<p><u>This is an oversight that must be immediately addressed</u> – my consultation feedback in January 2015 highlighted the proximity of our house (and the whole row we are on – 45 to 33 Lynton</p>	<p>Heights will be determined based on the design of the development when a planning application comes forward. This will consider detailed appraisal of</p>

				<p>However, the Council failed to adequately consult ANY of the 13 businesses potentially affected by the development of this site as proposed - <b>given one of the “Site Requirements” for this site is “No buildings need to be retained on this site”</b>, any of the businesses risk as a minimum, facing relocation whilst development takes place or at worst, risk closure of their business due <b>to a lack of ‘like for like’ premises</b> provision in the new development and the scarcity of other suitable business premises in the North London area.</p> <p>At a meeting some fellow residents, Courtyard business owners and I held with the Council Members for Housing and Planning and various other staff from the housing and planning teams on 30th June 2015, the Council member for Planning admitted that each of the individual businesses had not been consulted by letter (or directly in any other manner), as only the <b>freeholder’s details were on their mailing system</b> and thus, they were also unaware of the presence of any businesses on the site (in the previous iteration of the Sites Allocation DPD document, the proposed development guidelines were for an entirely residential development).</p> <p>Whilst we welcome the changes in the new Sites Allocation DPD document to mixed use, in response to us highlighting this issue in June, it does not and will not protect all of the existing jobs and businesses on the site and it does not alleviate the fact that in the initial preparation of the Sites Allocation DPD, the research, evidence/information gathering and subsequent public consultation on this site was far from robust and consequently the potential development of this site is set to have a devastating impact on both employment floorspace and job numbers in Crouch End.</p>	<p>Road) to the development and that all of these properties have bedrooms on the front side of the property so stand to be severely impacted both in terms of privacy and loss of light by a tall development in such close proximity. Again, more robust evidence gathering, including visiting adjacent homes which overlook the site and assessing the importance of the immediately adjacent green space opposite our houses, in terms of providing relief between two built up areas</p>	<p>the impact of any proposals on adjacent properties.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations and the <b>Council’s</b> Statement of Community Involvement.</p> <p>The</p>
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				<p>Furthermore, there are contradictory statements within the Sites Allocation DPD guidelines for SA49 with regards <b>it's mixed use allocation, as follows, that also indicate</b> that this element of the plan has been poorly researched and conceived:</p> <p>The Site Requirements state that:</p> <p><b><i>“No buildings need to be retained on the site”</i></b></p> <p><b><i>“Replacement employment floorspace will be required to be provided to replace the number of jobs on this site.”</i></b></p> <p>Whilst the Development Guidelines state that:</p> <p><b><i>“In line with policy SP9, if redevelopment results in a net loss of employment floorspace, a financial compensation will be required as set out in the Planning Obligations SPD.”</i></b></p> <p><b><i>“Any jobs lost through development of the site should be reprovided on site.”</i></b></p> <p>So, if, as above in the Site Guidelines, replacement employment floorspace needs to be provided to replace the number of jobs on the site and as per the development Guidelines, any jobs lost through the development of the site should be re-provided on the site, how can it also be possible to state that a development could also result in an uncapped and unquantified net loss of employment space for which the developer would have to provide financial compensation?</p> <p>As noted above, the site at 72-96 Park has an extant</p>	<p>and also privacy, should have been conducted before preparing this plan.</p> <p>The corner of green space (with mature trees) currently included as one of the three sites in SA49 should not be included as a space for potential development for the following reasons:</p> <p>i) As mentioned above, the trees provide screening and privacy for the houses in Lynton Road, from the business area</p>	<p>development guidelines are not contradictory . The expectation is that there will not be a loss, and could even potentially be a gain in employment floorspace within the site. The Council is required to plan flexibly however, so if the site does experience a reduction in floorspace, a local employment contribution will be sought in line with adopted Local Plan Policy SP9.</p> <p>The retention</p>
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				<p>planning permission (Haringey Planning ref <a href="#">HGY/2006/1839</a>) to build up to two additional stories on the existing two storey building i.e. making four stories in total. The commentary for SA49 in the Sites Allocation DPD states <b>that:</b> “2.140 There is an existing planning consent for the western portion of this site permitting development up to five storeys on the site.”. <u>This is plainly incorrect</u> and shows a lack of proper evidence gathering in relation to the preparation of this plan document.</p> <p>As a resident of 43 Lynton Road, one of the houses immediately opposite the current entrance to the site we stand to be affected the most by the development of this whole site, yet Lynton Road is not stated as one of the two roads whose amenity will be protected by the Development <b>Guidelines within the Sites Allocation DPD</b> “<i>Heights should be restricted to protect the amenity of properties on The Grove, and heights should be restricted to the north of the site to protect the setting of the church, and preserve the amenity of the back gardens on Palace Rd.</i>”.</p> <p>Currently the Sites Allocation DPD provisions only provide possible protection for mature trees on the site – “<b><i>The site contains a number of mature trees and these should be retained on site where possible.</i></b>” - but make no provision for the protection of this much used and valued green space. Thus we feel this space has not been properly assessed before being included into this plan and earmarked for potential development – it is not justified to lose such a valued green space in this built-up area when as above, it provides many valuable uses for the surrounding community.</p> <p>The Grove, one of the streets immediately adjacent to the</p>	<p>opposite and provide some relief from the traffic noise of Park Road for the residents in sheltered housing in the Grove.</p> <p>ii) It is a busy, much used pedestrian route through from Park Road, down to the Grove and through to Palace Road and Priory Park, used particularly by parents with young children and their buggies, bikes and scooters and also by dog walkers.</p> <p>iii) Ther</p>	<p>of the trees is a clear presumption that the open space will be preserved.</p> <p>The amenity of all surrounding neighbouring properties will be protected through policy DM1.</p> <p>The Piano Factory is not a listed building and as such does not receive specific protection in the Policy.</p> <p>No change</p>
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				<p>site, contains sheltered housing for elderly and infirm Haringey residents. The Grove itself is a very narrow road, with single parking and is not wide enough for truck access (there have been previous issues with fire engine and delivery lorry access). With these two factors combined, it is blatantly not suitable for a very large, multiple-storey residential development with front doors opening onto The Grove, as proposed. Removing the parking spaces from The Grove to widen the access would simply serve to place more pressure on parking which is already under-served in the immediate area. Again, had the Council undertaken more robust evidence gathering in <b>relation to this site and it's</b> surrounds, it would have been obvious that this level and type of development on the Courtyard area of this site is not justifiable versus the impact on both vulnerable members of the community and the surrounding area.</p> <p>The Courtyard portion of the site contains a large and attractive Victorian building that is a former piano factory. This building currently serves as offices for some of the businesses on the site and thus is in very good condition. This site, as the Sites Allocation DPD notes, borders the Crouch End Conservation area, so literally a few metres further and this building would be afforded much more protection. However, at present the Site Requirements for SA49 state that: <b>“No buildings need to be retained on this site.”</b>. Meaning that this building could be completely destroyed. North London in the Victorian era had the greatest concentration of piano factories in the UK, so as such, this building represents part of the socio-economic history of this part of London:  <a href="http://www.londonpianotuning.co.uk/history-of-piano-development/">http://www.londonpianotuning.co.uk/history-of-piano-development/</a></p> <p>If the site was developed with up to 41 residential units as</p>	<p>e is a dog waste bin on the green space which means the grassy area is used by dog walkers as a toilet stop, thus preventing soiling of the nearby pavement areas.</p> <p>iv) The green space and trees also provides a welcome and attractive area of <b>‘green relief’</b> in an otherwise built up area.</p>	
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					<p>proposed, this would potentially place a significant strain on local amenities such as parking (which in the surrounding streets is already at a premium) and school places, which it has been well reported are already over-subscribed in the Crouch End area/Haringey:</p> <p><a href="http://www.theguardian.com/education/2014/apr/11/primary-school-places-offer-day">http://www.theguardian.com/education/2014/apr/11/primary-school-places-offer-day</a></p> <p>We have not seen evidence of an assessment of the impact on these two areas in relation to this proposed site development.</p>		
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**Respondent 67: Susan Taylor**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
67	RSA162	SA49	no	no	Haringey failed to consult with local residents in their drafting of this proposal. When challenged by the local residents who had found out about the proposal via a personal search for a separate planning matter, Haringey consulted an ad hoc number of residents some 10 days before the end of the 2nd consultation period. Haringey failed to provide sufficient time for vulnerable residents, particularly on the Grove,	Haringey should be required to re-consult on this proposal with all adjacent residents (Lynton, The Grove Lynton, Topsfield, Park and Palace Roads).	<p>Consultation events in the preparation of this Plan have been carried out in accordance with the <b>Council's SCI and the relevant regulations.</b></p> <p>No change</p>

					Lynton Road, to consider and respond on the matter; no consultation letters were issued to those for whom English is a second language. Haringey failed to notify or consult at any stage, and in any form, the existing commercial and industrial business units on the site.		
67	RSA163	SA49	No	No	<p>The proposal for SA49 development at 72-96 Park Road/Courtyard Lynton Road/adjacent green space is unsound and fails to comply for the following reasons:</p> <ul style="list-style-type: none"> <li>• Haringey failed to consult or inform residents or existing businesses on drafting of this proposal.</li> <li>• Residents found out about this proposal only via a personal search on another planning matter.</li> <li>• When challenged by residents, Haringey issued late and ad hoc consultation letters to a few residents on Lynton and Grove, Lynton Roads, some 10 days before closure of the consultation period.</li> </ul>	<ul style="list-style-type: none"> <li>• Remove from the plan inclusion of the green space, land and trees, in front of The Courtyard and Lynton Road.</li> <li>• Add protection of the amenity of those residents/properties on Lynton Road to the proposal.</li> <li>• De-couple the extant planning on 72-96 Park Road from the new proposal for the development of The Courtyard and the adjacent green space.</li> <li>• Run full and proper consultation on the proposal with the residents and existing businesses in The Courtyard.</li> <li>• Restrict height of any</li> </ul>	<p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>The amenity of all surrounding neighbouring properties will be protected through policy DM1.</p> <p>It is not appropriate to de-couple the planning application that was granted for 72-96 Park Road, as the intention of the allocation is to seek a more comprehensive development across the two sites, which the Council believes will deliver better outcomes in terms of massing, layout, amenity considerations and the mix of uses to be provided.</p>

				<ul style="list-style-type: none"> <li>• Haringey failed to provide information to vulnerable residents in the Grove for whom English is a second language.</li> <li>• Haringey failed to inform or consult, at any time, in any format, the existing businesses on the industrial site, locally referred to as <b>“The Courtyard”</b></li> <li>• Haringey have coupled a legacy planning consent with the proposal to demolish viable businesses in the Courtyard, a well maintained and quaint industrial site.</li> <li>• The legacy planning consent has been misrepresented by Haringey in the DPD as <b>“2.140 There is an existing planning consent for the western portion of this site permitting development up to five storeys on the site”</b>. The original application for 5 storeys was rejected and only a 4-storey development approved.</li> <li>• Haringey have failed to account for amenity considerations to the residents on Lynton Road</li> </ul>	<p>planning proposal to a maximum of 3 storeys.</p> <ul style="list-style-type: none"> <li>• Protect existing businesses in The Courtyard now.</li> <li>• Protect the Victorian buildings in The Courtyard from demolition.</li> </ul>	<p>Consultation was undertaken in accordance with national requirements and the Council adopted Statement of Community Involvement.</p> <p>It is not appropriate to restrict heights. The Council advocated a design-led approach where development heights must have regard to their surrounding context.</p> <p>Provision is made in the allocation to replace the existing employment floorspace to retain existing businesses.</p> <p>Unfortunately the Victorian building is not listed or locally listed to give it the protection sought.</p> <p>No change</p>
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					<p>who are directly opposite, and closest to, the proposed site to be demolished and built up to 5 storeys.</p> <ul style="list-style-type: none"> <li>• The proposal does not provide sufficient protection of the much-valued and used green space between Lynton Road and The Courtyard; it alludes only to the trees on the green space. The green space itself, therefore, is not secured.</li> <li>• Removal of the green space would result in an unacceptable loss of amenity to my home, including direct views into <b>my young daughter's</b> bedroom – the bedrooms of those houses facing on to the Courtyard at the front. This is also a cul de sac with narrow pavements in line with the conservation status of the area which begins on Lynton Road</li> <li>• The proposed demolition of the existing pretty and perfectly functioning Victorian buildings in the Courtyard is reprehensible.</li> <li>• There is insufficient space</li> </ul>		
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					<p>between The Courtyard and The Grove to provide units opening on to that road; at present ambulances and fire engines have difficulty navigating the road.</p> <ul style="list-style-type: none"> <li>• Parking is a major difficulty at the present time; a recent application for additional dwellings in Palace Road, adjacent to Lynton Road and in the conservation area, was rejected by Haringey Planning for that, and a number of other reasons. The proposal fails to deal with this adequately.</li> <li>• The Courtyard is a thriving industrial and commercial area, providing much needed premises for non-retail business locally. There is no other commercial provision in the area.</li> <li>• Jobs lost now, through demolition, would not be recovered at this site.</li> <li>• Local schools and services are already dealing with over-capacity issues; this proposal does not take that into account.</li> </ul>		
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Respondent 68: JV Thomas

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
68	RSA164	SA49	No	Not stated	<p>I object to that part of the proposal that refers to the development of the Industrial site on Lynton Road and its adjoining grassed land (which I have called the 'Grassy Knoll').</p> <p>I would like to make the following comments on the Council's presentation:</p> <p><i>SA49 defined map area</i></p> <p>The drawing implies SA49 is a single site. This is not the case. 72-96 Park Road is already under development [HGY/2011/0905] and has been for some months. And to my knowledge the industrial site adjacent to the Grove is not under the same ownership and is, therefore, from the development point of view, a separate entity. The Grassy Knoll is immediately in front of the Industrial site facing Lynton Road and is managed by the Council.</p> <p><i>Commentary 2.140</i></p> <p>Commentary 2.140 says "There is an existing planning consent for the western portion of this site permitting development up to five storeys on this site. ..."</p>	Not specifically stated	<p>It is considered appropriate that the sites are allocated together to ensure a comprehensive approach to development comes forward.</p> <p>The Council has no plan to <b>change the "grassy knoll"</b></p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations and the <b>Council's Statement of Community Involvement</b>.</p> <p>Heights will be determined based on the design of the development when a planning application</p>

				<p>Referring to the Notice of Planning Permission for HGY/2011/0905<sup>2</sup> [72-96 Park Road] permission is granted for "... the erection of a further two floors to existing 2 storey building ...".</p> <p>Commentary 2.140 is therefore incorrect.</p> <p><i>Industrial site: employment issues</i></p> <p>Grouping together the following three paragraphs:</p> <p><i>[Site Requirements: point 2] Replacement employment floorspace will be required to be provided to replace the number of jobs on this site.</i></p> <p><i>[Development Guidelines: point 3] In line with policy SP9, if redevelopment results in a net loss of employment floorspace, a financial compensation will be required as set out in the Planning Obligations SPD.</i></p>		<p>comes forward.</p> <p>No change</p>
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<sup>2</sup> HGY/2008/0966 amends HGY/2006/1839; and HGY/2011/0905 amends both HGY/2008/0966 and HGY/2006/1839. And HGY/2014/1610 is attached to HGY/2008/0966. HGY/2005/1463 amends a shop front but HGY/2002/1877 proposes a five storey building (the decision in this case being classified as a 'Legal Agreement'). Understandably, but unfortunately, HGY/2006/1839 does not refer to either HGY/2008/0966 or HGY/2011/0905 or HGY/2014/1610. The latest drawings are in HGY/2008/0966.

				<p><i>[Development Guidelines: point 4] Any jobs lost through development of the site should be reprovided on site.</i></p> <p>There appears to be a contradiction between points 2/3 and point 4 that requires resolution.</p> <p>There are few sites that provide this type of workspace this side of the borough<sup>3</sup>. There is an assumption that retail premises are suitable for all, but for some businesses, for example, computer related, a shop window is not what is required. The facilities offered by this industrial site are unique in this area.</p> <p>Certainly the loss of industrial status will prevent investment in new and emerging commercial opportunities that could further benefit the borough.</p> <p>With regard to SP9 it seems odd to take jobs away, to support jobs elsewhere when there is no need.</p> <p><b><i>Industrial site: existing building issues</i></b></p> <p><i>[Site Requirements: para 3] No buildings need to be retained on this site.</i></p>		
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<sup>3</sup> London Borough of Haringey, Workspace Viability Assessment, December 2014

				<p>Removing the existing Victorian buildings is a lost opportunity. Firstly such buildings are popular<sup>4</sup> and secondly they provide a sense of scale that some modern developments choose to ignore. However from a <b>developer's point of view a new build may</b> have certain advantages and hence the inclusion of this paragraph.</p> <p><i>72-96 Park Road and Industrial site: building height issues</i></p> <p><i>[Development Guidelines: para 2] Attractive street frontage could be created to enhance the setting of the Conservation Area creating a 'gateway' to it.</i></p> <p>This statement implies more choice than there really is.</p> <p>The granting of planning permission by HGY/2011/0905 has established how this development will appear facing Park Road (front elevation), Lynton Road (side elevation), the industrial estate (rear elevation) and Veryan Court (side elevation).</p> <p>Consequently the only thing left is how the Industrial site interfaces with the rear elevation of 72-96 Park Road, The Grove, the Grassy Knoll, and part of Lynton Road.</p>		
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<sup>4</sup> London Borough of Haringey, Workspace Viability Assessment, December 2014

				<p><i>[Development Guidelines: para 1] The current blank brick façade on the approach to the Church on the Grove should be replaced with active building frontages, with front doors opening onto the street.</i></p> <p><i>[Development Guidelines: para 5] Heights should be restricted to protect the amenity of properties on the Grove, and heights should be restricted to the north of the site to protect the setting of the church, and preserve the amenity of the back gardens on Palace Rd.</i></p> <p>Parallel to the brick façade is a sheltered housing complex comprising 48 two-storey flats housing elderly and some vulnerable residents. The Lynton Road aspect contains two storey houses, eight of which opposite the Industrial site have front roof conversions. Lynton Road itself is part of the Crouch End Conservation Area.</p> <p>Consequently if the intention is to enhance the setting of the Conservation Area and protect the amenity of properties on the Grove, then any development onto the Grove should be no higher than two storeys.</p> <p>In addition, according to HGY/2011/0905, the interfacing elevation between 72-96 Park Road and Industrial site will remain at two storeys.</p>		
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				<p><i>[Development Guidelines: para 6] Heights and elevation details should respond to the Park Road frontage and the established rhythm.</i></p> <p>HGY/2011/0905 establishes a maximum of four storeys on the Park Road front elevation descending to two storeys on the Lynton Road and Grove side elevations.</p> <p><i>[Development Guidelines: para 7] Higher elements may be possible on Park Road marking the entrance to Crouch End District Centre.</i></p> <p>This contradicts HGY/2011/0905 which has set the height to four storeys.</p> <p><b><i>The Grassy Knoll</i></b></p> <p><i>[Development Guidelines: para 8] The site contains a number of mature trees and these should be retained on site where possible.</i></p> <p>A cynic may say that the Council has bundled in the Grassy Knoll simply to square off the shape of SA49.</p> <p>Whereas 72-96 Park Road and the Industrial site are freehold, the Grassy Knoll is managed by the Council on behalf of the public. And it should be noted that some local residents have made significant contributions to its upkeep.</p>		
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				<p>At the very least the potential loss of valuable public open space should be opened up for discussion; land should not be automatically confiscated by the Council for their own ends.</p> <p>As Simon Stevens, NHS England chief executive said earlier this month:</p> <p><b>“We want children to have places where they want to play with friends and can safely walk or cycle to school - rather than just exercising their fingers on video games. We want to see neighbourhoods and adaptable home designs that make it easier for older people to continue to live independently wherever possible. And we want new ways of providing new types of digitally-enabled local health services that share physical infrastructure and staff with schools and community groups.”</b></p> <p><b>SA 49: What hasn’t been said</b></p> <p><i>[Development Guidelines: para 9] Applicants must consult with Thames Water regarding both wastewater and water supply capacity upon the preparation of a planning application.</i></p> <p>Water is vital, but so are the other every day things of life.</p> <p>The increasing density of housing</p>		
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					occupancy will lead to pressure on local services. As examples, the Council's stance on education is leading to bulge classes in schools. We note that there longer waiting times to see a GP. Try catching a bus? Try parking?		
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Respondent 69: Defend Crouch End

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
69	RSA 165	SA49	No	Not stated	<p><u>Red Line of the Site</u>            Defend Crouch End Propose that the SSAD SA49 site boundary be tightened to exclude the western portion of the site owned by Orantex. The reason we propose this is that this part of the site is in separate ownership and on 14/12/2006 was granted permission for planning application HGY/2006/1839 '<i>Erection of a further two floors to existing 2 storey building to create 4x two bedroom and 2 x one and 3x three bedroom flats and 4 additional commercial units. Development includes alterations to elevations, formation of 5 car parking spaces and provision of covered bin store</i>'.            The owner has part implemented this consent and is still developing it out. For this reason Defend Crouch End do not consider it appropriate to incorporate this part of the site in the SSAD. This planning consent will deliver an additional 9 homes and 5 commercial units and is of appropriate density and design. There is no case for further intensification of this part of the site and anything larger than currently consented would be overbearing for residents opposite who live in two storey terraced cottage houses.</p>	<p>If, in any case, this part of the site remains in the SSAD the commentary at 2.140 on page 122 should be corrected. It currently states '<i>there is an existing planning consent for the western portion of this site permitting development up to five storeys on the site</i>'. This is incorrect and the residents propose that if this portion of the site is not removed from the</p>	<p>He height of the roof of the consented site was raised under HGY/2011/0905             It is considered that the most appropriate future allocation is to include both land ownerships together to ensure a comprehensive scheme comes forward.</p>

						<p>SSAD the text be reworded to say <i>'there is an existing planning consent for the western portion of this site permitting development up to FOUR storeys on the site'</i></p> <p>Page 122 Change the site boundary to exclude the Orantez Site ownership</p> <p>Page 122 2.140 replace incorrect <b>reference to 'five stories' with 'four stories'</b></p> <p>Page 123 Development Guidelines:</p> <p>The current blank brick façade on the approach to the Grove [delete should replace with] COULD be</p>	<p>It is not considered that changing the boundary would aid implementation of this policy.</p> <p>Heights will be determined based on the design of the development when a planning application comes forward.</p> <p>The Site boundary includes both parcels of land to ensure a comprehensive approach to development is brought forward.</p> <p>The Piano Factory is not a listed building and as such does not</p>
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						<p>replaced with active building frontages [delete with front doors] opening onto the street BUT OVERLOOKING SHOULD BE AVOIDED</p> <p>Attractive street frontage could be created to enhance the setting of the Conservation Area creating a <b>'gateway' to it</b> AND THE OLD PIANO FACTORY SHOULD BE RETAINED RECOGNISING ITS CONTRIBUTION TO THE CHARACTER OF THE AREA</p> <p>[delete fourth bullet point with</p>	<p>receive specific protection in the Policy.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations and <b>the Council's</b> Statement of Community Involvement.</p> <p>No change</p>
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						<p>reference to loss of jobs]  REDEVELOPMENT SHOULD INCREASE JOBS AND EMPLOYMENT OPPORTUNITIES ON SITE</p> <p>Fifth bullet point – Heights should be restricted to protect the amenity of properties on The Grove AND LYNTON ROAD, and heights should be restricted to the north of the site to protect the setting of the [delete church replace with] MISSION HALL BUILDING and preserve the amenity of the back gardens on</p>	
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						Palace Road.	
69	RSA 166	SA49	No	Not stated	<p><u>Retention of the Green Space</u> The Green is a very welcome and restful spot as you transition from the busy Park Road and move to the residential area. The Green is a place for dog walkers and in summer is used for sitting out; it also forms part of a green walking route to Priory Park to the north east of the site. It is populated by 8 mature trees, six of which are very attractive silver birch trees. There is a dog waste bin on the path and two areas of green land. While the Council have moved to retain the mature trees on the site Defend Crouch End do not consider this goes far enough and instead propose that the Green is RETAINED as an area of amenity and green space.</p> <p>The Green is used by a large number of people including those working in the businesses on their breaks, local dog walkers, students who walk through on their way to and from school. In particular the open space is welcomed by the older and sheltered residents in the Grove development who are happy with this local green as it is easy for them to access from their homes and is safe as it is overlooked by neighbours and near their homes; the trees also serve to help shield their homes from the noise of very busy Park Road nearby. The green also offers an amenity space for the local residents between their homes and the more intensive commercial uses within the site boundary. It will also be the nearest patch of amenity space for the new residential units in any site redevelopment as these units will not have gardens of their own and as such provides an important counterpoint to the further proposed intensification. The Green also allows an important set back of the current buildings from the low level two storey cottage</p>	<p>Amend Development Guidelines:</p> <p>[delete the eighth bullet point ]THE GREEN IS A LOCAL OPEN SPACE PROVIDING IMPORTANT AMENITY VALUE AND THE GREEN TOGETHETHER WITH THE MATURE TREES ON SITE SHOULD BE RETAINED</p> <p>Sixth, seventh and ninth bullet points to be retained.</p>	<p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>No change</p>

				<p>houses on Lynton Road and if a development were to encroach this space their amenity would be severely impacted as these houses have living rooms and bedrooms facing the green.</p> <p><b>The Council's Local Plan Policy SP13: Open Space and Biodiversity states that 'New development shall protect and improve Haringey's parks and open spaces. All new development shall:</b></p> <ul style="list-style-type: none"> <li>▪ <i>Protect and enhance, and when and where possible, extend the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development;</i></li> <li>▪ <b>Provide amenity space in accordance with the Council's Open Space and Recreational Standards Supplementary Planning Document (SPD);</b></li> <li>▪ <i>Manage the impact of such new developments in areas adjacent to designated open space;</i> <ul style="list-style-type: none"> <li>▪ <i>Secure improvements, enhancement and management in both quality and access to existing green spaces;</i></li> <li>▪ <i>Seek on-site or financial contributions towards open space from new developments as set out in the Open Space and Recreational Standards SPD;</i></li> <li>▪ <i>Seek to secure opportunities for additional publicly accessible open space especially in those identified areas of Open Space deficiency .....</i></li> </ul> </li> </ul> <p><b>Haringey's Open Space and Recreation Standards SPD (March 2008) highlights areas where there is an open space deficiency and the area just south of the site covering central Crouch End is an area of open space deficiency (see figure B1). The SPD grades different types of open space in Table 1.1 which states that Amenity Greenspace should be determined on a site by site basis. The GLA Parks Hierarchy is also given in Table</b></p>		
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					<p>1.2 and this defines this green space as a Small Local Park and Open Space due to its size. Defend Crouch End consider that while small this green space is still very valuable and so should be protected for its amenity value as a green space (not just the mature trees as currently stated in SA49) and that the SSAD is the appropriate document to do this as the site is now being considered <b>within it and this approach is suggested by Haringey's Open Space and Recreation Standards SPD.</b></p> <p>Defend Crouch End have also separately made an application to protect the site as an Asset of Community Value as it has been a green for over 5 years and can foreseeably be retained as a green into the future. This application is being made concurrently with our response to the SSAD in February 2016. However, we are clear that the Local Plan documents are also appropriate documents with which to give a further form of protection to open space (as stated in National Policy and <b>Haringey's Open Space and Recreation Standard's SPD</b>) and, to reiterate, we are seeking that the Green should be protected in Local Policy by referencing and protecting this green space in the SSAD, and also on the Local Plan Policies Map.</p>		
69	RSA 167	SA49	No	Not stated	<p><u>Protection of the Old Piano Factory</u>  <b>The SSAD states on page 123 that 'No buildings need to be retained on this site'.</b> While the site is not in a Conservation Area it is adjacent to Crouch End Conservation Area.</p> <p>Defend Crouch End are of the view that the Old Piano Factory at the rear of the Courtyard is a very attractive Victorian era building that abuts the 1881 Mission House at 49 The Grove just outside the site to the north east. The Old Piano Factory is a two storey building of two wings which join on an angle at the top of the site, with a sloping tile roof and made of London Stock brick with red</p>	<p>Page 123 Site requirements to be replaced as follows</p> <p>The Old Piano Factory is locally listed and of important amenity value and efforts should therefore</p>	<p>The Piano Factory is not a listed building and as such does not receive specific protection in the Policy.</p> <p>Its potential retention is a design issue</p>

					<p>brick window head detailing. It has a shaped pediment architectural detail above the main door on the western wing and an expressed lintel above the door of the north wing. The building is a rather delightful example of how Victorian architecture expressed details in even warehousing and employment buildings. The building adjoins the listed Mission building (which is just outside the site and contains two residential units). The Old Piano Factory building is also a much needed element of historic architecture in this locality, providing local heritage together with the Mission Building, among the modern buildings of the Grove, Lynton Road and Park Road which all date after 1970.</p> <p>It is proposed that the building be locally listed and that the SSAD be redrafted to express the desire to see the RETENTION OF THIS BUILDING or strong reasons given why not and a very high quality of design to be offered as an alternative. We consider this building would be most suitable for continued employment land and it is already being well used as such but could potentially be converted for residential use.</p>	<p>be made to retain this building on this site. A strong justification will be needed to show why that is not possible and very high quality alternative design will be required to allow its replacement.</p>	<p>and will be dealt with at the detailed planning application stage.</p> <p>No change</p>
69	RSA 168	SA49	No	Not stated	<p><u>Loss of Employment Land</u></p> <p>Defend Crouch End has not had the time to conduct its own assessments but we would like to raise a number of studies and policy positions which would support our view that the site should be identified for AN INTENSIFICATION OF EMPLOYMENT USE/ EMPLOYMENT LED MIXED USE DEVELOPMENT. The site currently is host to a number of businesses who provide valuable services within the local economy and a number of jobs and rely on a relatively local customer base. Defend Crouch End consider the site should be primarily employment led redevelopment as despite the irrefutable need for additional homes in London there is</p>	<p>Page 123 Site requirements to be replaced as follows</p> <p>Redevelopment of this site for intensification of employment use/employment led mixed uses</p>	<p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>The consultations</p>

				<p>also a need for mixed employment spaces, affordable workspace and the variety of jobs these sites offer. This site is not able to provide homes with gardens due to the requirement to retain the existing levels of employment land and the size of the site and therefore we contend the site should be intensified for employment use.</p> <p>The Haringey Core Strategy Policy SP8: Employment <b>states that</b> <i>‘the Council will secure a strong economy in Haringey and protect the borough’s hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas. The Council will:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Protect B uses (under the Use Classes Order) including light industry, logistics, warehousing and storage facilities to meet the forecast demand of 137,000m2 floorspace up to 2026;</i></li> <li>▪ <i>Support local employment and regeneration aims;</i> ▪ <i>Support environmental policies to minimise travel to work;</i></li> <li>▪ <i>Support small and medium sized businesses that need employment land and space; and</i> <ul style="list-style-type: none"> <li>▪ <i>Contribute to the need for a diverse north London and London economy including the need to promote industry in general in the Upper Lea Valley and in particular, promote modern manufacturing, business innovation, green/waste industries, transport, distribution and logistics.’</i></li> </ul> </li> </ul> <p>The London Plan Policy 4.4 also seeks to ensure that industrial land and affordable floorspace in other locations is protected where there is demand.</p> <p>The Federation of Small Businesses and the New Economics Foundation both regularly make the case for retention and improvement of workspace for small</p>	<p>will be permitted</p> <p>Replacement employment floorspace will be required to enhance the number of jobs on this site</p> <p>Page 123 Change Development Guidelines:</p> <p>REDEVELOPMENT SHOULD BE EMPLOYMENT LED/ENHANCE EMPLOYMENT FLOORSPACE [delete current third bullet point with reference to loss of employment floorspace]</p>	<p>carried out in the preparation of the Local Plan have been in line with national regulations and <b>the Council’s</b> Statement of Community Involvement.</p> <p>While the Council supports an intensification of the employment offer on the site, it is recognised that generally in the borough, the rental values generated by employment uses are not sufficient to cover the construction costs. As such the provision of an element of residential within mixed</p>
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				<p>businesses through the JustSpace Campaign <a href="https://www.justspace.org">https://www.justspace.org</a> . This site identifies an ongoing campaign by small businesses and other stakeholders not to see the continual erosion of industrial and employment land in London and in particular looks at ways the planning system currently contributes to the issue and how it can be used as a solution not a cause.</p> <p><b>London’s Industrial Land: Cause for Concern is a working paper</b> produced by Jessica Ferm and Edward Jones of the Bartlett School of Planning UCL in February 2015 <a href="https://justspacelondon.files.wordpress.com/2015/02/ferm-jones-londons-industrial-land-working-paper-final1.pdf">https://justspacelondon.files.wordpress.com/2015/02/ferm-jones-londons-industrial-land-working-paper-final1.pdf</a> . They quote in section 3 p 15/16 a URS 2007 study <b>that states</b> ‘<i>between 2001 and 2006 90 ha per annum industrial land were lost to other uses, approximately double the GLA’s proposed managed release in its 2003 Draft Industrial Capacity SPG</i>’ <b>and that</b> ‘<i>for the period 2006-16 the GLA benchmark for loss remained at 48 ha per annum (GLA, 2008) while in reality 86.75 ha per annum was released between 2006 and 2010 (GLA, 2012)</i>’. On page 18 they further quote a paper by Lima (2014) which was a study of Haringey that ‘<i>revealed of 54 sites identified for redevelopment in the Council’s Site Allocation Document five were Locally Significant Industrial Sites and six others were other industrial sites. Haringey is identifies in the London Plan (GLA, 2011, Map 4.1) for “limited” transfer of industrial land</i>’. <b>The authors</b> of this study conclude on pages 37-39 that development pressure and planning policy have played a role in the loss of employment land as well as <b>deindustrialisation, exacerbated by the Government’s</b> permitted development rights facilitating the conversion <b>of industrial land to residential</b>. <b>The go on to say that</b> ‘<i>in contrast to what downward spiralling projections suggest evidence on the ground indicates that manufacturing is</i></p>	<p>use schemes can be used to help fund the intensification of employment sites.</p> <p>No change</p>
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				<p><i>changing but not dead</i>'. The articulate that <i>'hidden industrial sites house businesses that are part of the local economic ecosystem and that relocation of these businesses is more problematic than often appreciated'</i> a point we would reiterate. The allocation of this site for a mix of residential and employment uses will likely result in a further loss of employment land above the planned level of release intended for London and Haringey.</p> <p><b>Haringey's own Employment Land Study (February 2015)</b> provides an analysis of the local property market. Due to its size this site is not classified as a Defined Employment Area within the borough but it is an employment area <b>none the less. At 3.7 on page 13 the report notes ' there is a perceived lack of supply of build developments catering for industrial and warehousing uses, local commercial agents noted there was high occupancy in the existing protected areas. The stakeholder consultees identified the Borough was suffering from limited industrial stock and competing pressure from other uses e.g. residential. At 3.18 the report notes there is 'a lack of suitable B1c/B2 stock across the borough. There is an insufficient supply of employment locations with enough capacity to accommodate additional B1c/B2 industrial uses across the Borough. Local commercial agents consider that additional sites need to be brought forward ...in order to accommodate SME's.'</b> Figure 5.1 in the report shows there has been a steady decline in industrial floorspace since 2004.</p> <p>We contend the evidence shows that the businesses currently on the site would find it very hard to identify other suitable premises in the area due to the overall lack of supply. This loss would potentially lead to a loss of jobs. Furthermore the evidence points to a greater than planned loss of employment land and a demand for such sites to provide jobs and support the London economy.</p>		
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					Defend Crouch End consider the site has potential for intensification as employment use and should be classed a suitable for intensification of employment use/ employment-led mixed use development.		
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**Respondent 70: Will Johnson-Marshall**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
70	RSA169	SA49	No	Not stated	<p>Issue 1: Change in use, protection of jobs, variety of local employment opportunities, premisses for SME and micro-businesses</p> <p>We believe the Site Allocation DPD is not consistent with national policy and I would like the plan to be modified and have provided suggestions for improvement. The national policy is The Current London Plan, Chapter 4 - <b>London's</b> Economy that recognises the importance of workspace for SMEs and for new and emerging industries is also required including for the needs of micro-firms. Here is the relevant policy extract:</p> <p><b>"Policy 4.4 Managing industrial land and premises</b></p> <p>4.18 Even an increasingly service-based economy needs space for less high-value activities crucial to</p>	Not specifically stated	<p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>No change</p>

					sustaining the city's metabolism, including 'services for the service sector, manufacturing and maintenance, waste management and recycling, wholesale and logistics. Sufficient space to accommodate demand for workspace suitable for SMEs and for new and emerging industries is also required including for the needs of micro-firms."		
70	RSA170	SA49	No	Not stated	The proposed change in use from industrial to Mixed use Commercial and Residential will adversely affect the mix of employment and employment opportunities in the area	I would like to see protection of current mix of light industrial and retail use	It is considered that the creation of additional residential, in addition to the replacement employment floorspace, will help to meet the <b>borough's identified</b> housing need.  No change
70	RSA171	SA49	No	Not stated	The indicative development capacity for employment of just 718 by m2 as we believe that this must be an underestimate given that the current site is stated as being '0.5 ha' {5,000 m2} i.e. indicative capacity is just 14% of the current footprint. By not increasing this the type and range of employment possible on the site will be restricted to only high-density type.	Therefore the required employment capacity should be increased.	The capacity is indicative, and the actual amount to be delivered will be determined at planning application stage.  No change
70	RSA172	SA49	No	Not stated	The Development Guideline guideline that states 'In line with	This development guideline should be	This would only apply if there is a loss of

					<p>policy SP9, if redevelopment results in a net loss of employment floorspace, a financial compensation will be required as set out in the Planning Obligations SPD.' appears to remove the safeguard to retention of employment 'floorspace'.</p> <p>Further, it appears to contradict another Development Guideline that states 'Any jobs lost through development of the site should be reprovided on site' and the Site Requirement that 'Replacement employment floorspace will be required to be provided to replace the number of jobs on this site.'</p>	removed from the plan	<p>employment floorspace. While this is not envisaged, the policy (SP9) will remain in force, and as such a reference is considered appropriate.</p> <p>No change</p>
70	RSA173	SA49	No	Not stated	We welcome the Development Guideline 'Any jobs lost through development of the site should be reprovided on site.'	And would like this guideline to be strengthened so that it is safeguarded requirement.	<p>Noted. It is not possible to require this, but the development guideline requires that the principle is explored.</p> <p>No change</p>
70	RSA174	SA49	No	Not stated	Issue 2: Protecting green space-trees and public rights of way. We value the public green space and right of way that is part of the site and it offers an effective and important break between the busy park road and the beginning of the residential area. We believe that the Site Allocation DFD is not consistent	Our view is that the plan should have a requirement for the existing green space and public right to be retained, enhanced and even extended	<p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>No change</p>

					with national policy as National Planning Policy Framework paragraph 75 which states that 'Planning policies should protect and enhance public right* of way and access.' We also think that this land has potential to be designated as Local Green space as it meets criteria listed in the National Planning Policy Framework paragraph 77 in so far as it is 'reasonably close proximity to the community it serves ;and 'where the green area concerned is local in character and is not an extensive tract of land. Without specific protection of the green space in the plan we fear this resource will be lost.		
70	RSA175	SA49	No	Not stated	Linked to this point, we welcome the spirit of the Development Guideline that states that 'The site contains a number of mature trees and these should be retained on site where possible.' We are very worried about the inclusion of the words 'where possible' as these appear to allow a mechanism not to retain the trees.	The plan should in to the effect that any trees that can't be retained MUST be replaced [:y an increased number of comparable trees within the development.	The retention of the trees is a clear presumption that the open space will be preserved.  No change
70	RSA176	SA49	No	Not stated	issue 3: Protection of buildings significant to the heritage of the local area  There is a Site Requirement that states 'No buildings need to be	Please amend the plan to include retention of these buildings within the context of development that is	The Piano Factory is not a listed building and as such does not receive specific protection in the Policy.

					retained on this site.' We think that this is not justified and want to point out that there are several Victorian buildings including an attractive historical Piano Factory, which represent the heritage of the area, are in apparently good condition, and should be retained. I understand that the plan must be justified on robust and credible evidence, however, no evidence has been made available an how the conclusion that no buildings need to he retained was reached and therefore we question if the plan can valid in this respect.	complementary and enhances their setting	No change
70	RSA177	SA49	No	Not stated	issue 4: Disproportionate scale of development, lack of specific safeguards and contradictory Development Guidelines regarding heights"  We have not seen specific evidence of sound infrastructure and delivery planning that would justify the scale of residential developrnent and I believe ii represents an over development of the area. We do not believe the plan is justified	We request that the stated nUnr.ber of residential dwellings is significantly reduced from the proposed indicative capacity of 41	Heights will be determined based on the design of the development when a planning application comes forward.  No change
70	RSA178	SA49	No	Not stated	We do not believe the plan is sound in so far as these two Development Guidelines appear to be contradictory	therefore the second should be removed	Heights will be determined based on the design of the development when a planning application

					<p>1. Heights and elevation details should respond to the Park Road frontage and the established rhythm.'</p> <p>2. 'Higher elements may be possible on Park Rd marking the entrance to Crouch End District Centre'</p>		<p>comes forward.</p> <p>No change</p>
70	RSA179	SA49	No	Not stated	<p>We do not believe the plan is sound as while it acknowledges the need to limit heights to protect amenity of the surrounding area, there is no safeguard to ensure this will happen. Relying on current development management policies is not satisfactory as there is no guarantee that the development management policies will not change in the future. Specifically, the plan contains the <b>Development Guideline that "Heights should be restricted to protect the amenity of properties on The Grove, and heights should be restricted to the north of the site to protect the setting of the church, and preserve the amenity of the back gardens on Palace Rd.'</b></p>	<p>Please add specific restriction on the restrictors of the heights for the Grove, Lynton Road and the north of the site of 2 stories.</p>	<p>It is considered that the DM policies dealing with height are sound, and as such the approach of appraising heights on a site by site basis is sound, in that it takes into account the surrounding context.</p> <p>No change</p>
70	RSA180	SA49	No	Not stated	<p>We suggest that a specific Site Requirement for parking provision is included. This can state that parking, including to meet the needs of disabled employees, residents and visitors to site in line with BS 8300. Must be provided within the</p>		<p>Details of access and parking will be required at the time of planning application in line with <b>the Council's DM Policies.</b></p>

					development schem and that on-street residential parking permits will not be available to the development. This is needed as there is already insufficient local parking for residents. I believe that the council has the power to add this to the Site Allocation plan and the Council should not simply delegate this to the DMDPD.		No change
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**Respondent 71: Crouch End Neighbourhood Forum**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
71	RSA181	SA 48 SA 49	No response given	No response given	<p>The Crouch End Neighbourhood Forum and Crouch End Neighbourhood Area were approved and designated by the London Borough of Haringey in December 2015. The Forum is presently preparing a Neighbourhood Plan which will include site specific policies and potential Neighbourhood Development Orders. Our comments on the SADP document are below.</p> <p>Two sites listed in the SADPD are within the Crouch End Neighbourhood Area: SA48</p>		Noted.

					Hornsey Town Hall, and SA49 72-96 Park Road and Lynton Road.		
71	RSA182	SA 48	No response given	No response given	<p>Haringey Council are currently disposing of the site to private developers under the terms of an OJEU procurement process. This process is due to complete in the latter part of 2016 and the site already possesses an implemented planning consent to build substantial residential units.</p> <p>1. We note that the designations and description in the SADPD do not indicate the status of the Town Hall and Square as an 'Asset of Community Value', declared as such by the local authority in August 2015 under the terms of the Localism Act 2011. This should be rectified.</p> <p>2. Furthermore, we feel that there is cause to comment upon the inclusion of the public square within the site. The Town Hall square and green lie at the centre of Crouch End on Crouch End Broadway, and represent a well loved and well used open space and 'village</p>	<p>Note that the designations and description in the SADPD do not indicate the status of the Town Hall and Square as an 'Asset of Community Value', declared as such by the local authority in August 2015 under the terms of the Localism Act 2011. This should be rectified.</p> <p>We ask that safeguards to full and unfettered public access to the public square be included in the site description, with any other identifiable constraints to development such as public highway status (three sides around the perimeter were the original access road) made clear</p>	<p><b>The ACV status of the building, and square will be noted in the Site Requirements of the allocation.</b></p> <p><b>The Council shares the aspiration that the public square should be retained, and a site requirement will be added to this end.</b></p>

					green' to the local community. The public square, as mentioned, is an Asset of Community Value, and should also be protected under the Council's policies in the 2013 Local Plan (SP13). We ask that safeguards to full and unfettered public access to the public square be included in the site description, with any other identifiable constraints to development such as public highway status (three sides around the perimeter were the original access road) made clear.		
71	RSA183	SA 49	No response given	No response given	1. The development guidelines seek to safeguard the number of jobs and the employment floorspace on site. The Forum are also keen to retain employment in the local area, which is under threat, and supports the Council's intention. However it is not clear to us how this is deliverable – clauses state that financial compensation will be payable for loss of employment floorspace, but that jobs lost through development will have to be re-provided on site, an apparent contradiction. We ask that both aspects of	We ask that both aspects of employment – jobs and floorspace – be ensured.  We ask that due regard is paid to the green space, or that it be removed from the red line.	Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.  The consultations carried out in the preparation of the Local Plan have been in line with national regulations and the <b>Council's Statement of Community Involvement</b> .

				<p>employment – jobs and floorspace – be ensured.</p> <p>2. We note that the description seeks to protect mature trees, but in our view fails to pay due regard to the value of the green open space in the SE corner, or provides options for its retention, particularly as the threat to the green received significant numbers of comments in the original consultation and is plainly valued by local residents. It is not clear to us why it was necessary to include this amenity within the red line of the site, given the earlier representations. The space would also serve to protect existing residents from excessive density or massing in any future development. We note in this regard the Council's policy to retain, provide and protect local amenity space in the 2013 Local Plan (SP13). The retention and protection of local open space will also form part of the Neighbourhood Plan. We ask that due regard is paid to the green space, or that it be removed from the red line.</p>		<p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>No change</p>
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Respondent72: Jo Sheppherd

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
72	RSA184	SA49	Not stated	Not stated	<p>I would like to object to the proposed compulsory purchase and development of the above site, in particular to my workplace, Unit 6, The Courtyard, Lynton Road.</p> <p>The business I am employed by is a growing structural engineering practice, providing employment for 18 local people, with planned recruitment this year and next of a further 15 people. My primary reason for choosing to work here is the locality, and the ease at which I can get home for school runs etc; I am not convinced the company would be able to find another workplace as beautiful or convenient as this one in the local area, which would mean a number of staff would have to consider moving to other company, which was be a great financial blow to the company, and its growth. The building, a converted Victorian piano factory, is not only beautiful, but has had considerable investment to improve facilities since I started working here in 2014, and there is investment planned for the site for this financial year.</p> <p>The Courtyard has a community of small businesses, all employing locally, it is a great asset to the local area and has a rigorous</p>	Not specifically stated	<p>There is no compulsory purchase planned on this site.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>No change</p>

					<p>maintenance schedule to ensure its upkeep. <b>I don't think developing the site to provide 41 residential units would be financial viable when you consider the loss of investments in the local communities by the resident companies should the development go ahead.</b></p>		
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**Respondent 73: David Beard**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
73	RSA185	SA49	Not stated	Not stated	<p>As landlord of The Maynard Arms I want to place my objection to the planned building at Lynton Road SA48 as a resident of Crouch End and a patron of the Maynard Arms. I object to them taking away the green space used by many locals, blocking the sunlight into the pub garden, increase in traffic, increasing the number of residents living in close proximity opposite the pub who will no doubt place complaints about the pub/noise (this will be if significant concern if it happens) and we will no longer have a view of Alexandra palace. We also support our neighbours and the adverse impact this will have on their day to day lives.</p>	No specifically stated	<p>Heights will be determined based on the design of the development when a planning application comes forward. This will include consideration of impacts on the public house.</p> <p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>The number of school places has been modelled in the School Place Planning report, and sufficient new classes to meet need planned for.</p> <p>Details of access and parking will be required at the time of planning application in line with the Council's DM Policies.</p>

							The view to Alexandra Palace from the pub is not a strategic view, and as such is not protected.  No stated
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**Respondent 74: Friends of Lordship Rec**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
74	RSA186	SA62	Not stated	Not stated	<p><b>NO TO THREAT OF DEMOLITIONS OF LOCAL ESTATES, AND THE BLIGHTING OF OUR COMMUNITIES.</b></p> <p><b>PROTECT ALL THE LOCAL FACILITIES AND IMPROVEMENTS, INCLUDING THE BROADWATER FARM COMMUNITY CENTRE</b></p> <p>1. The Friends of Lordship Rec are the constituted organisation for all Lordship Rec park users, formed in 2001. Over the last 11 years we have been instrumental in the successful community-led regeneration of Tottenham's largest public park, in partnership with Haringey Council Parks Service and other key stakeholders. We have a current membership of 1,344 park users, most living within a few minutes walk of the Rec, <u>including</u></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><u>many on the 4 housing estates within the area identified in proposal SA 62.</u></p> <p>We and other park user groups, in partnership with the Parks Service, currently manage or help manage various of the park's features and facilities, and the park as a whole.</p> <p>For more details, see Appendix at end: <u>The Community-led Transformation of Lordship Rec</u></p> <p>2. We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, some houses along Lordship Lane, and the Broadwater Farm Community Centre.</p> <p>The proposal would increase powers for property developers throughout that zone in the future. It would cause massive stress to all concerned, blight, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>Local residents have worked long and hard to make Broadwater Farm one of the most attractive and well-served estates in the UK.</p> <p>The proposal is unacceptable and should be withdrawn immediately. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p><b>3.</b> We support the objection of Broadwater Farm Residents Association and do not repeat most of their excellent points.</p> <p><b>4.</b> The proposal is unsound as it contradicts and undermines a range of Haringey, London and National policies which should protect the area:</p> <ul style="list-style-type: none"> <li>- respect for the existing character of an area</li> <li>- need for genuine consultation with stakeholders before proposals are made</li> <li>- need to preserve, enhance and expand rather than destroy genuinely affordable housing</li> <li>- respect for, and promotion of, strong communities rather than breaking them</li> </ul>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>up</p> <ul style="list-style-type: none"> <li>- need for mixed and balanced communities (like we have in Tottenham) rather than gentrification excluding lower income people (the majority of current local residents, and indeed of London residents generally)</li> <li>- the need for Lifetime Neighbourhoods</li> <li>- the need to protect and expand social infrastructure serving local communities</li> <li>- the need for all development to be sustainable, in particular socially and environmentally sustainable (both of which necessitate refurbishment rather than demolition of structurally-sound housing)</li> </ul> <p>5. The proposal is unsound and invalid as the description of the proposal: <i>'Improvements of the housing estate to improve stock, design of the site and routes through the area'</i> is grossly misleading. It is also misleading to characterise the area such: <i>'Broadwater Farm is a collection of Homes for Haringey and Housing Association estates...'</i> Those who know the area do not refer to the whole area as <b>'Broadwater Farm', and hence may</b> assume that only the Broadwater Farm estate itself is affected by the proposal</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>(maybe apart from some 'through routes' implications for the low rise estates). For some reason the key designation in the Urban Characterisation Study of the 3 Housing Association estates as 'suitable for tall buildings' of 6-11 storeys is not mentioned. Maybe it has been dropped, which is to be welcomed – indeed, if so, the current red-zone proposal should therefore not incorporate these estates and the homes along Lordship Lane. That bizarre and unacceptable designation is causing extreme concern and stress in these areas. They must be withdrawn from the red-zone immediately.</p> <p>The threat of demolition and redevelopment is not implied or mentioned let alone made explicit as it should have been if it is the case. No reasonable or fair-minded person would think '<i>Improvements of the housing estate to improve stock, design of the site and routes through the area</i>' meant or even could mean a threat of mass demolitions and redevelopment. It is only by reps of local community groups seeking discussions and clarification from planning officers that the true import of the proposal has been</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>revealed to us (see quotes below).</p> <p>It is therefore also unlawful as it contradicts the general principles of public consultation as set out by the Supreme Court (in an October 2014 ruling against Haringey Council).</p> <p><b>6.</b> It is worth noting that Haringey Council has confusingly promoted a specialist form for respondents to the Local Plan to fill in, sometimes implying that it is compulsory to use the form (which would be unacceptable as it would put off many local residents from responding), and other times not saying this. For example, in early 2016 the Council put up some posters in the 'red-zone' SA62 area, which doesn't mention any form and states at the bottom:</p> <p><i>" You can submit comments: By email: <a href="mailto:ldf@haringey.gov.uk">ldf@haringey.gov.uk</a> By Post: Planning Policy, Level 6, River Park House, Wood Green N22 8HQ "</i></p> <p><b>It also doesn't state that respondents at this stage are encouraged, should, or have to request the right to give verbal evidence. In the light of this we seek assurance that, as the Our Tottenham</b></p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>network have formally called for, <i>'all respondents to the current Local Plan consultation will be written to after the closure of the consultation to explain the Inquiry plans, procedures and issues and to ask if they wish to contribute 'in person' during the Inquiry.'</i></p> <p>7. The proposal is unsound and unattainable now that Lordship Rec has <b>been withdrawn from the 'red-zone'</b>.</p> <p>As pointed out in <b>Note 1</b> of our original 2015 objection (see below),</p> <p><i>" Steve Kelly from the Council's Planning Department spoke at the Tangmere Steering Committee on Broadwater Farm in February [2015] and when challenged admitted that the land on Lordship Recreation Ground would be needed for housing for people displaced by any demolitions on Broadwater Farm.</i></p> <p><i>Matthew Patterson, the Council's Interim Head of Policy, Strategic Transport and Infrastructure, also confirmed to a rep from the Friends of Lordship Rec on 20 February [2015] that the inclusion of the northern part of Lordship Rec in the</i></p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>development zone is for the power to build housing to decant the residents of Broadwater Farm (or many of them) into that area of the park <i>otherwise the demolitions on the estate could not go ahead</i> due to the impracticalities of re-homing those affected during the demolition and redevelopment works.</p> <p><i>Gavin Ball from the Councils Planning Department</i> told a rep from the Friends of Lordship Rec that <i>a deliberately large zone was chosen for maximum flexibility</i>. It included <i>additional powers</i> to achieve redevelopment. He said there would be <i>no net loss of open space, but that could include a realignment or a land swap</i>. [He didnt say where]. Most of the land in the zone is owned by the Council, but additional powers <i>could include increased powers of compulsory purchase of private land</i> such as the homes on Lordship Lane. When challenged about the proposed re-designation of the 3 low-rise estates in the northern part of the zone as <i>suitable for tall buildings</i>, he said that this is because <i>they are close to transport routes</i>. We note, however, that this directly contradicts policies which protect the existing character of each</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>neighbourhood, in this case the low-rise nature of all the existing buildings on and around <b>those 3 estates.</b> “</p> <p><b>8.</b> The ‘suitable for tall buildings’ designation for the 3 Housing Association estates seems to have no justification and is therefore arbitrary and unlawful and/or unsound.</p> <p><b>9.</b> In March 2015 we, the Friends of Lordship Rec, made the objection to the previous version of the proposal, SA63 (as it was then numbered). This is enclosed in full below. That red-zone proposal was the same as the current SA62 version, except it also included the northern third of Lordship Rec.</p> <p><b>10.</b> In fact a third of all the objections made in February/March 2015 regarding the whole Draft Local Plan were <b>objections to the SA63 ‘Broad Water Area’ red-zone proposal.</b> Almost all of these objections specified that they were <b>objecting to the entire ‘red-zone’</b> as then proposed.</p> <p><b>11.</b> The Council have since stated that Lordship Rec was withdrawn due to the volume and passion of the objections in</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>early 2015 - but despite the volume and passion of the objections clearly and explicitly relating to the <i>whole</i> zone at that stage, the Council have so far failed to withdraw the entire proposal.</p> <p><b>12. The Council's senior planning officer</b> Matthew Patterson wrote to the Friends of Lordship Rec on 03/10/2015, stating: <i>" I can confirm that the MOL extent, as shown on the UDP Policies Map, is to be excluded from the red line boundary."</i></p> <p>Indeed, Cllr Alan Strickland, Haringey Cabinet Member for Regeneration and Housing, repeated the above claim to Baroness Jenny Jones, an AM at City Hall (and former Deputy Mayor of London) on 25<sup>th</sup> November 2015.</p> <p>However, for some reason the MOL-designated land upon which sits the bulk of the Broadwater Farm Community Centre and its Harmony Gardens has not yet been excluded, and in fact the red-zone boundary has been specifically re-drawn to include the said building and gardens. These are part of the park, and <b>the park's lottery</b>-funded improvements explicitly included the Centre grounds. Indeed, the functioning of the</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>Broadwater United sport pitches, being part of the park and removed by the Council from the red-zone proposal SA62, are managed from and reliant on the Community Centre. Hence the Community Centre not only straddles MOL, but also is a fully integrated and essential part of that MOL.</p> <p>With the most senior planning officer and the relevant Cabinet member stating publicly that no MOL land should be under threat, the Community Centre must be withdrawn from the red-zone immediately.</p> <p><b>13.</b> It should be noted that the original red-zone proposal only covered Tangmere block on Broadwater Farm (total 115 dwellings) as it was said to have some specific repairs issues. Red-zoning it may not have been the appropriate course of action but at least there was some attempt at justification. We now know, from a recent FOI request [LBH4703815], that neither Tangmere nor any other block on Broadwater Farm has been found to be structurally unsound. Hence the landlord should perform its duty to properly manage and maintain Tangmere and all other</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>Broadwater Farm homes.</p> <p>However, the current red zone covers a staggering 1,473 homes (1,012 Council tenancies, 68 Council resident leaseholders, 63 Council non-resident leaseholders, 267 Housing Association tenancies, and 55 private sector dwellings) – a threat, in particular such an arbitrary threat, to such a huge area can only be described as unacceptable social engineering.</p>		

**Respondent 75: Lynne Darnell**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
75	RSA187	SA 62	No	No response given	<p>I strongly endorse the sentiments of the objection worded below. I believe this plan is a gross waste of money (since it demolishes buildings which are relatively recently built) , and hugely destructive of residents' stability as well as the massive community cohesion and wellbeing painstaking created over years.</p> <p><b>TO HARINGEY COUNCIL PLANNING POLICY TEAM</b>  <a href="mailto:ldf@haringey.gov.uk">ldf@haringey.gov.uk</a></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for</p>

				<p>I/We the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan.</b></p>	<p>demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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Respondent 76: Mr D Chambers

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
76	RSA188	SA62	No	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

Respondent 77: Liz Carter

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
77	RSA189	SA62	No	Not stated	<p>I/We the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a 'site allocation / red-zone' in the Haringey Plan.</p> <p>The local area has a strong community feel which would benefit from investment and maintenance, to replace the current homes with new builds and displace the current residents in order to 'redevelop' and create profit for the council and private companies is unthinkable. Please do rethink this strategy and protect the local community.</p>		

**Respondent 78: Elizabeth Adams & Peter Corley**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
78	RSA190	SA62	No	Not stated	<p>Please abandon such a proposal in favour of improvements to the estate. <b>It has taken many years to 'turn round'</b> Broadwater Farm and its immediate surroundings from the bad image created by the 1980s riots. But it most certainly has been turned round. Many residents we speak to are proud to live on the estate and also to enjoy the park, especially since the lottery grant enabled a lot of socially useful work to</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>take place. The relatively new 'Hub' community centre is also providing a useful service to the community, attracting people from different cultures, ages, etc.</p> <p>It would be tragic if this estate were to go the route that so much of London is going – redevelopment for the sake of profit and not for the sake of local people.</p>		<p>demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

**Respondent 79: Pitkins**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
79	RSA191	SA62	No	Not stated	I strongly object to the draft local plan proposal SA62. It is unacceptable & should be withdrawn immediately.		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>

Respondent 80: Candy Amsden

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
80	RSA192	SA62	No	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan. No change.</p>

Respondent 81: Eartha McDermott

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
81	RSA193	SA62	No	Not stated	I think that the proposal to demolish bwf and lido close is a very bad idea. One of the best things about tottenham is the green spaces and normal housing. My family lived on Broadwater farm for 16 years and it was horrible but tolerable because we could walk out into normal housing or parkland. Erect ing a mega estate over a much wider area would be replacing bad with worse than bad. People need proper homes not warehousing. Please don't go ahead with the proposed project.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

Respondent 82: Mark Applegate

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
82	RSA194	SA62	No	Not stated	I object to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and</p>		<p>permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					refurbishment of the estates – none of which require a 'site allocation / red-zone' in the Haringey Plan.		

Respondent 83: Tim Rawe

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
83	RSA195	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a 'site allocation / red-zone' in the Haringey Plan.</p>		

**Respondent 84: Sandra Saad**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
84	RSA196	SA62	No	Not stated	To whom it may concern, I strongly object to your draft proposal to redevelop Broadater farm and demolish people's homes in parts of Lordship lane and nearby areas. There should be a agreement with residents concerning improvements to be made. We do not		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					want our community disrupted and ruined. You are breaching planning rules. People in the community have worked hard and devoted their lives to improving the park and improving the area. Your proposals would mean a big disruption to our lives, especially to those who would lose their homes.		that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
84	RSA197	SA62	No	Not stated	I am writing to you to voice my objection to your plan to demolish and redevelop in the Broadwater farm area. I feel it is wrong to demolish houses in Lordship lane and the closes as this would ruin peopl's lives. I have lived in the area for many years and it is only fairly recently that lordship park has been improved and it is wrong to use it as a redevelopment zone. You should be thinking of other ways of refurbishing Broadwater farm, ways that won't ruin a whole community.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
							No change

**Respondent 85: Charlie Greenway**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
85	RSA198	SA62	Not stated	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan		

**Respondent 86: Nthabiseng Faku-Juqula**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
86	RSA199	SA62	Not stated	Not stated	<i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<i>the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i>		

Respondent 87: Carola Kornfeld

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
87	RSA200	SA62	Not stated	Not stated	<p>I/We the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>		<p>be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

Respondent 88: Francis Blake

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
88	RSA201	SA62	Not stated	Not stated	<p><i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight, and would undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</i></p> <p><i>It breaches a whole range of planning policies which should protect our community.</i></p> <p><i>It is unacceptable &amp; should be withdrawn immediately.</i></p> <p><i>Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area.</i></p> <p><i>The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</i></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

Respondent 89: Maria Lopez

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
89	RSA202	SA62	Not stated	Not stated	<p><i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</i></p> <p><i>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i></p>	As set out	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

Respondent 90: Catherine Collingborn

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
90	RSA203	SA62	Not stated	Not stated	<p>I want to register that I strongly object to the draft Local Plan Proposal SA62 for the demolition and redevelopment of the area covering the Broadwater Farm estate, Somerset Close, Lido Square, Moira Close and a number of houses along Lordship Lane.</p> <p>This would cause displacement, disruption and massive stress to all the current residents and users of Lordship Rec. Residents would lose their homes and be very unlikely to afford the rents or to buy in any new development.</p> <p>It would undermine all the efforts to build a strong and stable community in the area and to improve local facilities.</p> <p>It is totally unacceptable. The Council should continue the work of improving the homes , facilities and communities in the area. Otherwise the resources already poured into improvements are completely wasted.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

Respondent 91: Wendy Smith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
91	RSA204	SA62	No	Not stated	<p>I the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a 'site allocation / red-zone' in the Haringey Plan.		
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**Respondent 92: Edgar Jacobsberg**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
92	RSA205	SA62	No	Not stated	I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes,		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

					estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		
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**Respondent 93: A&P Investments Ltd**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
93	RSA206	SA62	Not stated	Not stated	<i>We are Landlords (among other houses in the area) of 263 Lordship Lane N17 6AA and we understand that our property falls within the proposal SA62 plan. We have worked very hard in the past few years to bring good &amp; quality tenants to the Tottenham area and worked very hard to promote the area as a growing and vibrant community and we see how hard working families are moving to the area and establishing healthy and prospers roots in Lordship Lane and other areas in Tottenham, therefore We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

					<p><i>stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.”</i></p>		
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**Respondent 94: Alison Johnston**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
94	RSA207	SA62	Not stated	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is</p>

					<p>and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p>		<p>considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 95: Suzan Fellah**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
95	RSA208	SA62	No	Not stated	We object to any kind of development in lordship lane and around the areas of Broadwater farm, lido, local plan SA63 for demolition and redevelopment zone covering lordship lane, lido square, Somerset close, moira close, lordship recreation. And some		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered

					houses along lordship lane.		that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
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**Respondent 96: David Wheatley**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
96	RSA209	SA62	Not stated	Not stated	I have deep concerns about the draft Local Plan proposal SA62 for a redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. I appreciate that 'improvements of the housing estate to improve stock' could be a positive action, if done considering the needs of the residents of the estate as best as possible. However I am concerned that these 'improvements' will not actually benefit the local residents and will be more favourable and affordable for new higher earning buyers moving into the area. The rights of the current residents must be protected. This means re-housing residents on the same site (and not elsewhere outside of the site) and		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.

					maintaining a similar organisation and order so that local neighbours/networks are maintained. Rent prices should similarly be maintained and not unfairly raised to be unaffordable. Local organised groups and facilities need to be preserved, maintained and improved.		No change
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**Respondent 97: Lordship Lane Private Houses Group (Petition: 321 signatures)**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
97	RSA210	SA62	No	Not stated	<p>We the singes of the attached petition object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a 'site allocation / red-zone' in the Haringey Plan.</p>		
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**Respondent 98: Anne Schulthess**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
98	RSA211	SA62	Not stated	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years, as well as blight and undermine all the successful efforts over decades to</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for</p>

					<p>build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable and should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p> <p>Look forward to hearing how you will work with the community to improve the area, rather than displacing hundreds of families.</p>		<p>demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>
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**Respondent 99: Jonathan Stevenson**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
99	RSA212	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could</p>

					<p>blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable and should be withdrawn immediately. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p>		<p>take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 100: Storm Moncur**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
100	RSA213	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could</p>

					blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan		take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
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**Respondent 101: Gulden Ezer**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
101	RSA214	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could

					<p>blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p>		<p>take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 102: Angela Napolitano & Sacha Armitage**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
102	RSA215	SA62	No	Not stated	<p><i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</i></p> <p><i>The proposal would cause massive stress to all concerned, displacement</i></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could</p>

					<p><i>and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i></p>		<p>take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 103: Carla Harding**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
103	RSA216	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is</p>

					and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
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**Respondent 104: David Martins**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
104	RSA217	SA62	No	Not stated	I the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to

					<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a <b>'site allocation / red-zone' in the Haringey Plan.</b></p>	<p>improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
104	RSA218	SA62	No	Not stated	<i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset</i>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site</p>

					<p><i>Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i></p>		<p>Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>
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**Respondent 105: Peter Corley**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
105	RSA219	SA62	No	Not stated	I would like to register an objection to the above plan for Broawater Farm		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations

					<p>and surrounding areas. It would cause disruption to everyone local for years. Planning policies which should protect our communities are being ignored. The homes and estates in the area should be improved and restored, not knocked down. Good maintenance is better [and cheaper] than demolition</p>		<p>document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 106: Mr C Yumakci**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
106	RSA220	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Fram, Somerset Close, Moira Close and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community. It is unacceptable and should be		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate

					<p>withdrawn immediately. Instead the council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</p>		<p>further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 107: David Stoker**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
107	RSA221	SA62	No	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>

					unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan		No change
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**Respondent 108: Peter Thomlinson**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
108	RSA222	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.

					unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		No change
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**Respondent 109: Peter Cripps**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
109	RSA223	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.

					unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan		No change
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Respondent 110: Susan Johal

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
110	RSA224	SA62	No	Not stated	<p>I the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.

					<p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan</b></p>		No change
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**Respondent 111: Andrew Topp**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
111	RSA225	SA62	No	Not stated	I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square,		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to

				<p>Moira Close, and houses along Lordship Lane.</p> <p>The proposal would cause massive stress, displacement and disruption for years to all those affected, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable to the existing local community and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is totally unnecessary compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>	<p>the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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Respondent 112: Esther Pierce

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
112	RSA226	SA62	No	Not stated	<p>I, the undersigned, object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan.</b></p> <p>I am afraid that new developments will drive out or exclude members of the community who have built so much more than bricks and mortar in their local area, namely their reputation, friendships and aspirations.</p>		
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**Respondent 113: Zelda Platten**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
113	RSA227	SA62	No	Not stated	<p>I, the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many</p>

				<p>stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan.</b></p>	<p>forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>
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Respondent 114: Ghazale Jamsheed

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	Council’s Comments / Response
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		Policy / Figure / Para		Compliant		Sought	
114	RSA228	SA62	No	Not stated	<p>I, the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>

					planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b>		
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**Respondent 115: Deborah Berger**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
115	RSA229	SA62	No	Not stated	<b>I'm writing in strong objection to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp;</b>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

					improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		
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**Respondent 116: Issy Harvey**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
116	RSA230	SA62	No	Not stated	<i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. I would like to see the Council work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

					<i>than demolition which would not require a site allocation in this plan.</i>		
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**Respondent 117: John Murray**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
117	RSA231	SA62	No	Not stated	I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It ignores all the renovation work done by the <b>Council's BWF Architects</b> in conjunction with tenants. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.

					and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		
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**Respondent 118: Richard Cooper**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
118	RSA232	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a 'site allocation / red-zone' in the Haringey Plan.</p> <p>There a plenty of brownfield sites nearby you could use. Why destroy communities and a beautiful park?</p>		
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**Respondent 119: Gulem Ezer**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
119	RSA233	SA62	No	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		
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**Respondent 120: Tracey Tindall**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
120	RSA234	SA62	No	Not stated	<p>I the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan</b></p>		
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**Respondent 121: Karolina Maroszek**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
121	RSA235	SA62	No	Not stated	<p>I, the undersigned, object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have</p>

				<p>years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan.</b></p>		<p>not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 122: Janet Lallysmith**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
122	RSA236	SA62	No	Not stated	object strongly to the draft Local		Objection is noted. The Council has

				<p>Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates –</p>	<p>proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					none of which require a 'site allocation / red-zone' in the Haringey Plan.		
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Respondent 123: Joan Curtis

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
123	RSA237				I would like to make an objection to the draft Local Plan proposal SA62 for the demolition and redevelopment of Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some privately owned houses along Lordship Lane. I think this would cause a lot of disruption in the area for many years and be very stressful to a lot of tenants and residents who would be moved, probably out of their community. It would cause blight in my area and undermine a lot of effort that has been put into regenerating it by a passionate local community, especially in Lordship Rec and Harmony Gardens and on Broadwater Farm over many years. Just as we have begun to regenerate our area together, some of the residents who now enjoy the fruits of that success will be displaced. It is in breach of a range of planning policies which are there to protect communities not destroy them. I feel the Council should be working with the community to protect and		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					improve all the existing homes, estates and facilities. It is totally unacceptable and should be withdrawn immediately. The draft proposal SA62 does not make sound planning sense and I believe repair and refurbishment of the estate, as was previously planned and promised for Broadwater Farm, rather than demolition, would be a better alternative and would not require a site allocation in this plan.		
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**Respondent 124: Yessica**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
124	RSA238	SA62	No	Not stated	<i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

					<i>must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</i>		
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**Respondent 125: Catherine Else**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
125	RSA239	SA62	No	Not stated	<i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

					<i>existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</i>		
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**Respondent 126: Michelle Laugie**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
126	RSA240	SA62	No	Not stated	<p>I strongly object to the proposed redevelopment. This area have been built-up over the years and has a very strong community.</p> <p>It is common knowledge that a lot of money has been invested into all these areas over the years. Last year alone saw a considerable amount of money invested into Lordship Lane. I personally was on the receiving end of some of those improvements after a long waited 20 years. I love my home and the community alike. Broadwater Farm is no longer the notorious estate once branded. Why destroy people's community? Is this what things have come to ! This plan needs to be revised and better solution put in its place.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

**Respondent 127: Phil Cocksedge**

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	Council's Comments / Response
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		Policy / Figure / Para		Compliant		Sought	
127	RSA241	SA62	No	Not stated	<i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

**Respondent 128: Maria Cocksedge**

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure / Para					
128	RSA242	SA62	No	Not stated	<i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

**Respondent 129: Isabel Why**

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		<b>Para</b>					
129	RSA243	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

**Respondent 130: Aleisha Miller**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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130	RSA244	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
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**Respondent 131: Maciej Poplawski**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
131	RSA245	SA62	No	Not stated	We object strongly to the draft Local		Objection is noted. The Council has

					<p>Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p>		<p>proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 132: Wayne Walters**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
132	RSA246	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition		Objection is noted. The Council has proposed in Policy SA62 to consider

					and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
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**Respondent 133: Jill Webb**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
133	RSA247	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone'		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and

					<p>covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p>		<p>improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 134: 14 Person Petition**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
134	RS248	SA62	No	Not stated	Re: Local Plan Proposal SA63 for the demolition and redevelopment zone covering	The proposal is unacceptable and should be	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and

					<p>Broadwater Farm, Somerset Close, Lido Square, Moira Close, some houses along Lordship Lane, and the northern part of Lordship Recreation Ground, including the enclosed sports field.</p> <p>We, the undersigned, write further to the above matter and to inform the Council and/or the Planning Department that we strongly object to the proposal which would see the demolition of our existing homes and facilities, including Lordship Lane Recreation Grounds.</p>	<p>withdrawn immediately.</p>	<p>improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 135: 166 Person Petition**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
135	RSA249	SA62	No	Not stated	We strongly object to the draft Local Plan Proposal SA63 for the demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, some houses along Lordship Lane, and the northern part of Lordship Recreation Ground, including the enclosed sports field.	It is unacceptable and should be withdrawn immediately. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that

					The proposal would cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community.		improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
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**Respondent 136: 19 Person Petition**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
136	RSA250	SA62	No	Not stated	We the undersigned, urge Haringey Council to reconsider and reverse their decision that we strongly object to the draft Local Plan Proposal SA63 for the demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, some houses along Lordship Lane, and the northern part of Lordship Recreation Ground, including the enclosed sports field.	It is unacceptable and should be withdrawn immediately. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This

					The proposal would cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community.		allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
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### Respondent 137: 499 Person Petition

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
137	RSA251	SA62	No	Not stated	<b>Stop "redevelopment" threats to the Broadwater/ Lordship Rec Area. Protect our estates and park. No to any demolitions of local homes! No to building on the park and the sports field! Protect all the facilities and improvements in the area.</b>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.

							No change
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Respondent 138: Wendy Charlton

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
138	RSA252	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’</b> in the Haringey Plan.</p> <p><b>Additional Comments</b></p> <p>People Matter. Talk to them and you will find out we need more love in this world.</p>		
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**Respondent 139: Tom Theodoulou**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
139	RSA253	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned,</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are,</p>

					<p>displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 140: Ed Spring**

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Para				
140	RSA254	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of</p>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		
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**Respondent 141: B Parsons**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
141	RSA255	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>Wellbeing of local residents over money grabbing developers. Council should work with local residents to protect existing houses and ALL Green Areas. Quality of life more important than money !!</p>		
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Respondent 142: Joanna Hawkes

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
142	RSA256	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion

				<p>Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>	<p>of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					Additional Comments		
					Please understand our community is alive and well. Don't destroy it!		

Respondent 143: M V Ellis

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
143	RSA257	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’</b> in the Haringey Plan.</p> <p><b>Additional Comments</b></p> <p>Established viable communities must not be sacrificed for speculative schemes which do not benefit local residents.</p>		
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**Respondent 144: L Regan**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
144	RSA258	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve

				<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p>	<p>conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					This is disgraceful and must not be happening. People before money – a government grabbing money <b>making b*\$+@d's</b> PEOPLE FIRST		
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**Respondent 145: Carmelifa Kadeena**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
145	RSA259	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>‘People first’ Community &amp; family staying together.</p>		
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**Respondent 146: P Murray**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
146	RSA260	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been</p>

					<p>years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</p>		<p>made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 147: Maureen Cole**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
147	RSA261	SA62	No	Not stated	I/We the undersigned object		Objection is noted. The Council has

				<p>strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates –</p>	<p>proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					none of which require a 'site allocation/ red zone' in the Haringey Plan.		
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**Respondent 148: Valerie Marquez**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
148	RSA262	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’</b> in the Haringey Plan.</p>		
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**Respondent 149: Thomas Moss**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
149	RSA263	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>

					<p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’</b> in the Haringey Plan.</p>		No change.
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**Respondent 150: Nicholas Kaptamis**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
150	RSA264	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the

				<p>some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>	<p>opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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Respondent 151: Jean Tate

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
151	RSA265	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’</b> in the Haringey Plan.		
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**Respondent 152: Hilary Aoams**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
152	RSA266	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		
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**Respondent 153: Sherine Khall**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
153	RSA267	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many</p>

					<p>stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 154: Derchienberg Paul**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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154	RSA268	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs</p>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		
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**Respondent 155: Alan Vile**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
155	RSA169	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>Moira Close is as important today as it was when opened in 1973. Integrated housing for able and disabled people to live in harmony and to combine integration and independence for all.</p>		
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**Respondent 156: Kevin O’Connell**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
156	RSA270	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve

				<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p>	<p>conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					Regardless of your opinions becoming an absentee landlord helps no-one.		
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**Respondent 157: Patience Ojukwu**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
157	RSA271	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes,</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>I do agree with everything discussed in the meeting today.</p>		
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**Respondent 158: Hatice Atmaca**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
158	RSA272	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further</p>

					<p>efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 159: S.C Allen Ms.**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
159	RSA273	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve

				<p>redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the</b></p>	<p>permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					Haringey Plan.		
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**Respondent 160: Seray Mertdjan**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
160	RSA274	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		
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**Respondent 161: Zenni Yaman**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
161	RSA275	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>

					<p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		No change
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**Respondent 162: A Antonicu Ms**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
162	RSA276	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the

				<p>some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</p>		<p>opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 163: Martin & Phoebe & Ashley Burrows**

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	Council’s Comments / Response
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		Policy / Figure / Para		Compliant		Sought	
163	RSA277	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</p> <p><b>Additional Comments</b></p> <p>We have been involved in the regeneration of this area for 10 years and although there is a lot to be done it is happening and it is <b>good. This proposal’s bad in that it is high handed, arrogant and undemocratic.</b></p>		
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**Respondent 164: Desmond McLeod**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
164	RSA278	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further</p>

					<p>efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 165: Alfred Weeks**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
165	RSA279	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve

				<p>redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the</b></p>	<p>permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					Haringey Plan.		
<b>Respondent 166: Rudolph Singh</b>							
ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
166	RSA280	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		
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**Respondent 167: S Tewogbade**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
167	RSA281	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		
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**Respondent 168: Ann McTaggart**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
168	RSA282	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many</p>

				<p>stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>	<p>forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 169: Caesar Lalobo**

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Para				
169	RSA283	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of</p>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>

					good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		
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**Respondent 170: Hasibe Guler**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
170	RSA284	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>When this proposal proposed certainly did not take into <b>consideration local people’s need.</b> Where there are group of people who survive be receiving community support from each other like Turkish speaking communities who are in need of language barrier.</p>		
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**Respondent 171: Khiry Pascal-Joseph**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
171	RSA285	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan		Objection is noted. The Council has proposed in Policy SA62 to consider how

				<p>proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site</p>	<p>to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					allocation/ red zone' in the Haringey Plan.		
					<b>Additional Comments</b>		
					Demolition isn't the way forward please don't rip up a community.		

**Respondent 172: Victoria Andoh**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
172	RSA286	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which <b>require a ‘site allocation/ red zone’</b> in the Haringey Plan.</p>		
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**Respondent 173: Huseyin Ualcin**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
173	RSA287	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This</p>

					<p>undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 174: Hasan Eric**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
174	RSA288	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan		Objection is noted. The Council has proposed in Policy SA62 to consider how

				<p>proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which <b>require a ‘site</b></p>	<p>to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					allocation/ red zone' in the Haringey Plan.		
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**Respondent 175: Hediye Aydemir**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
175	RSA289	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		
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**Respondent 176: Gulden Yilzirim**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
176	RSA290	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>

					<p>planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which <b>require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		
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**Respondent 177: Suzanne Bright**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
177	RSA291	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered

					<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</p>		<p>that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 178: Shengul Elmaz**

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
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		Para				
178	RSA292	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of</p>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		
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**Respondent 179: M Williams**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
179	RSA293	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		
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**Respondent 180: Alqa Khayium**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
180	RSA294	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can</p>

					<p>trong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a <b>'site allocation/ red zone'</b> in the Haringey Plan.</p> <p><b>Additional Comments</b></p> <p><b>This is a community, please don't destroy this and ruin lives!</b></p>		<p>be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 181: Asalet Yuksel**

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Para				
181	RSA295	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of</p>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		
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Respondent 182: Orhan Yuksel

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
182	RSA296	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’</b> in the Haringey Plan.</p>		
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**Respondent 183: Saime Coulcrsoy**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
183	RSA297	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further</p>

					<p>efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 184: Ozgul Aslan**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
184	RSA298	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve

				<p>redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the</b></p>	<p>permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					Haringey Plan.		
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**Respondent 185: Benneth Dake**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
185	RSA299	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					in the area.  The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b>		
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**Respondent 186: Adjoa Wiredu**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
186	RSA300	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		
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**Respondent 187: J E Badu**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
187	RSA301	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered

					<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 188: Rose Adomako**

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure / Para					
188	RSA302	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		
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**Respondent 189: Wilhemina Bruce**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
189	RSA303	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		
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**Respondent 190: Doris Tagoe**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
190	RSA304	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further</p>

					<p>efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 191: Faustina Blackstock**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
191	RSA305	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve

				<p>redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the</b></p>	<p>permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					Haringey Plan.  <b>Additional Comments</b>  I am against the demolishing of the estate.		
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**Respondent 192: Abeba Eyasu**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
192	RSA306	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		
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**Respondent 193: Eleanor Schling**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
193	RSA307	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further</p>

					<p>efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a <b>‘site allocation/ red zone’</b> in the Haringey Plan.</p>		<p>engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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**Respondent 194: Asli Mehari**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
194	RSA308	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan		Objection is noted. The Council has proposed in Policy SA62 to consider how

				<p>proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site</p>	<p>to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					allocation/ red zone' in the Haringey Plan.		
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**Respondent 195: Eileen McGrath**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
195	RSA309	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes,</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		
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**Respondent 196: Shirley Maynard**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
196	RSA310	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>

					<p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>Redecorate the estate</p>		No change
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**Respondent 197: Andrew St John**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
197	RSA311	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion

				<p>Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>	<p>of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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Respondent 198: Ruby Earle							
ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
198	RSA312	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		
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**Respondent 199: Augustine Amo Anyimadu**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
199	RSA313	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					<p>protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>I prefer to live on my estate. Displacement is awful, now that the estate is so peaceful why is all this fuss about. No red zone in my estate.</p>		
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**Respondent 200: J Anuimadu**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
200	RSA314	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan		Objection is noted. The Council has proposed in Policy SA62 to consider how

				<p>proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a ‘site</p>	<p>to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					allocation/ red zone' in the Haringey Plan.  <b>Additional Comments</b>  My concern is I love Broadwater Farm. I don't want to live anywhere else. I am against the Council proposals. Remove the red zone please.		
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**Respondent 201: Jose Luis Diaz Navas**

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
201	RSA315	SA62	No	Yes	The proposal would cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities & communities in the area	No response given	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

**Respondent 202: Mary Swift**

ID	Rep ID	Alteration	Sound	Legally	Reason	Change Sought	Council's Comments /
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				Compliant			Response
202	RSA316	SA62	Yes	Yes	I feel that improvements are based around the public funding provided especially for that area and a halt is placed on improvements when over expenditure becomes a problem.	Even though improvements are planned in a fair manner, occasionally, several properties may be neglected through an admin malfunction.	Noted.

**Respondent 203: Inga Bystram**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
203	RSA317	SA62	No	Not stated	Is the document justified? No evidence that stress and public health issues resulting from a proposed demolition have been realistically assessed.	Remove Broadwater Farm estate from the site allocation plan SA62.	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
203	RSA318	SA62			Is the document sound? No difference has been	Any proposal should guarantee	SP2 of the Local Plan sets out the differentiated target for affordable rent

					made between “affordable” housing rent and “social housing rent”. See enclosed chart which shows affordable rent double social rent.	social housing rent for any tenants choosing or forced to move.	and intermediate products. No change
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### Respondent 204: Broadwater Farm Residents’ Association

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
204	RSA319				<p>We write our reply to Haringey Council’s Local Plan Consultation mainly in reference to the <i>Sites Allocation DPD Pre-Submission Version</i> dated January 2016. Haringey Council’s Site Allocation 62 is the Broadwater Farm Area. This area includes Broadwater Farm estate with all its marvellous community facilities, and also Somerset Close, Lido Square, Moira Close and the houses along Lordship Lane to the north.</p> <p>The proposed zone is indicated by a red line on a map (see right) taken from the above document. This proposal, if adopted, would mean that developers could draw up plans to demolish housing on the site and provide new housing, whether this housing was provided by a Housing Association or was fully private sector housing.</p> <p>The residents and the Residents’ Association have worked with the Council to dramatically improve the estate over the last 30 years. It now has great facilities, including concierges, play areas, a</p>	<p><u>The Alternative We Want</u></p> <p>Broadwater Farm Residents’ Association wants improvement of the existing housing on Broadwater Farm as an alternative to demolition and rebuilding.</p> <p>Throughout 2015 representatives of Broadwater Farm Residents’ Association, Broadwater United Sports and Football Academy, Broadwater Farm Enterprise Centre, Back 2 Earth@Broadwater Community Centre and Friends of Lordship Rec.</p>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding</p>

				<p>health centre, landscaping and schools. In the last 6 years a range of refurbishments and repairs have been made - yet bizarrely it has now been put on a list of Council estates facing 'redevelopment'. We say it is the Council's duty as the landlord to finish off all the works started.</p> <p>This proposal which facilitates demolition and re-building will cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition. Repair and refurbishment would not require a site allocation in this plan.</p> <p>Broadwater Farm</p> <p>Broadwater Farm Estate was commenced in 1967 on the site of the allotments by Lordship Recreation Ground. It was a massive development of high density Council housing of initially 1063 flats for housing 3000-4000 people. Due to some early problems with the estate, such as leaking roofs, residents banded together and convinced the Council to carry out works on the buildings. By 1981 a process of refurbishment had</p>	<p>have been meeting together.</p> <p>We came up with the following principles for improving the Broadwater Farm:</p> <p>Complete the planned Decent Homes Works program  Do the repairs needed in the flats and blocks (including fixing leaking pipes)  Install effective entry/security systems to all blocks  Redecorate the estate  Protect and improve the existing facilities and services, and the estate's environment  Rehouse overcrowded families entitled to a bigger home if they wish</p> <p>Decent Homes work should include new front doors, kitchens and bathrooms for the existing blocks.  (Tangmere in addition requires new roofs,</p>	<p>how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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				<p>started, but progress was slow. Residents created a very active Youth Association and a Residents' Association.</p> <p>From the mid-1980s the Council consulted the residents about a new program of needed works and residents identified the improvements they wanted with the Council agreeing to implement them and finding the funds to do so. The community-led regeneration of the estate attracted over £40m of resources and has been a huge success. All of the tenants' recommended solutions were carried out by the Council. Improvements included concierges for all blocks, play areas, landscaping, workshops for rent, a health centre, a community centre, a new school campus, bus route through the estate, and more.</p> <p>It is now one of the most well-served Council housing estates in the UK and regularly attracts visitors from around the world who wish to see this great example of successful community-led regeneration. All these facilities are at risk of demolition if SA62 is approved as a site allocation. So is all the housing, not just on Broadwater Farm but also the excellent housing on Somerset Close, Lido Square and Moira Close. This includes special provision of housing for people with disabilities. Residents of these areas have expressed great concern about the possible demolition of their homes.</p>	<p>windows and other works to the exterior of the block). It should also include work to ensure good insulation and other work to the existing blocks as necessary. This modernisation of facilities will make give our flats a far more modern feel and make residents value their homes even more. Our homes will be warmer and more comfortable and our heating bills will be reduced.</p> <p>New door entry systems are planned for Northolt, Stapleford, Lympne, Manston, Kenley, Hornchurch, Martlesham and Rochford this year. Tangmere, Croydon, Debden and Hawkinge have been left out however. Adding the remaining blocks to the program will bring about an improvement to our security on the estate.</p>	
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				<p>Broadwater Farm Residents' Association</p> <p>The current Broadwater Farm Residents' Association was established in 1987, originating from the Broadwater Farm Youth Association. It was established to look at the issues of lack of representation and deprivation on the estate as well as to raise community spirit. It has held regular meetings with councillors and council officials over the years to achieve these goals.</p> <p>The current committee was elected at an Annual General Meeting in September 2015. We hold regular committee meetings. We continue to organise events for local residents. In 2015, for example, we organised two Open Days where residents could come and meet each other, enjoy refreshments and discuss any problems or suggestions they had about their estate. We have also taken up various issues, including issues with repairs, estate facilities, general maintenance and estate improvements with Homes for Haringey and Haringey Council.</p> <p>SA62: Proposal to 'Improve Stock'-What Demolition Would Mean</p> <p>As the Site Allocations document notes:</p> <p>'This site is listed as part of the Council's initial estate renewal programme in Policy SP2. This policy also seeks to ensure no net loss of existing affordable housing floorspace in development; and ensure that affordable housing units are</p>	<p>We also believe that our blocks require redecoration: painting of communal areas and new, more attractive flooring. Relative to capital works such as the new doors this is relatively inexpensive and would make a huge difference to the perceptions of residents and visitors about the estate.</p> <p>We wish our existing facilities to be defended and improved. Broadwater Farm Community Centre is a very valued local resource that provides a café, a gym and a football club among other services and events. We are very surprised that this facility is still being included on the Site Allocation for potential demolition. We also note that it stands on Metropolitan Open Land and we wonder how it can be imagined</p>	
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				<p>designed to a high quality and are fully integrated within schemes.<sup>5</sup></p> <p>The possibility of the demolition of council housing on the Broadwater Farm site has been broached in meetings between members of the Broadwater Farm Residents Association Committee and Steve Kelly of the Planning Department on 18/02/2015 and 16/03/2015 and by members of our Association and Matthew Pattison of the Planning Department on 09/03/2015 at the West Green and Bruce Grove Area Forum. At both meetings Mr Kelly rather reluctantly agreed that demolition and rebuilding of blocks in addition to Tangmere (see below for issues related to Tangmere) could be a possibility on the site but stressed that his department was not responsible for this decision and that no concrete plan for this had yet been drawn up. Mr Kelly stated in both meetings that the allocation of land on Lordship Recreation Ground was necessary for building new homes for decanted residents from Tangmere. Mr Pattison went further at the Area Forum on 09/03/2015 and said the land might be needed if blocks at Broadwater Farm need to be decanted, i.e. the land would house residents from more than one demolished block. While the Lordship Rec plan has now been dropped we believe that the continued inclusion of the other areas in SA62</p>	<p>that it would be legally possible to demolish it in any case.</p> <p>We regard improvement of housing as an alternative to inclusion on the site allocation plan as none of the improvements that are necessary would require inclusion of our estate on the Site Allocation. We believe the only reason for the inclusion of our estate as a Site Allocation is to facilitate demolitions in the future and we reject this option as unnecessary and damaging.</p> <p>Broadwater Farm Residents' Association does not agree that the potential demolition of the blocks we live in should be described as a way to 'improve stock'.</p>	
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<sup>5</sup> Site Allocations DPD Pre-Submission Version, January 2016. Page 151

				<p>indicates that demolition is still being seriously considered. It is obvious that the inclusion of Broadwater Farm on the Site Allocations plan does make demolitions of council blocks on Broadwater Farm a possibility and not only Tangmere, in the absence of any statement in the plan to the contrary.</p> <p>The type of 'regeneration' Broadwater Farm may well face is set out under proposals for Broadwater Farm to be included in a 'Joint Venture' arrangement. On 10/11/2015 Haringey's Cabinet approved a proposal to set up a Joint Venture to 'deliver regeneration' in various areas, including potentially the Broadwater Farm. As the report states:</p> <p>'The Haringey development vehicle would be a 50:50 joint venture between the Council and its private partner or partners.'<sup>6</sup></p> <p>Broadwater Farm is listed as one of the 'Sites and assets that may be transferred to the vehicle...'</p> <p>We are very concerned that the proposal in SA62 to 'Improve Stock' in fact bears no relation to our aspirations but could actually facilitate wholesale demolition and rebuilding. We find evidence of this in the proposed <i>Alterations to Haringey's</i></p>	<p>No report exists that indicates that the buildings on the Broadwater Farm are in any way structurally unsound. Stock should be improved by the type of Decent Homes work detailed above. In addition all the facilities and features serving and enhancing the estate should be treasured and protected. Further reasons for our opposition to demolitions will be detailed below.</p>	
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<sup>6</sup> *Haringey Development Vehicle* Report to Cabinet 10/11/2015 in *Agenda Packs*:

<http://www.minutes.haringey.gov.uk/documents/g7301/Public%20reports%20pack%2010th-Nov-2015%2018.30%20Cabinet.pdf?T=10> page 141

					<p><i>Adopted Strategic Policies 2011-2026.</i> Alteration 53 sets out an initial list of housing estates to be 'regenerated'. Broadwater Farm is one of the estates set out here. The reason box for Alteration 53 states that the alteration:</p> <p>'Recognises the Council's commitment to improving its existing housing stock and the limitations of the Decent Homes Programme for a significant number of Council-owned homes.'<sup>7</sup></p> <p>Now according to Haringey Council's September 2015 <i>Future of Housing Review</i> the Development Vehicle the Council wishes to set up:</p> <p>'is unlikely to be a refurbishment vehicle, and transfer would most likely be on the basis of decanting tenants and potentially offering them the opportunity to return.'<sup>8</sup></p> <p>The clear implication here is that estates on the regeneration list, including Broadwater Farm may well be knocked down. The idea of right to return is only stated as a possibility not a guarantee.</p> <p>Given reductions in government grants for new social housing build, it is very unlikely that</p>		
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<sup>7</sup> *Alterations to Haringey's Adopted Strategic Policies 2011-2026. Pre-Submission Version.* January 2016.

[http://www.haringey.gov.uk/sites/haringeygovuk/files/06\\_haringey\\_strategic\\_policies\\_dtp\\_221215.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/06_haringey_strategic_policies_dtp_221215.pdf) Page 17.

<sup>8</sup> *The Future of Housing Review-Conclusions and Recommendations* Report to Cabinet 4.9.15 in *Agenda Packs*

<http://www.minutes.haringey.gov.uk/documents/g7299/Public%20reports%20pack%2015th-Sep-2015%2018.30%20Cabinet.pdf?T=10> page 80

				<p>Haringey Council could demolish an estate the size of Broadwater Farm and re-provision anything but a small proportion of the homes at social rent. So-called 'Affordable Rented' housing and Shared Ownership are outside the income ranges of most Broadwater Farm residents and most Tottenham residents.</p> <p>Moreover, there are clear indications that all new housing built by Joint Ventures will be private not social in any case.</p> <p>In this connection we must note the report of Julian Wain, the Independent Adviser to the London Borough of Haringey Future of Housing Review. In his report of September 2015 he writes that:</p> <p>'At present local authority controlled companies can hold property exempt from the right to buy, but the government has signalled its intention to remove this exemption. This will leave joint venture vehicles, part owned by the the private sector as the only mechanism whereby properties can be protected for social use. These will however, not be secure tenancies; but rather private rented properties let at secure or affordable rents.'</p>		
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<sup>9</sup> Final Report of Independent Advisor to the Future of Housing Review. September 2015.

<http://www.minutes.haringey.gov.uk/documents/g7299/Public%20reports%20pack%2015th-Sep-2015%2018.30%20Cabinet.pdf?T=10> Page 160

				<p>Therefore if there is new development on the estates, the tenants will only be given the option of return if they want to swap a secure, council tenancy for an insecure private tenancy. Given that virtually no tenants will want to do that, our only real option will be to accept a move onto another housing estate in Haringey. We will lose all the facilities we enjoy on this estate and gain nothing.</p> <p>The Haringey Council Cabinet approved the establishment of a 'Development Vehicle' on 10/11/2015 on a Joint Venture model and tendering is now taking place.<sup>10</sup></p> <p>In this connection we must also mention the Council's proposed <i>Estate Renewal and Rehousing and Payments Policy</i>. This policy which is intended to determine how council tenants will be rehoused when their homes are demolished states:</p> <p>'The Council will aim to offer secure tenants the option of returning to a new permanent home on their estate where possible, on a scheme by scheme basis.'<sup>11</sup></p> <p>There is absolutely no guarantee that council</p>		
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<sup>10</sup> See for example: <http://www.gva.co.uk/news/HaringeyseeksJVpartnerfor2bnestatesregeneration/>

<sup>11</sup> *Estate Renewal and Rehousing and Payments Policy* [http://www.haringey.gov.uk/sites/haringeygovuk/files/estate\\_renewal\\_rehousing\\_and\\_payments\\_policy\\_-\\_final\\_draft.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/estate_renewal_rehousing_and_payments_policy_-_final_draft.pdf) Page 7

					tenants will be rehoused in the new homes on Broadwater Farm. It is therefore clear that most of the council tenants in Broadwater Farm have no real interest in the demolition of their homes and refurbishment not demolition should occur.		
	RSA320				<p>The Issue of Tangmere in Relation to the Potential Demolition of Other Council Blocks on the Broadwater Farm Estate</p> <p>Tangmere has a different design to the other blocks. Tangmere residents were consulted in a Homes for Haringey Steering Group in 2014 and 2015 where demolition was openly discussed. The principal reasons given for the concerns about Tangmere’s future appear to be a fairly large number of leaks in the block and anti-social behaviour . At the Steering Group meeting on 18/02/2015 the Repairs Department attended and stated they were doing extensive work on unblocking pipes, as pressure from water in blocked pipes on joints was deemed to be a major cause of leaks. It was also agreed to restore lighting to unlit parts of the car park due to resident complaints about car break-ins. The restoration of lighting was done. Balcony gully drains are being unblocked from 29/2/2016 which should help stop the problem with leaks. Given we have been given no evidence of any actual structural problem at Tangmere, it must be suggested that the problems at Tangmere could probably be addressed through better management and maintenance and it does not seem likely that demolition is necessary. The meetings of the Steering Group have already</p>		<p>The engagement with the community on Tangmere prompted consideration by the Council to further improvements across the estate. The intention is that the masterplan for the estate will be subject to the same level of engagement as has taken place on the Tangmere housing block to date. The allocation is not about demolitions, but rather further improvements on the estate.</p> <p>No change</p>

				<p>brought about improvements in the block and it is rather 'lazy thinking' for Haringey Council to suggest when there are maintenance or anti-social behaviour problems in a block that demolition must be put on the agenda rather than helping residents explore other alternatives.</p> <p>One point we wish to make, however, is that any problems in Tangmere that might exist should not be used as a 'Trojan Horse' for facilitating demolitions of any other blocks on Broadwater Farm. The current site allocation would enable developers to come forward with plans for demolitions of all blocks on Broadwater Farm, not just Tangmere.</p> <p>If it really is the case, that only Tangmere is being considered for demolition, which seems unlikely for reasons laid out above, then it must be asked why the Site Allocations plan does not indicate that all the other blocks will definitely not be demolished. This point does not in any way indicate that Broadwater Farm Residents' Association supports the demolition of Tangmere. We do not, and insist the necessary repairs be completed.</p> <p>Conclusion</p> <p>Broadwater Farm provides decent quality housing for thousands of people. It is a strong, vibrant community. Huge amounts have been spent on providing concierge suites, new roofs and windows, providing a Community Centre and</p>		
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				<p>many other facilities. All residents want to look to the future on our estate, rather than having our lives needlessly disrupted by demolitions and decants.</p> <p>On 09/03/2015 at the Area Forum, Matthew Pattison of the Planning Department indicated that Haringey Council has no evidence of any structural problems with the blocks at Broadwater Farm. The Planning Department is also clear that any redevelopment of the Broadwater Farm would not lead to a net increase in the number of houses on the site and would therefore have no impact on the Mayor of London's target for 1,502 new homes a year for Haringey. These two facts must clearly beg the question, what is the point of demolition and rebuilding?</p> <p>Demolition of housing on Broadwater Farm and in Somerset Close, Moira Close and Lido Square would lead to a huge loss of socially rented, genuinely affordable housing. Residents in these Somerset Close, Moira Close and Lido Square are very angry about the proposals. They have attended meetings and lobbies against these proposals and have handed in petitions against them. Representatives of these areas spoke against the proposals alongside Broadwater Farm Residents' Association Representatives and a representative of the affected houses on Lordship Lane at a protest meeting on 24/2/2016. Current options for 'Affordable Rent' housing or Shared Ownership housing on the site would not be</p>		
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					<p>genuinely affordable for the majority of households in Tottenham. Demolition and rebuilding would contravene Haringey's commitment to equal opportunities. In addition there would potentially be a huge loss of very valued community facilities such</p> <p>Refurbishment and improvements as set out above are a clear alternative to the woefully inappropriate policy of demolition. As refurbishment and improvement does not necessitate inclusion on the Site Allocations plan, we believe that SA62 should be removed.</p>		
204	RSA321	SA62			<p>From April 2015 around the end of 2015 Broadwater Farm Residents' Association carried out petitioning against the demolition of Broadwater Farm and surrounding areas and the building of houses on Lordship Recreation Ground. 684 people signed the paper petition. As of 29/12/2016 956 have signed the online petition (see screengrab attached.) We would note that other petitions against demolition were also carried out independently by residents of the affected areas and handed in as part of the first round of consultation.</p> <p>We attach copies of the petition. Please note: some of the petitions have different wording as Lordship Rec. was taken out of the Council plans in September 2015. The petitions were carried out by different people in different places so a small number of people may have signed it twice.</p>		Noted

Respondent 205: Rev Paul Nicolson

LB Haringey Local Plan – Site Allocations DPD – Responses to Publication consultation with Council responses

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
205	RSA322	SA62			<p>I write to object in the strongest possible terms to the proposed destruction of Broadwater Farm Estate and other council estates. .</p> <p>Ignoring the decision of the supreme court in Mosely v Haringey the Council has clearly decided to demolish the Broadwater Farm and other council estates before you consult the tenants about it and in the face of the united opposition of the tenants associations.</p> <p>May I remind you what the supreme court decided.</p> <p>"First, that consultation must be at a time when proposals are still at a formative stage.</p> <p>Second, that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.</p> <p><b>Third,... that adequate time must be given for consideration and response and, finally,</b></p> <p>fourth, that the product of consultation must be conscientiously taken into account in finalising any statutory proposals."</p> <p>May I also remind you that your recent</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>

				<p>consultation about council's statement of community involvement is subject to a High Court challenge and calls into question the validity of the 2011 SCI you are currently using.</p> <p>My objection is also concerned with the</p> <ul style="list-style-type: none"> <li>• lack of planning by the council for the housing of tenants at affordable rents during regeneration and after it;</li> <li>• the failure to take into account your public health responsibilities in the context of the current and increasingly unaffordable of rents, which creates rent arrears and takes an ever increasing proportion of the income needed for food, fuel, clothes, transport and other necessities.</li> <li>• the impact of inevitable household debts on the health and wellbeing of men, women and children and of the insecurity of tenure on the education of children</li> </ul> <p>You will be aware that since 2009 housing benefit paid to tenants has been cut three different ways with the benefit cap, the bedroom tax and the local housing allowance; that creates damaging rent arrears. Since 2011</p>	
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				<p>benefit increases have been frozen at 1%. Since 2013 the incomes provided by the taxpayer, through central government, for the survival people with the lowest incomes in the borough have been taxed by the council who follow up inevitable arrears with draconian enforcement</p> <p>against around 20,000 residents a year . The one or three month jobcenter benefit sanctions render all debts unpayable and impacts mental and physical health</p> <p><a href="#">But Chapter 7</a>  " HEALTHIER PEOPLE WITH A BETTER QUALITY OF LIFE"  of the local plan has no mention of the impact on health and wellbeing of inevitable rent or council tax arrears. As you know rent and council tax arrears are enforced against the lowest incomes or sometimes no incomes at all due to a sanction</p> <p>.  There is no comment in Chapter 7 of the damage to health of unaffordable rents, council tax or of council induced insecurity of tenure.</p> <p>The persistent reduction of single adult unemployment benefits of £59.70 a week for under 25s and £73.10 thereafter has</p>	
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				<p>consequences in poor maternal nutrition and low birthweight of which there is all ready to much in the London Borough of Haringey.</p> <p>You will also be aware that life expectancy on some wards in Haringey is an average of 17 years shorter than life expectancy in Kensington and Chelsea.</p> <p>There are volumes of robust research which confirm the damage to health and wellbeing of hunger, debts, insecurity of tenure and poor maternal nutrition</p> <p>I am, in other words, concerned about council's failure to have proper regard to its public health responsibilities in the local plan and to take into account of the impact on the health and well being of local men, women and children in the local plan in general, and at Broadwater Farm in particular, of high rents, low incomes, inevitable debts, insecurity of tenure and the destruction of homes and communities.</p> <p>For these reasons the council should drop its regeneration plans, put in place a public health programme that meets the human needs of residents for an adequate income and affordable rents and refurbish the council estates as requested by the residents.</p>	
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Respondent 206: Richard Bagnall-Oakley

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
206	RSA323	SA62	No	Not stated	I wish to object strongly to the proposals in the draft Local Plan, Site Allocation 62, for a demolition and redevelopment 'red zone' in the Broadwater Farm area. This proposal will severely damage community cohesion, displacing residents, disrupting their lives and causing massive and unnecessary stress to all who live locally. Broadwater Farm is noted for the achievements of its residents in building a strong community, with good facilities, and overcoming disadvantages - it should be celebrated as a positive example for Tottenham, rather than as something to be swept away. The proposals are unsound in terms of planning policies, and make no sense economically compared to the alternative of repair and refurbishment of existing buildings. In a time of housing crisis for Haringey families, it is bizarre that Haringey Council is proposing to increase their hardship by further reducing the supply of genuinely affordable, secure homes.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change

Respondent 207: Susan Ellis

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	Council's
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		Policy / Figure / Para		Compliant		Sought	Comments / Response
207	RSA324	SA62	No	Not stated	In respect of the above site allocation. I am pleased that the plans to build on Lordship Recreation Ground have been shelved. As in my previous correspondence I do not object to the demolishing of the Broadwater Farm estate but I feel that any replacement should be low rise development not the proposed 6-11 storeys proposed.		Noted.

#### Respondent 208: Tamsyn Wills

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
208	RSA325	SA62	No	Not stated	<i>I object to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. Redevelopment now means high density, high rise and unaffordable. If Tottenham Hale's new development is a benchmark for current planning, then that kind of density is inhumane; it is unsightly; will look even worse in 20 years time and some parts must be awful to live in. People need light and space and Broadwater farm has that currently.</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.  No change

					<p><i>Please do not take that away from the communities that desperately need it.</i></p> <p><i>As a designer, I think that the Modernist design is beautiful and significant for Tottenham and London and should be preserved as an example to future generations.</i></p>		
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**Respondent 209: Jasper Murphy**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
209	RSA326	SA62	No	Not stated	<p>If you price working class people out of boroughs like Haringey, soon the capital will be suffering a huge labour shortage for essential low-paid work. If you fill London up with rich people, those rich people will need people to do low-paid work for them (cooks, cleaners, kitchen porters, launderers, labourers, taxi drivers etc etc etc), and the people who do that work will need somewhere to live. So maybe you don't care about communities, you don't care about the poor, but the fact is that the affluent city you are creating needs us, and it'll collapse if we have nowhere to live. Eventually we'll just move to affordable cities, especially once you've fully destroyed our communities. I know you think this is what you want (in more euphemistic terms), but your plan to push out the</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>

				<p>poor and create a rich-only stronghold won't hold up without our labour. So if you want the rich to come, you better not destroy our communities and our homes.</p> <p>As someone on the housing list bidding for places on Broadwater Farm I put my name to the following statement:</p> <p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather</p>	
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					than demolition which would not require a site allocation in this plan.		
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**Respondent 210: Sallyann Bradnam**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
210	RSA327	SA62	No	Not stated	<p><i>We object strongly to the draft Local Plan proposal SA62 (and any other proposal you have in mind for Lordship Lane conservation area and surrounding areas) for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community.</i></p> <p><i>WHERE WILL THESE PEOPLE BE HOUSED WHILST THIS IS GOING ON</i></p> <p><i>It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes,</i></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>

				<p><i>estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.”</i></p> <p><i>Further more, how many homes will be affordable, Tottenham Hotspur redevelopment is not going to provide affordable homes after all from what has been written, how do residents know if contractors will back down from obligations to provide homes for renting at reasonable costs.</i></p> <p><i>How many other areas and homes in Tottenham do you plan to demolish? people do not want to re housed when they already have homes that are suitable.</i></p> <p><i>FIND EMPTY LAND SITE OR BROWN SITES AND BUILD ON THESE. HOW MANY OF YOU IN THE PLANNING DEPARTMENT WILL BE DISRUPTED IN YOUR HOMES, LOSE YOUR HOME AND COMMUNITY AS A RESULT OF THIS DEMOLISION AND COMPULSORY PURCHASE ORDER OF PRIVATE HOMES? HOW WOULD YOU FEEL.</i></p>	
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					ARE ANY OF US SAFE?		
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Respondent 211: Jennifer Kitchen

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
211	RSA328	SA62	No	Not stated	<i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.  No change

					<p>I am sending you the above objection, as outlined by community groups campaigning against this 'redevelopment' because in my experience as a resident it is not what the area needs. I moved here two years ago, and had my first child here, attending antenatal appointments at Broadwater Farm health Centre, and postnatal appointments at it's Children's Centre. My son and I walked round the streets of Broadwater and the Lordship Rec every day this summer. It is clear to me this is a vibrant, established community, with a strong active, civic element.</p> <p>To wipe all this away in order to build high-density, overwhelmingly private housing would be shameful. The Broadwater estate needs building up, not tearing down, and it's community needs to be supported and recognised for it's positive and enterprising spirit, not disenfranchised and scattered by short term, neo liberal housing policies.</p> <p>Find a more positive and sustainable way to develop this area, and work with local residents.</p>		
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**Respondent 212: Selen Mertdjan**

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	Council's Comments / Response
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		Policy / Figure / Para		Compliant		Sought	
212	RSA329	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan. Work with the community, NOT against the community!!!		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.  No change

**Respondent 213: Eva Atkins**

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	Council's Comments / Response
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		Policy / Figure / Para		Compliant		Sought	
213	RSA330	SA62	No	Not stated	<p>I am writing to object to the planned demolition and displacement of all the families in the SA62 which includes Broadwater farm and all the community facilities. Much time and effort and money has gone into developing this community over the years and more should be done to continue this positive action.</p> <p>It is totally unnecessary to destroy and disperse the families who live there, uprooting them from their social networks, their jobs and livelihoods when an alternative programme of maintenance and upgrading of the site would suffice.</p> <p>I strongly object to selling off more council housing to private developers whose only interest is money. The council has a responsibility to these families and any threat to their livelihoods is surely more likely to be damaging and cause local unrest again.</p> <p>Please review the plans and instead work to improve existing housing stock without attempting this blatant plan of social cleansing.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>

**Respondent 214: Margaret Burr and Noel Treacy**

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		<b>Figure / Para</b>					
214	RSA331	SA 62	No response given	No response given	Demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.  The demolition and redevelopment would cause huge stress to all current residents as well as undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. The Council should support one of the success stories in Haringey in which local initiatives brought the community together after the riots of 30 years ago and that it is now an important asset in Tottenham. Tottenham is already in the process of gentrification whereby local residents are being priced out of living in the area and this can only further damage the chances of them being able to stay within the community		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.  No change

**Respondent 215: Fiona English**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
215	RSA332	SA62	No	No	As a resident of Haringey	No	Objection is noted. The Council has

			response given	response given	(Tottenham Green Ward) I am writing to object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause not only displacement and disruption for years but also extreme stress to all who live in this zone. What's more, the plan will blight and undermine all the successful efforts over decades to build a strong and stable local community and improve local facilities. The plan goes against all received wisdom in relation to community and social housing and the area as a whole by creating unnecessary upheaval to tenants, home owners and nearby residents alike. The plan is deeply flawed and should be withdrawn. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area. Working with the community rather than against it will make everything move more smoothly as residents would be involved and engaged, hence supportive, rather than anxious and demoralised through	response given	proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.  No change
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					the uncertain future they face.		
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**Respondent 216: Khiry Pascal-Joseph**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
216	RSA333	SA62	Not stated	Not stated	Hi my name is Khiry pascal - Joseph I'm 23 years old live opposite the estate have wonderful views across the estate what I've heard is absolutely disgusting knocking down an estate that has an wonderful community sprit I oppose this completely if this goes ahead we are gonna be blight by years of noise anxiety the red zone needs to be completely removed		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents. No change

**Respondent 217: Mr & Mrs Yaman**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
217	RSA334	SA62	No	Yes	I would like the demolition to take place. I agree with the proposal to take place in the Rochford Area.	The floors are very dirty, and the lifts are dirt and needs cleaning on a day to day basis.	Noted.

Respondent 218: Jane Wilkin of the Environment Agency

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	<b>Noted, this amendment will be made.</b>
218	RSA336	SA52/general	Yes	Yes	We are pleased that site SA52 (Pinkham Way) has now been included in the sequential test. As outlined in the response form, the Site Allocations documents should reflect the wording in the sequential test and be clear that no more vulnerable development will be permitted in areas of Flood Zone 3.	-change of wording to reflect the wording in the sequential test and clarify that no more vulnerable development will be permitted in areas of Flood Zone 3.	<b>Noted, this amendment will be made.</b>

Respondent 219: Gardens Residents Association

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
219	RSA337	SA26: Hawes and Curtis	Not stated	Not Stated	Concern over the heights of the building and impact on Green Lanes Site allocation is 73 units 141 units have been submitted for Planning Permission	Not stated	Concern noted, but heights will be determined at the detailed planning permission stage. Capacities quoted in the Site Allocations are indicative and modelled. Detailed designs

							will identify how many units can be accommodated on each site.  No change
219	RSA338	SA27 Wightman Road	Not stated	Not Stated	Loss of amenity with Jewsons, concerns with heights. Contribution should provide section 106 funds to help contribute towards construction of a lift service / disabled access to Harringay Station.	Not stated	Assumed this is regarding the loss of amenity from having access to a builders depot. This is not a strategic need, with new homes and a potential improvement in the access to Harringay station considered to be of a greater benefit.  No change
219	RSA339	SA28: St Ann's Hospital Site	Not stated	Not Stated	Heights max 2/3 stories respecting heights of Warwick Gardens residents. Oppose access point at Warwick Gardens / Stanhope Gardens will become a potential crime route. Residents of the Warwick gardens – <b>"Homes for Haringey"</b> flats will loose amenity / garages and green space. Concern on the numbers of cars impacting on the area with large development. No school proposed for the site, potential of Chestnuts Primary and Park View Academy could create annex on the site this could link with the development of the Warehouse Community, through the disused railway arch. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Many buildings and structures of historical interest should be saved and developed.	Not stated	Heights of development will be determined at the planning application stage.  It is considered that the creation of an improved pedestrian/cycling network in the centre of the borough, linking this site, Green Lanes District Centre, and parks at Chestnutts, Downhills and Lordship Rec, and south through the disused tunnel to the Harringay Warehouse District and ultimately Clisshold Park through the Woodberry Down development, is of significant benefit.  Development Management Policies exist to ensure new development is sustainably designed and impacts, such as traffic generation and parking, are assessed and taken into account through appropriate mitigation.  No change
219	RSA340	SA29: Arena Retail Park	Not stated	Not Stated	Any development should consider heights for residents affected in Stanhope Gardens residents (Northside of the railway line)	Not stated	Amenity of all adjoining residents, including those across the rail line, will be considered when determining the height of development at the planning application stage, in

					development should be reduced at the North, South East and West of the site where residential properties face and adjoin the site. Car access needs serious consideration many mistakes have been made in the sites previous development and a road access point should be considered opposite Endymion Road creating a cross road.		accordance with Policy DM1.  It is agreed that car access is a key issue on this site and one that redevelopment of the site can help to resolve.  No change
219	RSA341	Harringay Warehouse District SA30: SA31 SA32 SA33 SA34 SA35	Not stated	Not Stated	Good well designed live work units are an opportunity to retain the talented artists, designers and musicians in the area with rent restrictions building upon this creative hub. Many developments such as these force such creative industries out of an area. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Concern on traffic impact in the area with such a development on all these sites and the 3-traffic road closures in place across the Hermitage Road Estate. Access to this development area needs careful consideration and its impact on the larger area. Overall concern on the heights of these developments	Not stated	<b>The Council's Warehouse Living approach</b> is designed to try and secure the future of the creative cluster, and share its benefits with the wider community.  It is not considered that the proposals will affect the road network at the current time.  Heights of development will be determined at the planning application stage in accordance with Policy DM1 and DM6.  No change
219	RSA342	SA36 Finsbury Park Bowling Alley	Not stated	Not Stated	Loss of the valuable leisure facility.	Not stated	The allocation includes a requirement for a replacement leisure facility, but overall it is expected that the benefits of the redevelopment will justify the costs of development.  No change

Respondent 220: Amec Foster Wheeler on behalf of National Grid

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
220	RSA343	General	Not stated	Not stated	National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.	None	Noted.

Respondent 221: Campaign to Protect Rural England

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
221	RSA344	Paragraph 2.1.3.	Not stated	Not stated	We support the proposed green chain linking Wood Green Common to the old rail line between Cumberland/Wolseley and Bradley/Barrett roads and Trinity Gardens as an important part of the Green infrastructure network	None	Support is noted.
221	RSA345	Paragraph 2.16	Not stated	Not stated	We support the statement on bringing back underused brownfield land; this must be the first priority for providing new homes in the Borough.	An additional line should be added to reflect a Brownfield first policy.	This statement is already included in the Strategic Policies DPD and does not need to be repeated here.  No change
221	RSA346	SA25, SA27, SA28 and SA31  SA23,	Not stated	Not stated	We support a number of proposals, including SA25, SA27, SA28 and SA31 where by a commitment is made in the plan to protect and enhance adjacent green	This commitment, to enhance the adjacent green spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.	<b>It is agreed that a comment regarding how the site impacts on the ecological corridor to the west of site SA23 could be added.</b>

		SA30, SA40 and SA54			spaces, including designated Green Chain and SINCs.		The other sites are considered to have appropriate references.
221	RSA347	SA39	Not stated	Not stated	We are concerned about the inclusion of the wooded area and would support the inclusion of a support for proposals that preserve and enhance the trees at this site in line with policy.	Not specifically stated	The aim of this policy is to link areas of open spaces together, by extending the Parkland Walk through the site, and SA40 through to Highgate Wood.  No change
221	RSA348	SA41	Not stated	Not stated	We are concerned about the potential loss of Metropolitan Open Land at High Gate School.	The Site Allocation should include a provision for the future SPD that ensures that the Metropolitan Open Land is protected and enhanced through any proposals for school expansion.	Metropolitan Open Land is already protected through the London Plan, and the Local Plan Strategic Policies.  No change
221	RSA349	SA60	Not stated	Not stated	We are concerned that the comments do not go far enough to ensure that future proposals protect the MOL:	additional criteria to the justification of impact and mitigation allowances should include <b>reference to a need to illustrate very special circumstances.</b>	Metropolitan Open Land is already protected through the London Plan, and The Local Plan Strategic Policies.  No change
221	RSA350	SA62	Not stated	Not stated	We have received a number of comments from local residents in relation to SA62, Broadwater Farm. Whilst we are pleased that original plans that included parts of Lordship Recreation Ground have been removed, estate regeneration must take into account the needs of local residents.	The estate regeneration must take into account the needs of local residents.	It is considered that the Plan makes this clear both in this site allocation and also in the alterations to the Strategic Policies DPD.  No change
221	RSA351	Schedule 6	Not stated	Not stated	We support the inclusion of Table 10 in Schedule 6. This provides an important resource to measure any loss or gain of Green Belt and Metropolitan	Not stated	<b>Noted. It should be noted that a minor modification is proposed to the Proposals Map to ensure each of these areas is labelled with its</b>

					Open Land in the future. We similarly support the inclusion of Table 11 on Significant Local Open Land and 12 on Ecologically Valuable Sites. We would urge the Council to ensure such data is shared with the Greater London Authority and Greenspace Information for Greater London (GiGL).		reference number on the Map.  The data on Ecological Valuable Sites comes from GiGL.  No change
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**Respondent 222: I Love Myddleton Road**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
222	RSA352	SA57	Not stated	Not stated	<p>These comments are made on behalf of a local community group, We Love Myddleton Road. While Myddleton Road is outside of the Wood Green Area Action Plan, making the online form largely irrelevant, the Guidance Note 2012 for Myddleton Road is apparently planning to be adopted under this plan (specifically in the section specified in the subject of this email).</p> <p>For this reason, we would like to make the following comment:</p> <p><b>INTRODUCTION</b></p> <p>In its current form, the Guidance Note 2012 contains misleading and inaccurate information. Indeed, even in 2012, the information it contained was arguably out of date. In light of recent changes on Myddleton Road, as of March 2016, it requires fundamental revision.</p>	Revision of the Myddleton Road Guidance Note prior to adoption	<p>It is not considered that these responses relate to the Local Plan. The SPG quoted is an unadopted Local Plan guidance note. It is considered that this would need to be in conformity with Policy SA57 once adopted, and would likely be reviewed.</p> <p>It may however be appropriate to place the information provided as an addendum to the SPG to ensure its use remains current until such time as it formally reviewed and published as an SPD.</p> <p>No change</p>

				<p>The following is not exhaustive, but rather intends to highlight the need for a new guidance note or some revisions prior to the adoption of this one.</p> <p><b>COMMENTS</b></p> <p>The following sections need corrections and additions:</p> <ul style="list-style-type: none"> <li>- 1.2.2</li> <li>- 1.2.3</li> <li>- 2.1.2 Numbers 64-72 should be included as 64 and 66 are of particular interest.</li> <li>- 2.1.9</li> <li>- 2.2.3 It should be noted that Numbers 95 and 99 are currently being restored.</li> <li>- 3.2 This entire section draws on studies conducted between 2008 and March 2012. However, the calculations of the vacancy rates and how they were reached, as well as the usage designations needs updating.</li> <li>- 4.5 to 4.7 We strongly disagree with the suggestion that less than one in three frontages being A1 (Shops) would ever be appropriate. Indeed, at the time of writing, there is an acute shortage of retail space on Myddleton Road, with a number of local entrepreneurs seeking premises.</li> </ul> <p>Moreover, deciding that “going forward, all of the</p>	
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				<p>vacant or closed unit should be regarded as being in A1 use” is unhelpful and sets a bias toward allowing conversion to non-retail use. Unless the Council takes an active role in ensuring that “Vacant/Closed/Storage/Undisclosed” become actual A1 use, this should not be the policy.</p> <p>- 6.1.4 We are unclear whether this happened.</p> <p>As noted, there is now high demand for office and retail space on the street and many changes have already taken place. Since the beginning of 2015, the Council finished restoration of four shopfronts and three existing businesses subsequently decided to do the same. Nine new businesses opened on the street, and two existing businesses cleaned up and expanded (the café at number 87 and Vrisaki at 71).</p> <p>So far in 2016, two more new businesses are about to open (numbers 112 and 120A), the timber merchant at number 78 is being converted to a DIY store, and sensitive restoration work is underway at two of the landmark buildings on the street (numbers 95 and 99), which will provide two more additional usable commercial units and good accommodation space.</p> <p>Furthermore, as noted, We Love Myddleton Road receives frequent enquiries from people who want both office and retail space.</p> <p>An audit of Myddleton Road should take place before the Guidance Note 2012 is adopted.</p>		
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**Respondent 223: Ashley Joan Burrows**

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
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		Figure / Para					
223	RSA353	SA62	Not stated	Not Stated	<p>As local Tottenham residents who have instigated and run successful community regeneration projects in this local area we strongly object to this draft Local Plan proposal SA62 proposing a possible demolition and redevelopment zone for the area that includes Broadwater Farm Community Centre, Broadwater Farm Estate, Somerset Close, Lido Square, Moira Close and some of the houses along Lordship Lane.</p> <p>To our knowledge nobody living or working here was consulted first about these planning proposals that would so greatly affect their homes and lives.</p> <p>We are told that there is some consultation now on the Broadwater Farm estate, asking individuals what they want. ( Unfortunately this is the old high handed tory tactic of divide and rule, as if the council are scared of dealing with people working together in a properly organised democratic group).</p> <p>If these proposals were to go ahead they would cause displacement and disruption for years and also massive stress to many as well as planning blight. Carried out in this way it would also undermine and destroy all the successful efforts made by people like ourselves over the decades, to help build a strong and stable local community and to improve local facilities - not destroy them. It is very peaceful and pleasant around Broadwater Farm nowadays and nothing like the myth always trumpeted in the media every time Broadwater Farm is mentioned.</p>	Withdrawal of the site allocation	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point.</p> <p><b>Home's for Haringey</b> have commenced early engagement with residents in the area to understand what residents like or don't like about the estate, but as yet no formal engagement has taken place on developing a masterplan to set out the improvement needed or desired. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>

				<p>Who is this proposed development for ? Who will gain the most out of it? Not the people living here we suspect. At a cursory glance these proposals are not about the people and communities here really at all, but are a high-handed planning exercise aimed at satisfying the government and GLA's <b>need for more housing in Haringey</b> - and the property developers and landlords who will make themselves even richer from all this redeveloped land.</p> <p>This not “Regeneration” but “Redevelopment” and the way this whole process has been carried out so far is not democratic. The local people who live and work here should have been involved in the process right from the outset There should be a committee or forum of local neighbourhood stakeholders who can best represent the interests of the people from this area - who should have been consulted first before any plans or red zones were even drawn up.</p> <p>This present red zone and all the plans and rumours that have gone with it is frightening people and making their future security uncertain. This is unacceptable and the red zone should be withdrawn immediately so that these initial discussions can take place properly, democratically - and without fear and anger.</p>		
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**Respondent 224: Martin Burrows**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
224	RSA354	SA62	Not stated	Not stated	As a local Tottenham resident who also runs a successful community gardening project	Withdrawal of the site	Objection is noted. The Council has proposed in Policy

				<p>at Broadwater Farm Community Centre, I object strongly to the way this draft Local Plan proposal SA62 proposing a possible demolition and redevelopment zone for the area including Broadwater Farm Community Centre , Broadwater Farm Estate, Somerset Close, Lido Square, Moira Close, and some of the houses along Lordship Lane.</p> <p>Nobody living or working here has been consulted from the outset about these proposals that would affect their homes and lives. If were to go ahead would cause displacement and disruption for years and so massive stress to many as well as planning blight. Carried out in this way it would also undermine and destroy all the successful efforts made by people like ourselves over the decades, to build a strong and stable local community and to improve local facilities. It is very peaceful and pleasant around here nowadays and nothing like the myth always trumpeted in the media everytime Broadwater Farm is mentioned.</p> <p>Who is this proposed development for ? Who will gain the mosty out of it? Not the people here we suspect. At a cursory glance these proposals are not about the people and communities here but are a high-handed planning exercise aimed at satisfying the <b>government and GLA's need for more housing</b> in Haringey and the property developers and landlords who will make themselves even richer from this redeveloped land.</p> <p>This not “Regeneration” but “Redevelopment” and the way this whole process has been carried out so far is not democratic. The local</p>	allocation	<p>SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point.</p> <p><b>Home’s for Haringey have</b> commenced early engagement with residents in the area to understand what residents like <b>or don’t like about the estate</b>, but as yet no formal engagement has taken place on developing a masterplan to set out the improvement needed or desired. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
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					<p>people who live and work here should have been involved in the process right from the outset. There should be a committee or forum of local neighbourhood stakeholders who can best represent the interests of the people from this area, who should have been consulted before any plans or red zones were even drawn up.</p> <p>This present red zone and all the plans and rumours that have gone with it is frightening people. This is unacceptable and the red zone should be withdrawn immediately so that these initial discussions can take place properly, democratically and without fear and anger.</p>		
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**Respondent 225: Maliah Ali**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
225	RSA355	SA62			<p>My family have lived in Lido Square since Lido Square was built, we were one of the first families to move in. We are not just neighbours but a small family. We share good and bad events and have helped each other throughout the decades.</p> <p>We object strongly to the draft Local Plan proposal SA62 for demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the</p>	Withdrawal of the site allocation	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on

					<p>successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p> <p>Please reconsider this proposal.</p>		<p>what these are, including the scope for demolitions have not been made at this point. <b>Home's for Haringey</b> have commenced early engagement with residents in the area to understand what residents like or don't like about the estate, but as yet no formal engagement has taken place on developing a masterplan to set out the improvement needed or desired. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
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**Respondent 226: Ellis Gardner**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
226	RSA356	SA34	Yes	Not stated	<p>My representations are with regard to the Haringay Warehouse District, and in particular SA34 where I have lived and worked for the last sixteen years. I run New River Studios CIC which is a community arts' centre , education and training facility and venue, and a separate large live/work development known as ExFed. Both are located within SA34.</p> <p>There was a great deal to comment on in the previous DPD, primarily because it represented a sea-change in the Council's position over</p>	Not specifically stated	<p>The consultations in regard the preparation of the Local Plan have been in accordance with the Council's SCI (which does exist!)</p> <p>The Plan's aim is to set parameters for acceptable development within the borough. This inevitably means what things will be "at the end of the day". The purpose of</p>

				<p>warehouse living and the Harringay Warehouse District. The result of this was that the resident creative community and the Council suddenly had a number of shared interests and objectives that we were excited to build on. In contrast, this latest version hardly departs from its predecessor, except where certain employment-related targets have been lowered.</p> <p>There is still a great deal to remain enthusiastic about, especially with regard to the Council's vision for the area. The formalisation of gallery spaces and the introduction of a public-facing hub/venue for artistic activity are two goals that I am currently working towards with New River Studios. A commitment to preserving the creative community here is obviously very welcome, as is the reduced target of 4,374 square metres of reintroduced employment space which is far less likely to radically alter the make-up of the community that the previous target of over 11,000 square metres.</p> <p>There is also little new ground covered, and currently insufficient detail in the proposals to make very meaningful observations. Although I am aware that there are inherent limitations, it is still difficult to know what we should expect from the process at this early stage. I have therefore limited my comments to issues which may pertain to the overall soundness of the document, and I concede that they may be down to unfounded expectations.</p> <p>In terms of consultation, the DPD states that "the Council will work with local landowners and residents", but at what point should we expect this consultation to begin? The DPD</p>	<p>including a masterplanning process in the allocation is to enable the principles included within the Local Plan to be explored in greater detail with the landowners and residents, and for implementation discussions to proceed.</p> <p>Regarding gentrification, which is manifesting itself as significant residential land value pressure, it is considered that by giving the sites Employment designations, this will to some degree protect the existing community in their present surrounds, and provide time to ensure positive solutions are found.</p> <p>The Council will look forward to progressing these with landowners, residents, and businesses in the coming years.</p> <p>No change</p>
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				<p>states that the “process of community involvement for the Plan in question should be in general accordance with the LPA’s Statement of Community Involvement (where one exists)” but I am unable to find one for Haringey, and therefore assume that one does not exist. So the exact nature of consultation is a question that remains. I have contacted my ward councillor and the LPA on several occasions seeking a dialogue on these issues, and have not had a reply to any of my requests.</p> <p>Another area in which there is doubt is what happens between now and the time that development concludes? The DPD focuses almost exclusively on the Harringay Warehouse District post-development. I appreciate that controlling the nature of development is the DPD’s key objective and that this focus is in line with those aims. However, given that the calendar for development extends ten to fifteen years into the future, and that the DPD also aims to preserve the existing creative community, there is understandable concern as to the lack of provision for what happens between now and then. Traditionally artists are quite used to sheltering in the period of time in a building’s lifecycle between planning and development and they often make use of old properties until they are torn down. The situation here is quite different, with gentrification exerting significant pressure before development has even begun. The danger is that the creative community as we know it will have long gone by the time the time the measures in the DPD come into effect, and although it will obviously be possible to tempt some to return, the essential authenticity and</p>		
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					<p>patina of the place will have been lost, along with the irreplaceable networks that have organically developed and that are so valuable. This is of course a London-wide problem and not unique to these estates by any means.</p> <p>Despite these two reservations, I appreciate that we are still working with the broad brush strokes of planning policy, and in this context I have no reason to question the overall soundness of the DPD. I am enthusiastic about the future of the area, and I share many of the <b>Council's objectives</b> - the safeguarding of an artistic community, the creation of a limited destination, the support for new enterprise and the formalisation of cultural facilities. My regret is that there have been missed opportunities to work together to develop a genuinely progressive and successful community that will be an asset to the borough and to London. My fear is that if we continue to miss these opportunities, we will ultimately fail to realise the full potential of this opportunity. I sincerely hope to have the opportunity to work with the Council to make this vision a reality.</p> <p>I look forward to this Summer's public consultation.</p>		
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#### Respondent 227: Our Tottenham

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
227	RSA 357	SA56-65	No	Not Stated	Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues.	Not specifically stated	Noted.

				<p>The <i>Our Tottenham</i> network brings together <b>50 key local community groups, projects and campaigns</b> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.</p> <p><b>Organisations affiliated to the <i>Our Tottenham</i> network</b> include (as of 1.03.2016):</p> <ul style="list-style-type: none"> <li>Bull Lane Playing Fields Campaign / Weir Hall Action Group</li> <li>Chestnuts Community Centre</li> <li>Clyde Area Residents Association</li> <li>Day-Mer</li> <li>Defend Haringey Health Services</li> <li>Dissident Sound Industry Studios</li> <li>Find Your Voice</li> <li>Friends of Downhills Park</li> <li>Friends of Lordship Rec</li> <li>Growing-In-Haringey Network</li> <li>Haringey Alliance for Public Services</li> <li>Haringey Defend Council Housing</li> <li>Haringey Federation of Residents Associations</li> <li>Haringey Friends of Parks Forum</li> <li>Haringey Green Party</li> <li>Haringey Housing Action Group</li> <li>Haringey Independent Cinema</li> <li>Haringey Justice for Palestinians</li> <li>Haringey Left Unity</li> <li>Haringey Living Streets</li> <li><b>Haringey Needs St Ann's Hospital</b></li> <li>Haringey Private Tenants Action Group</li> <li>Haringey Solidarity Group</li> <li>Haringey Trades Union Council</li> <li>Living Under One Sun</li> <li>Lord Morrison Hall / Afro International</li> </ul>	
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				<p>N.London Community House  Peoples World Carnival Band  Selby Centre  The Banc  Tottenham and Wood Green Friends of the Earth  Tottenham Chances  Tottenham Civic Society  Tottenham Community Choir  Tottenham Community Sports Centre  Tottenham Concerned Residents Committee  Tottenham Rights  Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b>  See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a>.</p> <p>This response, formulated by the <i>Our Tottenham Planning Policy Working Group</i> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham Local Economy Working Group</i>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham network</i> at our first Community Conference on 6 April 2013 (available here:  <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>.  This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham</i> network</p>	
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					<p>are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p><b>[Attached as an appendix to the representation]</b></p> <p><b>This response builds upon the previous responses we submitted:</b></p> <p>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>;</p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here:  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf</a>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (thereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.</p> <p><b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>		
227	RSA 358	SA56 Park Grove and Durnsford	Not stated	Not stated	<p>See our detailed comments about the soundness of the Housing Estate ‘renewal and improvement’ approach taken by the Council in our separate responses on the <i>Alterations to Strategic Policies</i> and on the <i>Tottenham AAP</i>. We contest the ‘red lining’ of housing estates for future redevelopment into ‘mixed communities’ on the grounds explained in our comments.</p> <p>We demand to see structural reports that would indicate that the homes here are uneconomic to improve. The presumption in favour of demolition is opposed. We find the case for inclusion on the site allocation not made to</p>	<p>We demand the following principles to be explicitly included in the Site Requirements and Development Guidelines in the Site Allocation DPD:</p> <p>No estate regeneration programme should go ahead without a meaningful and fair process of consultation,</p>	<p>The Council has, and will continue to engage with residents affected, or potentially affected by estate renewal programmes a required under</p>

					any extent. We demand improvement not demolition as an alternative to the unsound and unsubstantiated inclusion of this site on the list of site allocations.	involvement and empowerment of the existing resident tenants as the drivers of all the decision-making related to their homes. Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants. There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. Social housing in this context is housing at rents equivalent to existing council housing levels with permanent, secure tenancies.	s105 of the Housing Act. The Council is undertaking a programme of estate renewal in order to renew or increase the borough's stock of affordable housing, and considers this is essential to help meet the full range of housing need within the borough.  No change
227	RSA 359	<b>SA59: Haringey Professional Development Centre:</b>	Not stated	Not stated	In line of the acute need for social infrastructure of all kinds in the Eastern part of the Borough, this publically owned site should be prioritized for such uses.	Not specifically stated	Noted, it is considered that the Allocation provides for this, if it is necessary, as does Policy DM49  No change
227	RSA 360	<b>SA60: Keston Centre:</b>	Not stated	Not stated	In line of the acute need for social infrastructure of all kinds in the Eastern part of the Borough, this publically owned site should be prioritized for such uses.	We want clarification of exactly how the existing day centre and nursery centre	This is a detailed matter to be

						uses could be reprovided on the same site.	determined through a planning permission.
227	RSA 361	<b>SA62: Broadwater Farm Area:</b>	Not stated	Not stated	Our Tottenham fully endorses the response of the <b>Broadwater Farm Residents' Association</b> regarding this matter. See our detailed comments about the soundness of the Housing Estate 'renewal and improvement' approach taken by the Council in our separate responses on the <i>Alterations to Strategic Policies</i> and on the <i>Tottenham AAP</i> . We contest the 'red lining' of housing estates for future redevelopment into 'mixed communities' on the grounds explained in our comments.	We demand the following principles to be explicitly included in the Site Requirements and Development Guidelines in the Site Allocation DPD: No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing resident tenants as the drivers of all the decision-making related to their homes. Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants. There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. Social housing in this context is housing at	No change Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions

						rents equivalent to existing council housing levels with permanent, secure tenancies.	on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.  No change
227	RSA 362	<b>SA63: The Selby Centre</b>	Not stated	Not stated	Our Tottenham absolutely supports the retention of the Selby Centre as a multi-use community centre. We seek reassurance that inclusion in the Site Allocations will lead to no loss of community meeting space.	Not specifically stated	Noted, it is considered that the Allocation provides for this, if it is necessary as does Policy DM49  No change
227	RSA 363	<b>SA65: Leabank and Lemsford</b>	Not stated	Not stated	See our detailed comments about the soundness of the Housing Estate 'renewal and improvement' approach taken by the Council in our separate responses on the <i>Alterations to Strategic Policies</i> and on the <i>Tottenham AAP</i> . We contest the 'red lining' of housing estates for future redevelopment into 'mixed communities' on the grounds explained in our comments. We demand to see structural reports that would indicate that the homes here are uneconomic to improve. The	We demand the following principles to be explicitly included in the Site Requirements and Development Guidelines for SA56 in the Site Allocation DPD: No estate regeneration programme should go ahead	The Council has, and will continue to engage with residents affected, or potentially affected by estate renewal

					<p>presumption in favour of demolition is opposed. We find the case for inclusion on the site allocation not made to any extent. We demand improvement not demolition as an alternative to the unsound and unsubstantiated inclusion of this site on the list of site allocations. Leabank and Lemsford is a prime site for property developers to make profits by demolishing social housing and building private housing. We think it is very unlikely that existing council tenants will be rehoused here if the council properties are demolished. The proposal is unsound and inappropriate. The clear alternative is retention of existing housing.</p>	<p>without a meaningful and fair process of consultation, involvement and empowerment of the existing resident tenants as the drivers of all the decision-making related to their homes.</p> <p>Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.</p> <p>There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. Social housing in this context is housing at rents equivalent to existing council housing levels with permanent, secure tenancies.</p>	<p>programmes. The Council is undertaking a programme of estate renewal in order to increase the borough's stock of affordable housing, and feel it is essential to help meet the full range of housing need within the borough.</p> <p>No change</p>
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**Respondent 228: CGMS on behalf of Hadley Property Group**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
228	RSA364	SA26	Not stated	Not stated	<i>NHS Requirement NHS use has not previously been included within the emerging Site Allocations DPD and has therefore not been consulted on</i>	Therefore, the policy wording needs to be amended to promote greater flexibility on	This is not quite accurate. The Council has been working with the NHS to understand

				<p>The requirement for an NHS facility was a late addition to the emerging Site Allocations document. Previous versions, including the <b>Regulation 19 ‘Preferred Options’ document</b> consulted on between February 2015 and March 2015 did not reference the need for a medical facility. The proposed allocation to include the NHS facility has therefore not until now been consulted on.</p> <p>Furthermore the NHS have not previously submitted representations to LB Haringey on their requirements for a new facility in this location.</p> <p><i>NHS requirement in this location not supported by evidence base</i></p> <p>The inclusion of the requirement for a new NHS facility is not wholly and robustly supported within the evidence base. The Draft Health Infrastructure Plan 2011-2026 dated October 2011 states that there is a national target of 1GP per 1,700 of population (as established by the NHS Healthy Urban Development Unit). There are currently 191 GPs in Haringey in 54 premises. With a current population of 228,837, Haringey would be expected to have 135 GPS. Therefore, based on the current population figures the Borough as a whole exceeds its requirement for GPs.</p> <p>The document does note however that there is a geographical mismatch with a GP deficit in the south eastern area where there are pressing health issues, as well as in the east /north east Tottenham area. Therefore, given the current constraints on public spending, NHS Haringey’s planning assumption is for an increase of 12 GPs by 2026, of which 8 GPs are associated with the east of the borough.</p>	<p>the floorspace requirement for the NHS. It is suggested that a range may be suitable, for example from 700m2 to 1,000m2 which will be dependent on the viability of the scheme as a whole. In addition greater flexibility regarding the height and residential density the site can deliver needs to be reflected to allow for a viable Site Allocation.</p>	<p>how the growth identified in the Local Plan will be catered for in terms of health facilities. A detailed piece of work examining growth assumptions, as well as changing NHS provision models has been undertaken to identify locations in which new facilities should be provided. It is this process which has informed the requirement for a new health facility on this site, rather than through a formal rep to the Local Plan.</p> <p>The floorspace quantum is a standard assumption for the town centre model (10% town centre, in this case health, 90% residential). The actual quantum may vary depending on a number of factors, including design on the site, viability, and NHS requirements.</p> <p>The Council understand that finding a financial agreement between</p>
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				<p>The site at Green Lanes is situated centrally within the borough and is therefore not considered to be best located to provide an additional GP surgery to mitigate this disparity, given patients should be within walking distance of their local surgery. A new facility would be best located within the centre of the eastern part of the borough. This will ensure the catchment area captures the residents who currently suffer from the deficit of GPs in their area.</p> <p><i>Quantity of NHS Floorspace</i> Hadley has endeavoured to liaise with the NHS on a number of occasions to discuss their needs and operational requirements for a new facility in line with the emerging site allocation. Previous requests from the NHS have ranged in floorspace requirements from between 700m2 and 1500m2. The uncertainty on the exact NHS floorspace and operational requirements as well as position on financial contributions is leading to the stalling of the scheme and inability for a scheme to be progressed and come forward on this site.</p> <p>The current proposed allocation includes a 1500m2 floorspace requirement. There is however, no justification for this within the emerging site allocation nor has this been set out as a requirement within the evidence base. In addition, the NHS have not submitted representations to Haringey Council specifically requesting a new facility in this location, nor have they set out their required floorspace for a new facility.</p> <p><i>Viability</i> Any Local Plan designation or scheme brought forward by Hadley Property Group needs to be viable, taking into account the cost associated in providing an NHS facility. Policy SA26 must therefore comply with the NPPF paragraph 173</p>		<p>NHS and the landowner will be possible. The statement regarding zero rent is spurious.</p> <p>NHS have confirmed that they will be shortly bidding for the next 3 year capital programme to deliver the facility on this site.</p> <p>No change</p>
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					<p>which reads:</p> <p><i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”</i></p> <p>Ensuring the Site Allocation is viable is therefore fundamental to ensuring the delivery of a deliverable scheme on this site. As it stands the requirement to deliver an NHS facility at 1500m2 and lease at zero rent to the NHS renders the site allocation unviable, and therefore conflicts with Paragraph 173 of the NPPF.</p>		
228	RSA365	SA26	Not stated	Not stated	<p><b>Density</b> The site has the capacity to accommodate a significantly denser scheme than stated within the emerging Site Allocations document. Providing just 73 units in this highly sustainable location with a PTAL rating of 6+ is a conservative approach taken by the Council, given the strategic significance of the site. Furthermore, the site is approximately a 10 minute walk from the proposed new Crossrail 2 station at Turnpike Lane which would further improve the access, which must be taken into account when setting proposed site capacities. Not only is the site sustainably located in terms of</p>	Revised density requirements in site allocation	Calculations regarding capacities are modelled and indicative. The capacity will be determined based upon a robust design-led analysis of the site in accordance with Policy DM1. It is expected that they will vary from the indicative capacities set out in the Appendix to this document, which

				<p>public transport, but any new development has the potential to create a sense of place and a local community feature when entering Green Lanes. This opportunity must be maximised and encouraged within the wording of the emerging Site Allocations policy.</p> <p><i>Consideration of pre-application scheme</i> Paragraph 4.3 of Appendix 4 of the emerging Site Allocations document states ‘where details of pre-application proposals are available and considered reasonable, the relevant housing capacity and employment floorspace have also been used to inform the site allocation.’ Since the publishing of this draft Site Allocations DPD, Hadley have held 2 pre-application meetings with LB Haringey for a residential led mixed use scheme.</p> <p>The formal pre-application written feedback from LB Haringey supports the principle of the scheme and density stating, ‘<i>the latest scheme presented to officers considered ambitious development proposals but not in principle unacceptable in urban design and land use terms, provided the designs are of sufficient quality and resolve detailed challenges. Over the two pre-application meetings, the proposals have developed to a significant degree...the principle of developing the site for medical centre and residential purposes is considered to be acceptable in principle subject to the applicant providing floorspace in line with NHS requirements.</i>’</p>		<p>are used to demonstrate that the <b>Borough’s strategic</b> housing requirement can be met.</p> <p>No change</p>
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Respondent 229: London Borough of Hackney

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
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		<b>Para</b>					
229	RSA366	SA33 and SA34	Not stated	Not stated	London Borough of Hackney is particularly interested in close working on key sites in the south of Haringey and specifically would like to be an active participant in any future masterplanning exercise for strategic sites identified in the south of the borough. The Council is of the view that sites adjacent to the borough boundary including two sites identified at Regulation 18 listed in the SADPD as <i>Site SA33: Vale Road/Eade Rd</i> and <i>Site SA 34 Overbury Rd/Eade Rd</i> would benefit from further detailed masterplanning to meet identified needs and Hackney would welcome the opportunity to play an active role in this process.	Not stated	The allocations require a masterplan be prepared to accompany any planning application. It is noted that LB Hackney has an interest in this area, and the Council will look forward to meeting with LB Hackney in line with its Duty to Co-operate.

### Respondent 230: Greater London Authority

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
230	RSA367	General	Not Stated	Not Stated	The Mayor notes that the Council has responded positively to the comments issued at preferred option stage, and the proposed refinements to designation boundaries and opportunity site allocations are broadly supported in strategic planning terms. A number of further detail comments are set out within Appendix 1 and 3	None	Noted.
230	RSA368	Sites in the west of the borough	Not Stated	Not Stated	(London Plan Reference: Policy 7.17) The removal of the allocation (including residential use) for Hornsey Water Treatment Works (an area of Metropolitan Open Land) is supported. GLA officers nevertheless remain open to discussion on opportunities to improve east-west connections between Wood Green town centre and Alexandra Palace and Park.	None	Noted.
230	RSA369	SA62: Broadwater Farm area	Not Stated	Not Stated	(London Plan Reference: Various, especially policies 3.9, 3.14 and 7.17) Further to GLA representations at preferred option stage, the removal of Lordship Lane recreation ground (an area of Metropolitan Open Land) from this allocation is supported.	None	Noted.

## Respondent 231: Transport for London

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
231	RSA370	BG2, BG3, BG4	Not Stated	Not Stated	BG2, BG3 and BG4 - TfL strongly supports the identification of these sites for development as this will assist with the regeneration of the Bruce Grove area and provide the impetus for transport improvements such as works to the A10 and the upgrade of Bruce Grove rail station	None	Noted.
231	RSA371	SA8	Not Stated	Not Stated		SA8 Station Road Offices - TfL would request that an additional bullet point is included stating: " <u><i>any development on this site should be aware of the provision of a bus facility on the adjacent site.</i></u> "	It is considered that this is adequately covered in the first Site Requirement.  No change
231	RSA372	SA45	Not Stated	Not Stated	SA45 Highgate Magistrates Court and Police Station - TfL would expect to see vehicle and servicing access located off the TLRN	None	It is considered that this can be added as a development guideline, in case any subsequent planning amendments come forward.
231	RSA373	SA52	Not Stated	Not Stated	SA52 Pinkham Way - The Mayor of London has revealed further details to redesign a number of key road networks in the capital in order to unlock growth and make the capital a more attractive place to live and work in line with the Mayor's 2050 Infrastructure Plan and the recommendations of the Roads Task	As such we would suggest including a new bullet in the development guidelines of " <u><i>TfL is investigating options for decking or a mini tunnel over</i></u> "	Noted. This will be added as a development guideline.

					Force. One of these locations is the A406 in New Southgate, where decking or a mini-tunnel over this junction on the North Circular would unlock land for new homes and connect the area around the proposed Crossrail 2 station. TfL welcomes the ongoing discussions with Haringey (as well as Barnet and Enfield) Councils.	<i>this part of the North Circular Road as recommended by the Roads Task Force, which if progressed could change the development context for this site."</i>	
231	RSA374	SA1	Not Stated	Not Stated	<p>Indicative Crossrail 2 Areas - TfL and Crossrail 2 welcomes this overarching designation but note that it could benefit from being minor rewording to read 'Sites required for the construction <u>and operation</u> of Crossrail 2 will be protected as <b>necessary</b>'. The elements of the policy which seek to ensure that the potential of Crossrail 2 is maximised through development is also supported. In relation to specific allocations, Haringey Council should note the following:</p> <ul style="list-style-type: none"> <li>• SA7 – the northern part of this site has been identified as being required as a worksite associated with a potential Crossrail 2 station at Wood Green.</li> <li>• SA14 – as identified in the supporting text, part of this site has been identified as a worksite associated with a potential Crossrail 2 station at Turnpike Lane.</li> <li>• SA16 – as identified in the supporting text, part of this site has been identified as a worksite associated with a potential Crossrail 2 station at Turnpike Lane.</li> </ul>	Rewording: read 'Sites required for the construction <u>and operation</u> of Crossrail 2 will be protected as <b>necessary</b> '	It is agreed that this can be clarified.

Respondent 232: Historic England

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
232	RSA375	Wood Green Tall building clusters	Not stated	Not stated	It is noted that throughout the document ' <i>tall building clusters</i> ' are identified. We would suggest that the title of these sections should be amended to ' <i>potential tall building clusters</i> ' as the supporting policy DM6 and the supporting text in the site allocations clearly outline that these locations may be appropriate for tall buildings subject to further considerations. Further clarification could be provided through site allocations that fall within the ' <i>cluster</i> ' areas, as the details provided do not specify limitations on height levels or bulk.	-' <i>tall building clusters</i> ' amended to ' <i>Potential tall building clusters</i> '	Agreed for consistency
232	RSA376	SA9	Not stated	Not stated		The Development Guidelines and Site Requirements should reference the need to contribute positively to the adjoining Noel Park conservation area and its significance.	An additional site requirement will be added to this effect.
232	RSA377	SA11	Not stated	Not stated		For consistency purposes the same details should be provided on this site as expressed for SA10, with regards to the setting of the Gaumont Cinema	It is considered that this is currently in the document.  No change
232	RSA378	SA19	Not stated	Not stated		The Development Guidelines and Site Requirements should reference the need to contribute positively to the adjoining Wood Green	An additional site requirement guideline will be added to this effect.

						Common conservation area and its significance.	
232	RSA379	SA28: St Ann's Hospital Site	Not stated	Not stated	We note that the Site Requirements advise that developments should preserve or <b>enhance the appearance of the St Ann's conservation area 'as per statutory requirements'</b> . We would suggest that this should be rephrased to ensuring developments conserve and enhance the significance of the conservation area and its setting. This approach reflects closely the NPPF and places a requirement upon understand the significance of the conservation area as part of the development process whether this is expressed in the conservation area appraisal and guided by an up to date management plan, or in a supporting planning application document . This approach should be applied to all other site allocations where there are heritage assets that could be affected by development e.g. sites that fall within or setting of heritage assets such as Highgate conservation area.	We would suggest that this should be rephrased to ensuring developments conserve and enhance the significance of the conservation area and its setting.	<b>Wording will be amended to this effect.</b>
232	RSA380	SA37	Not stated	Not stated		The Development Guidelines and Site Requirements should reference the need to contribute positively to the adjoining Stroud Green conservation area and its significance.	<b>An additional site requirement guideline will be added to this effect.</b>
232	RSA381	SA38 460-470 Archway Road & other sites in the Highgate conserva	Not stated	Not stated	it is important to ensure consistency in the guidance provided. For example the details provided on the Highgate conservation area and the need for development to respond to its significance is not expressed consistently between SA38 & SA39 e.g. Site Requirement for SA38 makes no reference to the conservation area, yet SA39 does. SA38 considers these issues in the Development		<b>The Development Guideline in SA38, and the Site Requirement in SA39 will be updated to reflect the Site Requirement in SA37.</b>

		tion area			Guidelines only		
232	RSA382	SA41 Highgate School	Not stated	Not stated	It is important that where there are any listed buildings whether locally or statutorily defined details of their significance and capability to accommodate change should be described. This is relevant for this site, where there is a mixture of listed buildings and other site allocations e.g. SA42, SA44, etc... In addition it should be noted that the site falls within an area that possibly be a medieval settlement and recorded pre-school chapel. We would therefore suggest that the Site Requirements highlight the potential for significant archaeology.		<b>The Council will add a development guideline setting out the potential archaeological interest of this site.</b>
232	RSA383	SA46: Hornsey Depot	Not stated	Not stated		the Development Guidelines and Site Requirements should reference the need to contribute positively to the Hornsey conservation area and its significance.	<b>An additional site requirement will be added to this effect.</b>
232	RSA384	SA48: Hornsey Town Hall	Not stated	Not stated	the wording of the Site Requirements need to be amended in the context of enabling development. The significance of the Town Hall should be the primary consideration when assessing the appropriateness of new development in its setting, thus reflecting the NPPF.		<b>The second Site Requirement will be amended as suggested.</b>
232	RSA385	SA50: St Luke's Hospital	Not stated	Not stated	the Development Guidelines and Site Requirements should reference the need to contribute positively to the Muswell Hill conservation area and its significance. In addition the setting of the statutorily and locally listed building, and their significance should be highlighted as a development consideration.		<b>Two site requirements will be added covering the Conservation Area and setting of listed buildings.</b>
232	RSA386	SA53: Alexandra Palace	Not stated	Not stated	the Development Guidelines should be expanded in relation to any proposed works to the listed building. Currently the wording focuses on not harming the historic fabric of		<b>Expanded the Development Guidelines to include the need to avoid harm to the significance of the listed</b>

					the building and the need to be sensitive to it. This should be expanded to include the need to avoid harm to the significance of the listed building, thus taking into account other heritage interests associated with the Palace and which supports its designation as a grade I listed building. In addition it would be useful to link the guidelines to any supporting documentation that describes the significance of the Palace and the surrounding gardens.		building,
232	RSA387	SA 64 The Roundway	Not stated	Not stated	it is noted that the site allocation is located opposite Bruce Castle Museum and within the historic medieval core We therefore would suggest that the site requirements are amended to include a reference to the potential for significant archaeology.		Amend the site requirements to include a reference to the potential for significant archaeology.

**Respondent 233: Michael Burroughs Associates on behalf of Omved international Ltd**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
233	RSA388	SA42	No	Not Stated	While it would be placing a wholly unreasonable burden on the respondent to expect him to remedy the Council's failure to provide an evidence base, a number of broad points can be made about these issues. These lead inexorably to a different conclusion on the appropriate development of the Southwood Nursery site to the SADPD.		Noted.
233	RSA389	SA42			The deliverability of the allocation and its SRDGs is thus profoundly in question. All the land is in fragmented private ownership and the deliverability of the allocation's comprehensive land use aspirations will		Noted.

					<p>require the use of compulsory purchase powers. The Trust for London's recent study shows Haringey is the most unequal borough in London, with over half of its wards being either very rich or very poor. Northumberland Park, a ward in the east of the Borough, is the most widely deprived ward in London.</p> <p>It is inconceivable that a Council with this spread of disadvantage could legitimately use resources to compulsory purchase private land in Highgate to provide open space in a situation where there is already ample open space locally (as the next section shows) – and impossible to see how the access sought could be achieved in any other way without complete cooperation from landowners, which will be denied.</p>	
233	RSA390	SA42			<p>The allocation site is identified in HLP as being within the Highgate Conservation Area. This is its only Proposal's Map notation.</p> <p><b>HLP policy SP12 (Conservation)</b> says the Council shall ensure the conservation of the historic significance of Haringey's heritage assets, their setting, and that the wider historic environment should be used as the basis for heritage-led regeneration and as the basis for good design and positive change. Where possible, development should help increase accessibility to the historic environment.</p>	Noted, the safeguarding of the heritage asset is included in this policy.
233	RSA391	SA42			In the SADPD the Council has failed to test its proposals for the allocation against the	The rationale for allocation of this piece of open space is on the basis of the open

				<p>statutory test for development in Conservation Areas – that the decision on any development proposal affecting the proposed allocation must pay special regard to considering whether it harms (following South Lakeland) the Conservation Area’s character or appearance - and the other relevant policy factors identified above – in summary:</p> <ul style="list-style-type: none"> <li>• There is no local or strategic need for public open space on the allocation;</li> <li>• There is no appraisal of the effect of housing development on the allocation on the Conservation Area;</li> <li>• There is policy support for heritage-led regeneration but no appraisal of the way this can be achieved;</li> <li>• There is policy support for increased accessibility to the historic environment but no appraisal of the way this can realistically be achieved;</li> <li>• There is policy support for restoration of heritage assets in a way that puts them in a suitable viable use but no appraisal of alternative ways this can be done on the allocation;</li> <li>• There is policy support for the establishment and maintenance of sustainable communities and economic viability but no appraisal of the way this applies to the allocation.</li> </ul>	<p>nature of the Highgate Bowl being the key feature of this part of the Conservation Area.</p>
233	RSA392	SA42		<p><b>NPPF para 158</b> requires each Local Plan to be based on adequate, up-to-date and relevant</p>	<p>There are a number of planning appeals that support the retention of this area as</p>

				<p>evidence about the economic, social and environmental characteristics and prospects of the area. There is no published evidence base that supports the proposed allocation.</p> <p>It is a fundamental criticism of the SADPD that it is wholly inconsistent with the guidance in the NPPF. It means that the document is not fit for purpose in this respect. We are certain that, if the Council had undertaken an objective, transparent assessment of the development opportunities on the representation site as required by national guidance, this would have led to a very different vision for it that is set out below.</p> <p>The allocation itself has three elements:</p> <ul style="list-style-type: none"> <li>• the Bowl should be protected open space;</li> <li>• public access to it should be improved;</li> <li>• there should be limited redevelopment of Townsend and Dukes Head Yards.</li> </ul> <p>Its Site Requirements and Development Guidelines (SRDG - it is difficult to understand the difference between them) make twelve identifiable separate points:</p> <ol style="list-style-type: none"> <li>a. buildings facing the High Street and their burgage plots should be retained;</li> <li>b. the Bowl will be redefined as Significant Local Open Land;</li> </ol>	<p>an open space that forms the heart of this part of the Conservation Area. In this regard the Conservation Area Management Plan provides the evidence.</p>
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					<p>c. enhanced access to the Bowl through Kings Head and Townsend Yards;</p> <p>d. redevelopment of the garages and workshops in the Yards for 3-4-storey mews-style residential development;</p> <p>e. public routes through the various land parcels that make up the Bowl will need to be introduced to unify the open space;</p> <p>f. development should preserve or enhance the Highgate Conservation Area;</p> <p>g. the entrances to the yard roads should signal the open space hidden behind with a visual link established where feasible;</p> <p>h. new users of the open space will be encouraged, while generally keeping it open for public use;</p> <p>i. the Local SINC designation should be protected;</p> <p>j. Thames Water should be consulted on the capacity of existing drains;</p> <p>k. redevelopment that results in loss of employment floorspace will trigger financial compensation;</p> <p>l. contamination studies should be undertaken on development in the yards portion of the site.</p> <p>No evidence base has been produced by the Council to support any of these requirements. Before drawing the conclusion that these were the most appropriate uses for the site, the Council should have at least have thoroughly assessed:</p> <ul style="list-style-type: none"> <li>• Relevant Development Plan policy;</li> </ul>	
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					<ul style="list-style-type: none"> <li>• The physical and land use character of the allocation;</li> <li>• The need for additional open space in the area including previous Planning Inspector’s conclusions on whether it should be identified as SLOL;</li> <li>• The need for and feasibility of additional public access to the area;</li> <li>• The likelihood of achieving its aspirations in the light of current ownerships and particularly if change of use from commercial will attract a financial penalty.</li> <li>• The feasibility of providing the access routes shown;</li> <li>• The relationship of its proposals to the conservation character of Highgate Village;</li> </ul>		
233	RSA393	SA42			<p>The <b>SRDG e</b> aspiration for public access routes through is linked to the <b>SRDG b</b> requirement for the site to be SLOL and <b>SRGD h</b> that new users should be found for the SLOL.</p> <p>The plans that shows the Council’s aspirations for Allocation Site SA44 shows a wavering line crossing the site from the access to the Harington Project in Chomeley Park to the east through the SINC, the garden centre site and the Highgate School grounds to Kingsley Place in the west. New access are shown running to it from the south through Townsend and Dukes Head Yards.</p>		The allocation sets parameters for what any redevelopment of the yards should achieve (improved pedestrian access to the bowl). It does not prescribe that particular parts of it will come forward.

					<p><b>It is most surprising that the Council does not claim to have consulted the Metropolitan Police about the proposed footpaths. They are not overlooked and so will not be self-policing. Footpaths of this type are routinely objected to because they are escape routes for criminals and an obvious focus for anti-social activity that are impossible to police efficiently.</b></p> <p><b>The purpose, deliverability and safety of these footpaths is highly questionable in this area that already has ample open space criss-crossed by footpaths – some of the best dog walks in London!</b></p>	
233	RSA394	SA42			<p>The SA claims the Bowl is part of the London Green Grid. It explains in <b>para 14.14.2</b> that <i>‘a solution (it does not say to what) is to apply a ‘Green Grid’ approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. A DM Policy is set to be adopted that will establish the overall strategy, and a number of site allocations will help to ensure that it is implemented. In Haringey Heartlands it is notable that there is a strategic aim to create a network of ‘pocket open spaces’. Across the borough, strategically important features within the Green Grid include Alexandra Palace Park (given its proximity to Wood Green), various areas of Metropolitan Open Land (MOL) and SINCS (where they are</i></p>	<p>Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL. The green grid map shows current open space designations and the development management policies document states that new open spaces will be expected to link into the green grid.</p>

				<p><i>accessible). Another priority for the east of the borough is to open-up access to the Lee Valley Regional Park.</i></p> <p><b>DMP Map 4.3</b> shows Haringey’s Green Grid. It does not show the Bowl as a Green Grid site. Plainly the SA for this site and the proposed allocation in the SADPD has been prepared on an entirely false basis.</p> <p><b>SA para 14.14.3</b> shows the extent of the error that it has fallen into - <i>the following sites are set to contribute to the Green Grid, or otherwise ensure easily accessible open space</i> -... <i>SA 45: Highgate Bowl – The aim is to achieve protection of the Highgate Bowl as open space, and improvement of public access through limited redevelopment of Townsend and Duke’s Head yards. The entrances to the yard roads should signal the open space hidden behind, encouraging new users of the open space.</i></p> <p>The SA properly identifies that Green Grid is a strategic policy – but says its identification of the Bowl as part of the Green Grid is based on draft DMP policy that was only published at the same time SADPD. It says the policy <i>‘is set to be adopted’</i> but it is clear from the Plan above that the draft DMP does not include the Bowl in the Green Grid.</p> <p>Obviously the SA’s indication that the draft DMP policy <i>‘is set to be adopted’</i></p>	
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					unacceptably pre-judges the result of its public examination and shows clear pre-determination, not the objective assessment that will be sought by the Examining Inspector.	
233	RSA395	SA42			<p>In any event, the SA does not apply the Green Grid concept appropriately. <b>Para 2.27 of the Haringey Open Space and Biodiversity Study</b> confirms the Green Grid is a strategic policy - <i>The All London Green Grid (ALGG) is a London-wide framework for managing London's green spaces and natural assets, and has been adopted as Supplementary Planning Guidance (SPG) supporting the London Plan. The ALGG also highlights areas of London where there are strategic gaps in provision of open space. The ALGG divides London into 12 Green Grid Areas, and most of Haringey falls within Green Grid Area 1 'Lee Valley and Finchley Ridge'.</i></p> <p>The ALGG is indeed a strategic policy and the GLA provides strategic guidance on this in its <b>Green Infrastructure and Open Environments: the All London Green Grid SPG</b> (March 2012). This identifies the Green Grid in this area in <b>para 5.16</b> <i>The Parkland Walk Link runs along a disused railway line connecting Finsbury Park to Highgate Wood and Queen's Wood and then onto Alexandra Park;</i> and <b>para 5.22</b> <i>The Hampstead Heath Ridge Link connects the Heath to Alexandra Park in the north via Highgate Wood and in part follows the northern arm of the Parkland</i></p>	It is considered that new additions to the Green Grid will always be welcomed, and do not need to be specifically linked to over/under provision.

				<p><i>Walk through Muswell Hill. Parts of the route pass through residential areas and alongside a golf course.</i></p> <p>Its <b>para 5.24</b> identifies the only strategic Green Grid opportunity in this area: <i>Improve the facilities of, and connections between, Alexandra Park, Highgate Wood, and Queens Wood along the Parkland Walk Link, in order to maximise their potential as a visitor destination of rich landscape character offering fantastic views across London.</i></p> <p>There is no support in the GLA's SPG for the proposition that the Bowl should be identified as SLOL within the strategic ALGG.</p>	
233	RSA396	SA42		<p><b>CONSERVATION CHARACTER OF HIGHGATE</b></p> <p><b>SRDG a</b> seeks to preserve the character of building fronting the High Street and their burgage plots, <b>SRDG d</b> seeks redevelopment for mews of up to four storeys and <b>SRDG f</b> seeks to apply the statutory test to new development.</p> <p>The Inspector in the 2014 appeal on the garden centre site (<b>Annexe 2</b>) described the relationship of the Bowl to the High Street and the Conservation Area generally. <i>The historic core of the hilltop Highgate village includes the nearby buildings in the High Street. They are mainly characterised by C17 to C19 small scale terraced houses with traditional shop fronts, tight frontage</i></p>	<p>It is considered that the preservation of the area as SLOL guarantees the retention of the openness of the area in the future.</p>

				<p><i>development and long narrow plots. The mix of earlier buildings and fine C20 buildings contribute to the architectural diversity in the Conservation Area.</i></p> <p><i>The Highgate Bowl (the Bowl) includes an arc of privately owned, open backland lying roughly north of the High Street which falls steeply down from the ridge. It has survived as relatively undeveloped land for reasons including its former use as fairly low value service land, its hilly topography, and its restricted access. It is one of 2 major open spaces which contrast with the fine grained development of the village and its semi-rural character maintains the connection to its agricultural past. Although the Bowl is mainly characterised by its openness, there are few nearby public views into it. Even so, there are many views over and through it, from the buildings and spaces around and within it. The contrast between the Bowl and the development in the High Street is important to the appreciation of Highgate village as a historic hilltop settlement. Its general openness contrasts with the adjoining townscape, and at night, its relative darkness contrasts with its well-lit surroundings. The Bowl is significant as a remnant of the once rural village.</i></p> <p>There had been a nursery on the site for more than 100 years and so the site's significance as part of the 'once rural village'</p>	
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					<p>must be seen in this context. Before and after the Second World War there were two houses on the site and the extensive area of glasshouses shown on the 1937 OS map below. Townsend Yard is visible entering the nursery and running to a house now demolished about where the glasshouse visible on the aerial photo above now stands as well as Whistler's Cottage that is still in place on the southern boundary of the site currently used as offices.</p> <p>In this context the following points the Council might have relevantly identified the following points as relevant to its planned future:</p> <ul style="list-style-type: none"> <li>• There is no intention of disposing of the site or allowing public access across it.</li> <li>• About 10% of the site is occupied by buildings and a further 54% is hard standing used for open sales and storage and car parking;</li> <li>• The site's commercial use is unsightly;</li> <li>• The landscape contractor's business is in operation and generates considerable activity;</li> <li>• There is no reason why the garden centre use should not resume;</li> <li>• There is no public access to the site at present;</li> <li>• There are no access points to the site other than Townsend Yard and from</li> </ul>	
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					<p>the yard to the west of it;</p> <ul style="list-style-type: none"> <li>• General public access would inevitably be inconsistent with continued commercial use;</li> <li>• Commercial use of the site is historic and inconsistent with the poor access along Townsend Yard;</li> </ul> <p><b>In view of the historic context and its present semi-developed nature, the Inspector’s analysis does not preclude new development in the Bowl as long as this does not harm the character and appearance of the Conservation Area – principally by not reducing openness and retaining tree cover.</b></p>	
233	RSA397	SA42			<p><b>The Sustainability Assessment (SA) para 10.2.5</b> explains the systematic process used to evaluate sites involved defining a set of ‘rules’ that control the uses that might be suitable at each of the sites considered:</p> <ul style="list-style-type: none"> <li>• <i>A site is potentially suitable for residential development unless it is a Designated Employment Area (DEA: LSIS/EL/SIL),A</i></li> <li>• <i>A site is potentially suitable for employment development where it is a DEA, in a town centre, or where PTAL is good (4 or above),</i></li> <li>• <i>A site is potentially suitable for town centre uses if it is within a town centre,</i></li> <li>• <i>A site is potentially suitable for community infrastructure uses where</i></li> </ul>	<p>There is a particular implication on this site that the Bowl forms an important part of the character of this part of the Conservation Area, and is being protected on that basis.</p>

					<p><i>it has a high PTAL and/or is within a town centre. It may also be suitable for large scale infrastructure based on the size and quantum of development on the site. This will be explored at a later stage, incorporating the findings of the emerging Infrastructure Delivery Plan,</i></p> <ul style="list-style-type: none"> <li>• <i>A site is potentially suitable for <b>open space where there is an identified deficiency.</b></i></li> </ul> <p><b>SA Table 10.1</b> identifies the Bowl as potentially suitable for housing and open space and unsuitable for employment, town centre and questionable for community infrastructure use. <b>Map 4.1 of the draft DMP</b> shows the Bowl is not in an area of open space deficiency and <b>Map 4.2</b> confirms it is not in a ward with an open space deficiency.</p> <p>As there is no identified deficiency of open space in Highgate, it is evident that SADPD's proposed allocation of the Bowl as SLOL is inconsistent with the Council's own decision-making criteria.</p>	
233	RSA398	SA42			<p>SADPD is also deficient because it fails to adequately respond the requirement identified in <b>National Planning Guidance paragraph: 006 Reference ID: 12-006-20140306</b> that:</p> <p><i>The Local Plan may also require a Habitats Regulation Assessment, as set out in the Conservation of Habitats and Species</i></p>	<p>A habitats regulations assessment has been prepared as part of this planning process.</p>

				<p><i>Regulations 2010 (as amended) if it is considered likely to have significant effects on European habitats or species, located in the local planning authority's area or in its vicinity.</i></p> <p>About 25% of the Allocation is a SINC that will be crossed by a new path and so the requirement for a Habitats Regulation Assessment must be screened for. We are unable to find any screening that has taken place.</p>	
233	RSA399	SA42		<p><b>NPPF para 111</b> sets out the national policy for such land: <i>Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.</i></p> <p>The respondent's Southwood Nursery site is an illustration of the type of site where development could be inhibited by the policy as drafted. It has a commercial use, is largely open (about 10% of its site covered in buildings and more than 50% by hard standing), it has no public access, and it is virtually invisible in public views. A policy that restricts its development in principle would be inconsistent with the NPPF.</p>	Noted. It is considered that the Policy makes provision for an appropriate level of development, while protecting the heritage and biodiversity value of Highgate Bowl.
233	RSA400	SA42		<p>The Council has accepted for almost 20 years that the Bowl has no strategic or local open</p>	Noted.

					space significance. Its evidence to the 2005 RUDP inquiry that explains the reasons for this is at <b>Annexe 1</b> .	
233	RSA401	SA42			<p>It is not surprising in this context that HLP does not say anywhere that the site should be treated as Local Green Space or its equivalent. As <b>NPPF para 76</b> indicates, this should only be designated when a Plan is prepared or reviewed. The Local Plan was adopted in March 2013 (two years after the NPPF issued in draft) and so there was ample time to include a policy to this effect that would have a spatial expression on the Proposals Map.</p> <p><b>London Plan Policy 7.9</b> is part of the Development Plan for this area. It says the significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality. <b>NPPF paras 132 and 134</b> have similar requirements.</p>	The Site Allocations forms part of the Local Plan, and is a suitable vehicle for amending open land designations.
233	RSA402	SA42			Despite Map 4.1 of the draft DMP (that was published at the same time as SADPD) the SA fails to consider whether there is a shortage of open space in Highgate. As there is no shortage, its decision to make the Bowl SLOL	Noted, the Council does not claim there is a significant deficiency of open space here.

					shows a disregard of the SA's own decision-making criteria. Its failure to identify its potential for residential development is similarly inconsistent with its criteria. It is also inconsistent with the HLP Proposals Map that does not show the Bowl as SLOL.	
233	RSA403	SA42			<p>Its last full use was as a Garden Centre (that closed in 2014 but the planning use has not been abandoned) and a landscaping contractor's business. Both of these are commercial uses that would be financially penalised under <b>Site Requirement and Development Guideline (SRDG) k</b> (employment floor space loss trigger financial compensation) if their use changed.</p> <p>In March 2014 the Council refused a community nomination to include it in the Council's list of Assets of Community Value because the land did not constitute land of community value for the purposes of Section 88 - access to it was only possible when the Garden Centre was open and not otherwise and the main use of the land was retail and so its actual use was in fact an ancillary use (reliant on the Garden Centre being open and ancillary to it) that did not meet the criteria for nomination.</p> <p>There has never been public access to the landscape contractor's part of the site. The Garden Centre had a shop but no coffee shop and so was not a facility where customers lingered socially. Public access was restricted</p>	While the Harington scheme cannot be protected by name, a presumption that any development will retain, and where possible enhance the site for horticultural/education use.

					<p>to commercial activities and its gates were locked at nights. They are now locked day and night.</p> <p>The Garden Centre had 30-40 unmarked parking spaces and large open storage areas serviced by vans, small lorries and large articulated lorries through the narrow and tortuous Townsend Yard. The car park and open storage area are mainly in the eastern part of the site adjoining Chomeley Crescent and are still used as storage by the landscape contractor.</p> <p>Other than in the circumstances outlined below, there is no intention of facilitating public access to the land or disposing of it and so it is unavailable for public use sought by <b>SRDG e and h</b>. (public routes and new users will be encouraged)</p>	
233	RSA404	SA42			<p>The remainder of the allocation is also in private ownership with a disparate land use character and so its use is unlikely to facilitate the <b>SRDG h</b> (new users will be encouraged) aspiration. There is no access to the general public and it is remarkably inconspicuous in public views – only its boundary planting can be glimpsed from Chomeley Crescent to north, Kingsley Place to the west and at the end of Townsend Yard to the south. It is lost in long views against the wooded skyline of the Hampstead/Highgate Ridge.</p>	Noted.
233	RSA405	SA42			<p>Turning to the wider area, including the subdivided respondent's site six distinct areas</p>	While the Harington scheme cannot be protected by name, a presumption that

				<p>of use can easily be identified on the allocation.</p> <p>To the east is the Harington Project that provides horticultural and other training for young adults with learning disabilities and difficulties. Its character is of allotments and buildings. The special character of the users of the facility means that it is unlikely to encourage public access as sought by <b>SRDG e and h</b> (public routes and new users will be encouraged).</p> <p>The respondent's site is separated from the Harington Project by the area of dense self-sown woodland visible on the aerial photo. The woodland is a privately-owned SINC. No screening appears to have been carried of the significance of the species it contains and as a result it is impossible to say whether the access through it sought by <b>SRDG e and h</b> is compatible with <b>SRDG i</b> (SINC be protected).</p> <p>To the south of the respondent's site the allocation is the area of unkempt yards and garages in Townsend and Kings Head Yard behind the historic buildings in Highgate High Street. The respondent's site is separated from this area by a wall and dense vegetation. <b>SRDG c</b> requires the entrance through these yards to be enhanced, <b>SRDG d</b> that they should be redeveloped as mews houses, <b>SRDG g</b> that they should signal the open space behind but <b>SRDG k</b> says that</p>	<p>any development will retain, and where possible enhance the site for horticultural/education use.</p>
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				<p>change of their employment use will trigger a financial penalty.</p> <p>There can be no certainty they will come forward as the allocation requires in this context – why should the owners of this property undertake development that they will be penalised for?</p> <p>To the southwest of the respondent’s site are gardens containing two swimming pools behind houses in Southwood Lane and to the west is the Highgate School former Parade Ground and gymnasium building that have been part of the school grounds for at least a century and separate it from the post-war housing at Kingsley Place. It is hard to conceive that either of these will be made available for the private routes sought by <b>SRDGe</b> or for the new users of the Bowl sought by <b>SRDGH</b>.</p> <p>It is clear from this that there is no visual or functional relationship between the respondent’s site and the other areas of the allocation – the woodland separates it from the Harington Project, the wall and dense woodland from the yards and gardens and a dense tree-line and embankment from the former Parade Ground and the gardens.</p>	
233	RSA406	SA42		<p>The proposed SLOL designation can only rely upon adopted HLPSP policy, the relevant <b>Policy SP13</b> of which says: <i>All new development shall...seek to secure</i></p>	<p>Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL.</p>

				<p><i>opportunities for additional publically accessible open space especially in those identified areas of Open Space deficiency ... as set out in the Council's Open Space and Standards SPD.</i></p> <p>The policy recognises that new open space provision should be linked to development and principally applied where there is an open space deficiency - which (as shown above) does not apply in the area of the Bowl. The proposed SLOL designation is inconsistent with the adopted HLPSP as well as the emerging DMP.</p>	
233	RSA407	SA42		<p>As shown below, the Bowl's function has already been considered by the Inspector at the 1998 UDP Inquiry who concluded it neither had the necessary features to be MOL or a SLOL. The Council fully accepted these conclusions and its evidence to the 2005 RUDP Inquiry refuted local claims that the site should be SLOL.</p> <p>The SADPD and SA's reliance on the ALGG concept and draft DMP policy is thus wholly misplaced. Its advocacy of designation as SLOL is wholly inconsistent with its position to date. It is evident that Council's decision that the Bowl should be SLOL is unsound because it is the result of flawed and inconsistent analysis.</p>	Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL.
233	RSA408	SA42		<p>There is no policy in the RUDP 2006 or the Haringey Local Plan (HLP) 2013 that unequivocally constrains development in the Bowl to particular uses. The proposal that the</p>	Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL.

					site should be a SLOL is inconsistent with the Development Plan.		
233	RSA409	SA42			<p><b>TOWARDS AN EVIDENCE BASE FOR THE NEED FOR OPEN SPACE AND THE PROPOSED SLOL DESIGNATION</b></p> <p>This area has an exceptional quantity of public open space for London (the CACA calls it a wealth of open space and green surroundings). Within about a kilometre of the appeal site there is access to about 400ha of major open space including ancient woodland and open heath as well as more conventional urban open space. The entrance to Waterlow Park is about 100m from Townsend Yard.</p> <p>The allocation is not in an area of Local Open Space Deficiency and none of the reasons for refusal in the recent appeal on the site (<b>Annexe 2</b>) identifies a need to place the site in public open space use.</p> <p>The Council sought in the draft Haringey UDP 1998 to designate the Bowl as MOL. The UDP Inspector concluded it was not MOL and was also asked to consider whether it should be designated Significant Local Open Land (SLOL).</p> <p>On this he concluded that it was clearly not a public open space as access to it is extremely limited to places such as the private garden centre and private school and it does not meet any local recreational needs and has no</p>		Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL.

				<p>recognised nature conservation value. As its value was said to come almost entirely from its relationship to the historic Highgate Village, this specific value was more appropriately protected by relevant policies dealing with Highgate village as a conservation area than policies designed to protect open space.</p> <p>It seemed wrong to the Inspector to try to force open space policies on a piece of land, about half of which comprises an artificially raised tarmac parade ground, a garden centre with substantial areas of hard surfaces and structures and rear gardens. He concluded it was not SLOL. Nothing has changed to justify a different conclusion.</p> <p>Even though there has been a long history of attempts to secure residential development on the site, there is no policy in the UDP 2006 or the Local Plan 2013 that unequivocally prevents this. Nor is there any statement in the CACA 2013 that is unequivocally hostile to residential development on the site; The Council has accepted for almost 20 years that the Bowl should not be SLOL as spelt out in its evidence to the 2005 RUDP inquiry <b>(Annexe 1).</b></p> <p><b>Plainly designating the area as SLOL now would be fundamentally inconsistent with the Council’s position over the past 20 years and would be wholly unreasonable. It</b></p>	
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					follows that SRDG b that seeks that the Bowl should be a SLOL requires the most closely argued justification – but justification is wholly lacking in SADPD and its SA criteria preclude this.	
233	RSA410	SA42			<p>This section first describes the key features of the respondent’s land and moves on to put this in the context of the allocation generally.</p> <p>Southwood Nursery is an area of 0.9has north of Highgate High Street in the western part of the 3.9ha Allocation Site SA44 in the Highgate Conservation Area.</p> <p>The CACA says it <i>has ... a notable tree cover around its boundaries and in clusters within the site. This screens the sheds and other structures within the site. Much of the site also contains raised beds to display plants which also reduce the amount of ground covered by hard standing as conventionally understood.</i></p> <p><i>This is an important factor in the contribution of the Nursery site to the Bowl as a whole. The largest building now present is the greenhouse, and although the development covers a significant amount of the site, it is not sufficiently dominant or visually intrusive to undermine the contribution the site makes to the apparent open tree-covered character of the Bowl.</i></p>	Noted.
233	RSA411	SA42			<b>AN ALTERNATIVE VISION FOR THE SOUTHWOOD NUSERY SITE CONSISTENT WITH THE EMERGING EVIDENCE BASE</b>	The site is protected as SLOL due to its importance to the conservation area.

				<p>As far as policy is concerned, the points identified above are relevant:</p> <ul style="list-style-type: none"> <li>• Policy support for heritage-led regeneration;</li> <li>• Policy support for increased accessibility to the historic environment;</li> <li>• Policy support for restoration of heritage assets in a way that puts them in a suitable viable use;</li> <li>• Policy support for the establishment and maintenance of sustainable communities and economic viability.</li> </ul> <p>As far as the criteria in the SA are concerned, this offers no support for a SLOL designation and considerable support for a housing allocation. In this context (as well as the lack of any identified funds to undertake the extensive acquisition and construction work the proposals entail) the proposals in the SADPD are plainly pie in the sky.</p> <p>Only allowing carefully controlled new residential development will secure a remedy for the manifest disadvantages of the use of the Southwood Nursery site at present and secure the public access sought by the Council.</p> <p>We object that the following has not been included in SADPD as a development brief for the Southwood Nursery site.</p>	
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					<ul style="list-style-type: none"> <li>• An area about 30m wide along the eastern boundary of the site running adjacent to the SINC from the Townsend Yard gate to the rear of the Chomeley Road houses shall be made available for public use;</li> <li>• A public access route along the north boundary of the site shall be designated between the SINC and the Highgate School Parade Ground if supported by the Metropolitan Police;</li> <li>• No more than three houses shall be permitted on the remainder of the site;</li> <li>• The houses shall be accessed from Townsend Yard;</li> <li>• One house shall be on the site of Whistler's Cottage and the other two on the lower western part of the site where they will not impact the setting the High Street;</li> <li>• Their total footprint shall not exceed the footprint of the existing buildings on the site;</li> <li>• Their scale, materials and height shall ensure they are visually subservient to Highgate High Street and the wider conservation area;</li> <li>• They must respect the local built form and vistas leading into the site;</li> <li>• The existing tree cover on the site shall be maintained and enhanced;</li> </ul>	
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					<ul style="list-style-type: none"> <li>• The proposed development shall protect the local SINC designation and wherever possible enhance the quality of the local landscape and habitats;</li> <li>• New development shall mitigate against any flood risk posed by local drainage issues;</li> <li>• Its illumination shall be less than the illumination that exists for the garden centre and the landscape contractor at present.</li> </ul> <p>This will secure all the Development Plan policy objectives set out above – it will create heritage-led regeneration; will increase public accessibility to the historic environment and it will support restoration of heritage assets in a way that puts them in a suitable viable use. The respondent would be very glad to discuss them with the Council and seeks a meeting to do so.</p>	
233	RSA412	SA42			<p>The SADPD is unsound on these measures. It does not:</p> <ul style="list-style-type: none"> <li>• contain an objective assessment of development and infrastructure requirements that supports identification of the Highgate Bowl as a SLOL;</li> <li>• evaluate its strategy in this respect against reasonable alternatives based on proportional evidence;</li> <li>• consider whether its proposals are</li> </ul>	<p>Noted. The next stage of consultation (Regulation 19) will offer an opportunity to comment on the soundness of the plan. Following this, an independent Inspector will test the soundness of the plan.</p>

					deliverable.	
233	RSA413	SA42,			<p><b>We object that the draft SADPD would plainly fail the test of soundness that will be applied by the independent Inspector in the following respects:</b></p> <p><i>a.</i> There is no SEA or Habitats Assessment appraisal;</p> <p><i>b.</i> There is no evidence base supporting the SADPD’s conclusions;</p> <p><i>c.</i> There is no thorough appraisal of the potential uses of the allocations SADPD identifies, particularly in respect of the decision to make the Bowl SLOL;</p> <p><i>d.</i> Its allocation of the Bowl as SLOL is inconsistent with the Council’s published criteria and adopted policy;</p> <p><i>e.</i> It does not take into account the fact that there is no open space deficiency in the area;</p> <p><i>f.</i> The site is not shown as part of the ALGG on the DMP’s plan and so use of the Green Grid policy to justify allocation of the Bowl as SLOL is entirely misplaced.</p> <p><i>g.</i> The issue of whether the site has a strategic or significant open space function was disposed of many years ago. Nothing has changed that would justify a different view being taken now;</p> <p><i>h.</i> Its failure to consider whether it should be a housing allocation is similarly inconsistent with the Council’s published criteria;</p> <p><i>i.</i> It does not consider whether its proposals for the allocation are deliverable and so cannot be certain they are realistic;</p> <p><i>j.</i> It fails to align with the HLP policy SP13</p>	<p>Noted. The next stage of consultation (Regulation 19) will offer an opportunity to comment on the soundness of the plan. Following this, an independent Inspector will test the soundness of the plan.</p>

					<p><b>and the Proposals Map, which do not identify a SLOL designation on the Bowl.</b></p> <p>We expand these objections below, where we conclude with a more practical proposal for the respondent's element of the allocation. This fulfils the reasonable planning requirements identified in our assessment of the relevant evidence base.</p>		
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**Respondent 234: Councillor Clive Carter**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
234	RSA414	SA 37 – 18–20 Stroud Green Road	No (?)	Not stated	THIS is described as a <i>New town centre frontage onto Stroud Green Road</i> , however in truth it is no more than a housing development. It's described as "an opportunity to create new town centre uses within the Finsbury Park District Centre" but it is hard to see this as other than a residential development alongside Islington's misnamed 'town centre'. It's hard to know what is meant by, <i>Town centre uses will be required at ground floor level on the Stroud Green frontage of this site.</i>	Not stated	The policy describes the uses that will be required on this site, should a planning application come in. Town centre uses contain retail, community, and high density employment functions.  No change
234	RSA415	SA 36 – Finsbury Park bowling alley	No (?)	Not stated	THE principal feature of this site is that exists on the boundary of two other Boroughs. It sits on the extreme periphery of Haringey, Hackney and Islington, far from the centres of the three Boroughs.  The site allocation maximizes benefit to one Council (Haringey) at the expense of the local community and especially at the expense of the potential for a genuine 'town centre'.  If this SA36 is sound, it is sound only within the	Not stated	TfL, and LB Hackney, and LB Islington were all consulted, as statutory consultees.  The premise of this response is not accepted. The creation of a new high quality urban realm linking the station and the park are considered to be of significant potential benefit to the local community, and the supposition that is it being treated differently because it is at the edge of the borough is

					<p>artificial confines and disregards the adjacent areas. It is not clear that a major stakeholder (Transport for London) was consulted. Given that this site is (a) adjacent to one of London's major transport interchanges and (b) on the edge of the Borough and (c) adjacent to one of north London's largest parks, this site should have been subject to different criteria from say, a similar site in the middle of the Borough.</p> <p>One of the main reasons for Neighbourhood Forums is to bridge Borough boundaries and to try to make sense of areas that make sense to the public, but that are currently subject to arbitrary and artificial borders.</p>		<p>spurious to say the least.</p> <p>The Council will look forward to seeing how the yet-to-be-formed Neighbourhood Forum will propose to mediate across the "artificial and arbitrary" boundary mentioned.</p> <p>No change</p>
234	RSA416	SA 36 and SA37	No (?)	Not stated	<p><b>Effective /Deliverable? Question 15</b>  IN THE <i>Haringey Local Development Framework Core Strategy Submission Soundness Self-Assessment</i>, key question number 15 asks, <i>Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</i>  The answer is couched in sweeping generalities: <i>LBH works closely with ..., and also works with ...; work together ...</i>  An oblique reference is made to SA36 and 37, where the document says that, <i>Other action areas of the borough which require partnership working with neighbouring boroughs include: ... .. Finsbury Park and Manor House – with major regeneration projects at Finsbury Park station (in Islington) and at Woodberry Down (in Hackney).</i>  The difficulty is that cross-border co-operation is fitful, feeble and short-lived. Co-operation, or partnership is needed but there's no evidence of it being effective or sustainable in the current absence of a Neighbourhood Plan and Forum.</p>	Not stated	<p>The Core Strategy was adopted in 2013 and the Inspector concluded the Plan met its legal compliance. The Council is confident that it has fulfilled its obligations under the Duty to Co-operate for this plan. It is within the gift of the local community to bring forward a Neighbourhood Plan should they wish, and the three local boroughs will support this process.</p> <p>No change</p>

					As a consequence, SA36 and 37 are strictly limited in scope and lack ambition for the area as a whole.		
234	RSA417	SA 36 and SA37	No (?)	Not stated	<p><b>Neighbourhood forum: not yet</b>  ALTHOUGH there exists the beginnings of a Finsbury Park Neighbourhood Forum in the area of SA36, the local community is at a disadvantage compared with other areas in that a Forum is not yet set up. When set up, it is likely that <b>its nucleus would be one of London's</b> most important transport nodes: Finsbury Park station. It would encompass a significant area that would include all of SA36 and a large margin around (here is an draft area).</p> <p>The object of the Neighbourhood Forum would be to consider Finsbury Park area as a single whole. Because this locality exists on the edges of three Boroughs and at extreme corners, it has for decades been little regarded by the Boroughs (i.e. by Haringey, Hackney and Islington). Now and again efforts are made at co-operation between the three Boroughs about FP, but these have tended not to last long or be meaningful.</p> <p>It is this lack of common purpose for the area and the absence of meaningful responsibility, that is one of the driving forces for a NF, that would bridge the Borough Boundary borders (three of them).</p> <p>The current ambitions for this site are contained within the confines of the Borough boundary. It could be seen as local-council selfish plan to maximise Council tax receipts within, at this <b>'extreme' southernmost location of Haringey</b> Borough, with little regard for the needs of the area as the public sees it.</p>	Not stated	<p>The Council looks forward to working with a Finsbury Park Neighbourhood Forum in the future. In the meantime it is not considered that this comment is pertinent to the Plan as written.</p> <p>No change</p>
234	RSA418	SA 36 and SA37	No (?)	Not stated	<p><b>Corridor for 'permeability'</b>  THERE is one aspect that relates to the</p>	Not stated	There are no details about the design for the new urban realm linking the

				<p>neighbouring Borough that needs to be addressed. The corridor that might run between or through two large buildings has been said – in planner-jargon – to increase permeability. It has been advanced as a means of improving the view of Finsbury Park from the station (in Islington). However, not only is this not so, the proposed (over-) development of the site would <i>detract</i> from the current view.</p> <p>Firstly, the tall mature trees are currently easily visible over the Rowans building. Replacement buildings of anywhere near the heights proposed would obscure the trees from view from ground level anywhere near the bus station.</p> <p>However, this assumes that the trees remained. Despite assurances that any construction work would not take place on the park, due to their closeness to the proposed building site, there is no guarantee that this large stand of trees would not be felled. (A similar felling of mature trees occurred during building on the Jewsons site alongside Wightman road: now SA27).</p> <p>Secondly, the width of the corridor would likely be narrow and this corridor has been subject to misleading depictions. A so-called artists illustration published by promoters shows a Champs Elyse sized avenue. This is a distortion of the narrow shopping arcade. The narrow angle of view through to the park could only be had by someone standing close to the central axis of the shopping arcade, looking directly down it. For the majority of people exiting the station, the gap would be unlikely to be noticed, let alone for the park to be seen.</p>	<p>Park and the station. By having a policy, it allows this to be defended when an application comes in however, which is seen as positive.</p> <p>It is incorrect to suggest that the current view of the park over/around Rowans is superior to what it could be through a new urban realm. It is considered that the reference to removal of mature trees is disingenuous as policies in the Local Plan seek to retain mature trees, especially those of high amenity value.</p> <p>There is no indication from TfL that they intend to significantly change the way Finsbury Park Station operates, which as the respondent suggests, would alter the approach to the area. If they do, the Plan will be updated to reflect this. It is unclear how development as allocated would compromise this objective however.</p> <p>No change</p>
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					<p>The alley/shopping arcade is the sole concession that the area is a major transport interchange. It is TfL and the station that ought to have a major influence. The artist's impression put out by the promoters even airbrushes out the huge porch by the bus station and indeed the bus station disappears altogether.</p> <p>There is already access to the park alongside the bicycle storage facility. The main difficulty with the proposed development at this site allocation is that it would preclude a superior solution for the area, if it were considered as a whole.</p> <p>There is little point in the planners talking about permeability to the park unless they address east/ west permeability through/ over/ under the station.</p>		
234	RSA419	SA 36 and SA37	No (?)	Not stated	<p><b>TfL and the railway station</b> A BIG chunk of residents so close to this key transport node is likely to create a constituency of nimbys who would likely object, frustrate or stop further change or improvement in the area. Housing is needed but it needs to be further away from this <i>key transport node</i>.</p>	Not stated	<p>This is speculative and depending on the design, untrue. The London Plan is clearly in favour of locating new housing in close proximity to transport nodes as a sustainable form of development for London. There are design considerations which can be overcome with elements such as double/triple glazed glass.</p> <p>No change</p>
234	RSA420	SA 36 and SA37	No (?)	Not stated	<p><b>A transport interchange</b> THE area is primarily a <i>transport interchange</i> and about the movement of people. We need statistics of what that movement is going to be and how the arrival of Thameslink would affect it (peak hour traffic to- and from- Highbury and Islington will be challenging, making a Finsbury</p>	Not stated	<p>Cycle routes are shown in the Green Grid policy (DM20).</p> <p>It is not clear how the arrival of Thameslink will make Finsbury Park less desirable, and issues of permeability within the station are</p>

					<p>Park Town Centre /less desirable).</p> <p>Cycle routes: why are they not shown? One of the main ones goes down Finsbury Park Road – but that is not considered relevant to the development area. <b>In the artist’s impression</b> published a while back, part of proposal appears to abolish the East Bus terminus and put all the bus stops onto Seven Sisters Road increasing the walk distance from train – again making the interchange less not more efficient?</p>		<p>outside the scope of the Plan.</p> <p>No change</p>
234	RSA421	SA 36 and SA37	No (?)	Not stated	<p><b>Ticket gates</b></p> <p>THE <b>ticket gates</b> will stop people walking through the station between the two bus stations.</p> <p>It is suggested that this inconveniences few and that the distance to walk is less via Stroud Green Road than through the foot tunnels. This depends on which bus you are catching and where you are dropped off at the terminals – some bus stops are not in the East Terminus but on Seven Sisters Road).</p> <p>There is some disingenuity here. The rail may go northsouth but the east west routes deserve proper consideration.</p> <p>Elsewhere they describe walking under the bridges as unpleasant to be avoided so a route through the station <b>might be desirable can’t</b> have it both ways. To make transport interchanges work better they should interconnect <i>more</i> and that includes making bus station to bus station access better. Schemes that reduce amenity for bus users have been around for a long time. There are enough rail arches/ is sufficient space there to provide an independent walk through, although not a right of way obviously.</p>	Not stated	<p>This is outside the scope of the Plan.</p> <p>No change</p>

234	RSA422	SA 36 and SA37	No (?)	Not stated	<p><b>Footfall</b>  IF Islington and Haringey want more of a sense of place and seamless integration of commercial Stroud Green Road with commercial Seven Sisters Road and Blackstock Road then <b>the 'key' is <i>not</i></b> footfall to Rowans.</p> <p>If this was a footfall issue, we would be talking about Arsenal Football Club match day attendances and how pressure on the Tube system could be relieved if there were more things to do and see before and after games. (Holloway Road Tube station has to close during matches because the area regeneration proposals did not stretch to upgrading that station).</p> <p>Games are no longer solely a Saturday afternoon issue and the ground capacity at Emirates – at a nominal 60,000 – is 20,000 (= <b>over 50%</b>) higher than Highbury's former 38,000. Should we be turning the area more into a hospitality zone – especially if Haringey want more events in the park?</p>	Not stated	<p>It is agreed that footfall between the Station and the Park is not the only issue here. The new link is planned to have leisure and other town centre uses within it, thereby increasing activity and vitality within the Centre</p> <p>No change.</p>
234	RSA423	SA36	No (?)	Not stated	<p><b>Would SA36:</b>  1) remove the play group/garden/playground facility? If so why? To be replaced where? In a south facing not east facing location? Near the tennis courts in winter maybe?  2) make it easier for parents with children to use park benching (and access toilets/ nappy change) near this playgroup area?  3) increase the number of toilets generally for a popular park?  4) stop local supermarkets selling cheap booze to alcoholics?  5) take any account of the number of methadone users who use the chemist opposite</p>	Not stated	<ol style="list-style-type: none"> <li>1) Local Plan policy SP12 is clear that community facilities will not be permitted to be removed unless alternative premises for their rehousing have been found. This is a detailed matter that will be investigated through a planning application.</li> <li>2) If this is a shortcoming of the existing facility, then whatever replaces it should be of a better standard in this regard.</li> <li>3) This is outside the scope of the plan</li> <li>4) This is outside the scope of the</li> </ol>

					for their (daily) fixes? 6) answer the public safety issues/public fears regarding local stabbings (going back to the Zito case)? Highbury police station has closed for conversion to flats: Is the 'new' Blackstock Road shop unit an effective replacement?		plan 5) This is outside the scope of the plan 6) This is outside the scope of the plan. And the borough.  No change
234	RSA424	SA 36 and SA37	No (?)	Not stated	<p><b>Retail and commerce</b></p> <p>TO MAKE more of a sense of place, the arches under the station need to be opened up to encourage movement (footfall) between the east and west commercial areas. The Arsenal Shop might have to give way. Arsenal could buy Rowans as their own 'Nike Town', and show an interest in developing park facilities and support the community life.</p> <p>People travel to <b>Fonthill Road Fashion Shops</b> from far and wide (even from south London): how could this vibrancy be used to make the wider area more commercially viable?</p> <p>Some kind of rival to Petticoat Lane or Camden Market? <b>Where is the planners' vision?</b> That part of Blackstock Road, known as Highbury Vale has secondary shopping on both sides of the road, so please show this on maps. Highbury Vale was known once upon time, in retail terms as the local 'Bond Street'. Where is the vision in the plan for Finsbury Park to be regenerated from the south? <b>The T Bird Drapers's shop was once</b> commercially successful, but is now a wine bar. The area can still not sustain a fishmongers (nearest Nag's Head Market, Highbury Barn, Stroud Green Road, near Tesco). What indices/benchmarks will they be using to demonstrate success? Are any of them based on socio</p>	Not stated	This is outside the Plan area, and the borough.  No change

					economic class presumptions or prejudices?		
234	RSA425	SA 36 and SA37	No (?)	Not stated	<p><b>Concerts</b></p> <p>THE impression given is that this all about Haringey getting planning gain money for some flats on the very edge of its borough. However, the narrow goal of selling more housing at this point sharply conflicts with Haringey's goal of monetizing the park in the shape of increased concerts. The owners of expensive flats will be the most vociferous in opposing the Council's major events policy.</p> <p>Finsbury Park does have its charity shops, pound stores, pawn shops and pay day lenders: what exactly was being sold in the artist's impression market stalls? Why are there no proposal regarding alternative use of the British Transport Police site? (What is BTP's role in preventing stabbings at bus stops under the SSR Bridge?).</p> <p>Finsbury Park concerts are now associated with crime.</p> <p>How useful is the Blackstock Road Police (Shop Unit) for these events? (Or the British Transport Police office for that matter?).</p> <p><i>Once again a Town Centre concept is not about footfall to Rowans.</i></p> <p>The point about the 2,500 objections to more Emirates concerts (never mind Finsbury Park ones) is that many concertgoers arrive/ depart through Finsbury Park station.</p> <p>There can be little doubt a major part of the fans at the notorious Stone Roses fans were seriously inebriated before the shows started. 'A dispersal zone was in place'. Any Town Plan for Finsbury Park has to show dispersal zones on the map. Should/shall there be more toilets?</p>	Not stated	<p>This is not pertinent to the Plan. Meeting Haringey's housing requirement is however the goal of the Local Plan.</p> <p>No change</p>

					<p>The park was 'sticky for weeks' – play there with your toddlers anyone? (Even the dog walkers complained of the underfoot conditions!)</p> <p>Should the artist's impressions now include a <i>piss</i> artist's impression. Who is taking the piss?</p>		
234	RSA426	SA 36 and SA37	No (?)	Not stated	<p><b>Alley way</b></p> <p>THE <b>block of flats</b> proposals features a new <b>alley</b> to the park which looks more and more like a holding pen for 'kettle-ing' concert goers/ departers. Would councillors propose living over a public urinal? Should we be kettle-ing people? Haringey makes money from concerts in the park: but where is the benefit for Islington + Hackney locals??</p> <p>At the Seven Sisters Entrance there is often a fun fair dominating the view. Do you know you can not even see a park bench from the entrance?</p> <p><b>Can't see a circus bench or a pop concert bench</b> to sit on either. Poor people are often described as not having a pot to piss in; the park entrance does not have a bench to sit in (but is a great place to piss apparently). The park (and a sane town centre) is for all ages groups, all of the time.</p> <p>Especially ones too young to vote or too old or poor to afford pop tickets or to get pissed in public. Any Town Plan has to show how it manages big events involving non-locals.</p> <p>Window dressing images of some cosy (provincial rural idyll looking <b>Farmer's</b>) market do not represent the reality of a hard-working urban environment that regularly has high participation metropolitan entertainment events (with which it struggles to deal).</p>	Not stated	<p>It is considered that this is high on conjecture, and low on fact. The details of how the new piece of urban realm will be completed will be the subject of a detailed planning application in the future.</p> <p>No change</p>
234	RSA427	SA 36 and SA37	No (?)	Not stated	<p><b>Town Centre planning</b></p> <p><b>To present a Town Plan as merely about street frontages misses the point.</b> Town</p>	Not stated	<p>The plan is concerned with town centre viability and vitality, and seeks to ensure this is maintained and</p>

					<p>centres are about commercial activity: this means people movement and footfall.</p> <p>The Finsbury Park area needs to be looked at, not in a linear sense of the main roads only, but in terms of people flows, the existing aspects that promote and those that inhibit these flows. It is difficult to create a tranquil and bustling space next to a Red Route (Seven Sisters Road). Has anyone looked at Windrush Square in Brixton? Is it animated in the classic way we associate with Italian plazas or is it just a joyless open space that might only be used for tub-thumping rallies/ public speaking events?).</p>		<p>enhanced through provision of certain activities and uses and control over others that detract from this objective. Movement will be considered as part of a detailed planning application.</p> <p>No change</p>
234	RSA428	SA 36 and SA37	No (?)	Not stated	<p><b>Red-route alert</b></p> <p>NON-RED route sites have to be designed properly too: has any one looked at the Town Square in Walthamstow? The junction of High Street and Hoe Street – this triangular space is just a wide pavement. The animation is in High Street market only. Town squares have the characteristic of enclosure and for the most part (at ground level) human scale. To be human scale you might argue that you should probably be able to walk across the shortest dimension of a square in, say, less than a minute. The space occupied by City North/United House and faced by Wells Terrace could be reconfigured (under a long term plan) to make a great square unmolested by the red route (and complement the bustle of Fonthill road). (It would however reduce large scale local business premises – are they big employers though?).</p> <p>Why did not Islington propose the N4 Library site on Blackstock Road as a Town Square? Why are Islington supporting this proposal for</p>	Not stated	<p>This is not pertinent to the allocations.</p> <p>No change</p>

					flats in Haringey?		
234	RSA429	SA 36 and SA37	No (?)	Not stated	<p><b>First and foremost, Finsbury Park is a transport interchange</b></p> <p>TOWN planning needs to consider Finsbury Park first and foremost as <i>a transport interchange</i>. Interchanges work best when all modes are close to each other so the time taken transferring between two modes is minimized /optimised.</p> <p>The most use of the rail is <i>through traffic</i> but the bus stations are the <i>feeders</i> for commuting locals that live nearby and who support local businesses, on those days when there are no football matches or concerts in the park.</p> <p><b>Destroying the East Bus station would be a big step backwards.</b></p> <p>The <i>cycle park</i> is an initiative to make Finsbury Park more accessible for local commuters. Using bikes to get to the station reduces kiss and ride motorists (who slow traffic at peak times) and is therefore good for pedestrian and traffic flow (and healthier too). Where has the cycle park gone from the artists impression?</p> <p><i>Removal or placing the cycle park at a greater distance is regressive.</i></p> <p>Similarly, for those disabled or otherwise unable to use buses, the Taxi is very important in their lives. Taxi drop off + pick up has to be as close as possible to station entrance. It is surprising—if not disgraceful—that the artist impression appears to have deleted the Taxi rank – this is so regressive (typical of one dimensional where's-my-profit developers' thinking). Is it not regrettable that Islington appears to be supporting this?</p>	Not stated	<p>The cycle parking facility is protected in the plan, as intermodal connectivity is considered a key aspect of the area.</p> <p><b>Additionally the “artist impression”</b> quoted is not Policy.</p> <p>No change</p>
234	RSA430	SA 36 and	No (?)	Not stated	<b>Step-free access and pedestrians</b>	Not	This is outside the scope of the

		SA37			<p>LINKED to this is the need for step-free access street to platform for the rail and tube services. Finsbury Park and Arsenal are among the very few deep level tube stations with no lift or escalator access.</p> <p>Stairs-only access make Finsbury Park unfriendly to visitors. People travel from King's Cross to Angel and then catch a bus to Finsbury Park because it is easier for them to carry their luggage that way.</p> <p>Retail at Finsbury Park suffers because of lack of step free access. Why is Finsbury Park not a (higher) TfL priority for escalators or lifts? Revenue loss between Heavy Rail and Tube has been an issue and turnstile gates are being included at last at Finsbury Park station. However this entails stopping bus station to bus station users transferring via the foot tunnels.</p> <p>This is <i>regressive</i>; it might meet the needs of TfL/ Network Rail revenue protection but it reduces the amenity for locals. Everyone agrees that walking under the still-pigeoninfested bridges on Seven Sisters Road and Stroud Green Road is miserable.</p> <p>TfL/NR benefits from mass attendance at sports and park events: why are they making life more difficult for locals (at all times)?</p>	stated	<p>allocations to address.</p> <p>No change</p>
234	RSA431	SA 36 and SA37	No (?)	Not stated	<p><b>The key concept</b>  <b><i>The key to any concept of 'Town Centre Finsbury Park' is the station and improving East /West permeability.</i></b></p> <p>Opening up Station Place to the Public Park is quite literally a side issue (for reasons previously discussed). The railway arches under the rail viaduct could be opened up to</p>	Not stated	<p>This is not pertinent to the allocations.</p> <p>No change</p>

				<p>encourage people movement: the ambience of these tunnels could match that at London Bridge?</p> <p>The more people movement there is the more retail opportunity, the more self-policing surveillance goes on. The poor management of <i>Live-Nation</i>- type events makes the Town Centre unattractive and makes it a no-go area in <b>people's mind for not just concert days</b> but other days too.</p> <p>Lots of people avoid shopping locally on match days. <b>Let us see the 'dispersal zones' (for 30,000 people) on the Maps.</b></p> <p>Let us see some benchmarking against the measures Brent Council took in preparation for/response to the new Wembley Stadium (not all favourable/progressive). People-friendly initiatives are taking place: pavements have been widened to assist pedestrians going to/from the Emirates.</p> <p>Cycle Routes are being taken off the main roads through side streets – but they should be recognised as part of the hierarchy of spaces and uses that contribute to a balanced and well-thought-out town centre. Let us see them <i>on Maps.</i></p> <p><b><i>Successful town squares</i></b> are often one-street back from a 'red route' thoroughfare (looked at Christopher Place in relationship to Oxford Street?). Finsbury Park Station is a significant <b>asset on London's</b> transport infrastructure (and a no-brainer missed opportunity for more commercial development): how many places in Zone two are so well served? (None, probably, <b>including Islington's favourite, Upper Street</b>)</p> <p>Finsbury Park can support commercial activity in the form of office blocks. Workplaces, retail and social/leisure activities <i>should be close to</i></p>	
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					<i>the station.</i>		
234	RSA432	SA 36 and SA37	No (?)	Not stated	<p><b>Housing</b> HOUSING, should be slightly further away so as not to be disturbed by trading. People also work shifts so bedrooms should be further away from noisy rail lines. It is noted that this block of flats is being promoted at the same time that house-owners in local streets are refused dormer windows to do loft conversions – an increase of housing density within walking distance of the station (or one or two bus stops) that would be sustainable. (The local area is not a conservation area, dormers do not overlook the way high rise flats do – compare issues with those for redeveloping Camden Town.)</p> <p>Finsbury Park Station as a prime location could justify over site development, raising commercial activity density to finance escalators etc.</p> <p>Putting denser housing closer to a remote outer suburban station might be justified because reduced footfall means there is less scope for commerce (yes this can be a circular argument). Not for nothing does the Square Mile discourage housing because it becomes an obstacle to commercial redevelopment/ economic activity.</p> <p>Finsbury Park is so well connected to the transport system it should be a work destination: London plc has to use or sweat its assets if it is to provide employment (compete locally and globally).</p> <p>Along the Islington side of Blackstock Road in recent years, the Pickfords Depository and the petrol station sites that once provided employment were converted to housing</p>	Not stated	<p>The Council disagrees with the premise, and supports appropriately designed mixed use development including residential uses in close proximity to rail hubs.</p> <p>No change</p>

					<p>(and one of them a gated community) not even work-live units. Unless local children grow up seeing (small) scale business around them, what ambitions will they have?</p> <p><b>Also we should be encouraging people to work locally and not commute long distances? What are the <i>Islington</i> Planners thinking of?</b></p> <p>Converting Rowans to housing is another (shameful) dumbing down of <b>the area's</b> potential. This is not leafy suburbia, it should be bustling city-life-driven commerce. The aspirations for the area across Stroud Green Road looks like a plan by Islington to <i>reduce</i> the potential of Finsbury Park.</p> <p>Housing this close to Finsbury Park is not ideal and the long term potential for Nimbyism is a conflict to be avoided.</p>		
234	RSA433	SA 36 and SA37	No (?)	Not stated	<p><b>Thameslink</b></p> <p>WHEN Finsbury Park gets Thameslink services (2018?) more transfers between trains will happen.</p> <p>At present at rush hour often the only way locals can get onto a Victoria (or Piccadilly) line train is because of the transfers taking place. Often locals have to wait several trains before they can board, never mind get a seat. This will get worse when Thameslink (otherwise very welcome) arrives. In the event of major <b>incidents at King's Cross</b>, it is Finsbury Park that is used to de-train passengers, so Finsbury Park has many strategic purposes. People using Thameslink may well want to transfer to the London Overground at Highbury and Islington to reach Docklands.</p>	Not stated	Noted.
234	RSA434	SA 36 and SA37	No (?)	Not stated	<p><b>Overground</b></p> <p>ALREADY this stretch of Victoria Tube line is at</p>	Not stated	This response seems to suggest that what is proposed is a purley

					<p>capacity. How long before the idea of a London Overground branch to Finsbury Park is revisited?</p> <p>Where would such platforms (no) go? And what objections would these newly arrived flat owners then raise?</p> <p>Maybe a London Overground branch would/could not terminate at Finsbury Park and would need to go on to Alexandra Palace (to connect with Crossrail 2?)</p> <p><b>Any Finsbury Park Town Plan proposal has to look at the strategic future of Finsbury Park as a major London asset.</b></p> <p>Key urban sites (adjacent major transport hubs) should be active revenue generating; not passive housing. <i>The closer to mass footfall a site is, the more commercial it should be.</i></p> <p>If commuters/ employers/ planners of all three boroughs saw Finsbury Park as a destination, the potential for economic growth would be great because so many people can access the station.</p> <p>Turning prime sites next to the likes of Finsbury Park into sleepy housing is an abomination and is denying future work opportunities to the local economy.</p> <p><b>This would be a seriously regressive, backwards step that is not easily reversed and will compromise future progressive ideas. These are half-baked plans. Whether or not planners manage to force them through, the documents will stand as a monument to lack of vision and a text book case as to how <i>not</i> to do town planning.</b></p>		<p>residential scheme. It is not, it is a mixed use scheme seeking to secure a new active piece of urban realm in Finsbury Park.</p> <p>Issues of train frequency are outside the scope of the plan.</p> <p>No change</p>
234	RSA435	SA 36 and SA37	No (?)	Not stated	In support of his representations, Councillor Carter attaches some general comments on the proposals from 2 years ago	Not stated	These have been taken into account in previous iterations of the Plan.

Respondent 235: Pinkham Way Alliance +1,488 Supporters

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
235	RSA436	SA52: Pinkham Way	No	Not stated	<p>[Strategic Risk Assessment Prepared by: Paul Scott BSc(Hons) Dipl Arch Cert APDM ARB RIBA - Chartered Architect &amp; Project Manager also attached in support of Pinkham Way Alliance reps]</p> <p><b>Introduction and summary</b></p> <p>1 This submission will argue that the local plan documents are not sound because they are not in compliance with NPPF, The London Plan 2015, Haringey's Local Plan 2013 and planning guidance. In particular, the planning decisions on the Pinkham Way site are not justified because they are not positively prepared and are not based on sound objective evidence. Instead we believe they have been driven by political pressure.</p> <p>2 The Council is treating this site as if it was a derelict brownfield site suitable for development, rather than a green open space that is an important part of a larger ecological complex and corridor, including other SINC's (Hollickwood Park, Muswell Hill Golf Course, Tunnel Gardens and Bluebell Wood, Albert Road Rec and Rhodes Avenue Spinney).</p> <p>3 The site has been mainly undisturbed for over 50 years "making it a rare resource for Haringey of high ecological value."<sup>12</sup> As such, it should be given the highest protection in the local plan.</p> <p>4 The plans are not Positively Prepared. In so far as Pinkham Way site is concerned the Site Allocations DPD and the</p>	Not stated	<p>The Council continue to view this site as a brownfield site which is suitable for development, specifically that which makes a contribution to <b>the borough's</b> strategic employment need.</p> <p>The Council disagrees that the plan is not positively prepared, as it takes account of the wider strategic needs of the borough to which this site has the potential to contribute.</p> <p>It should be</p>

					<p>Development Management DPD have not been positively prepared and are not based on an objective assessment/strategy for development on the site.</p> <p>5 For example, there are no development plans or indicative development capacity shown for the site in the Site Allocations DPD unlike all the other sites and no cognisance has been taken of the fact identified by LUC in the Open Space Study that there is a deficiency of local open space in the western zone of the borough.</p> <p>6 The plans are not Justified. There is no justification for this site to be included in the Site Allocations DPD as there are no proposals for its future use. No other site is included simply to protect its planning designation.</p> <p>7 The Council has produced no evidence to support its inclusion and has not explored reasonable alternative uses for the site.</p> <p>8 The plans are not Effective. Atkins in their Employment Study 2015 advised that the Pinkham Way site is unlikely to be brought forward for development during the plan period; The GVA viability assessment on the Pinkham Way site found that the site <b>was not viable “there was no analysis of a 100% commercial scenario”</b>; LUC advised in the <b>Open Space Study 2014 that the site was of high ecological value and a rare resource for Haringey, indicating that the site is not deliverable.</b>The Environment Agency advised the Council that the site falls within flood zones 1 2 and 3 classified by the National Planning Practice Guidance as having a low medium and high risk of flooding from rivers.<sup>13</sup> This increased flood risk affects the deliverability of the site.</p>		<p>noted that the site is included in the draft NLWP as a potential area of search for the provision of waste management facilities. The landowners have also confirmed the site is available and deliverable for its allocated use.</p> <p>No change</p>
235	RSA437	SA52:	No	Not stated	<b>The Pinkham Way Site and political pressure</b>	Unless this	It is agreed that

		Pinkham Way		<p>1.1 The Pinkham Way site currently has a dual planning designation: Site of Importance for Nature Conservation, Borough No 1 value and Employment Land.</p> <p>1.2 It is an open green space that has been vacant for over 50 years. Its ecological value is acknowledged by its SINC designation. See Haringey Council's site map of Pinkham Way SINC below.<sup>14</sup></p> <p>1.3 It is part of a larger ecological complex and corridor including other SINC's (Hollickwood Park, Muswell Hill Golf Course, Tunnell Gardens, Bluebell Wood, Albert Road Rec and Rhodes Avenue Spinney).</p> <p>1.4 A watercourse running in a culvert beneath the site is highlighted in the London Rivers Restoration Action Plan for de-culverting.</p> <p>1.5 There is a substantial amount of sound evidence to support retention of the SINC designation which the Council has accepted. However, there is no sound objective evidence to support retention of the Employment designation. On the contrary, as will be seen later in this submission, there is a substantial amount of evidence to support its removal.</p> <p><b>Political Pressure</b></p> <p>1.6 The current attempt by Haringey Council to cling on to the employment designation in the absence of sound evidence to support it is, we believe, driven by political pressure, not by sound objective evidence.</p> <p>1.7 This political pressure arises from Haringey Council's conflicted position as Local Planning Authority for the</p>	<p>change was made for sound planning reasons and unless the Council can justify it, the delineation of DEA 6 should retain its original boundary.</p>	<p>the site has ecological value, and the Site Allocation makes provision for how biodiversity can be preserved and enhanced through any redevelopment.</p> <p>Regarding the ecological corridor overlapping with the 2013/2006 SSP/DEA, the Council's view is that it is appropriate that the site boundary does not include the section of Ecological Corridor. It is noted at present that the DEA currently overlaps the Ecological Corridor, but the proposed Site Allocation</p>
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				<p>Pinkham Way site and as a member of the North London Waste Authority. Over the past five years, PWA and residents have watched the Council's losing struggle to manage this conflict.</p> <p>1.8 The catalyst for the conflict was the NLWA's purchase of the majority of the Pinkham Way site at a cost of more than £12m in December 2009.</p> <p>1.9 At the time of the purchase the site was a designated Site of Importance for Nature Conservation, and was part of a designated Ecological Corridor. It was also designated for employment but had no planning consent and no established use. It was acquired secretly,<sup>15</sup> and in haste,<sup>16</sup> from Barnet Council, in anticipation of a PFI bid to support the major Waste Procurement the NLWA was pursuing at that time.</p> <p>1.10 Following completion of the purchase in 2011, a joint Barnet/NLWA planning application was submitted to Haringey Council for (a) an MBT Waste Facility for the Waste Authority and (b) a Refuse Collection Vehicle Depot and passenger transport depot for Barnet Council.</p> <p>1.11 Subsequently, the MBT Waste project was abandoned as unnecessary, the PFI bid and the Waste Procurement failed, and the planning application was withdrawn.</p> <p>1.12 The Waste Authority is now holding a 4.5 ha open green space, all of which is subject to a <i>dual designation of Site of Importance for Nature Conservation, Borough No 1 value and Employment Land</i> and part of which is <i>designated Ecological Corridor</i>.</p>	<p>boundary does not. It is considered appropriate that the DEA and Site Allocation are the same. <b>As such the DEA will be amended to reflect the Site Allocation.</b></p> <p>The allocation is based on evidence of need and deliverability</p>
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				<p>1.13 The importance of retaining the employment designation was pointed out at a meeting of the NLWA last year<sup>17</sup> “If the employment designation for the site is removed, and the site is only designated as a SINC, it is unlikely to pass any screening assessment ..... in the North London Waste Plan and it will be very difficult for NLWA to seek a waste use on the site.”</p> <p>1.14 Haringey Council is unable to produce sound objective evidence to support the retention of the Employment designation on this site. As we will demonstrate in this submission, all the objective evidence provided to the Council (by their own consultants as well as others) supports the removal of this designation.</p> <p><b>Identification, size and extent of the site</b></p> <p>1.15 This site has been given many different identities and references by Haringey Council, and others, over the years. it has been referred to variously as SA 46; SA 49; SA 53; MH3;DEA 6; and LEA 4.</p> <p>1.16 In the current Site Allocations document it is referred to as SA52: Pinkham Way but its planning designations are set out as; Local Employment Area: Former Friern Barnet Sewage Works employment land and SINC Borough grade I: Friern Barnet Sewage Works.</p> <p>1.17 Constantly changing references tend to lead to confusion. The site has not been used as a sewage treatment for over 50 years. For the sake of clarity, we propose that the Council simply uses the name Pinkham Way Site and then follows with whatever planning designation applies.</p> <p><b>Employment Land designation</b></p> <p>1.18 It would appear from comparing the plan of SA52 shown on</p>	
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				<p>page 128 of the Council's Pre-Submission Site Allocations DPD 2016 and the plan identified as DEA 6 on the Council's proposals map that the area of the designated Employment Land for the Pinkham Way Site has been altered.</p> <p>1.19 The site area on the above plan is given as 6.6 ha. The eastern boundary of the site is shown as part of the designated Ecological Corridor listed No 2 in Schedule 6 of the Reg 19 Site Allocations DPD as: Great Northern Line Railsides from Finsbury Park to Bowes Park and New Southgate stations and Wood Green Tunnel Gardens.</p> <p>1.20 This was confirmed by the Council on 22 February 2012 when they answered the Inspector's question "Is the site part of a designated green corridor?"<sup>18</sup></p> <p>1.21 The answer given was "A small portion of the north-east corner of the site forms part of a designated ecological corridor. This can clearly be seen on the UDP map dated 2006 in the middle of the eastern side of grid reference E4. The portion of the site that is a designated ecological corridor forms part of the embankment of a railway line. That part of the site that forms part of the ecological corridor comprises 2544 msq".</p> <p>1.22 However, the map in the Site Allocations Pre-Submission 2016 version no longer shows the site as part of the Ecological Corridor and the size of the DEA appears to have shrunk from 6.5ha to 5.95ha.</p> <p>1.23 The description has also changed. The DEA is no longer referred to as part of the Ecological Corridor but we are now advised that "The area in the vicinity of the north eastern corner of the site (along the rail line) is an ecological corridor and any development should serve to enhance this function."</p>		
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					<p>1.24 No explanation is given for this change and we can find no reference to it. If there is a sound planning reason for changing the area of the DEA it should be set out. If there is no sound planning reason then it should not have been changed. Either way, it should have been flagged up as a proposed change in the Site Allocations DPD.</p> <p>1.25 The Council is proposing to delete SSP5 as part of the current local plan review. The protection given to the Pinkham Way site in this policy is stronger than the protection given in the new SP13 and we would object to its removal in the event that the Employment Land designation is retained on the site.</p> <p>1.26 A core principle of the NPPF is that planning should be genuinely plan led. Planning authorities should objectively balance assessed needs against adverse impacts that would significantly and demonstrably outweigh the benefits.</p> <p>1.27 A policies map must illustrate geographically the application of policies in a development plan. The policies map may be supported by such other information as the Local Planning Authority sees fit to best explain the spatial application of development plan policies.</p> <p>1.28 The National Planning Policy Framework (NPPF) (2012) sets out the Government's national policies on different aspects of planning in England. Section 10 paragraphs 109 to 125 detail planning policies on the conservation and enhancement of the natural environment.</p> <p>1.29 Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. In summary, it states that the planning system should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> <li>• <i>'minimising impacts on biodiversity and providing net gains in biodiversity where possible,</i></li> </ul>	
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				<ul style="list-style-type: none"> <li>• <i>contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.</i></li> <li>• <i>opportunities to identify land where development would be inappropriate, for instance because of its environmental or historic significance; and</i></li> <li>• <i>contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.</i></li> </ul> <p>1.30 Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p> <p>1.31 There is no evidence that the Council gave any consideration to the implications of changing the boundaries of this DEA or to the implications of changing the boundary of the designated Ecological Corridor.</p> <p>1.32 It appears that this change has not been made on proper planning grounds but rather at the request of the NLWA. We set out our reasons for taking this view below.</p> <p>1.33 In its response to the Call for Sites in 2013, the NLWA enclosed an extract the map of DEA6 (see above) and identified certain points of the DEA 6 site boundary which were contiguous with the surrounding MOL boundary.</p> <p>1.34 They also stated that “The adjacent railway line and cutting to the east of the site forms a designated Ecological Corridor.”</p> <p>1.35 The NLWA referred to an enclosed plan (Pinkham Way Site Ownership MOL Plan) and proposed that the DEA boundaries “be redrawn to remove such anomalies ....”.</p> <p><b>Conclusion</b></p> <p>1.36 Unless this change was made for sound planning reasons</p>		
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					<p>and unless the Council can justify it, the delineation of DEA 6 should retain its original boundary.</p> <p><u>Footnotes</u>  <sup>2</sup>EA letter of 25 March 2015 to LBH  <sup>3</sup> Haringey Open Space and Biodiversity Study Oct 2014 - Site B7  <sup>4</sup>The contract for sale dated 17 Dec 2009 contained a ‘no disclosure of purchase’ secrecy clause (para 20.01)  <sup>5</sup>The seven London Councils which make up the NLWA were given 24 hours’ notice to sign up to the PFI bid  <sup>6</sup>NLWA Report ‘Consultations and Policy Update’ 25 June 2015  <sup>7</sup>Haringey Councils list of written Inspectors Questions for EiP hearing on 22 February 2012</p> <p>[representation also contains maps]</p>		
235	RSA438	SA52: Pinkham Way	No	Not stated	<p><b>Section 2.</b>  <b>The Site Allocations DPD Pre-Submission version is not sound for the following reasons:</b>  <b>Not Positively Prepared</b></p> <p>2.1 In so far as Pinkham Way site is concerned this document is not positively prepared. It is not based on an objective assessment/strategy for development on the site.</p> <p>2.2 Under the heading Proposed Site Allocation, it states “protection of the site for employment use, subject to appropriate protection of nature conservation status.” Under Indicative Development Capacity, none is identified.</p> <p>2.3 All other sites include proposals for various types of redevelopment and have indicators of indicative development capacity expected from the site – even sites such as Alexandra Palace and Tunnel Gardens which also have no indicative development capacity identified have proposals for a range of additional uses, improved connections, renewal/replacement of defective housing etc.</p> <p>2.4 There are no proposals whatsoever for the Pinkham Way site other than to protect its employment designation. No anticipated indicative capacity is shown. For what purpose is it allocated in</p>	As set out	<p>This Site Allocation, as PWA posit, is principally a renewal of the dual designation Employment Land and SINC designations the site currently holds.</p> <p>It is noted that a range of options have been proposed for delivery of the site, notably from the landowners that the site is appropriate for continued employment use, from the</p>

				<p>the SA DPD? If the Council can identify no other purpose than protecting the employment designation then it should be removed.</p> <p><b>Not Justified</b></p> <p>2.5 There is no justification for this site to be included in the Site Allocations DPD as there are no proposals for its future use. No other site is included simply to protect its planning designation.</p> <p>2.6 The Council has produced no evidence to support its inclusion and has not explored reasonable alternative uses for the site which it might reasonably have been expected to do given that</p> <ul style="list-style-type: none"> <li>• the Biodiversity Study advised that the site was “of high ecological value and a rare resource for Haringey”</li> <li>• the Open Space study identified deficiency of local open space in the vicinity of the site,</li> <li>• the Employment Study advised that the site was not suitable for the type of employment uses anticipated in Haringey over the plan period and that it was unlikely to be brought forward anyway during the plan period because of its location and contaminated state.</li> <li>• the GVA Viability Assessment of Pinkham Way, even with its sympathetic approach which we discuss elsewhere, found that a development that was purely employment would not be viable under any scenario on this site.</li> </ul> <p>2.7 Reasonable alternatives to explore might have been its potential value as local open space or as a Local Nature Reserve, or as natural green space providing educational value and access to nature for local people and schools.</p> <p>2.8 To support such a proposal, PWA submitted a Five Year Site Management Plan to Haringey in 2014. This had wide community support and over 100 people gave their commitment to ensure its practical implementation. The Plan remains with the Council</p>	<p>PWA who have suggested a range of uses focusing on ecological, educational, residential, retail, hotel, and open space uses, and more recently from TfL/ GLA as potential for high density redevelopment linked to a Crossrail 2 and A406 decking proposal.</p> <p>In terms of proposing a positive use for the land, it is considered that the employment designation is appropriate as it secures a designation that the landowners believe is deliverable and meets identified strategic needs.</p> <p>If a more ambitious future for the site</p>
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					<p>pending consideration.</p> <p>2.9 Enfield Council, in its response to the Site Allocations DPD consultation 2014, requested discussions with Haringey about future uses of the site in the context of the Enfield Action Area Plan. That plan includes the development of a significant number of additional residential dwellings close to the boundary of both boroughs, a large number of which have already been erected with no provision for local open space. PWA considers this a lost opportunity for cross borough cooperation which could have provided some natural green space for the wider community.</p> <p><b>Not Effective</b> 2.10 Atkins advised it is unlikely to be brought forward during the plan period and LUC advised it was of high ecological value and a rare resource for Haringey – presumably they did not have in mind its development as a waste transfer station, for example.</p> <p>2.11 The only joint working we are aware of is the participation of Haringey in the North London Waste Plan preparation where the site has been identified as a potential waste site although any reference to this possibility has been positively avoided in this document and throughout the consultation process.</p> <p><b>Not Consistent with National Planning Policy</b> 2.12 The document is not consistent with National, Regional or Local planning policy and we have dealt with this in some depth on pages 25-26.</p>		<p>comes forward, as indicated by GLA/TfL, it is considered that ensuring the employment designation is retained is consistent with ensuring the deliverability of the current landowners aspirations, without compromising any future development. It is considered that the alternative option, a removal of the designation, and an open space designation as proposed by PWA would compromise both the current landowners aspiration, and a potential long term vision from GLA/TfL.</p> <p>No change</p>
235	RSA439	SA52: Pinkham	No	Not stated	<p><b>Section 3</b> <b>Local Plan Documents are not in compliance with the</b></p>	As set out	The council believe the Plan

		Way		<p><b>Statement of Community Involvement (SCI) 2015</b></p> <p>3.1 Page 9 of the SCI sets out a list of Aims for the Haringey Planning Service. This section will comment on the first, second and fifth aims.</p> <p><b>First Aim is to ‘Ensure Consultation is Effective’:</b></p> <ul style="list-style-type: none"> <li>• <i>By providing relevant information and sufficient reasons for any proposal to permit intelligent consideration and response by all affected parties.</i></li> </ul> <p>3.2 The Council concealed material evidence prepared by their consultants, GVA, about Pinkham Way’s non-viability as employment land during the consultation process, and failed to include it or refer to it at any of the Council Committees during the process of considering changes to the Local Plan.</p> <p>3.3 The council was finally forced to disclose it under Fol, in May 2015, several weeks after the consultation period ended, and it continued to try and diminish its importance by claiming it was not ‘evidence’ but a ‘think piece’, ‘presentation slides’ etc. it is however listed on the Council’s website as supporting evidence for the local plan documents.</p> <p>3.4 When the Council passed PWA’s response to the Regulation 18 to the NLWA in May 2015 with an invitation to make further post-consultation comments, it again concealed the document, as it was not passed to NLWA, nor was it passed to Atkins when they undertook the Employment Study. The Council also failed to disclose to NLWA both PWA’s critique of the GVA viability assessment and the ongoing correspondence about it and about other matters relevant to the local plan evidence. Thus NLWA only received part of the picture.</p> <p>3.5 The resulting response from NLWA, prepared by ARUP at public expense, was therefore compromised as they were unable to address the material issues of the viability evidence and our critique of it and of other matters.</p>		<p>to be in conformity with the SCI.</p> <p>In all of the examples cited, the Council has published information in a timely manner once it has been requested.</p> <p>The argument relating to non-viability of the site is mute, as the owner supports the existing designation and confirms an employment use of the site is deliverable without giving rise to viability concerns.</p> <p>No change</p>
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				<p>3.6 As a result of this, the Council is not in a position to give full consideration to the viability evidence produced by GVA. See pages 34-35, where we discuss the reliance of the Council on the landowner’s claim that the site is viable<sup>19</sup>.</p> <p>3.7 It is clear to PWA that the assessment was concealed because it did not provide the evidence the council was hoping for; it did not support the decision to retain the Employment designation on the Pinkham Way SINC.</p> <p>3.8 On the contrary, it confirmed the site’s non-viability in that “there was no analysis of 100% commercial scheme as this returned a negative residual value under any scenario”<sup>20</sup></p> <p><b>Second Aim is to ‘Ensure Consultation is Transparent</b></p> <ul style="list-style-type: none"> <li>• <i>By being up front about any potential conflicts of interest and how these are to be appropriately managed to meet public expectations of integrity.</i></li> </ul> <p>3.9 During the last review of the local plan in 2010 the Council responded to NLWA’s urging by re-designating the site as Locally Significant Industrial Land, with the justification that it: <i>‘Complies with pre-application discussions which have already taken place to use part of site for recycling centre and other part as waste station,’ leaving a revealing image of bullying by a powerful developer towards a subservient planning authority that has resonated ever since.</i></p> <p>3.10 PWA challenged the re-designation and the Inspector refused to allow it on the grounds it was not justified by supporting evidence.</p>		
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				<p>3.11 After the publication of the EiP Inspector’s Report rejecting the redesignation, the Council felt obliged to issue a public statement on Pinkham Way in March 2013, in which it committed itself to openness and transparency, thus setting out, in the words of the SCI, the ‘integrity the public should expect’ as far as its dealings on the Pinkham Way site were concerned. The reality, as this submission illustrates, has been quite the opposite.</p> <p>3.12 The Council has been less than ‘upfront’ about the link between the North London Waste Plan and the Site Allocations DPD in so far as the Pinkham Way site is concerned.</p> <p>3.13 Section 1.3 of the LUC Open Space and Biodiversity Study 2014 states that it is to ‘inform and support’ the Local Plan and the NLWP. Of all the Haringey sites in the NLWP, Pinkham Way alone required Open Space assessment. It is thus the <u>only</u> link between the Open Space study and NLWP.</p> <p>3.14 Haringey’s conflict was how to avoid assessing as open space a site whose status was a matter of fact and not a matter of judgement. We discuss how it dealt with that conflict, whilst simultaneously concealing it, in the section on Open Space.</p> <p><b>Fifth Aim is to ‘Ensure consultation findings are Accountable’</b></p> <ul style="list-style-type: none"> <li>• <i>By publicising the responses and providing feedback to participants</i></li> </ul> <p>3.15 The Council undertakes that ‘<i>All responses will be made available online</i>’ (SCI 5.3.1). However, it omitted PWA’s submission from the consultation responses uploaded on June 30<sup>th</sup> 2015. PWA had to ask twice before the Council finally uploaded it some two weeks later and were unable to give a satisfactory reason for this omission. (The variety of explanations from the planning officer, Mr Goldberg, became known within PWA as “The Goldberg Variations”!) During that two weeks it had been unavailable for inspection by Regulatory Committee and Cabinet members preparing to consider the draft North London</p>	
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				<p>Waste Plan. When we raised this we were told that “members had been fully briefed on PWA’s concerns.”</p> <p><b>Consideration of Local Plan - Regulatory Committee (21 September 2015) and Cabinet (20 October 2015)</b></p> <p>3.16 We believe that the reports to both these committees deliberately concealed the extent of concern felt by local residents about the site and the strength of support for the PWA submission by referring to it as a ‘<i>petition</i>’.</p> <p>3.17 We pointed this out, and, at the full Council meeting on 23<sup>rd</sup> November 2015 a verbal correction was made. However, this correction was omitted from the Council minute of that meeting. So there is still no formal record of our submission and supporting evidence or of the extent of support for it in the local community.</p> <ul style="list-style-type: none"> <li>• <i>By explaining how the responses to consultation have been conscientiously taken into account</i></li> </ul> <p>3.18 At a meeting between the Council and PWA<sup>21</sup> the Council admitted to not having read PWA’s March 2015 submission, a 26-page document of substantive and detailed evidence with 10 appendices. The Council also told PWA at the same meeting that the site had been included in the forthcoming draft NLWP, which was published shortly afterwards. So far from being ‘conscientiously taken into account’, PWA’s evidence (and presumably evidence from other respondents) had not even been opened before the Pinkham Way Site was offered up as waste site fodder.</p>		
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				<p>3.19 Subsequent to that meeting, the Council advised PWA that<sup>22</sup></p> <p><i>We have now had sufficient time to digest and consider the submission, including seeking the views from the Council's Nature Conservationist and it is our conclusion that the evidence submitted does not support automatic exclusion of the site and therefore it is reasonable to test the site through the development plan process and allow all parties to express their views before taking a decision on the future of the site.</i></p> <p>3.20 What the Council is effectively saying here is that 'evidence submitted' is insufficient to reverse a decision which breached the established consultation rules and was anyway based on evidence the Council would reasonably have known to be wholly unsound.</p> <p>3.21 No evidence was produced on the Conservation Officer's views. Thus PWA cannot comment except to say that, were they as described, their emphasis would have differed from his views written on behalf of the Council's Parks' Service a few months previously where he said that</p> <p><i>"if employment uses were not economical for this site then it should remain undeveloped for its ecological importance and the employment designation should be removed".</i></p> <p>3.22 And in response to the proposed relocation of businesses from regeneration areas in other parts of the borough to improved premises on Pinkham Way he said</p> <p><i>"this is not acceptable as if existing or alternative sites exist for development then a SINC should not be developed".<sup>23</sup></i></p>	
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				<ul style="list-style-type: none"> <li>• <i>By linking decision-making to robust, consistent and sound grounds.</i></li> </ul> <p>3.23 Since the March 2013 public statement on Pinkham Way, the Council has repeatedly said both publicly and in meetings with PWA that decisions will only be made that are 100% ‘evidence-based’ and that the process would be ‘open and transparent’. As is shown elsewhere in this submission, the Council either simply ignored inconvenient material evidence or refused to seek it. It has:</p> <p>a) ignored unambiguous evidence from its professional advisors on the site’s unsuitability for employment and recommendations for such sites whilst itself having offered no positive evidence;</p> <p>b) as a basis of its strategic policy, relied on claims of viability from one site-owner, evidence for which is apparently unavailable</p> <p>c) failed to assess properly the site’s Open Space value as it had promised, and in particular failed to apply both its own definition of Open Space and relevant Local Plan commentary;</p> <p>d) quoted other specious grounds to support its decision that the site is not Open Space;</p> <p>e) distorted its own Open Space &amp; Green Grid policy DM20 to exclude Pinkham Way SINC from the Haringey Green Grid as a SINC/natural green space,</p> <p>f) regarding the culverted water course, has failed to apply its own policy properly</p> <p><u>footnotes</u>  <sup>8</sup>Letter from LBH to PWA dated 6 July 2015 from Assistant Director of Planning  <sup>9</sup>Email from LBH to E Ryan 26 May 2015 (Gavin Ball LBH)  <sup>10</sup> Meeting 20 May 2015 between PWA and council officers  <sup>11</sup>Email from LBH to E Ryan PWA 29 May 2015</p>		
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					<sup>12</sup> Ian Holt's internal response to Haringey's Site Allocations DPD Reg 18 consultation Document October 2014		
235	RSA440	SA52: Pinkham Way	No	Not stated	<p><b>Section 4</b></p> <p><b>Open Space Status</b></p> <p>4.1 PWA considers that the Pinkham Way SINC, shown in the picture below, is open space. We set out evidence below to show that not only does it fall squarely within the definition of Open Space given in the NPPF, the London Plan 2015 and the Council's own Local Plan glossary, but that it has been used as open space for recreation by local residents and others over a long period.</p> <p>4.2 Haringey Council does not agree that the site is open space and set out the following reasons for that view in a letter last September 2015: <sup>24</sup></p> <ul style="list-style-type: none"> <li>(i) its secure enclosure,</li> <li>(ii) the remains of existing structures,</li> <li>(iii) the outcome of the Village Green Application and</li> <li>(iv) the adopted designation in the Development Plan</li> </ul> <p>4.3 These reasons are unsound. The Council has produced no evidence to support them and therefore is not justified in its refusal to acknowledge and protect the Open Space status of the site in the Local Plan and has no justification in refusing to undertake a proper assessment of the quality of its open space value.</p> <p><b>Definition of Open Space</b></p> <p>4.4 The Council defines Open Space in the glossary to the Local Plan as "All land in London that is <i>predominately undeveloped</i></p>		<p>The Council do not believe that the site is open space. It is privately owned land which the owner intends to develop. To provide it with an open space designation would not only be undeliverable, as the landowner has not indicated any intention to develop the land for this purpose, but would also compromise meeting the borough's objectively identified employment needs.</p> <p>The Council does not believe that this Site is, should be</p>

				<p>other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, <i>whether in public or private ownership</i> and <i>whether public access is unrestricted, limited or restricted.</i>" (our emphasis).</p> <p>4.5 The definition does not support the Council's view.</p> <p><b><u>LBH Reason (i) "its secure enclosure".</u></b></p> <p>4.6 In a letter dated 6 July 2015 the Council stated that "Pinkham Way was excluded from the LUC Open Space Study in October 2014 because it was not publicly accessible – a key requirement of the study.</p> <p>4.7 The open space definition is quite specific on accessibility. A site may be completely fenced off and completely inaccessible to the public and still be classified as open space. As it happens, the public had access to the site and used it for recreational purposes up to 1994<sup>25</sup>.</p> <p>4.8 SP13 sets out the Council's policy for Open Space and Biodiversity. Paragraph 6.3.4. states that "the level of public access is not a criterion for definition. Where desirable, and where the open space in question has identifiable value, the council will resist any development that results in a net loss of this open space"</p> <p>4.9 It is difficult to see why the Pinkham Way site was singled out for exclusion from the review since the following sites were included in the LUC Open Space Study even though they had no public access either. Plevna Crescent/Ermine Rd; West Junction, Markfield Railway Triangle; The Park/Southwood Lane Wood; Station Road (Palace Gates Embankment); Tile Kiln Lane</p>	<p>allocated, or is deliverable as open space.</p> <p>It is considered that the evidence offered shows that there is not a need for an additional local open space on and around this site, which is well served by Hollickwood Park, and the Park immediately north of the A406. It is also not an area which is planned to accommodate the borough's growth in the current spatial strategy.</p> <p>No change</p>
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				<p>covered reservoir; Railway Line; Cranford Way and Tewkesbury Close.<sup>26</sup></p> <p>4.10 In our view the Council has not justified the exclusion of Pinkham Way from the open space study.</p> <p><b><u>LBH Reason (ii) “the remains of existing structures”</u></b></p> <p>4.11 This reason is more relevant to the issue of brownfield land which we deal with later but for the purposes of this section we will address it here also.</p> <p>4.12 The open space definition requires land to be <b>predominately undeveloped</b> except for buildings or structures that are <b>ancillary to its use as open space</b>, for example, benches, pavilions, huts, sheds etc. Pinkham Way SINC is totally undeveloped and the site has been vacant for over 50 years.</p> <p>4.13 The fact that there are no buildings on the site was accepted by the Council when it agreed to remove the Pinkham Way site from a proposed Article 4 Direction aimed at protecting <b>the Council’s strategic employment sites</b> from unsuitable development.</p> <p>4.14 The recorded minutes of the Regulatory Committee meeting on 21 September 2015 state;</p> <p>“Pinkham Way Alliance had made a representation seeking the removal of the Pinkham Way site from the Article 4 Direction. Officers had subsequently agreed to this removal on the basis that there were no buildings on the site to which the permitted development provisions would apply. The map at appendix A of the report would be amended to reflect this”.</p>	
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				<p>4.15 In the Environmental Statement for NLWA in 2011<sup>27</sup> Arup's set out the history of the site. It explains that by 1968 the sewage works had gone, the majority of structures having either been removed from or buried on the site and <b>the site was shown as open land with trees.</b></p> <p>4.16 Atkins listed the Pinkham Way site as Open Space in Figure 1-0 – Open Spaces Sites. See site No 89 - Former Friern Barnet Sewage Works.<sup>28</sup></p> <p>4.17 For the purposes of the Open Space definition we would argue that remnants of buried structures and foundations - now absorbed by nature, do not amount to buildings, nor can they be said to constitute predominantly developed land. This reason is therefore not justified.</p> <p><b><u>LBH Reason (iii) “the outcome of the Village Green Application”</u></b></p> <p>4.18 An application to register the Pinkham Way Site as a Town or Village Green was made in 2011 by local residents. The application was unsuccessful on two grounds. It was submitted too late, and it failed to provide sufficient evidence to show that a ‘significant number of people’ used the site for recreation.</p> <p>4.19 However, the Assessor found, and the objectors accepted, that there was sufficient evidence to show that there was “reasonably open access to the site up to 1994.”</p> <p>4.20 Evidence was given by a number of witnesses at the hearing of the type of activities that used to take place on the site when it was accessible. Children met up and hung out there, played ‘run out’, people picked flowers, searched for golf</p>		
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<sup>27</sup>NLWA and LBB Development at Pinkham Way – Environmental Statement Vol 2 Main Text Rev A May 2011

				<p>balls (from the adjacent Muswell Hill golf course), some people liked to observe nature, eg watching birds, frogs and newts, looking for foxes. Some people picked fruit (there were apple and cherry trees) and blackberries. Some people used it for motorbike scrambling. It had always been popular with dog walkers. It was used for quiet reflection.</p> <p>4.21 Dr Oliver Natelson gave evidence that David Bevan, (who had been an Environmental Officer for Haringey Council) told him that a number of unusual and rare plants had been recorded on the site. They visited the site and found golden dock, a very rare plant. Dr Natelson also explained that he sometimes gave guided tours of the site. In the summer of 2011 he had led a party looking for bats, and the previous April he had gone there with bird experts. His last visit to the site was in Summer 2011.</p> <p>4.22 Barnet Council gave evidence that the fencing around the site was not secure at all points and due to fear of occupation by third parties (particularly by travellers) decided to secure it. In May 2009 Barnet commissioned the work for the fence to be secured.<sup>29</sup></p> <p>4.23 The outcome of the application for registration of the site as a town or village green does not affect a decision about whether this site should be designated open space or not, except in so far as it provides evidence (given under oath) as to the uninterrupted access to the site over a long period and the use of the site by local people and others for recreation.</p> <p>4.24 The photo below, taken from Google Earth, shows the site with tracks throughout. Clear evidence that people were accessing the site and using it as recreational open space.</p> <p><b>LBH Reason (iv) “the adopted designation in the</b></p>	
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					<p><b>Development Plan”</b></p> <p>4.25 The current designation for this site in the adopted Local Plan 2013 is SINC Grade 1 Borough Importance and Employment Land. But the previous Examination in Public had left a proviso that the site be assessed for its open space value amongst other features.</p> <p>4.26 Evidence had also been given at the hearing about the value of the biodiversity and open space on the site. The outcome was a recommendation by the Inspector in his report that the Council should take the opportunity at the next Site Allocations DPD review, to consider the status of the site taking into account as necessary, the outcome of the Village Green Application and other evidence including considerations of its open space value, its biodiversity and its specific site features such as the culverted water course.</p> <p>4.27 The Council has wilfully ignored the Inspector’s recommendation to review the Open Space Value of this site. When LUC were commissioned to undertake a review of the borough’s biodiversity and open spaces, the Pinkham Way Site was conspicuous by its absence.</p> <p>4.28 The Council’s Open Space strategy summarises the benefits of open space and the important contribution it makes overall to quality of life.</p> <p>“It provides a sense of freedom and relief from our built environment, somewhere to relax and leave behind the strains and pressures of day to day life, somewhere to play, enjoy flora and fauna, to meet with our friends and family, to exercise and to learn about our natural environment.”</p> <p>“In developing the Open Space Strategy, Haringey Council is seeking to provide a framework for the future management and development of open space within the borough which will enable the whole community – residents, community organisations .... to work in partnership in order to obtain the maximum benefit</p>		
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				<p>from our open spaces.”</p> <p>“... we want to particularly stress the importance we will place on our desire to involve the whole community in shaping the future of our open space.”</p> <p>4.29 The Council advised PWA in July 2015<sup>30</sup> that “the LUC Open Space Study identified a primary deficiency in the east of the borough. Pinkham Way is not well placed to address this deficiency effectively.”</p> <p>4.30 What the Council omitted to mention was the finding by LUC that in fact large parts of the borough are deficient in access to local open space, especially the Western zone of the borough.</p> <p>4.31 On page 85 they state:</p> <p><b>“Local open space</b></p> <p><b>7.31</b> Large parts of the borough are deficient in access to local open space. The Western zone has large areas of deficiencies at this level of the hierarchy”</p> <p>4.32 Among the areas in the western zone LUC identified the Eastern parts of Alexandra Ward and in the Central zone they identified central parts of Bounds Green Ward (para 7.32) as being deficient in local open space Fig 7.7 below.</p> <p>4.33 The Pinkham Way site is very well placed to address these deficiencies.</p> <p>4.34 In 2003, Atkins also found there was open space deficiency in the northern part of Bounds Green. Since no new open spaces</p>		
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				<p>have been identified in this area since then we presume that this deficiency persists. See extract from Atkins 2003 Open Space and Sports Assessment below.</p> <p><b>4.35 PWA is certain that the Council’s wilful decision to avoid assessing the open space value of this site, and its subsequent disregard of LUC’s evidence of deficiency in the western zone, were driven by concern that the aspiration to set the site aside for waste use would be thwarted.</b></p> <p><b>4.36 The evidence for this is the Council’s decision to include the Pinkham Way site in the emerging North London Waste Plan where it is identified as a potential Area for a wide range of waste facilities.</b></p> <p><b>4.37 The Council included the site in the NLWP without considering evidence submitted as part of the Local Plan Site Allocations consultation<sup>31</sup>, without having properly assessed the site, and in full knowledge that to carry out such an assessment of its open space value was not within the remit of the NLWP, which can only assess sites against specific criteria for sifting out those suitable for waste.</b></p> <p><b>4.38 It is Haringey Council’s job as local planning authority to properly review this site before any consideration is given to whether it can be developed, for waste or for anything else. By shirking its job the Council falls foul of national and regional policy.</b></p> <p><b>4.39 Paragraph 73 of the NPPF requires planning policies to be based on robust and up-to-date assessments of the needs for open space and opportunities for new provision. The assessments should be qualitative as well as quantitative. No up to date assessment of the open space value of Pinkham Way exists.</b></p>		
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				<p>4.40 Paragraph 74 of the NPPF prohibits building on existing open space unless an assessment has been undertaken which has clearly shown the open space to be surplus to requirements or that the loss would be replaced by equivalent or better provision in a suitable location or the development is for sports or recreational needs that clearly outweigh the loss.</p> <p>4.41 Retention of the Employment Land designation on the site and including it in the Site Allocations DPD exposes this open space to development likely to be detrimental to its open space and biodiversity value. The whole of the designated employment land site is a SINC of high ecological value as the LUC study found. Any development on any part of it will result in the loss of that particular part of the open space contrary to national and local policies set out here.</p> <p>4.42 Paragraph 74 of the NPPF was considered by Mrs Justice Patterson in the case of Anne Marie Loader v Rother DC <sup>32</sup> in June 2015, where it was found that “the criteria in paragraph 74 of the NPPF need to be interpreted to include the quality of the open space. In that case no assessment of the amenity value of the open space had been undertaken and no assessment had been undertaken to show it was surplus to requirements and that was found to be a material error.”</p> <p>4.43 The NPPF states that the planning system should contribute to and enhance the natural and local environment and at paragraph 114 directs local planning authorities to set out a strategic approach in their local plans, planning positively for the creation, protection, and enhancement and management of networks of biodiversity and green infrastructure.</p> <p>4.44 Policy 2.18 of The London Plan requires Local Planning</p>		
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				<p>Authorities to identify priorities for addressing deficiencies and should set out positive measures for the design and management of all forms of green and open space.</p> <p>4.45 Policy 7.18 of The London Plan which deals with Protecting Open Space and addressing deficiency states that Local Development Plans should ensure that open space needs are planned in accordance with green infrastructure strategies to deliver multiple benefits.</p> <p><b>Haringey’s Green Grid</b></p> <p>4.46 In the ALGG SPG 2012, the All London Green Grid is defined as a ‘network of high quality, well designed and multifunctional green and open spaces’.</p> <p>4.47 Aim 3 of the ALGG (section 1.4, p 14), is: To secure a network of high quality, well designed and multifunctional green and open spaces to establish a crucial component of urban infrastructure able to address the environmental challenges of the 21st century – most notably climate change.”,</p> <p>4.48 The aim is not about increasing access to open space. Every one of the 12 Green Grid Area Maps includes ‘Private Open Space’ in its legend. The map for GGA1, Lee Valley and Finchley Ridge, includes the Pinkham Way site under this category.</p> <p>4.49 The Council’s determination to avoid declaring the site as Open Space does not end with its contradiction of its own OS policy, but extends to Development Management policy DM20 ‘Open Space and Green Grid’, which has, absurdly, enabled it to exclude the Pinkham Way SINC from its own GG map.</p> <p>4.50 The commentary on that policy, at 4.16 on page 42, says that ‘Haringey’s network of open spaces should be regarded as integral infrastructure which will contribute to the ‘London wide Green Grid’. This, as far as it goes, is 100% correct.</p>		
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					<p>4.51 Misleadingly, however, the omission of any mention of Haringey's green spaces in the ALGG is asking the reader to infer that Haringey's contribution to the Grid begins and ends at 'its network of open spaces'. Consequently, the Council's 'Green Grid' policy makes no mention of the inclusion in that grid of Haringey's Green Spaces/Nature Conservation sites.</p> <p>4.52 These contradictions and convolutions in policy mean that the Council has excluded on two criteria a site which qualifies for inclusion in the Green Grid on both.</p> <p>4.53 PWA notes Natural England's submission to the SA consultation that highlights Haringey's lack of Green Infrastructure policy. PWA also notes the Council's subsequent belated inclusion in the Site Allocations Sustainability Assessment of a list of Green Infrastructure sites, among which is Pinkham Way (Section 10.15.3).</p> <p>4.54 That will take the Council some way, at least, to fulfilling NPPF Section 114.</p> <p>4.55 However, DM20 is still left as an unsound policy that requires wholesale redrafting.</p> <p><u>Footnotes</u>  <sup>13</sup>Letter dated 21 September 2015 to E Ryan PWA from Haringey Council's Assistant Director Planning  <sup>14</sup>Report of Independent Assessor – Philip Petchey, 30 May 2013  <sup>15</sup>Appendix 3 Open Space Study October 2014 LUC  <sup>16</sup>NLWA and LBB Development at Pinkham Way – Environmental Statement Vol 2 Main Text Rev A May 2011  <sup>17</sup>Haringey Open Space and Sports Assessment October 2003 - Atkins,  <sup>18</sup>Village Green Application Inspector's report  <sup>19</sup>Letter dated 6 July 2015 from Haringey's Assistant Director of Planning to Stephen Brice Chair of PWA  <sup>20</sup>Email from Haringey's Assistant Director Planning to E Ryan PWA 20 May 2015  <sup>21</sup>The Queen on the Application of Anne-Marie Loader v Rother DC v Churchill Retirement Living Ltd [2015] EWHC 1877 (Admin)</p>		
235	RSA441	SA52: Pinkham Way	No	Not stated	<p><b>Section 5</b></p> <p><b>The Culverted Water Course</b></p>	As set out	Local Plan Policy SP5 supports deculverting

				<p>5.1 The previous Inspector recommended the Council to consider ‘... <i>site specific features such as the culverted water course</i>’. In its March 2013 statement, the Council promised that ‘<i>Decisions taken on ... the Pinkham Way site will take into account the findings and recommendations of the Haringey Local Plan: Strategic Policies Inspector’s Report.</i>’</p> <p>5.2 Haringey’s BAP states that ‘... <i>other opportunities to restore water courses exist on the former Friern Barnet Sewage Works site.</i>’The 2010 draft Core Strategy listed as options for the site: ‘<i>Employment generating uses &amp; opportunity to deculvert stream</i>’(LBH, BAP 2009, Page 42)</p> <p>5.3 Our detailed Risk Assessment submitted in 2015 included evidence on the development constraints imposed by the culvert.</p> <p>5.4 As we have said above, the Council’s comments in the 21<sup>st</sup> September 2015 report to the Regulatory Committee would have left members none the wiser. In answer to its own summary of PWA’s evidence about the culvert  ‘Culverted watercourses make the site unsuitable for development’,  the Council says this:  ‘<b>Specific requirements</b> to consider the impact upon the culverted watercourse are contained within the policy.’(DM28)</p> <p>5.5 If members had studied ‘the policy’, DM28, they would have found it comprehensive and robust, and exactly the quality of strategic planning a LPA should aim at. It is an extension of the Harrow policy so admired by the Environment Agency in its 2015 submission. If members had then looked to see how it had been applied to Pinkham Way, the substantive policy is missing. The Development Guideline about the Pinkham Way culvert says this:  <i>Evidence that the development will not prejudice or compromise the integrity of the culverted stream will be required as part of any planning application.</i></p>	<p>wherever possible, and as such the feasibility of achieving this will be expected to be investigated through any development proposal for this site.</p> <p>No change</p>
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					<p>5.6 In the commentary on DM28, the Council says:  <i>Culverts are considered flood defences. Sites with existing culverts will be expected to investigate the feasibility of deculverting within the Flood Risk Assessment. Where the implementation of measures to restore section of the watercourse is not considered possible, clear and robust justification must be provided. (DM – 4.101)</i></p> <p>5.7 The result of robust and sound application of DM28 on Pinkham Way would have been stringent development guidelines in line with local, regional and national policy. The Council chose only a diluted version of part of Section 4.101, having apparently already decided that the problem of de-culverting should not trouble the developer. Once again it has failed to apply its own policy.</p>		
235	RSA442	SA52: Pinkham Way	No	Not stated	<p><b>Section 6</b>  <b>The site should no longer be considered as Brownfield Land</b></p> <p>6.1 The Council asserts this site should be treated as brownfield land suitable for development.</p> <p>6.2 The NPPF defines PDL as follows:  <i>“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 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.”</i></p> <p>6.3 The NPPF focuses explicitly on “permanent structure” and “associated fixed surface infrastructure”, and the exclusion</p>	As set out	<p>The council contends that the site is Brownfield land capable of meeting strategic needs for employment provision.</p> <p>No change</p>

				<p>depends on the extent to which these things have or have not blended into the landscape in the process of time. It does not refer to ground levels and contours, and the authors of the policy have been careful to be specific about what it is that is to be assessed.</p> <p>The site accords with the exclusion from the definition of PDL in the NPPF.</p> <p>6.4 Only a very small element of the permanent structures remain, on a very small portion of the site, and even those structures – whilst still visible from certain vantage points – have effectively blended into the landscape when the site is considered as a whole.</p> <p>6.5 Pinkham Way is just the sort of site the authors of the NPPF had in mind when formulating the exclusion from the definition. The site is now in a condition which is positively beneficial in planning terms (both in terms of its ecological value, its open space value and as a visual amenity), and thus it is no longer:</p> <p>a. the sort of site that requires redevelopment in order to be put to beneficial use; or</p> <p>b. which ought to be preferred for redevelopment over sites which have never previously been developed, because of the harm associated with developing green field sites – the same harms would arise on Pinkham Way.</p> <p>6.6 Similar considerations apply to the London Plan 2015 definition of Brownfield land and are analysed in the table below</p> <p><b>“Both land and premises are included in this term, which refers to a site that has previously been used or developed and is not currently fully in use, although it may be partially occupied or</b></p>		
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					<p>utilised. It may also be vacant, derelict or contaminated. This excludes”<sup>33</sup></p>						
					<table border="1"> <thead> <tr> <th>Exclusion</th> <th>Is this exclusion applicable to Pinkham Way?</th> </tr> </thead> <tbody> <tr> <td> <p><b>Open Space</b> open space is defined in The London Plan as:</p> <p>“All land in London that is <b>predominantly undeveloped</b> other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open space within London, <b>whether in public or private ownership and whether public access is unrestricted, limited or restricted</b>” (London Plan)<sup>34</sup></p> </td> <td> <p><b>Clearly applicable:</b> The land is predominantly undeveloped. The last use ceased in the early 1960’s. There are no buildings on it.</p> <p>The previous development (sewage works) commenced in 1883 and ceased in the early 1960s. Prior to 1883 the site was undeveloped agricultural land. There were allotments in the western corner of the site up until the early 1950’s Attached plans show the site prior to construction of sewage works, fully developed sewage works, post sewage works, and as it is today (Appendix A)<sup>35</sup></p> <p>There is no requirement that the site should have public access and therefore it is irrelevant whether it has or has not GOT public access.</p> <p>When the sewage works closed in the</p> </td> </tr> </tbody> </table>	Exclusion	Is this exclusion applicable to Pinkham Way?	<p><b>Open Space</b> open space is defined in The London Plan as:</p> <p>“All land in London that is <b>predominantly undeveloped</b> other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open space within London, <b>whether in public or private ownership and whether public access is unrestricted, limited or restricted</b>” (London Plan)<sup>34</sup></p>	<p><b>Clearly applicable:</b> The land is predominantly undeveloped. The last use ceased in the early 1960’s. There are no buildings on it.</p> <p>The previous development (sewage works) commenced in 1883 and ceased in the early 1960s. Prior to 1883 the site was undeveloped agricultural land. There were allotments in the western corner of the site up until the early 1950’s Attached plans show the site prior to construction of sewage works, fully developed sewage works, post sewage works, and as it is today (Appendix A)<sup>35</sup></p> <p>There is no requirement that the site should have public access and therefore it is irrelevant whether it has or has not GOT public access.</p> <p>When the sewage works closed in the</p>		
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					<p><b>land where the remains of previous use have blended into the landscape, or have been overtaken by nature conservation value</b></p> <p><b>or amenity use and cannot be regarded as requiring development</b></p>	<p>early 1960's, most of the structures were removed from the site or were buried on the site. The remaining vestiges of the previous use have long since blended into the landscape and are no longer identifiable to the passing observer as sewage beds.. See photos attached at Appendix B<sup>36</sup></p> <p>In 2014 a Biodiversity Study for Haringey Council described Pinkham Way as a "Mosaic of semi-natural woodland, scrub, tall ruderal vegetation, ephemeral habitats and rough grassland. A small part of the site was recorded in the study as MOL and the remainder as SINC.</p> <p>Pinkham Way is designated a Site of Importance for Nature Conservation No 1 Borough Importance in Haringey's Local Strategic Plan 2013. In 2014 its ecological value was confirmed by the LUC Biodiversity Study in which it was referred to as "... a rare resource for Haringey of High ecological value."<sup>37</sup>The site supports a large number of birds, insects, invertebrates</p>		
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					<p>and bats</p> <p>Pinkham Way acts as a visual amenity for Hollickwood Park, Muswell Hill Golf Club and for passing traffic on the busy NCR. It acts as sound buffer from the NCR for the local residents and also as a 'lung' absorbing pollutants etc from the heavy passing traffic..</p> <p>The site therefore falls into the London Plan definition of Open Space as being "predominantly undeveloped", indeed wholly undeveloped in this case</p>		
					<p><u>Footnotes</u></p> <p><sup>22</sup> London Plan 2015 Glossary p387</p> <p><sup>23</sup> London Plan 2015 p397</p> <p><sup>24</sup> OS old map 1951-2 <a href="http://www.old-maps.co.uk/maps.html">http://www.old-maps.co.uk/maps.html</a> (coordinates 528736 191624)</p> <p>[Footnote 25 omitted in submitted rep]</p> <p><sup>26</sup> Haringey Open Space and Biodiversity Study Final Report Oct 2014 – Appendix 7 Site B7</p>		
235	RSA443	SA52: Pinkham Way	No	Not stated	<p><b>Section 7</b></p> <p><b>Employment Designation not appropriate</b></p> <p>7.1 Haringey has had to isolate Pinkham Way's employment designation in a planning 'clean room', protecting its fragility and lack of substance from the contaminating reality of proper site appraisal, rigorous planning policy, and the deadliest threat of all – sound evidence. As though it was Miss Havisham's disintegrating wedding dress.</p> <p>7.2 Section 4 of Atkins (Employment Land Study 2015) analyses the potential demand for space in Haringey. It is in the context of the growing demand it forecasts for B1/B2 that Atkins emphasises the need to safeguard sites. <i>Atkins4.19</i></p>		It is not considered that any evidence base document preclude the potential for employment to be accommodated on this site. Indeed the ELS identifies that it is suitable for retention as Employment

				<p>7.3 Both Atkins and GVA Grimley(Workspace Viability Assessment 2015) dismiss the site’s suitability for employment generally, with Atkins emphasising its unsuitability for B1/B2 uses.</p> <p>7.4 This mirrors Further Alterations to the London Plan Policy 4.4(e) that LPAs should ‘...<i>take account of quality and fitness for purpose of sites.</i>’ GVA dismisses the site in 9 words: ‘Some of the sites such as Pinkham Way ... <i>have limited workspace drivers to support future workspace delivery.</i>’ (PWA italics)</p> <p><b><i>Atkins 5.40-5.41; GVA 6.4</i></b></p> <p>7.5 Atkins’ logic can be traced easily through Sections 4 and 5 to Section 8, where it states the need to safeguard <u>suitable</u> sites, adding that ‘there is little benefit’ in safeguarding unsuitable, which should be considered for release for alternative uses. <b><i>Atkins 8.6, 8.17, 8.19</i></b></p> <p>7.6 In reports to members and in draft DPDs, as well as in correspondence with PWA, Atkins has been misrepresented; Atkins advice at 4.19 has been quoted out of context whilst <b>Section 8’s recommendations have simply been omitted; GVA’s dismissal of Pinkham Way is conveniently forgotten.</b></p> <p>7.7 The clear sense in reports and DPDs is that Haringey must protect <u>all employment sites</u> irrespective of suitability. The Council appears to rely on Key Performance Indicator 9 in FALP Table 8.2 ‘<i>Ensure that there is sufficient employment land available</i>’, while disregarding Policy 4.4(e) quoted above about the suitability of that land.</p> <p>7.8 The Regulation 19 SA DPD says about Pinkham Way: <i>This site can play an important role in providing employment floorspace capacity to meet the borough’s objectively identified employment needs, as set out in the Employment Land Study</i></p> <p>7.9 What ‘important role’? There is no floorspace and no</p>	<p>Land, and the Workspace study excerpts identifies that employment development would be possible with an element of residential cross-subsidy. Finally, the owner of the site identifies that they intend to bring it forward for employment use.</p> <p>No change</p>
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				<p>potential for it according to the two consultants who looked at the site, GVA and Atkins. The site is vacant open green space with no buildings. If this site is to be listed under Employment at all, it should be listed under vacant land as it was last time round when Atkins did the 2012 update to the Employment Land Study 2009.</p> <p>7.10 The same consultants who objectively identified employment needs also, objectively, judged the site unsuitable to meet those needs. Pinkham Way was the only site among the 22 assessed that Atkins judged ‘unlikely to meet future business needs.’</p> <p><b>Atkins – Viability of Pinkham Way</b></p> <p>7.11 The clarity of Atkins’ report makes the appearance of Sections 5.42 and 5.43 so incongruous that PWA believes them to be a later addition, some trundling retrospective acknowledgement of the suppressed October 2014 GVA viability assessment on Pinkham Way.</p> <p>7.12 5.43 rolls condition into condition, its tortured syntax reminiscent of Groucho Marx: <i>‘If we had some eggs we could have eggs and ham if we had some ham.’</i></p> <p>7.13 It mentions ‘suitable mitigation’ as a pre-condition for retention of the employment designation. In six years, Haringey has taken not a single step to address the site’s irreconcilable dual designation. ‘Suitable mitigation of nature conservation issues’ has therefore never entered the discussion. This cat’s cradle of conditions means nothing.</p> <p><b>GVA Viability Assessments</b></p> <p>7.14 A number of viability assessments were undertaken by GVA Grimley for the Council during the preparation of the plan documents. The viability assessment for Pinkham Way in particular used less demanding financials compared to the wider study. The Council has not been able to explain why there was such a discrepancy. We therefore recalculated scenarios in the</p>	
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				<p>Pinkham Way viability study, applying the difference in the cost figures used in GVA's borough-wide viability study.</p> <p><b>The GVA Grimley Haringey Borough –wide Site Viability Assessment February 2015</b></p> <p>7.15 This borough-wide study of 12 sites factored in the following development costs: Residential £1800 per M2, employment £1500 per M2.</p> <p>7.16 GVA gave the figures their full professional endorsement:  <i>Standard construction and development costs have been applied - 1.7</i>  <i>These assumptions are based on BCIS, alongside evidence from comparable schemes and in-house expertise – 4.14</i></p> <p><b>The GVA Grimley Pinkham Way Viability Assessment – October 2014</b></p> <p>7.17 For the Pinkham Way study, the respective development costs were: residential £1600 per M2, employment £1000 per M2(respectively 16% and 33% less than the Haringey study). GVA offers no in-house endorsement of these different development costs is, just the stark 'BCIS'.</p> <p>7.18 The Council maintains that GVA supplied no background documentation; without this, both the lower costs per se, the rationale for using different costs within the same borough, and the existence of two BCIS indices offering conveniently different statistics, remain a mystery. For public consultation purposes the study exists in a vacuum.</p> <p>7.19 Tellingly, the Council stated that '<i>There was no analysis of a 100% commercial scheme as this returned a negative residual value under any scenario</i>'.</p> <p>7.20 PWA believes that, given the many ecological constraints on the site which needed consideration, a realistic assessment</p>	
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				<p>would have tended to factor in higher development costs than the borough wide study rather than significantly lower.</p> <p>7.21 As part of our analysis, we drew up a simple spreadsheet factoring into the Pinkham Way calculation the development costs used in the Haringey study, and profit on almost all scenarios disappeared. The Gilbertian result was that employment on Pinkham Way could only really be viable with 100% residential development.</p> <p><b><u>Contamination costs underestimated</u></b></p> <p>7.22 We have looked at the 2008 guidance used by GVA, and the more recent H&amp;CA's <b>Guidance on Dereliction, Demolition and Remediation</b> (March 2015) which updates the 2008 document, and we consider that the cost figure used by GVA should have been substantially higher. We have assumed GVA have based their figure on Site Category B, Low water risk, with proposed end use Residential and Employment (Table 1).</p> <p>7.23 GVA estimated £250k per hectare</p> <p>7.24 We consider that the more appropriate category should be Site Category C, High water risk (Moderate Sensitivity). The figures for this category are:  £485 - £1,305k per ha (residential flats without gardens) or  £540 - £1,460k per ha (residential with private gardens)</p> <p>7.25 We say this because the 2015 guidance explains on page 13 that a long unused site, with old contamination, is likely to be worse and therefore nearer the top end of the range [of cost]. In Annex B it also identifies <b>landfill waste</b> in Site Category C (Annex B, Fig 10 p26). As you are aware, the former sewage works closed in the early 1960's (50 years ago). This length of time qualifies it as 'long used'. Subsequent to closure, Environment Agency records show that the Pinkham Way site was used for <b>landfill waste</b> up until 1980. The site also has a history of sporadic fly tipping. Therefore the range of contamination falls within Category C, a more expensive</p>		
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				<p>category than allowed for by GVA's figures.</p> <p>7.26 Lead and asbestos have been found on the site, Jacobs Report (2008). The 2015 guidance states, on page 6, that the presence of asbestos, even at low levels, may significantly increase costs.</p> <p>7.27 As to whether the calculation should be within the Low or High Water risk category, PWA considers the High Water category is more appropriate because the Environment Agency considers the site a major aquifer and a Source Protection Zone 2 (EA response to NLWP1, 2009).</p> <p>7.28 Also, the EA response to the Council's 2014 SA consultation advised that the water course under the site should be de-culverted – it laid out clear guidelines re 8 metres access space on either side etc. We have set out in some detail the implications of these guidelines in the Strategic Risk Assessment attached at Appendix 1</p> <p>7.29 If the higher remediation figure is accepted as more appropriate, and we consider it should be, it will have the effect of exacerbating the unviability of cross subsidising Employment on the site.</p> <p><b>The NLWA 'evidence' on viability preferred</b></p> <p>7.30 The Council has dismissed the GVA viability assessment on Pinkham Way and has made no response to our analysis save to tell us that it prefers instead to rely on a statement subsequently made by the NLWA, saying that:</p> <p><b><i>“Representations received from the landowners to the local plan consultation claim a viable employment use is deliverable under its current and proposed designation (SINC and Employment). ... The site could be used for owner occupier purposes which represents a different viability picture to those faced by a speculative developer.”</i></b></p> <p>7.31 When we asked the Council for evidence supporting the NLWA's assertion, we were advised to <b>“approach NLWA</b></p>		
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					<p><i>directly for the information that they are basing their response to the Council upon. Officers are satisfied that the submission from NLWA is sufficient.”</i></p> <p>7.32 If the Council has not seen the information on which the NLWA has based its assertion about the viability of the site, and we believe it has not, then the Council has no justification for relying on that assertion.</p> <p>7.33 It is unclear whether Barnet Council, the Landowner of the other part of the site has come up with any viability evidence. Presumably the NLWA viability assertion applies to its own area of ownership.</p> <p>7.34 Whether NLWA has factored the original £12m purchase price into its claim, as required for VfM considerations, is another issue where no information is available.</p>	
235	RSA444	SA52: Pinkham Way	No	Not stated	<p><b>Section 8</b> <b>Employment designation is contrary to the Council's own Policies</b></p> <p>(1) Employment</p> <p><b>8.1 Policy SP8 Employment: The Council will ... protect the borough's hierarchy of employment land, Locally Significant Industrial Sites (LSIS) and Local Employment Areas (LEAs)</b></p> <p>Para 5.1.12 LSISs are well established industrial areas</p> <p>Para 5.1.14 [LEAs] ... In principle, mixed use development including residential, employment and community facilities may be appropriate ...</p>	It is considered that this site is appropriate for retention as an employment area. While other sites with good town centre and public transport access are suitable for regeneration into mixed use typologies, this site has the

				<p>8.2 Haringey's Draft DMP advises potential developers to "ensure that development proposed is appropriate to the location ..."<sup>38</sup></p> <p>8.3 The Pinkham Way SINC does not fall within the definition of a LSIS and therefore is not suitable for uses within this designation as set out in the London Plan (see later). Nor is it suitable for designation as a LSIS because it is not an established industrial area. The site has been unused for almost 50 years and has developed into an established open green space.</p> <p>8.4 We do not consider it is any longer suitable for employment use for the reasons set out below, and that the Employment Use designation should be removed because it leaves the site vulnerable to inappropriate development proposals coming forward which could irreparably damage the nature conservation and/or biodiversity value of the whole site.</p> <p>8.5 Of all the nine Borough Grade 1 SINC's in Haringey, Pinkham Way is the only one to have a dual designation. All the others are simply designated Borough Grade 1 Site of Importance for Nature Conservation.</p> <p>8.6 The Pinkham Way site lies within the Muswell Hill Area Neighbourhood<sup>39</sup>. The Council has identified the policies that take priority in this neighbourhood as 'Design, Town Centres, Open Space and Biodiversity; Community Facilities and Housing<sup>40</sup>'.</p> <p>8.7 Note that employment is not identified as a priority policy because the Council considers unemployment in this area as being well below the borough average<sup>41</sup>. The number of currently</p>	<p>potential to accommodate lower density uses thanks to its location in close proximity to the SRN.</p> <p>No change</p>
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<sup>38</sup> Draft DMP Section 1 Getting the right development in the right place

<sup>39</sup> Fig 1.10 page 27 Local Plan – Strategic Policies 2013

<sup>40</sup> 1.3.64 p26 Local Plan – Strategic Policies 2013

<sup>41</sup> 1.3.57 p26 Local Plan – Strategic Policies 2013

				<p>vacant units on the Bounds Green Industrial Estate indicates a lack of need for (or surplus of) employment land in the vicinity.</p> <p>8.8 Haringey Council conceded at the public examination into the Local Plan (February 2012) that the Pinkham Way site was not a well established industrial area as it had remained unused for almost 50 years. Nor is it necessary to retain this site as a vacant employment site.</p> <p>8.9 In the course of the hearing, Richard Coburn, a Senior Economic Planner at W S Atkins, consultants to the Council on <b>their employment policy, spoke on the Council's behalf.</b> The Inspector asked whether removing the Pinkham Way site from the pool of vacant employment land would result in the policy being unsound. Mr Coburn advised the Inspector that removal would make little difference, since the vacant land remaining would still be within the accepted frictional rate for employment land vacancy.</p> <p>8.10 We notice the site is no longer listed as vacant land. It is vacant, why is it not listed as such?</p> <p><b>(2) Poor Site Accessibility</b></p> <p>8.1.1 The Council's own advisers say that sustainable modes of transport should be a key consideration with any major regeneration of a DEA site.<sup>42</sup> Although part of the Muswell Hill Area Neighbourhood is reasonably well served by buses, this particular site is not.</p> <p>8.1.2 It is identified as being badly provided for by public transport. It is scored as 1a – 1 being the lowest possible level of scoring in the Local Plan.<sup>43</sup> The reasons that the public transport score is so low are a) because the nearest station is more than</p>		
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<sup>42</sup> p22 (Point No 11) of The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement

<sup>43</sup> Fig 3 page 85 Local Plan – Strategic Policies 2013

				<p>900m from the site boundary and b) only one bus route operates within 460m of the site and that is the 232 which runs every 20 minutes.</p> <p>8.1.3 This lack of public transport is a major obstacle to employment use on this site. It would encourage car use (for those who could afford it) and as demonstrated, access would be difficult for those who could not afford cars.</p> <p>8.1.4 In November 1998, lack of transport accessibility was given as one of the reasons for refusing a planning application for housing development on the site. Another reason for refusal was loss of ecological value. In the 15 years since refusal, the transport accessibility has not changed but the ecological value has been retained as confirmed by the ecological survey (attached).</p> <p><b>(3) 40:20 Carbon Commission Report</b></p> <p>8.2.1 Working towards a low carbon borough is now a key challenge for the Council – indeed Haringey has taken the initiative in setting itself targets with its own 40:20 Carbon Commission Report. The Council's policy now requires the efficient use of land and buildings in order to reduce car dependancy.<sup>44</sup> The encouragement of car use on this site is contrary to this policy<sup>45</sup></p> <p>8.2.2 The Council's overall strategy for managing future growth in Haringey is to steer new development with high transport demand to areas with significant redevelopment opportunities at, or near, transport hubs in order to discourage car use.</p> <p>8.2.3 The key growth areas identified in the Local Plan are Haringey Heartlands and Tottenham Hale. It is in these areas that</p>		
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<sup>44</sup> 4.1.6 p71 Local Plan – Strategic Policies 2013

<sup>45</sup> Policy SP4 of the Haringey Local Strategic Plan 2013

				<p>the most significant amount of houses, jobs and infrastructure will be delivered during the life of the Plan, not in the Muswell Hill Area Neighbourhood.<sup>46</sup></p> <p>8.2.4 The Council's Air Quality Action Plan<sup>47</sup> aims to ensure that "new development does not have a negative effect on local air quality and that public exposure to air pollutants is reduced in areas which breach the government's air quality standards". Air pollution is regarded as a material planning consideration.</p> <p>8.2.5 PWA has, under the aegis of Barnet Council, sponsored an air quality measurement device at the Alan Day car showroom opposite the Pinkham Way site. Readings are provided annually; the readings for the final 6 months of 2012 showed an average of 91.5ug/m3.</p> <p>8.2.6 This contrasts with the EU permitted upper limit of 40ug/m3 and therefore breaches it by 130%. Any development on this site is likely to further add to the pollution levels and therefore pollution should be considered a material planning consideration and given appropriate weight in light of the very high existing levels of pollution at this location.</p> <p><b>(4) Open Space and Biodiversity</b></p> <p>8.3.1 The Local Plan sets out the following targets for its policies on Biodiversity and Open Space:<sup>48</sup></p> <p>SP 13a: no loss of any areas of open space  SP13b: no loss of the 60 SINCS in the borough  SP13d: enhance areas of identified open space deficiency  The target for the London Plan Key Performance Indicator No 18 (Protection of Biodiversity habitat) is "no net loss of SINCS".</p>	
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<sup>46</sup> Paras 2.1.4 and 3.1.6 of Haringey's Local Plan – Strategic Policies 2013

<sup>47</sup> Haringey Air Quality Action Plan 2010-2018 section 3.3 Non Transport Measures

<sup>48</sup> Strategic Policies 13: Open Space and Biodiversity (p177 Local Plan – Strategic Policies 2013)

				<p>8.3.2 All of these policies and statements favour the protection of Pinkham Way SINC as a green open space, not as an employment site.</p> <p>8.3.3 Open Space and Biodiversity have been identified as priority policies for the Muswell Hill Area Neighbourhood.<sup>49</sup> The Pinkham Way site is a verdant open space that is recognised as having high nature conservation value. Haringey has designated it a Borough Grade 1 SINC.</p> <p>8.3.4 The definition of open space covers “all land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open space within London, whether in public or private ownership and whether public access is restricted, unrestricted or limited”<sup>50</sup> so the site qualifies for protection as open space.</p> <p>8.3.5 The site forms part of an ecological chain from Alexandra Palace through Rhodes Avenue Spinney, Albert Road recreation, Tunnel Gardens, Bluebell Wood and Muswell Hill Golf Club and thence to Coppetts Wood and Glebelands Local Nature Reserve (LNR).</p> <p>8.3.6 The site is bounded on two sides by adjacent open space, Hollickwood Park and Muswell Hill Golf Course, both recognized as important green spaces and SINC’s in their own right. Because of this particular juxtaposition, the sites gain additional value from each other. Atkins Consultants advised Haringey in December 2010 that <b>“Strategic landscape and open space resources should be maintained, enhanced and, where possible, linked.”</b><sup>51</sup></p>	
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<sup>49</sup> page 26 Local Plan – Strategic Policies 2013 para 1.3.64

<sup>50</sup> London Plan Glossary p305

<sup>51</sup> Appendix 4 Extract p4 Haringey Atkins LIP Strategic Environmental Assessment 2010

				<p>8.3.7 “Despite being located off the A406 which receives high traffic densities, mature trees at the boundaries of the site as well as woodland habitat provide screening from traffic noise and disturbance which creates a feeling of being outside an urban area.</p> <p>8.3.8 Views over the adjacent Muswell Hill Golf Course can be seen from areas of higher ground, towards the southern boundary. The diversity of bird and invertebrate species in particular butterflies as well as the rich diversity of wildflowers adds to the aesthetic appeal of the site.”<sup>52</sup></p> <p>8.3.9 Development of any significance on the Pinkham Way SINC would, we believe, have a detrimental impact on the SINC itself and on the perception of greater space and openness, and enhanced views which benefit the adjacent SINCS.</p> <p>8.3.10 The Mayor of London recognizes the current and potential value of open space to London communities, and The London Plan 2015 requires London boroughs to protect local open space and address local open space deficiencies.<sup>53</sup></p> <p>8.3.11 The Council has stated that development will not be permitted on designated and other open spaces, and on suitable land with the potential to be used as open space, unless it is for limited small scale development ancillary to an existing use on the land and for which there is demonstrable need.<sup>54</sup></p> <p>8.3.12 Employment is not one of the Council’s priorities for this part of the borough and the Local Plan states that “There is no major development planned for the area, however, preservation</p>		
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<sup>52</sup> P 24, box 2, Aesthetic appeal - Preliminary Ecological Appraisal – Report for PWA October 2013 Ref:2013\_012

<sup>53</sup> London Plan Policy 7.18 p304

<sup>54</sup> 6.3.3 page 199 Local Plan – Strategic Policies 2013

				<p>and enhancement of conservation areas and green spaces are important issues”<sup>55</sup></p> <p>8.3.13 The Pinkham Way site is an open space and therefore according to Haringey’s own policy is not suitable for employment use. The current dual designation of SINC/DEA is therefore not in line with this open space policy.</p> <p><b>(5) SINC</b>s</p> <p>8.4.1 The Council states in its Local Plan that it will not permit development on SINC’s unless there are exceptional circumstances <u>and</u> the importance of the development outweighs the nature conservation value of the site; in such circumstances appropriate mitigation measures must be taken <u>and</u>, where practicable and reasonable, additional nature conservation space must be provided.<sup>56</sup></p> <p>8.4.2 The London Plan Policy requires planning authorities to “avoid adverse impact to the biodiversity interest” when considering proposals that would affect SINC’s:</p> <p>8.4.3 It is difficult to see how any significant employment use on the Pinkham Way site could be implemented without its having a serious adverse impact on the nature conservation value of the site itself and on the adjoining open spaces and SINC’s. Indeed, the employment policy is seen as one of the policies in the Council’s Local Plan “to have the most potential for negative impacts mainly related to environmental objectives”<sup>57</sup></p> <p>8.4.4 Given that Haringey Council has been advised of this, and</p>		
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<sup>55</sup>Local Plan – Strategic Policies 2013 p26 para 1.3.61

<sup>56</sup>6.3.24Local Plan – Strategic Policies 2013

<sup>57</sup>Page 25 The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement

				<p>given that the priorities in its own Local Plan for this location do not include employment,<sup>58</sup> and given no major developments are anticipated in this neighbourhood, it is difficult to see how the retention of a dual designation of employment/SINC can continue to be justified for the life of the Plan.</p> <p>8.4.5 Loss of habitat and biodiversity and the potential for fragmentation would appear to be at odds with the Council's Objectives relating to Ecology, Biodiversity, Climate Change and Accessible Open Spaces</p> <p><b>(6) Preservation of Woodland</b></p> <p>8.5.1 The NLWA Tree Survey carried out in November 2012<sup>59</sup> found more than 1,500 trees of various species and ages on the site, some covered by Tree Preservation Orders. The Council considers that Trees play a significant role in improving environmental conditions and people's quality of life. The Council's Tree Strategy 2008-2011 aims to ensure that trees within the borough are managed in a pro-active and systematic manner.<sup>60</sup></p> <p>8.5.2 The Council states in its Biodiversity Action Plan that it aims to conserve and enhance Haringey's woodland for the benefit of both current and future generations. It has set itself the target of increasing the extent of woodland habitat in Haringey by 0.5 hectares by 2015<sup>61</sup>. 55% (3.6ha) of Pinkham Way is covered by woodland (ie 55% of 6.5 hectares); the council cannot afford to lose this extent of woodland when it is simultaneously trying to increase woodland in the borough. All of the older trees and most of the rest would be lost if, for example, a waste facility were permitted on the site.</p>	
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<sup>58</sup> 1.3.64 p26 Local Plan – Strategic Policies 2013

<sup>59</sup> Tree Survey Report, CBA Trees for NLWA November 2012

<sup>60</sup> Para 6.3.30 Haringey Local Plan Strategic Policies

<sup>61</sup> LBH Biodiversity Action Plan 2009 p29

				<p><b>(7) Watercourse – opportunity to deculvert</b></p> <p>8.6.1 There is potential to deculvert the watercourse under Pinkham Way (thought to be approximately 300m in length). This flows into Bounds Green Brook and thence into the Blue Ribbon Network at Pymmes Brook. A recent ecological report prepared for PWA noted that “If current conditions allow, the reinstatement of this watercourse would further enhance the biodiversity value of the site”<sup>62</sup></p> <p>8.6.2 The Environment Agency has advised that all development on sites with culverted watercourses will be expected to investigate the feasibility of de-culverting<sup>63</sup></p> <p>8.6.3 Moreover, the opportunity to deculvert is recognised in Haringey Council’s Biodiversity Action Plan, “ ... opportunities to restore water courses exist on the former Friern Barnet Sewage Works site ... ”.<sup>64</sup> Development on this site would therefore be contrary to the Council’s aim to protect water courses.</p> <p>8.6.4 The EA has also identified SA52 as lying in Flood Zones 1, 2 and 3 and has recommended that the Council’s guidelines should be amended to reflect this<sup>65</sup>.</p> <p><b>(8) Potential to create Cycle path/walkway through the Pinkham Way site</b></p> <p>8.7.1 It is physically possible to create a cycle path/walkway to the Pinkham Way site from the top of Cline Road, and/or Blake Road, along the railway land. The site has potential for access to</p>	
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<sup>62</sup> Preliminary Ecological Appraisal Report October 2013 for PWA: Table 7 Box 1 p24

<sup>63</sup> EA letter to LBH 25 March 2015

<sup>64</sup> BAP Haringey 2009 para 9.3.3

<sup>65</sup> EA letter of 25 March 2015 to LBH

				<p>be provided to the area of Bounds Green shown as deficient in open space (280m).<sup>66</sup> The cycle path/walkway could also provide access through the Pinkham Way site and over the bridge to the Retail Park on the other side of the NCR.</p> <p>8.7.2 There is potential also to open access from the Bounds Green Industrial estate to the Retail Park and vice versa for residents and businesses on the retail park side of the NCR. There is sufficient land along the side of the railway to create a comfortable path and it is possible to access the railway land from Cline Road or from Blake Road via Tunnel Gardens SINC. See Council's Policy SP7<sup>67</sup></p> <p>8.7.3 Haringey's monitoring arrangements in its Local Strategic Plan are intended to identify adverse effects of various policies so that remedial action can be taken. Logically this can be only after any damage has been done. In the case of a valuable SINC like Pinkham Way that has developed its biodiversity value over 50 years, the likelihood is that the damage would be irreparable.</p> <p>8.7.4 The Council will note from the Ecological Report<sup>68</sup> that " ... the site is positioned along an ecological corridor and offers an important greenlink between other sites. This is noteworthy within the context of inner London where well connected sites are becoming increasingly rare."</p> <p>8.7.5 It is also worth noting here that "Given the geographical context of the site which is situated in a heavily urbanised area, the number of notable species recorded is considered significant."<sup>69</sup></p> <p><b>Wider Ecological Importance of SINCs and Biodiversity</b></p>		
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<sup>66</sup> Page 126 Fig 6.4 Local Plan – Strategic Policies 2013

<sup>67</sup> Local Plan: Strategic Policies 2013-2026 SP7 p83 paras 4.4.13 - 4.4.21

<sup>68</sup> Preliminary Ecological Appraisal Report (Oct 2013) for PWA p23 Box 6 Recreatability

<sup>69</sup> Preliminary Ecological Appraisal Report (Oct 2013) for PWA p23 Box 2 Species Richness

				<p>8.8.1 The first White Paper on the natural environment for over 20 years was published in April 2012. Introducing the White Paper, The Secretary of State said <i>“by properly valuing nature today, we can safeguard the natural areas that we all cherish and from which we derive vital services ..... this White Paper aims to strengthen connections between people and nature, to the benefit of both”</i>.<sup>70</sup></p> <p>8.8.2 In May 2013, a groundbreaking report was published by a coalition of leading conservation and research organisations. Scientists working side-by-side from 25 wildlife organisations have compiled a stock take of our native species – the first of its kind in the UK. The State of Nature report reveals that 60% of the species studied have declined over recent decades. In the Foreword to the report, <b>Sir David Attenborough</b> said <b>“This important document provides a stark warning: far more species are declining than increasing in the UK, including many of our most treasured species.</b></p> <p>8.8.3 Alarming, a large number of them are threatened with extinction. The causes are varied, but most are ultimately due to the way we are using our land and seas and their natural resources, often with little regard for the wildlife with which we share them. The impact on plants and animals has been profound.</p> <p>8.8.4 Dr Mark Eaton, a lead author on the report said: <b>“These declines are happening across all countries and UK Overseas Territories, habitats and species groups, although it is probably greatest amongst insects, such as our moths, butterflies and beetles. Other once common species like the lesser spotted woodpecker, barbastelle bat and hedgehog are vanishing before our eyes”</b>.<sup>71</sup></p>	
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<sup>70</sup> The Natural Choice <http://www.defra.gov.uk/environment/natural/whitepaper/>

<sup>71</sup> <http://www.wildlifetrusts.org/news/2013/05/22/state-nature-60-uk-species-decline-groundbreaking-study-finds>

				<p>8.8.4 The 2013 Preliminary Ecological Appraisal carried out for PWA found that the Pinkham Way SINC “is used as a breeding site by no less than six notable bird species (UK BAP Priority Species or RSPB Red or Amber Status). Priority Species, Slow worm and Cinnabar moth caterpillars were also identified.</p> <p>8.8.5 The site is likely to provide roost sites for common pipistrelle bats and mature trees at the boundary of the site have the potential to provide roost sites for a diversity of bat species.</p> <p>8.8.6 There is clearly growing awareness of the importance of protecting our biodiversity and open spaces including in Haringey. The Pinkham Way Alliance commissioned an independent Ecological Report on the Pinkham Way site which is attached. This confirms that the Pinkham Way site continues to meet the criteria for Borough Grade 1 Site of Importance for Nature Conservation.</p> <p><u>Footnotes</u>  <sup>27</sup> Draft DMP Section 1 Getting the right development in the right place  <sup>28</sup> <b>Fig 1.10 page 27 Local Plan – Strategic Policies 2013</b>  <sup>29</sup> <b>1.3.64 p26 Local Plan – Strategic Policies 2013</b>  <sup>30</sup> <b>1.3.57 p26 Local Plan – Strategic Policies 2013</b>  <sup>31</sup> <b>p22 (Point No 11) of The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement</b>  <sup>32</sup> <b>Fig 3 page 85 Local Plan – Strategic Policies 2013</b>  <sup>33</sup> <b>4.1.6 p71 Local Plan – Strategic Policies 2013</b>  <sup>34</sup> Policy SP4 of the Haringey Local Strategic Plan 2013  <sup>35</sup> <b>Paras 2.1.4 and 3.1.6 of Haringey’s Local Plan – Strategic Policies 2013</b>  <sup>36</sup> Haringey Air Quality Action Plan 2010-2018 section 3.3 Non Transport Measures  <sup>37</sup> Strategic Policies 13: Open Space and Biodiversity (p177 Local Plan – Strategic Policies 2013)  <sup>38</sup> <b>page 26 Local Plan – Strategic Policies 2013 para 1.3.64</b>  <sup>39</sup> London Plan Glossary p305  <sup>40</sup> <b>Appendix 4 Extract p4 Haringey AtkIns LIP Strategic Environmental Assessment 2010</b>  <sup>41</sup> P 24, box 2, Aesthetic appeal - Preliminary Ecological Appraisal – Report for</p>		
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				<p>PWA October 2013 Ref:2013_012</p> <p><sup>42</sup> London Plan Policy 7.18 p304</p> <p><sup>43</sup> 6.3.3 page 199 Local Plan – Strategic Policies 2013</p> <p><sup>44</sup> Local Plan – Strategic Policies 2013 p26 para 1.3.61</p> <p><sup>45</sup> 6.3.24 Local Plan – Strategic Policies 2013</p> <p><sup>46</sup> Page 25 The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement</p> <p><sup>47</sup> 1.3.64 p26 Local Plan – Strategic Policies 2013</p> <p><sup>48</sup> Tree Survey Report, CBA Trees for NLWA November 2012</p> <p><sup>49</sup> Para 6.3.30 Haringey Local Plan Strategic Policies</p> <p><sup>50</sup> LBH Biodiversity Action Plan 2009 p29</p> <p><sup>51</sup> Preliminary Ecological Appraisal Report October 2013 for PWA: Table 7 Box 1 p24</p> <p><sup>52</sup> EA letter to LBH 25 March 2015</p> <p><sup>53</sup> BAP Haringey 2009 para 9.3.3</p> <p><sup>54</sup> EA letter of 25 March 2015 to LBH</p> <p><sup>55</sup> Page 126 Fig 6.4 Local Plan – Strategic Policies 2013</p> <p><sup>56</sup> Local Plan: Strategic Policies 2013-2026 SP7 p83 paras 4.4.13 - 4.4.21</p> <p><sup>57</sup> Preliminary Ecological Appraisal Report (Oct 2013) for PWA p23 Box 6 Recreatability</p> <p><sup>58</sup> Preliminary Ecological Appraisal Report (Oct 2013) for PWA p23 Box 2 Species Richness</p> <p><sup>59</sup> The Natural Choice <a href="http://www.defra.gov.uk/environment/natural/whitepaper/">http://www.defra.gov.uk/environment/natural/whitepaper/</a></p> <p><sup>60</sup> <a href="http://www.wildlifetrusts.org/news/2013/05/22/state-nature-60-uk-species-decline-groundbreaking-study-finds">http://www.wildlifetrusts.org/news/2013/05/22/state-nature-60-uk-species-decline-groundbreaking-study-finds</a></p>		
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## Appendix J: Responses to the Pre-Submission Site Allocations DPD Consultation – Document Order

### Introduction to Site Allocations

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RSA66	Fig 2.3, Para 2.10-2.12	Not stated	Not stated	The identification of Wood Green as a Tall Building Growth Area and a location for tall buildings is supported. St William agrees that high rise buildings will mark the area as a location for people to visit, invest in, and navigate around. These urban regeneration objectives has been identified by CABE and English Heritage. Whilst paragraph 2.11 includes reference to <b>“Penstock foot tunnel” as a suitable location for tall buildings “signalling the connection between Wood Green and Alexandra Park” we believe that this reference should include Clarendon Gas Works and be expanded to reference wayfinding to a new urban (employment). Tall buildings are defined in the Strategic Policies Local Plan as being buildings 10 storeys and over. Given the recent planning permission at Clarendon Gas Works we would expect this site to be referenced at Paragraph 2.11 certainly as the Haringey Potential Tall Buildings Locations Validation Study (2015) confirms that tall buildings up to 10 storeys high</b>	We consider that the allocation should refer to the provision of tall buildings on site	<p>It is considered that the indicative tall building growth area map at Figure 2.3 of the document, when used in conjunction with DM6 of the DMDPD established an appropriate framework for analysing the suitability of tall buildings in Wood Green. The references in the UCS are examples of potentially suitable tall building locations, within the defined area, and the document acknowledges these.</p> <p>The extant permission is for <b>‘taller’ buildings but not for a tall building.</b></p> <p>It is acknowledged that the gas holders are tall,</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>(permission granted 21/03/12) have been approved at this site. It should also be noted that the Issues and Options Wood Green AAP states that <b>"The redundant gasholders on the Clarendon Road development site are also highly visible, and their removal may emphasise the need for a landmark or significant building in this location as a wayfinding device"</b>. Finally the Haringey Urban Character Study refers to the existing scale of the Gasholders as one of only 11 buildings in the borough of 39m (13 storeys) plus, and therefore the existing site contains defined tall buildings. Reference to Tall Buildings at Clarendon Gas Works appears an incorrect omission.</p> <p>6.7 We do consider that the allocation should refer to the provision of tall buildings on site, certainly in light of the scale of the existing gasholder, the extant permission for tall buildings, Paragraph 2.21 reference to the tall buildings cluster at the junction of Western and Coburg Roads, and the commentary within the Issues and Options Wood Green AAP. It should be noted that the consented building heights for the majority of the site are significantly above those recommended at Page 156 of the 2015 Urban Character Study.</p>		<p>but the ability to see, in part, through them creates a noticeably <b>different impact on it's</b> surrounding urban realm than a solid building of the same size would. Any proposals for the holders replacements will be based on the quality of design of the proposed development, not the height of the gasholders.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RSA67	Para 2.19-2.21	Not stated	Not stated	The spirit of the text at Paragraph 2.19 to 2.21 is supported however the factual discrepancies need to be amended – 2012 not 2011 and 10 storeys not 9 storeys. <b>St William support the consideration that “It may be possible to add a tall buildings cluster at the junction of Western and Coburg Roads to mark the entrance to Wood Green from Alexandra Park and the west of the Borough” and would like to work with the Council to consider this detail further in respect of Clarendon Gas Works.</b>		<p>The Council are happy to amend the stated consent year and the 10 storey building height.</p> <p>It is considered that the indicative tall building growth area map at Figure 2.3 of the document, when used in conjunction with DM6 of the DMDPD established an appropriate framework for analysing the suitability of tall buildings in Wood Green. The references in the UCS are examples of potentially suitable tall building locations, within the defined area, and the document acknowledges these.</p> <p>No change</p>
22	RSA99	SA38 – SA 45 & 2.108 to 2.128	No	Not stated	The Highgate Site Allocations do not comply with <i>London Plan Policy 7.7 – Location and design of tall and large buildings</i> and are inconsistent with Haringey <i>Strategic Policy 11 – Tall Buildings</i> .	a) The Site Allocations DPD should record on Page 96, in preface to	The relevant policy in this regard is DM6 of the DMDPD, which identifies areas which may be suitable for tall buildings – building over 30m (the

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>Part E London Plan Policy 7.7:  <b>“E) Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks.” Also:</b>  <b>“7.25 Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline.”</b>  Historic England Advice Note 4 Tall Buildings:  <b>“2.3 An up-to-date local plan based on a sound evidence base will contain enough detail to allow the significance of heritage assets to be assessed and to secure a commitment to high quality design (paragraphs 169-170). This will help local planning authorities to identify in local plans areas where tall buildings would not be appropriate because of their adverse impact (paragraph 157)”</b>  The 2015 Preferred Options DPD set maximum heights of up to 7 storeys and would have produced buildings out of sympathy with the surrounding Conservation Area (eg, Policy 7.8, London Plan; 132, NPPF).  In the revised Jan 2016 Site Allocations DPD, max height limits have been omitted</p>	<p>Highgate Sites, that:  <b>“On London Plan Policy 7.7 Haringey Council is required within Local Plans to identify areas that are inappropriate for tall and large buildings. The Highgate Conservation Area is identified by this Local Plan as inappropriate for new tall and large buildings, these being buildings that are</b></p>	<p>equivalent of a 10 storey building). It is noted that Highgate is not included as a location suitable for a tall building. Large buildings are those that are two storeys higher than the surrounding building heights. It is not considered appropriate to identify locations within the Borough for ‘Taller’ buildings as taller buildings are considered suitable across the entire borough, including within conservation areas, subject to meeting the criteria set out in Policy DM6.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>for Highgate sites. The lack of limits will trigger applications for inappropriately sized apartment blocks. This expectation is justified by events and by supporting documents. Eg: The Council has approved a new seven-storey block at SA45 despite objections from local residents and stakeholders such as the Corporation of London</p> <p><b>The "Evidence Base" (2015 Highgate Urban Character Study - HUUS)</b> proposes five, six, seven -and even 9-storey blocks at Highgate sites and claims it determines maximum building height limits for the Conservation Area.</p> <p>Sample :</p> <p><i>"At the Aylmer Road and Archway Road gyratory, there is opportunity to create a cluster of taller buildings as a way-finder into the neighbourhood and to create an attractive gateway. These should be seven to nine storeys in height" p 215, HUUS</i></p> <p><b>This is not "evidence". The target development outcomes in the Character Study conflict with Haringey/London Plan/NPPF policies on tall building location, heritage protection etc.</b></p> <p>Historic England Advice Note 4, Tall Buildings:</p> <p><b>"3.1 In a successful plan-led system, the location and design of tall buildings will</b></p>	<p><b>substantially taller than their surroundings which cause a significant change to the skyline."</b></p>	

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><i>reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of the local plan. Techniques such as characterisation and building height studies provide evidence to support a local height definition for tall buildings and the identification of appropriate locations in local plans. This can be used to create clear core strategic policies, site allocations and development management policies, supported by supplementary planning advice where appropriate.”</i></p> <p>These sites' appropriate scale and form has not been assessed, max local height definitions have not been set/supported. Inappropriate locations have not been identified as required (London Plan 7.7, E). London Plan Policy 7.8:  <b><i>“Heritage assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.”</i></b></p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>Haringey Strategic Policy SP11:  <b>“6.1.15 Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough and 3-4 storey development in its town centres. The exception is Wood Green town centre, where buildings within its core area range between 4-9 storeys</b>  <b>6.1.16 The Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their neighbours”</b> And:  <b>6.1.18 The Council considers that currently only two areas, Haringey Heartlands/Wood Green and Tottenham Hale, have sites that may be suitable for some tall or large buildings... Elsewhere tall buildings are considered inappropriate to Haringey’s predominantly 2-3 storey residential suburban character.”</b></p> <p>Despite SP11, the Evidence Base and DPDs could provide a basis to allow tall/large buildings at the Highgate sites (as has already happened at SA45.)</p>		
23	RSA104	Para 2.109	No	Yes	<p>On page 96 under the sub-index para 2.109 the property is described as “Gonnermann Antiques Site” and listed as site SA40 and the “Former Highgate Rail Station” is listed as site SA39.</p>	Correction required	It is accepted that the maps for SA39 and SA40 have been swapped over. This is a publishing error, and

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
							will be included for modification by the Inspector.
221	RSA344	Paragraph 2.1.3.	Not stated	Not stated	We support the proposed green chain linking Wood Green Common to the old rail line between Cumberland/ Wolseley and Bradley/Barrett roads and Trinity Gardens as an important part of the Green infrastructure network	None	Support is noted.
221	RSA345	Paragraph 2.16	Not stated	Not stated	We support the statement on bringing back underused brownfield land; this must be the first priority for providing new homes in the Borough.	An additional line should be added to reflect a Brownfield first policy.	This statement is already included in the Strategic Policies DPD and does not need to be repeated here.  No change

#### SA1: Indicative Crossrail 2 Areas

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RSA64	SA1	Not stated	Not stated	Excludes reference to the "Option Via Wood Green" Crossrail 2 option (Autumn 2015). This option should be included, and is an option that St William support.	Not specifically stated	The Council supports the "option via Wood Green" however, at the time of publication, and submission, there had not been an announcement by TfL/DOT that this option has been approved.  It is noted that the Wood Green

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
							AAP is going to refresh the allocation in this area, hopefully based on an updated commitment to Crossrail 2 serving Wood Green.  No change
231	RSA374	SA1	Not Stated	Not Stated	<p>Indicative Crossrail 2 Areas - TfL and Crossrail 2 welcomes this overarching designation but note that it could benefit from being minor <b>rewording to read 'Sites required for the construction <i>and operation</i> of Crossrail 2 will be protected as necessary'. The elements of the policy which seek to ensure that the potential of Crossrail 2 is maximised through development is also supported. In relation to specific allocations, Haringey Council should note the following:</b></p> <ul style="list-style-type: none"> <li>• SA7 – the northern part of this site has been identified as being required as a worksite associated with a potential Crossrail 2 station at Wood Green.</li> <li>• SA14 – as identified in the supporting text, part of this site has been identified as a worksite associated with a</li> </ul>	<p>Rewording: <b>read 'Sites required for the construction <i>and operation</i> of Crossrail 2 will be protected as necessary'</b></p>	<p><b>It is agreed that this can be clarified.</b></p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>potential Crossrail 2 station at Turnpike Lane.</p> <ul style="list-style-type: none"> <li>SA16 – as identified in the supporting text, part of this site has been identified as a worksite associated with a potential Crossrail 2 station at Turnpike Lane.</li> </ul>		

### SA2: Changes to Designated Employment Areas

*No comments received*

### SA3: Changes to Towns centre Boundaries

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	RSA1	SA 3 Fig 1.9	No	No	<p><b>Montagu Evans act on behalf' of La Salle</b> Investment Management, the fund managers for Coal Pensions Property Ltd, the freehold owners of the Arena Shopping Park. We consider that the draft Site Allocations <b>Development Plan document is "unsound"</b> on the basis that it proposes to exclude the Arena Shopping Park from the Green Lanes District Centre.</p> <p>Site Description</p> <p>Arena Shopping Park is located towards the</p>	<p>Retention of Arena Shopping Park within Green Lanes District Centre as identified on the attached plan.</p> <p>(Council note: see original representation</p>	<p>The change in question sought not to reduce the overall quantum of activity, or indeed commercial floorspace on this site, but rather seeks to establish a new urban form along Green Lanes, creating a <b>"High Street" frontage</b>, rather than the set-back, car-dominated typology that exists at</p>

				<p>southern end of Green Lanes district centre with a <b>Sainsbury's supermarket and a McDonald's</b> restaurant located adjacent to the shopping park with vehicular access from Williamson Road. Green Lanes District Centre is a long established shopping street, comprising a number of restaurants, cafes, takeaways and convenience shops reflecting the diverse community which reside in the area. The shopping park has good public transport accessibility with Green Lanes overground station located immediately to the north of the shopping park. Manor House underground station is located approximately 500 metres to the south of the shopping park and there are also substantial bus routes passing along Green Lanes and well situated bus stops located close to shopping park. The shopping park has a very good level of accessibility with a PTAL rating of 6. the highest ranking of public transport accessibility.</p> <p>The shopping park provides an important contribution to the district centre with a diverse retail offer including the recent opening of TK Maxx in the former Royal Mail unit. The majority of the shopping park benefits from unrestricted open A1 retail use together with complementary cafes and a health and fitness use on the first floor. It is considered that the nature and composition of the shopping park together with this prominent location in Green Lanes provides a robust case for Arena Shopping Park to remain within the designated</p>	for attached plan).	<p>present.</p> <p>Currently there is a presumption that the creation of this new typology in the long term, will mean that the town centre boundary will shift to reflect this. There is however no need for the town centre boundary to reduce to meet the aims of the policy. Indeed a range of activity being achieved <b>"behind the High Rd"</b>.</p> <p>We agree with the respondents that there is no need to reduce the overall amount of retail floorspace in Green Lanes District Centre. It is at present a very successful centre with low vacancy, and vibrant daytime, and evening economies. The Council would expect any proposal that comes forward on this site to further contribute to this.</p>
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				<p>Green Lanes District Centre.</p> <p>Policy background</p> <p>The boundary of Green Lanes District Centre was amended to include the Arena Shopping Park within the defined district centre in the Haringey Unitary Development Plan (UDPJ which was adopted in July 2006. The UDP recognised that opportunities to accommodate additional retail provision in the district centre was limited to small infill however the inclusion of Arena Shopping Park into the district centre offered an opportunity for greater diversity in terms of retail offer Arena Shopping Park is also defined within Green lanes district centre in the <b>Haringey's</b> Local Plan: Strategic Policies (formerly Core Strategy) 2012,</p> <p>We note that that Policy SP10: Town Centres seeks to promote and encourage the development of retail, office, community, leisure, entertainment and cultural uses in district centres the council continues to support the importance of having service centres to meet peoples day-to-day needs and that the council take a proactive approach to reinvigorating the town centres, widening their offer, developing their identities, improving the <b>public 'calm</b> and accessibility to the shopping park. In relation Green Lanes District Centre Policy SP10 acknowledges that the centre includes the Arena Shopping Park which is a more recent addition and that the centre provides for a diverse community, with tire bulk</p>		<p>As such, and noting the co-ordinated responses from landowners on SA29, the Council will amend the Town Centre boundary on the proposed Proposals Map, so that it matches that in the current adopted 2013 Proposals Map.</p>
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				<p>of national multiple outlets located in the Arena Shopping Park.</p> <p>The National Planning Policy Framework (NPPF) March 2012 provides guidance from central Government in respect of inter alia, the preparation of local plans.</p> <p>Paragraph 157 states that local plans ‘should</p> <ul style="list-style-type: none"> <li>• <b>plan positively for the development and</b> infrastructure required in the area to meet the objectives, principles and policies of this framework; <ul style="list-style-type: none"> <li>- be drawn up over an appropriate timescale, preferably a 15 year timeline, to take account of longer requirements, and be kept up to date.</li> <li>- be based on cooperation of neighbouring authorities, public, voluntary and private sector organisations.</li> <li>- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale and quantum of development where appropriate.</li> </ul> </li> </ul> <p>With regard to business needs Paragraph 160 states that local planning authorities should have a clear understanding of business needs within the economic market operating within and across the area. To achieve this they should:</p> <ul style="list-style-type: none"> <li>- prepare and maintain a robust case to understand both the existing business needs and likely changes to the market;</li> </ul>		
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				<p>- work closely with business communities to understand the changing needs and identify and adjust barriers to investment, including lack of housing, infrastructure or viability.</p> <p>Paragraph 161 states that local planning authorities should use an evidence base to assess, inter alia, the capacity of existing centres to accommodate new town centre development and the need for floorspace and economic development for all foreseeable types of economic activity over the plan period including full retail and leisure development.</p> <p>Planning case for Arena Shopping Park to remain within the Green Lanes District Centre</p> <p>We consider that the Arena Shopping Park provides a positive contribution to Green Lanes District Centre and to exclude it from the designated district centre boundary could restrict and stifle future development in terms of changing retailer representation which we consider would be contrary to the NPPF.</p> <p>We consider that this is of even greater significance given the size and importance of Arena Shopping Park in the context of Green Lanes District Centre. Potentially stifling sustainable economic development born such a large part of the district centre could in turn have a detrimental effect on sustainable economic development across the whole of the district centre. Moreover we note that the Council has long term aspirations for</p>		
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				<p>comprehensive redevelopment of the site and wider area to deliver additional housing in the Borough and consider that removing Arena Shopping Centre from the district centre designation will reduce the ability to attract retail to this area and consequently hinder the ability to develop future redevelopment options for the site (including high density residential use) which is likely to be supported by retail development.</p> <p>We note that it is the Councils intention to extent the length of Green Lanes District Centre further to the south to provide scope for a more linear frontage and to develop more high street shops. However, we do not consider retaining Arena Shopping Park within the district centre boundary will prevent retail development of the high street further south in a linear form.</p> <p>It is considered that the proposed removal of the shopping park from the designated district centre could have detrimental long term impacts on the ability to continue to diversify the retail offer which may change over time subject to tenant demand and change in retailer representation.</p> <p>On the basis of the above we do not consider that there are any sound planning reasons given the highly sustainable location, unrestricted A1 retail use of the park and potential for future <b>‘redevelopment opportunities that the shopping park should be excluded front the defined</b></p>		
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					<p>Green Lanes District Centre.</p> <p>In light of the above evidence we are of the view that the boundary of Green Lanes District Centre is amended to include Arena Shopping Park as identified on the attached plan.</p> <p>(Council note: see original representation for attached plan).</p>		
2	RSA3	SA3	No	Not stated	<p>In respect of the Green Lanes District Centre, Policy SA3 proposes the reduction of the town centre boundary to reduce the envelope from that of the existing Retail Park to the Green Lanes frontage.</p> <p>In addition, the preferred allocation (SA29) for the Arena Retail Park provides for the long-term potential for redevelopment of the existing retail park but does not specifically provide for the <b>retention of the existing Sainsbury's store on the site.</b></p> <p>We are surprised and concerned at the approach that the Council is taking to these two policies given the undoubted importance of <b>the Sainsbury's store in serving the local community</b> but also in helping the Green Lanes District Centre fulfil its retail function.</p> <p>Town Centre Boundary</p> <p>In short, we consider that there is no justification to support this proposed amendment to the town centre boundary as the <b>Council's own</b> evidence base does not support</p>	<p>Given this, and in accordance with the definition of a District Centre, the <b>Sainsbury's</b> store must remain within the town centre boundary. It is the only logical approach which will be found sound at Examination.</p> <p>In short, the current text regarding the boundary for the Green Lanes District</p>	<p>The change in question sought not to reduce the overall quantum of activity, or indeed commercial floorspace on this site, but rather seeks to establish a new urban form along Green Lanes, creating a <b>"High Street" frontage</b>, rather than the set-back, car-dominated typology that exists at present.</p> <p>Currently there is a presumption that the creation of this new typology in the long term, will mean that the town centre boundary will shift to reflect this. There is however no need for the town centre boundary to reduce to meet the</p>

				<p>this approach.</p> <p>The NLP Retail and Town Centres Study (2013) does not recommend this change. Indeed, paragraph 15.26 of the Study clearly identifies that (our emphasis):  <i>We consider the <b>town centre boundaries</b> and <b>primary/secondary shopping frontages to be appropriate</b> for <b>Wood Green, Muswell Hill and Green Lanes</b>, having regard to both the existing situation and the identified site allocations for potential development within them.</i></p> <p><b>To clarify, the Council’s own up-to-date evidence base is recommending that the current policy position, with the Arena Retail Park and the Sainsbury’s store included within the boundary of the Green Lanes District Centre, should be retained. Given this, the amendments proposed by policy SA3, in respect of Green Lanes, are entirely unsound. It is simply unjustified and inconsistent when viewed in the context of the Council’s own evidence base and national planning policy.</b></p> <p>Furthermore, Paragraph 15.17 of the NLP Study advises that district centres will usually comprise groups of shops often containing at least one supermarket or superstore while the London Plan suggests district centres traditionally provide convenience goods and services for more local communities and are accessible by public transport, walking and</p>	<p>Centre should be deleted. In accordance with the evidence base, the boundary for the District Centre should be retained as currently provided by Haringey policy ie the Arena Retail Park and the <b>Sainsbury’s</b> store on Williamson Road should be included.</p>	<p>aims of the policy. Indeed a range of activity being achieved <b>“behind the High Rd”</b> would be supported.</p> <p>We agree with the respondents that there is no need to reduce the overall amount of retail floorspace in Green Lanes District Centre. It is at present a very successful centre with low vacancy, and vibrant daytime, and evening economies. The Council would expect any proposal that comes forward on this site to further contribute to this. The Council is however, concerned that the long-term vitality of the centre is affected by traffic caused by the car-dominant retail park.</p> <p><b>As such, and noting the co-ordinated responses from landowners on SA29, the Council will amend</b></p>
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					<p>cycling.</p> <p>The Sainsbury's store is the key supermarket within the District Centre. NLP clarify that the Iceland store is only 530 sqm (net sales), which is only slightly above the offer of a convenience store, with Tesco only operating an Express format store. <b>At 4,341 sqm, the Sainsbury's store is by far the largest convenience store within the centre and, given the size of other units, is the only store which provides a true supermarket offer within the context of providing a main convenience goods shopping destination within Green Lanes.</b></p>		<p>the Town Centre boundary on the proposed Proposals Map, so that it matches that in the current adopted 2013 Proposals Map.</p>
6	RSA31	SA3	Yes	Yes	Wood Green Investments Ltd supports the expansion of town centre boundaries within the borough, particularly in Wood Green.		Noted.
13	RSA65	SA3 Fig 1.5 & Fig 1.8	Not stated	Not stated	Excludes Clarendon Gas Works. Given the permitted uses to the north of the site, and the emerging objectives of the Wood Green AAP, it may be prudent to extend the Wood Green Metropolitan Boundary to cover the north of the Clarendon Gas Works. Site allocation SA21: Clarendon Square Gateway directly to the east, for example, is included in the allocation.	Not specifically stated	<p>The Council does not believe that there is sufficient evidence to justify increasing the extent of Wood Green Metropolitan Town Centre.</p> <p>It is acknowledged that the emerging Wood Green AAP will go into more detail regarding what the uses on an enhanced link between Wood Green and Haringey Heartlands/Alexandra Palace will be, and offer</p>

							an opportunity to alter town centre boundaries as necessary to reflect these.
							No change
19	RSA95	SA3	No	Yes	<p>Policy SA3: Changes to Town Centre Boundaries</p> <p>Parkstock Ltd are the freeholders of both 10 Stroud Green Road and 269 – 271 Seven Sister’s Road located within Finsbury Park.</p> <p>We are supportive of Policy SA3 and the proposed designation of Finsbury Park as a District Centre. We consider that it is important to secure Finsbury Park as a District Centre to both ensure consistency with adjoining boroughs but also to provide the required status of the Centre as an area where mixed use regeneration, in the most accessible and appropriate locations, is supported by the Council.</p> <p>However, we do not consider that the accompanying figures (1.6 – 1.10) are effective or clear. Figures 1.6 – 1.10 show a mixture of district and metropolitan centres, whilst all of these centres are shown as town centres on Figure 1.5. We think that this labelling is confusing and unhelpful, and therefore does not deliver an effective plan. Furthermore, Policy SA3 notes that primary shopping areas are shown yellow on the above figures, when this is not the case.</p>	<p>In order to make the Site Allocations DPD sound we recommend that the text and associated plans for Policy SA3 are aligned in terms of the use of terminology for town centre designations.</p> <p>We also recommend that the proposed secondary frontage at 236 to 271 Seven Sisters Road is instead proposed as a primary</p>	<p>The Council considers that the policy text and associated figures are clearly aligned with each figure stating the town centre designation, <b>with the exception that SA3 should be amended to state that the primary shopping areas are shown as blue dotted areas and not yellow on the figures.</b></p> <p>The differentiation between primary and secondary is not to do with quantity of activity, or footfall, or development aspiration, it is concerned with the management of ground floor retail uses. It is considered that this frontage represents the start of the edge of the town centre, and not</p>

					Furthermore, within Figure 1.10 we are supportive of the primary frontage designation from the corner of Seven Sisters Road (no. 263) to 10 Stroud Green Road. We also note that a secondary frontage is proposed along 236 to 271 Seven Sisters Road and along the new route proposed through the Finsbury Park Bowling Alley (SA36). Whilst we welcome these frontage designations we question why 263 to 271 is a secondary, rather than primary, frontage given the level of activity and footfall along this part of Seven Sisters Road. To deliver an effective strategy we consider that 263 to 271 should be a primary frontage to assist with the delivery of a vibrant and active district centre.	frontage to ensure an effective strategy is delivered.	the primary shopping area within the centre.
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#### SA4: Safeguarded Waste Sites

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RSA5	SA4	Not stated	Not stated	In their representations dated 26 March 2015, THFC objected to the safeguarding of 44 White Hart Lane under this policy ( <b>Attachment 1</b> , paras. 18 – 22). THFC stated in March 2015 that they intended to use this site to facilitate the construction of the stadium and the wider development and that the current occupiers of the site (Redcorn Limited) were relocating their current vehicle dismantling business to their site in Brantwood Road. In effect, the relocation of the business would not result in any net reduction in the processing of waste on the basis that Redcorn Limited business operations would be	Removal of safeguarding of 44 White Hart Lane site.	While it is noted that the licensed waste capacity has been transferred onto the Brantwood Rd site, the Council is still waiting on demonstration that the actual maximum waste

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>relocated in their entirety. The relocation of Redcorn Limited to Brantwood Road has now been completed.</p> <p>As set out in paragraph 6 above, on 16 December 2016 Haringey's Planning Sub Committee also resolved to grant planning application HGY/2015/3002 for temporary planning permission for the use of 44 White Hart Lane as a construction compound for the stadium development for a period of 3 years. The decision notice was issued on 12 February 2016. The Planning Sub Committee Report describes how the last use of the recently vacant site was as a vehicle recovery facility (para. 6.16) and notes Recorn's relocation to the Brantwood Road site (para. 11.1.4). Paragraph 6.17 of the Committee Report describes how the 44 White Hart Lane site is within the High Road West site allocation in the emerging Tottenham AAP and states:</p> <p><b><i>"The High Road West regeneration area envisages a comprehensive redevelopment creating residential led mixed use neighbourhood including a new public realm linking White Hart Lane Station and a redeveloped football stadium and an expanded local shopping centre on the High Road opposite the football stadium including the new public square. A master plan for the High Road West area has been prepared, in consultation with local residents and businesses and was considered by Cabinet at its meeting on the 16 December 2014. The Council's Strategic Regeneration Framework envisages that High Road West will play a key role in delivering the aspirations for regenerating the area."</i></b></p>		<p>throughput capacity from 44 White Hart Lane can be accommodated for through the facility at Brantwood Road. Until such time as this is demonstrated, the Council is not in position to remove the waste safeguarding from 44 White Hart Lane.</p> <p>No change</p> <p>NB: Table 2 on p15 of the Site Allocations DPD has been updated to reflect the maximum throughput capacity achieved at each of the identified</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>The Planning Sub Committee Report goes onto state (para. 11.1.5):  <b><i>“The principle of an alternative use of the application site for non-waste use is in accordance with development plan policy because <u>the previous waste-handling capacity of the application site has been transferred.</u> In addition the use proposed is only temporary and, following the cessation of the temporary use of the site will be available for redevelopment in accordance with site allocation NT5 or to be returned to waste use subject to the outcome of the North London Waste Plan.” [our underlining]</i></b></p> <p>In addition, THFC have been liaising with the Environment Agency with regard to waste operations at the 44 White Hart Lane site. Correspondence from THFC to Harginey planning officers to explain the background is included at <b>Attachment 2</b>. It explains how the permitted waste capacity of 44 White Hart Lane (75,000 tonnes per annum) has effectively been transferred to Brantwood Road and as such there is no longer a requirement and therefore it is not justified to safeguard the 44 White Hart Lane site.</p>		waste sites, using EA data from the past 5 years or more. This is in preference to the licensed waste capacity, for which the banding is not reflective of actual capacity. This approach accords with the methodology of the North London Waste Plan and ensures baseline consistency across Local Plan documents.
4	RSA7	SA4	Not stated	Not stated	<b>We note that the O’Donovans site</b> in Markfield Road will be affected by Crossrail 2, and recommend that a site is safeguarded in a more suitable location for the business to relocate. The draft N London Waste Plan proposes sites in the NE Tottenham industrial area.	Not specifically stated	Both the London Plan (Policy 5.17) & NLWP require that, if for any reason, an existing waste management site

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
							is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved. The onus will be upon the developer (in this case Crossrail) to find a new site prior to any redevelopment.  No change
34	RSA117	SA4	Yes	Yes	North London Waste Authority notes that 'the waste sites identified in the schedule below (Table 2 in the document) will be safeguarded for waste use until <b>alternative provision has been made.</b> ' The Reuse and Recycling Centres (RRCs) at Western Road and Park View Road which are managed by the Authority are contained in table 2. The specific notification of the protection afforded to waste sites is welcomed and the Authority supports the inclusion of section SA4.	No modification to this section considered necessary.	Noted. NB A minor modification is proposed to Table 2 to replace the licensed waste capacity with the maximum throughput capacity achieved

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
							to align with the baseline data underpinning the emerging North London Waste Plan.

#### SA5: LBH Civic Centre

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA8	SA5	Not stated	Not stated	We welcome proposals to develop the car-parking area. In general reducing car-parking capacity will reduce the number of car journeys and encourage alternative modes of travel.	Not specifically stated	Noted.

#### SA6: Green Ridings House

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35,	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any</i>	<b>Noted, this amendment will be made.</b>

		SA47, SA53, SA57			the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	<i>development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
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#### SA7: Wood Green Bus Garage

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA9	SA7	Not stated	Not stated	We welcome the proposed green chain through this site and ask that it should be as ecologically rich as possible so it is a wildlife corridor not just a pleasant walking route.	Not specifically stated	Support for the Green Link is noted but it is unlikely that the requirement for this to be a wildlife corridor is unlikely to materialise <b>given the site's location</b> within the town centre and its proposed use.  No change
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33,	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12).	<b>Noted, this amendment will be made.</b>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
		SA34, SA35, SA47, SA53, SA57			across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	<i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	

#### SA8: Station Road Offices

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RSA46	SA8	Not stated	Not stated	Workspace supports the broad principles of redevelopment included within draft policy SA8. In particular, the acceptance that all buildings on the Site can be demolished and that this is a suitable location for a tall building are welcome. Given the excellent existing PTAL and the likelihood of Crossrail 2 coming in the future, this is considered an important Site that can	The draft allocation should be amended to advise that the redevelopment of SA8 should not fetter or prejudice the future redevelopment of SA7 but that the development potential of SA7 does not need to be included in the masterplanning	Noted, however, this is an exceptional and unique circumstance as the Bus Garage is likely to remain on the neighbouring site with development potential being realised by bridging over the existing facility. As such, it is appropriate that the redevelopment of SA8 have regard to the likely

					<p>deliver a notable number of new homes and commercial space over the next plan period and in accordance with the growth strategies of LBH and the London Plan. Furthermore, this is a prominent site within Wood Green Town Centre and presents a key opportunity to enhance the character, visual amenity and function of this part of the Town Centre.</p> <p>Notwithstanding the above, Workspace raises the following comments in respect of policy SA8:</p> <p>1) The draft site allocation requires a masterplan which includes consideration of the potential redevelopment of the Wood Green Bus Garage site. The Wood Green Bus Garage site is identified separately as draft Site Allocation SA7. Whilst there is merit in an illustrative masterplan to demonstrate how Site Allocation SA8 could come forward in a coordinated manner, it is not considered reasonable to require the masterplan to extend to an adjoining site allocation.</p>	exercise.	<p>future form of any redevelopment of SA7.</p> <p>No change</p>
9	RSA47	SA8	Not stated	Not stated	<p>2) The Site is currently occupied by employment generating uses. The draft site allocation seeks to introduce town centre uses to the</p>	The requirements of Policy SP9 and the Planning Obligations SPD should be waived	The policy requirement is that the employment floorspace on this site be re-provided as part of any

					ground and first floor of any redevelopment proposal which could potentially include an element of employment. However, <b>the 'Development Guidelines'</b> advise that a net loss of employment floorspace would trigger a financial contribution in line with Policy SP9 and the Planning Obligations SPD. This approach is inconsistent. On one hand LBH is seeking to limit the reprovision of employment floorspace but on the other is seeking a financial contribution to compensate for any loss. It would be more appropriate to require a mix of uses suitable for the town centre location including the provision of employment and residential. This provides greater flexibility and would allow the allocation to adapt to changing market conditions, for example.	as a reduction in employment floorspace is in line with the <b>Council's development</b> aspirations for this key town centre site. At the very least they should be subject to viability.	mixed use redevelopment. Provision is however made for retail and other town centre uses at ground and first floors, as well as replacement employment floorspace. The allocation also recognises that the site lends itself to residential use. The balance between residential and replacement employment floorspace will likely be determined by issues of layout, bulk, mass, height and viability. If employment floorspace is lost, this will need to be compensated for through a financial obligation.  <b>Amend paragraph 2.28 to include 'replacement employment floorspace'</b>
9	RSA48	SA8	Not stated	Not stated	3) The draft allocation seeks a <b>'finer-grain street layout'</b> with north-south and east-west pedestrian links. The Site is relatively narrow which presents difficulties in delivering an appropriate quantum of development (responding to the excellent PTAL and appropriate	The requirement for a <b>'finer-grain street layout'</b> should be removed from the allocation	The Council considers that the site, which already has two streets accessing it, is large and would benefit from a finer grain street layout, than is currently present on site.  No change

					density range as set out in the <b>London Plan</b> ) and a <b>'finer-grain street layout'</b> . The area is not typified by a fine-grain street layout and whilst there will be benefits to the north-south and east-west pedestrian links, the requirement a fine-grain street layout is considered neither practical nor justified. Moreover, this level of prescription does not provide for a flexible or positively prepared policy.		
9	RSA49	SA8	Not stated	Not stated	4) The identification of the Site as suitable for a tall building is welcomed and the suggested location at the junction of Wood Green High Road and Station Road is agreed. It is likely that heights on the remainder of the Site will be lower but the approach to heights on the remainder of the Site should be design-led (responding to emerging Policy DM6) and take into consideration a range of factors including local character. In our view the allocation should not require a reduction in height. Rather, it should advise that heights should be justified in the context of local character.	In our view the allocation should not require a reduction in height. Rather, it should advise that heights should be justified in the context of local character	The entire redevelopment will need to accord to the other relevant policies of the Plan, including Policy DM1 (design-led approach) and DM6 (building heights). However, the provision of a landmark building on the corner of Wood Green High Road and Station Rd necessitates a stepping down in heights across the rest of the site, especially along Station Road in particular and this is a long linear frontage.  No change
9	RSA50	SA8	Not	Not stated	5) The draft allocation requires the	Not specifically stated	Noted.

			stated		provision of open space on the Site that connects to a 'green chain'. The merit of providing open space on the Site is acknowledged. However, the form and quantum would need to be carefully considered in the context of design, and balanced against other requirements of the allocation (e.g. fine-grain street layout, pedestrian links and potential access to Site SA7).		
9	RSA51	SA8	Not stated	Not stated	6) The Development Guidelines suggest that consideration should be given to providing private courtyards 'fronting onto Station Road and Wood Green High Road'. The Station Road and Wood Green High Road sections of the Site are identified as primary frontages on the adopted Policies Map (2016). The provision of courtyards in the suggested locations would undermine the aspiration for active town centre frontages. Courtyards could be provided on upper floors but this would need to be considered in the context of the overall design approach. This level of prescription is not appropriate and directly conflicts with other aspirations of the draft allocation.	Not specifically stated	The Council considers that the 'new private' courtyards could work with town centre ground floor uses, providing relief from the traffic environment, whilst adding to the activity at street level. This would not conflict with the frontage designation but could work in tandem with it. It may also be suitable for commercial and or residential development on upper levels.  No change
9	RSA52	SA8	Not stated	Not stated	7) It is unclear from the draft wording as to whether access for	In the event that access to Site SA7 is	Noted, however, this may be necessary to facilitate

					bus stabling at the adjacent Site SA7 is expected to be delivered through Site SA8. This should be clarified. In the event that access to Site SA7 is envisaged through Site SA8, Workspace would strongly object to this. It would be unreasonable and unenforceable to require such access through this Site and could severely compromise its future development. Access to SA7 should be provided from a suitable point to the north from a highway adjacent to that site.	envisaged through Site SA8, Workspace would strongly object to this.	comprehensive development across both sites.  No change
9	RSA53	SA8	Not stated	Not stated	8) The benefit of connecting to a decentralised energy network is recognised. There is not currently a network in place within the local area. Should one become available the aspiration would be to connect to this. However, it is not considered reasonable to seek land owners to relinquish part of the site to provide an easement for such a network, nor in our view should this be necessary.	We consider that this element of the site allocation is overly prescriptive and should be omitted.	The Council will continue to support the flexibility built into the development guideline governing decentralised energy infrastructure.  No change
9	RSA54	SA8	Not stated	Not stated	To summarise, the broad principles for redevelopment of the Site as outlined in the emerging site allocation SA8 are welcomed. However, the burden of requirements/ guidelines set out in the allocation (including		The site is a large, well located site within the Metropolitan town centre. There is already a precedent of a tall building on the site and taller buildings both on

					<p>the provision of a fine-grain street layout, pedestrian connections, open space and potential access to Site SA7) are likely to present difficulties in delivering an appropriate quantum of development and may impact on development viability. Moreover, several provisions are in direct conflict with one another (e.g. active town centre frontages and private courtyards, reduction in employment floorspace and a financial contribution to compensate for a loss of employment). Additional flexibility and a lesser degree of prescription should be embedded within the allocation to allow a high quality design-led and viable redevelopment. Workspace commit to working with London Borough Haringey and surrounding landowners to bring forward comprehensive redevelopment of SDA8 for both employment and residential purposes.</p>		<p>and neighbouring the site. The Council is content that site requirements and guidelines are not burdensome but will help deliver a high quality mixed use development on the site that achieves the indicative development capacity set out.</p> <p>No change</p>
231	RSA371	SA8	Not Stated	Not Stated		<p>SA8 Station Road Offices - TfL would request that an additional bullet point is included stating: "<i>any development on</i></p>	<p>It is considered that this is adequately covered in the first Site Requirement.</p> <p>No change</p>

						<i>this site should be aware of the provision of a bus facility on the adjacent site.”</i>	
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#### SA9: Mecca Bingo

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA11	SA9	Not stated	Not stated	We support the idea of deculverting the Moselle on this and other sites (eg SA11, SA12, SA21, SA61).	Not specifically stated	Noted.
232	RSA376	SA9	Not stated	Not stated		The Development Guidelines and Site Requirements should reference the need to contribute positively to the adjoining Noel Park conservation area and its significance.	<b>An additional site requirement will be added to this effect.</b>

#### SA10: Morrison's Wood Green

*No comments received*

#### SA11: Wood Green Library

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
5	RSA29	SA 11	No	No response given	Capital and Regional (C&R) is one of the leading community shopping centre owners in the UK and currently operates	We would recommend that the second bullet point under	<b>It is agreed that the development guideline can be</b>

				<p>eight major centres. C&amp;R acquired The Mall at Wood Green in 1996, since which time it has made substantial investment to modernise both the malls and car park and to broaden the range of uses, introducing a cinema and restaurants.</p> <p>C&amp;R has been a major investor in Wood Green for 20 years and is committed to further investment in the Mall to improve both the quality and range of its offer to visitors. C&amp;R is a therefore a major landowner in Wood Green Town Centre and a key stakeholder in plans to bring forward development in the town centre.</p> <p>The proposals in respect of the Wood Green Library site location incorporate a significant area of land that is in the ownership of C&amp;R. Our client is currently in discussions with the Council to bring forward development to facilitate provision of a national brand food retailer within the Mall to be served by a surface level car park making use of the former petrol filling station site on the corner of Mayes Road and Caxton Road. These proposals will provide for much improved public realm in this location with enhanced pedestrian route to the frontage of the site along Caxton Road and improvement and active frontage to the Mall along Mayes Road. The proposals have also been designed to allow for longer term residential</p>	<p>Development Guidelines should be reworded as follows:</p> <p><b>“Development on parts of the site directly opposite residential buildings on Caxton and Mayes Road should respect their residential amenity”</b></p> <p>We would also recommend that a further bullet point is added under development guidelines as follows:</p> <p><b>“Having regard to the different ownerships across the site, consideration will be given to phasing of development which contributes to the overall site allocation objectives as development site opportunities come forward”.</b></p>	<p><b>improved as suggested: “Development heights on parts of the site directly opposite residential buildings on Caxton and Mayes Road should respect their residential amenity.”</b></p> <p>Regarding site delivery, it is noted that there are policies in the DMDPD which seek to co-ordinate delivery of more complicated sites, and that therefore the added statement is not required.</p> <p>It is noted that the Council is at present in the process of developing a Wood Green AAP, with a linked delivery framework.</p>
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				<p>development above what will the surface level car park to serve the new food store.</p> <p>The Council’s <b>development aspirations</b> for the site allocation are set within the policy including site requirements and development guidelines. Delivery of these aspirations would rely on the involvement of a number of landowners across a range of different land uses. Some sites are identified for substantial new development, whilst others would provide the public spaces, infrastructure and facilities that are necessary to facilitate it. There is no detail of how delivery of these aspirations would be coordinated or financed in a comprehensive and equitable way and we recommend that consideration needs to be given to these aspects.</p> <p>Having regard to the different site <b>ownerships and our client’s current</b> development proposals noted above, we consider that the potential for phasing of <b>development to realise the Council’s</b> objectives should be recognised in the policy. Without such a reference, the policy is unlikely to be effective in delivering the site allocation and is unsound on this basis.</p> <p>We also consider that the reference to restriction on height at bullet point two</p>		
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					under Development Guidelines may serve to unnecessarily restrict the development potential of the site in this location. Height is a relative term and whilst development will need to respect the amenity of nearby residential properties, appropriate height and relationship to adjoining sites will be a matter for detailed design and testing. We therefore consider that the policy is not effective in this regard and unsound on this basis.		
232	RSA377	SA11	Not stated	Not stated		For consistency purposes the same details should be provided on this site as expressed for SA10, with regards to the setting of the Gaumont Cinema	It is considered that this is currently in the document.  No change

**SA12: The Mall**

*No comments received*

**SA13: Bury Road Car Park**

*No comments received*

**SA14: 16-54 Wood Green High Road**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	RSA2	SA14	No	Not stated	<p>The preferred strategy for this site, which incorporates the <b>existing Sainsbury's store, is to</b> provide for the mixed-use redevelopment of the site to comprise town centre retail uses at ground and first floor level with residential uses above.</p> <p>As currently drafted, we object to this proposed allocation. <b>Whilst Sainsbury's would be</b> happy to explore options to contribute to the redevelopment of this site, the current wording provides no <b>security to Sainsbury's that any</b> redevelopment would re-provide a foodstore on the site.</p> <p><b>The Sainsbury's store at 54</b> Wood Green High Road is a key anchor store for the Wood Green Metropolitan Centre having opened in 2003. As such, any proposed policy must allow for the continued use of the site as a foodstore.</p> <p><b>Recognition of Sainsbury's</b></p>	<p>As such, we consider that the use allocation for this site must be amended to state:  <i>Comprehensive redevelopment of current High Road frontages for mixed use development consisting of town centre uses at ground and first floor level, including the suitable re-provision of the existing supermarket on-site, with residential above, and a potential new Crossrail 2 station entrance onto Wood Green High Road.</i></p> <p>The above wording will incorporate sufficient flexibility into the allocation to ensure it is aspirational yet realistic in accordance with national guidance.</p> <p>Importantly, the amended allocation would specifically ensure that a supermarket use can continue during the lifetime of the DPD. However, the wording will also ensure that the sustainable redevelopment of the site can come forward if viable.</p>	<p>SA14 is located within the Metropolitan town centre and has a designated primary frontage onto the High Street. The site is therefore suitable for the full range of town centre uses, including A1 uses, which will be required and prioritised at ground floor level. Ultimately however, it will be for the detailed planning application(s) to establish the development use on site, including retail provision, having regard to commercial and viability considerations. It is therefore not appropriate for the allocation to</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					occupation of the site, its important anchor role within the Metropolitan Centre, and the potential for this convenience retailing use to continue, is fundamental in the formation of a robust and ultimately sound policy.		safeguard any specific A1 use for reprovision on the site.  No change
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken.</i> <i>Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	<b>Noted, this amendment will be made.</b>

SA15: Westbury & Whymark Aves

ID	Rep ID	Allocation	Sound	Legally	Reason	Change Sought	Council's
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		/ Policy / Figure / Para		Compliant			Comments / Response
6	RSA30	SA15	Not stated	Not stated	<p>Wood Green Investments Ltd ('the client') has an investment in relation to properties 4, 6, 8, 10, 12 and 14 High Road within the proposed site allocation area 'SA 15: Westbury &amp; Whymark Aves' and therefore has an aspiration to bring forward and encourage the development of this area. These aspirations have been discussed with the Council on 20th August 2015 led by Matthew Patterson, Head of Strategic Planning, Transport &amp; Infrastructure in regards to the upcoming Wood Green AAP.</p> <p><b>Site Allocation Particulars</b> The Current/Previous</p>	<p>Haringey's vision for SA 15, as an area for <b>"Redevelopment of existing town centre buildings to create a landmark building marking Turnpike Lane Crossrail Station, with town centre uses at ground and first floor levels and residential above"</b> (Paragraph 2.43) is welcomed and supported by Wood Green Investments Ltd.</p> <p>1.10 As was mentioned in the representations previously submitted on the 'Preferred Options Site Allocations DPD', whilst it is understood that that the Crossrail 2 proposal is clearly a strong instigator for development, our client would look to ensure that development is encouraged on this site regardless of whether Crossrail 2 is formally announced to be aligned with Turnpike Lane Station. Re-development in this area would significantly regenerate the area positively irrespective of whether Crossrail 2 does come through this station. We would like to ensure that this is reflected within the text at paragraph 2.42.</p> <p>1.11 In recognition of the above our client proposes the following new wording for the text at Paragraph 2.42: <b>"Redevelopment of existing town centre buildings to create a landmark building marking Turnpike Lane Crossrail Station, with town centre uses at ground and first</b></p>	<p>Support for the allocation is noted, as is the willingness to work with the Council to realise the development potential of the site.</p> <p><b>It is agreed that the current/previous use can be updated to reflect the mixed use town centre nature of the site at present.</b></p> <p>The Council has used a consistent approach in calculating the indicative minimum development capacities for each allocation. This is to show that together, the site allocations can meet the</p>

				<p>use of the site is described within the document as being <b>‘Predominantly Residential’</b>. It should be noted that the current use of the site offers principally retail units at ground floor with some residential units above and therefore it is suggested that this be amended.</p> <p>It is stated that the indicative development capacity for Town Centre uses is approximately 742 sqm. Having done some measurements of the existing site, the existing ground floor area totals approximately 3000sqm. As the Council have indicated that they would preferably like to see town centre uses at ground and first floor levels, this would potentially</p>	<p><b>floor levels and residential above.”</b> The re-wording of paragraph 2.4 will also sit in line with the reference to the station within the Commentary.</p> <p>1.12 This proposed re-wording would not compromise the opportunity to redevelop the site if Crossrail 2 does come forward on this basis would support development of the site in either instance. <b>Commentary</b> 1.13 The re-wording of paragraph 2.4 will also sit in line with the reference to the station within the Commentary (Paragraph 2.43) which describes the station as <b>‘Turnpike Lane tube station’</b>.</p> <p>1.14 In addition, it is noted that the <b>‘Timeframe for Delivery’ of redevelopment</b> of the allocated site is marked for 2020 onwards. It has been reasonably assumed that this is to be in line with the proposed delivery of Crossrail. Wood Green Investments Ltd would suggest that this timeframe may restrict development opportunities on the site.</p> <p>It is stated within Paragraph 2.43 that redevelopment will be encouraged through a <b>‘comprehensive development’</b>. However due to the complex land ownership, especially on Westbury Avenue, this would result in a comprehensive delivery being unlikely. Therefore the delivery of this site should be encouraged to come forward in a</p>	<p>objectively identified housing need in the Borough. The aim is not to limit capacity on each of the sites. The actual quantum of development that comes forward on each site will be determined through a design-led analysis of applications using the principals set out in the Site Allocation, and the DMDPD.</p> <p><b>It is considered that, although the plan continues to be predicated on the potential introduction of a Crossrail 2 station at Turnpike Lane, the development would continue to be acceptable in light of proposed upgrades to the Piccadilly Line, and that therefore</b></p>
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				<p>amount to a maximum capacity of approximately 6000 sqm. On this basis Wood Green Investments Ltd would request that the figure be revised to consider this.</p> <p><b>Conclusions</b> Our client supports the aspirations behind the proposals for SA 15: Westbury and Whymark Aves, specifically in relation to properties 4 – 14 High Road, Wood Green; however there is concern that delivery of the site could be compromised by policy in its current form due to the restrictive time pressures, the requirement for a comprehensive rather than incremental development and the suggested close alignment with the</p>	<p>phased or incremental approach over the time period from 2015-2020 and onwards.</p> <p>1.16 It is therefore suggested that the text at Paragraph 2.43 be amended to read: <b>“... New town centre uses, an improved public realm, and residential development will be encouraged through either a comprehensive or phased development in line with a site-wide masterplan.”</b></p> <p>1.17 In recognition of the above, Wood Green Investments Ltd seeks to work together with LB Haringey to progress a comprehensive strategy for the site however not a comprehensive delivery. Prescriptive policy is inappropriate in this instance and likely to restrict and unduly delay future development proposals.</p> <p>1.18 The importance of viability is enshrined in para.173 of the NPPF which states: <b><i>“Plans should be deliverable. Therefore the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”</i></b></p> <p><b>Site Requirements</b> 1.19 Our client welcomes the Site Requirements and supports the proposed requirement of ground and first floor town centre uses fronting the High Road as well as the proposed fulcrum of tall buildings at Turnpike Lane.</p>	<p><b>the change, to increase flexibility, and therefore deliverability is acceptable.</b></p> <p>Regarding timeframe, it is considered that of the options, this is the most realistic. However, the timeframes are indicative and as such it is not a restriction on development, but a guide for stakeholders/ residents/ infrastructure providers. If an application comes forward before 2020 then this would effectively represent a ‘credit’ on the delivery of the later years of the Plan.</p> <p>It is considered that the first site requirement already contains</p>
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				<p>proposed Crossrail 2 delivery which has not yet been confirmed.</p> <p>Our client would like to work collaboratively with LB Haringey to ensure a strategy is adopted for the site that ensures a viable and successful area within an appropriate timetable regardless of whether Crossrail 2 comes into fruition or not.</p>	<p>1.20 It has been noted that the specificity of tall building development in terms of height and design of the building that was included <b>within the ‘Preferred Options’ document has been removed, and this is supported by our client.</b></p> <p>1.21 The document states at bullet point three <b>“Ground floor and town centre uses will also be expected on the north side of Westbourne Avenue.” It is believed that the reference to Westbourne Avenue has been made in error and that it should read either “Whymark Avenue” or “Westbury Avenue”.</b> For the avoidance of doubt it would be useful if this could be clarified and amended accordingly.</p> <p>1.22 The policy states at bullet point four <b>that “Development will accommodate the fulcrum of the Turnpike Lane tall buildings cluster facing the High Road opposite Turnpike Lane station”. The specificity of this may restrict development options, and therefore our client would suggest rewording the sentence to remove “opposite Turnpike Lane station”.</b></p> <p><b>Development Guidelines</b></p> <p>1.23 Our client welcomes and supports the majority of the development guidelines, especially the creation of a high quality frontage to the High Road and the opportunity to provide additional town</p>	<p>flexibility, citing <b>“co-ordinated development on other land parcels”</b> within the Allocation.</p> <p><b>It is agreed that “Westbourne” should read “Westbury”.</b></p> <p>The Council consider that the principal of having a tall building marking Turnpike Lane Station is only appropriate if it is in close proximity to Turnpike Lane Station.</p>
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						<p>centre uses at first floor level.</p> <p>It is however noted that in relation to the <b>text stating that “Height should fall away from its peak at the frontage to Wood Green High Road along Whymark Avenue”, that this is neither clear in terms of how this would work with multiple development options, nor is it worded in such a way which allows for development flexibility in terms of where the ‘peak’ of development should be located.</b></p> <p>1.25 In relation to the above, it is suggested that the sentence should be reworded to read:  <b>“Height should fall away from its peak on the High Road towards the east of the site”.</b></p>	
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47,	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	<p>We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12).</p> <p><i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken.</i></p> <p><i>Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i></p>	Noted, this amendment will be made.

		SA53, SA57					
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### SA16: Turnpike Lane Triangle

*No comments received*

### SA17: North of Hornsey Rail Depot

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA10	SA17	Not stated	Not stated	a) We welcome the requirement to enhance the ecological corridor at this site. b) the potential to provide heating via a heat pump in the New River should be explored.	Not specifically stated	It is not clear how a ground source heat pump is particularly appropriate on the New River.  No change
7	RSA32	SA17	Not stated	Not stated	Fairview wish to promote the Hampden Road site as part of the emerging Draft SADPD consultation for a residential-led mixed use redevelopment to deliver up to 182 new homes and commercial floorspace, with the aspiration to deliver the new homes and commercial space within the next 3 years.  However, Fairview have a number of <b>concerns with the Council's proposed</b> submission version of the Draft SADPD and the assessment and commentary that is included within the draft policy. These concerns are outlined in further detail below.	In light of the foregoing, it is recommended that the text at paragraph 2.46, which provides a summary of the site allocation, should be amended to read as follows: <i>"Residential-led mixed use development securing, where feasible,</i>	The Council has used a consistent approach in calculating the indicative development capacities for each allocation. This is to show that together, the site allocations can meet the objectively identified housing need in the borough. The aim is not to limit capacity on each of the sites. The actual quantum of development that comes forward on each site will be determined through a design-led analysis of

				<p>Net Residential Units</p> <p>The draft SADPD makes reference to an indicative development capacity of 56 no. residential units. Notwithstanding this is described as <b>“an indicative minimum, not prescriptive”</b>, this provision is well below the development capacity of the site and would not represent an efficient or effective use of previously developed brownfield land for housing delivery, as emphasised at all levels of planning policy, particularly at a national level and within the London Plan.</p> <p>This number of units would represent a density of 80 units per hectare. Whilst the PTAL rating of the site is 4, the site is located adjacent to Hornsey Train Station (served by a number of regional trains with services into Central London) and Turnpike Lane Underground Station (served by the Piccadilly Line and possibly a Crossrail 2 station in the future), as well as number of local bus services available along Turnpike Lane. <b>It is therefore felt that the Council’s</b> assessment of development capacity is not considered sound or appropriate.</p> <p>Policy 3.4 of the London Plan (Further Alterations: March 2015) relates to Optimising Housing Potential which</p>	<p><i>improved pedestrian and cycling link to Hornsey rail station and the west of the borough, and improvements to the New River Path, where feasible.”</i></p>	<p>applications using the principals set out in the Site Allocation, and the DMDPD.</p> <p>It is not considered that the <b>addition of “where feasible” to the allocation</b> is of benefit. All applications are required to have regard to feasibility.</p> <p>No change</p>
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					<p>provides a density matrix at Table 3.2 for new development in London based on PTAL ratings and the setting of the <b>new development. Based on the site's PTAL and 'urban' location, Table 3.2</b> states a density range of 45 to 260 units per hectare. For the Hampden Road site this would translate to between 32 units and 182 units being considered appropriate within the London Plan specific density ranges.</p> <p>Fairview have held a pre-application meeting with Officers at the GLA. Officers raised <b><i>"no specific strategic issue in terms of proposed building heights"</i></b>. Officers further advised that the density matrix within the London Plan should not be applied mechanistically and promoted a design-led approach to residential density. Owing to the site's <b>location adjacent to</b> a train station, no impact on daylight/ sunlight/ overshadowing, Growth Area allocation of the site, and <b><i>"highly accessible location"</i></b> (as stated in the draft SADPD), the site is considered to be appropriate for the delivery of a high density residential-led development. In this regard, it is proposed that the <b>indicative capacity be changed to "up to 182 units" to reflect this.</b></p>		
7	RSA33	SA17	Not stated	Not stated	<p>Employment Floorspace Reprovision</p> <p>The draft SADPD makes reference to an</p>	<p>On this basis, the level of employment</p>	<p>The council has a requirement to plan proactively for economic</p>

				<p>indicative development capacity of 930 sqm of new employment floorspace. The site does not sit within a designated Defined Employment Area and does not form part of any local or strategic employment area designation.</p> <p>Fairview are proposing to deliver development on this site within three years. Whilst the Haringey Employment Land Study (February 2015) does indicate there is demand for employment floorspace, the study assesses this demand up to 2031. In respect of office accommodation, the study states that <i>“Haringey has a relatively weak office market”</i> and the low level of demand tends to be for smaller sized units up to 185 sqm.</p> <p>In addition, the study states that the development pipeline for office floorspace indicates there will be a substantial net gain in the amount of office accommodation in the borough.</p> <p><b>Whilst Fairview’s emerging proposals for the site are likely to incorporate nonresidential employment floorspace, the quantum of this should be realistic and based upon market demand in the local area.</b></p> <p>Fairview have taken advice from leading commercial agent Jones Lang LaSalle</p>	<p>floorspace to be re-provided on the site as part of any redevelopment (particularly in respect of the 3 year timescale for delivery of the scheme) should be based upon market evidence and the likelihood of the floorspace being occupied upon completion. The 930 sqm (10,000 sqft) quoted within the emerging draft SADPD is not considered a sound, reasonable or realistic quantum to be provided on the site as part of any redevelopment, with little apparent</p>	<p>growth in the borough so that development meets emerging employment need. The Councils policy position is that on former employment sites, and sites with good public transport access, new employment floorspace should be provided to meet job growth in the borough. Furthermore the Workspace viability study suggests that the provision of appropriate workspace (not necessarily just office floorspace), can be cross-subsidised by residential development.</p> <p>This site has a great number of positive attributes (excellent public transport access, close proximity to Wood Green town Centre, amenity from the New River, and that as such a meaningful amount of employment floorspace should be sought.</p> <p>It is recognised that the indicative development capacity for each site is a guide to show how</p>
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				<p>who have experience in the local market. They have advised that there is very little demand for office floorspace in this location, which is a position that is unlikely to change in the next 3-4 years.</p> <p>JLL have advised that the provision of 10,000 sqft of office floorspace at this location, as proposed by the draft SADPD, would be entirely inappropriate and have advised that a lower provision of approximately 1,000 to 2,000 sqft would be more appropriate, but that it may still struggle to find an occupier.</p>	<p>justification for this significant quantum of employment floorspace. On this basis, it is strongly suggested that this figure be reduced to 150 sqm.</p>	<p>housing and employment needs can be met across the borough. Developments will be determined on a site-by-site basis, having regard to viability and feasibility.</p> <p>No change</p>
7	RSA34	SA17		<p>New River Path</p> <p>Bullet point three under the heading Site Requirements on page 51 states <i>'enhancement of the New River Path should be provided as part of the development'</i>. Under the heading Development Guidelines on page 51, bullet points four and five state that the development should create access to the New River and that opportunities should be explored to enhance access, safety and appearance of the New River.</p> <p>Fairview support the Council's aspirations to facilitate the New River Path and improvements to the New River, recognising the benefit this will have on the redevelopment of the site. However, the land and the river are not within the control of Fairview and the</p>	<p>Remove requirements on the development to create access to the New River and opportunities to enhance access, safety and appearance of the New River.</p>	<p>This point is agreed. It is proposed that it is more appropriate to require <b>"consultation with Thames Water regarding the potential for enhancements to the New River path"</b> would be more appropriate.</p>

					<p>entirety is in third party ownership. Fairview therefore have no legal right to provide or promote access onto this land or to provide a path.</p> <p>Any requirement on Fairview to facilitate access onto third party privately-owned land and to deliver a path would therefore be <i>ultra-vires</i>. On this basis, the development cannot provide enhancement of the New River Path or promote access to the New River as stated within the draft SADPD. It is therefore strongly recommended that the above significant constraints are recognised and these requirements are removed from the site allocation or amended to recognise these significant issues.</p>		
7	RSA35	SA17	Not stated	Not stated	<p>The draft SADPD states that <b><i>“development should be used as an enabler to improve access to the bridge”</i></b> which would involve <b><i>“improvements to Hampden Road and consideration of how access to Hornsey Station can be made more accessible”</i></b>. The draft SADPD further states that <b><i>“the pedestrian bridge over the rail line should be improved to create improved access across the railway line”</i></b>.</p> <p>Fairview support the Council’s aspirations to facilitate enhanced access to Hornsey Station and improvements to Hampden Road, recognising the benefit</p>	<p>In this regard, it is strongly recommended that these constraints are recognised and the requirements are removed from the site allocation or amended to recognise these significant restrictions to deliver</p>	<p>It is considered that this site is a key opportunity to create accessibility improvements to and at Hornsey station, but the authority responsible for making the physical improvements is Network Rail. As such, ensuring that Network Rail are consulted should be the key aim of the site requirement.</p>

					<p>this will have on the redevelopment of the site. However, Hampden Road and the pedestrian foot bridge across to Hornsey Station are not within the ownership or control of Fairview and they are both within third party private ownership. Any requirement on Fairview to provide enhancements to the road or pedestrian footbridge is beyond the control of Fairview and would be <i>ultra-vires</i>.</p> <p>In this regard, it is strongly recommended that these constraints are recognised and the requirements are removed from the site allocation or amended to recognise these significant restrictions to deliver enhancements.</p>	enhancements.	
218	RSA335	<p>Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53,</p>	Yes	Yes	<p>We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.</p>	<p>We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore</i></p>	<p><b>Noted, this amendment will be made.</b></p>

		SA57				<p><i>any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i></p>	
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**SA18: Wood Green Cultural Quarter (North)**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
8	RSA 36	SA18 Para 2.48	No	Not stated	We support the principle of the allocation of the site for future redevelopment, which is consistent with Haringey's Strategic Policies for the Wood Green Growth Area. However, we <i>object</i> to the wording of the proposed allocation, as it	Furthermore, it is considered necessary to allocate the site for "mixed use development to include residential use", in order to ensure the	This is agreed. The Site Allocation can be expanded to include reference to mixed-use development, which is consistent with the mix of uses set out in the

				<p>allocates the site for “enhancement of the cultural quarter with the provision of a new link” and does not expressly allocate the site for redevelopment notwithstanding the indicative development capacity for net residential units (89) and employment (3,061 sq.m) in the table.</p> <p>The NPPF required Local Plans to “<i>allocate sites to promote development and flexible use of land, bringing forward new land where necessary</i>” (Paragraph 157).</p> <p>Furthermore, the NPPF states that “<i>Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan</i>” (Paragraph 154).</p> <p>We therefore consider that the proposed wording of the site allocation is ambiguous and does not positively support regeneration of the site. It is also unclear how the indicative development capacity has been identified, for which we would request a further opportunity to comment once clarified.</p> <p>It should be noted that the site is within the strategic growth area and a Regeneration Area of the Local Employment Area (‘LEA’), where uses</p>	<p>effectiveness of the Local Plan as a whole, and to be consistent with the proposed Development Management Policy DM10 (A) states that “<i>the Council will support proposals for new housing on sites allocated for residential development, including mixed use residential development within the Site Allocations Local Plan and Area Action Plans</i>”.</p> <p>Proposed Site Allocation (Paragraph 2.48) “<i>mixed use redevelopment to include residential and/or student accommodation and employment generating uses, which would enhance the Wood Green Cultural/creative Quarter, including an opportunity for a new north south pedestrian/cycle link between Clarendon</i></p>	<p>Appendix to the Sites DPD.</p> <p>In line with other DEA site allocations, including this one, the mix of uses will be expected to be employment-led, with residential being used to cross-subsidise, subject to the other aims of the policy (enhancing the cultural quarter and creating a new link to Wood Green Common).</p> <p>To make this consistent with SA19, the addition of “<b>Comprehensive redevelopment of the site for employment-led mixed use development with residential</b>” will be added.</p>
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					appropriate in a mix use development include residential uses (Policy SP8). As such, the site allocation should be made clear that the site is allocated for a mixed use development, to include, inter alia, residential use and employment generating uses, in line with the strategic policy objectives. Our view is reinforced by the Council's preferred option expressed in the emerging AAP (February 2016), which envisaged residential use as part of the mixed use development of the site.	<i>Road and Wood Green Common</i> ".	
8	RSA 37	SA18 Para 2.49	No	Not stated	We are concerned with the draft commentary for the allocation, which states that <i>"the redevelopment of the existing employment area will play a key role in supporting the realisation of new employment floorspace in the Borough through attractive and complementary employment uses with ancillary residential use."</i> We object to the reference to "complementary employment uses with ancillary residential use." The term "complementary employment uses" should be amended to "employment generating uses" in order to ensure that a wide range of economic use can be considered. The term 'ancillary residential use' appears to suggest that residential accommodation ancillary to commercial uses e.g. manager's flat/	"The Wood Green Cultural Quarter represents a significant opportunity for improvement in the greater Wood Green Area. The redevelopment of the existing employment area will play a key role in supporting the realisation of new employment opportunities floorspace in the Borough through attractive and complementary employment generating uses with ancillary residential use.	It is noted that this can be made clearer. The aim is to enable a range of commercial opportunities on the site, with residential to provide the land value necessary for the development to proceed. The term "ancillary" is ambiguous and will be removed.  It is considered appropriate that the employment uses are complementary to its location in the Wood Green Cultural Quarter, and that reference to this, as well as reference

					accommodation ancillary to public house use. This is contrary to the strategic growth and regeneration objectives.	Development will create a high quality public realm which supports opportunities to visit and gather. <i>In order to facilitate</i> a new connection from the Cultural Quarter towards Alexandra Palace Station, <i>a new pedestrian/cycle link</i> should be <i>designed created</i> as part of comprehensive <i>or otherwise phased</i> development on this site <i>to be delivered by a masterplan approach, where practically feasible and viable.</i> "	to realising new employment floorspace are appropriate.  <b>As all development is expected to be feasible and viable, it is not considered that it is necessary to add these terms into the commentary. A reference to the masterplan as set out in the site requirements) is appropriate however.</b>
8	RSA 38	SA18	No	Not stated	We are also concerned with the <b>reference to “comprehensive redevelopment on the site,”</b> as the allocation is in two separate ownerships, and it may not be feasible to deliver a comprehensive scheme, depending on circumstances in the future. Whilst we do not object to the aspiration to deliver a comprehensive site wide scheme, we consider that the policy should be sufficiently flexible to allow an individual plot to be brought forward independently, in	Site Allocation Boundary The site allocation boundary for SA18 should be amended so that there is no overlap between different ownerships with other allocated sites SA19 and SA18. Specifically, both the eastern and western boundaries <b>(within LIM’s interest as shown on the site</b>	Policy DM55 adequately addresses the concerns over the requirement for <b>‘comprehensive development’</b> .  <b>After reviewing the site plan attached, the alteration of the site boundary to include the small patch of land behind Guillemot Place is acceptable. SA19 will also be modified to</b>

				<p>the event that comprehensive redevelopment is not achievable, particularly as the allocated site is identified as long term potential. We therefore request that there is flexibility to allow for phased development to be delivered by a masterplan approach.</p> <p>As expressed in the previous representations, the site is also considered appropriate for student accommodation if a requirement for further student accommodation is identified in the future. It is noted in paragraph 3.21 of the Proposed Submission Development Management document that Haringey has a role to play in fostering relationships with existing higher education institutions and in meeting the needs for purpose built student accommodation. In this respect, Policy DM15 specifically refers to Haringey Growth Areas and within or at the edge of a town centre as being suitable locations for future student accommodation, where required. As <b>the site's redevelopment is a long term opportunity</b>, we consider it appropriate to allow for flexibility to facilitate student accommodation in the allocation, in line with Policy DM15.</p> <p>In terms of creation of a new north south link, it is understood that the</p>	<p>location plan at Appendix 1) are not drawn correctly. We request that allocation maps are amended to reflect the correct ownership boundaries in each site allocation.</p>	<p><b>reflect this.</b></p> <p>Policy DM15 sets the locational requirements for when student housing may be acceptable. It is not considered necessary to include this on site allocations.</p> <p>The new route through the site is proposed to be a cycle and pedestrian link, and is not considered to be overly onerous.</p>
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					aspiration is to provide permeability by way of a new pedestrian/cycle link. We consider that this should be specified in the wording of the allocation for clarity.		
8	RSA 39	SA18	No	Not stated	<p>Site Requirements</p> <p>The first bullet point (a site wide masterplan approach): We support the site wide masterplan approach as the allocation is in multiple ownerships. This approach would facilitate the delivery of regeneration of the site in a coordinated manner without undermining the delivery of part of the allocated site to come forward first. However, it is considered that minor amendment is necessary to ensure that the policy can facilitate phased delivery.</p> <p>The third bullet point (pedestrian and cycle link): The requirement is <b>ambiguous as to whether “an extension” of Clarendon Road is an aspiration to be provided in the form of an extended “road” or a “pedestrian/cycle link.”</b> It is our understanding from discussions with the Planning Policy Team that it is the latter which is also clarified in Development Guidelines. We would strongly object to the provision of a road through the allocated site, as such a requirement would seriously undermine the viability of the future redevelopment opportunity of the</p>	<p>Suggested Wording of Site Requirements/Development Guidelines</p> <p>We consider that there are a number of combined <b>“requirements” and additional guidelines</b> which would make the redevelopment of the site unviable. Policies should positively support redevelopment and provide details to guide/enable development in line with the <b>Council’s objectives and visions</b> as far as possible. Accordingly, we consider that the Site Requirements and Development Guidelines should be consolidated as <b>“Development Principles and Guidelines,” as follows:</b> Development Principles</p>	<p><b>It is confirmed that it is a new cycle/pedestrian link to be proposed and that this be included at the beginning of bullet point 3.</b></p> <p>The redevelopment of the site is predicated on it helping to achieve the wider regeneration of the Wood Green Area.</p> <p>The absence of the cycle/pedestrian link would mean the site fails to deliver a significant part of its contribution to that regeneration story and would render any proposal unacceptable being harmful to the realisation of wider regeneration benefits. Given that the proposed cycle/pedestrian route goes through the site, the design must enable this and as such is a development cost.</p>

				<p>site, as it will take up a significant proportion of the development land, and there are normally substantial costs associated with the construction of roads. We <i>object</i> to the current wording as it could be interpreted to mean an extended vehicular road, and is not sufficiently clear.</p> <p>Whilst we support the aspiration to create a pedestrian/cycle link through the site, it may not be feasible to deliver such a pedestrian/cycle link due to viability and it is not clear whether the job centre site (which will be required to provide a link) will become available for redevelopment over the lifetime of this Plan and the emerging AAP. Therefore, such an aspiration should not be identified as a “<b>requirement,</b>” and we request that this is identified as “<b>an opportunity subject to feasibility and viability</b>”.</p> <p>Furthermore, the provision of a pedestrian/cycle link will be for the benefit of the wider public and the regeneration of Wood Green/Heartlands, rather than to serve the development of the allocated site alone. As such, the developers of the site should not be expected to fund the provision of the link, and such infrastructure should be funded by the CIL, as otherwise the regeneration of the site may</p>	<p>and Guidelines</p> <p><i>Development proposals will be required to be accompanied by a site wide masterplan, showing how the land included <del>meets this policy</del> and does not compromise co-ordinated development on the other land parcels or phased delivery within the Allocation.</i></p> <p><i>The Wood Green job centre and Guillemot Place are of limited architectural quality, and will be permitted for redevelopment.</i></p> <p><i>Tall buildings on the site are supported in order to maximise the <b>site’s redevelopment potential</b> and increase the development capacity, subject to the required assessment under Development Management Policy DM6.</i></p>	<p>Likewise, each site within Wood Green has a role to play and the mix of uses suitable to each relate to meeting area wide objectives where growth and intensification apply as much to employment growth and intensification as they do to residential growth and intensification. As an existing employment site with Regeneration Area designation, the role of this site is to help deliver the former.</p> <p>The reference to tall buildings is not supported by the UCS. While the site is within the growth area the site is not recommended as a tall building location. As such there will not be a reference within this policy, and the height of development permitted on the site will be determined in line with DM6.</p>
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				<p>become undeliverable due to viability issues. Accordingly, the provision of a new pedestrian and cycle network should be designed in as part of any masterplan for the wider area, or in the emerging AAP, for including in the <b>Council’s Infrastructure Delivery Plan</b>, and the Regulation 123 list, to secure the delivery.</p> <p>The fourth bullet point (active frontages): We note the aspiration to create an enhanced public realm at the south of the site which is intended to act as a focal point of the Cultural Quarter. However, we are concerned <b>with the ‘requirement’ to provide</b> active frontages to both sides of Clarendon Road to contribute to this vision, as it is prescriptive in the absence of a scheme/masterplan for the adjoining site and how it would relate to a scheme for the site. Whether active frontages can be provided or is appropriate will depend on the type of uses, layout and relationship with adjoining developments. In order to ensure flexibility and that the delivery of a viable scheme is not compromised, it should be identified as a guide rather than a site requirement.</p> <p>The fifth and sixth bullet points (employment floorspace and cultural quarter): We welcome the removal of the previous criterion setting a target</p>	<p><i>The opportunity to extend Clarendon Road as a pedestrian and cycle link through the site allocation to link with Wood Green Common should be explored as part of the Masterplan, subject to feasibility and viability, and funding available through CIL to deliver the link.</i></p> <p><i>Active frontages to the potential new pedestrian link should be explored, having regard to the site’s mix of uses and relationship to the enhanced public realm envisaged at the south of the allocated site, which will act as the focal point of the Cultural Quarter.</i></p> <p><i>As part of mixed use development, the maximum quantum of commercial/ employment generating floorspace feasible should be provided on</i></p>	<p>This site is not within a town centre, and as such the plan will not be seeking town centre uses on the site, which could <b>fall under a “commercial”</b> banner. Uses which are employment generating, and/or contribute to the cultural quarter being supported is considered appropriate. The phrase <b>“subject to viability”</b> is not required as all developments will be subject to viability.</p> <p>It is considered that active frontages, whatever the use, should be encouraged on the site. It is important that this area is busy during the day, and into the evening, and active frontages will help to achieve this.</p>
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				<p>of 33% employment floorspace, and are generally supportive of the amended criterion which seeks to secure the maximum quantum of employment floorspace feasible from redevelopment. However, in order to achieve strategic growth objectives, the type, quality and mix of <b>employment ‘generating’ uses</b> will be taking into account in the consideration of the viability of the <b>site’s redevelopment options</b>. This should also be considered in the <b>context of the Council’s aspiration for uses</b> which would positively support and enhance the cultural quarter. Redevelopment of the site to provide new employment/ commercial uses and residential use would support the improvement and enhancement of the cultural quarter including public realm and visual appearance. We consider that the requirement for <b>the provision of “employment floorspace”</b> is ineffective and does not provide sufficient flexibility to facilitate the delivery of redevelopment. The NPPF states that the Local Plan should allocate sites to promote development and flexible use of land. Therefore, all employment generating uses and economic development, as defined by the NPPF, should be considered for an appropriate mix of uses to</p>	<p><i>this site, having regard to the type of uses which would contribute to the regeneration of the cultural quarter and job creation subject to market demand and viability.</i></p> <p><i>Residential development will be supported in order to facilitate the regeneration of the site and in line with the strategic objective for Wood Green Growth Area.</i></p> <p><i>Part of the site is located within Wood Green Common Conservation Area and any development should make a positive contribution to the setting of the Conservation Area, in particular Alexandra Primary School and 109 Mayes Road.</i></p> <p><i>The site is identified as being an area with potential for being part</i></p>	
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				<p>deliver a viable regeneration scheme, subject to occupier interest and market demand at that time, which would result in contributing to the enhancement of the cultural quarter. The seventh bullet point (residential development): This requirement is unsound, as there is no justification and is contrary to the strategic growth and regeneration objectives for the area. It implies that residential development is conditional on the provision of new workspace. The <b>site's strategic designation and objective</b> does include both job and <b>housing growth, the term 'subsidise'</b> new workspace for which no definition is give, is contrary to the strategic policy and national policy which requires Local Plans to secure sustainable development – positive growth. Residential development may be necessary to ensure viability of the regeneration scheme, depending on the market conditions and type of uses being proposed. However, as the site is designated in an area of growth and intensification, it should not be expressed as conditional on the provision of a particular type of commercial uses.</p> <p>The eighth bullet point (masterplan/AAP): It requires that development of the site follow the</p>	<p><i>of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network, subject to feasibility and viability.</i></p> <p><i>Studies should be undertaken to understand what potential contamination there is on the site prior to any development taking place.</i></p> <p><i>A piling statement will be required prior to any piling taking place.</i></p> <p><i>Applicants must consult with Thames Water regarding wastewater and water supply capacity upon the preparation of a planning application.</i></p>	
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				<p>principles set out in any future Council-approved masterplan for the area and/or the emerging AAP. A masterplan is already required as part of redevelopment of the site (as per the first bullet point). As such, it is not clear what any future Council approved masterplan is. In addition, the emerging AAP states that once adopted this site allocation will be superseded. We therefore do not consider this requirement is necessary.</p> <p>The ninth bullet point (capped commercial rents): <i>We strongly object to the requirement of “capped commercial rents” as such a requirement would, fundamentally, constrain the deliverability of the regeneration scheme. There is no definition of and justification (including viability evidence) for the requirement to cap commercial rents. In principle, the requirement for capping the commercial rents goes beyond the purpose of the Local Plan, and it is a concern as there is no clear policy objective and justification as stated. Fundamentally, this requirement, as currently drafted, will make any scheme unviable, as not only it is unrealistic to “cap” rents commercially, but it will act as an impediment to securing the necessary inward investment towards the</i></p>		
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				<p>regeneration of the area, particularly where there are substantial costs associated with redevelopment. We therefore strongly object to the capped rent requirement as it is not justified and would fundamentally affect the deliverability of regeneration of the site.</p> <p>Development Guidelines</p> <p>The first bullet point (pedestrian and cycle link): The Development Guideline states that Clarendon Road will be extended as a pedestrian link through Guillemot Place and the Job Centre site. For the reasons we state at paragraphs 4.13 and 4.15, such an expectation requires careful wording, so as to ensure that the delivery of the regeneration of the area is not constrained by the expectation of the policy, if it is not practically feasible or viable to provide the pedestrian/cycle link through the site, and if it cannot be delivered by the CIL.</p> <p>The second bullet point (a new junction): This guideline suggests that a new junction at Mayes Road, Western Road and the aspirational extension of Clarendon Road is expected. Whilst a cycle and pedestrian link through the allocation site may be appropriate, subject to feasibility and necessary funding, the provision of a road through the site will make the redevelopment of the</p>		
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				<p>site unviable, as it would take up a significant proportion of the development site, and there are normally substantial costs associated with the delivery of a road/junction.</p> <p><b>The site's redevelopment should only</b> be expected to design a pedestrian/cycle link within the site, where feasible and viable, that would connect to the existing Mayes Road.</p> <p>The third bullet point (decentralised energy network): We would comment that any requirement for the site to provide an easement for the work should be deleted, where an existing network does not exist or it is not practically feasible or financially viable. This point is supported by the London Plan Policy 5.5 which states that boroughs should require developers to prioritise connection to existing or planned decentralised energy network, <u>where feasible</u>. As worded, the requirement to provide connection adds an unnecessary cost to the development, which could make the scheme unviable.</p> <p>Tall Buildings – Previously there was a criterion which supported the principle of tall buildings. Whilst we objected to the limitation of the height, we were supportive of the principle of tall buildings on the site.</p> <p><b>The site's strategic designation is for</b> growth and intensification and in</p>		
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				<p>order to increase the development capacity by making efficient use of the site, the policy should encourage and support the principle of tall building.</p> <p>In respect of identifying tall building clusters, Paragraph 2.10 refers to the Urban Characterisation Study (2015) (UCS). As we commented in the previous representations, we are concerned with the recommended approach for Wood Green in this document. It recommends that heights should be greatest along the railway line (mid to high rise) stepping down to mid-rise towards the existing 2-3 storey building and terraces that line Hornsey Park Road and Mayes Road. We are concerned with this approach, as there are no development sites available or allocated along the eastern area of the railway line when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. We therefore <i>object</i> to the reference to this document unless it is updated as further work is undertaken, as evidence base for tall buildings or a material consideration in the determination of planning applications.</p>		
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SA19: Wood Green Cultural Quarter (South)

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RSA43	SA19	Not stated	Not stated	In accordance with the NPPF, local plans should be based on a strategy that seeks to meet objectively assessed needs. The most up to date housing and employment requirements for London are set out in the London Plan (2015). This identifies an increased annual housing requirement for Haringey of 1,502 (up from 820 houses per annum in the previous version of the London Plan, 2011) and a 29.5% increase in jobs (the greatest increase of any London borough). The requirements set out in the London Plan are expressed as minima and, furthermore, represent a constrained approach having regard to the evidence base documents. Haringey should therefore be aiming to exceed the requirements for both housing and employment provision within the borough. To achieve this, Haringey needs a positive and robust strategy for	To accord with the growth strategies, SA19 should seek to encourage growth and optimisation of site potential. At present SA19 <b>seeks 'enhancement' and 'improvement' of the area.</b> It identifies its aim as to <b>'increase employment uses'</b> and that some residential will be permitted. In our view this is not sufficiently positive and forward-looking to satisfy the NPPF test. The site allocation should be updated to reflect the growth strategies. It should seek to maximise the capacity of the site and optimise its potential to deliver an increased quantum and improved quality of employment floorspace along with an increase in residential as part of a vibrant and viable mix of uses appropriate to the area. Indicative capacity should be	The site allocations within the Local Plan make sufficient provision to meet and exceed the minimum strategic housing requirement for the Borough as set out in the London Plan. As set out in the representation, the London Plan also sets the Borough an ambitious and challenging jobs growth target. This site is designed for employment use. Both the designation and allocation seek to promote the intensification of employment use on the site, maximising its contribution to delivering <b>the Borough's jobs target.</b> The Council acknowledges that a mixed use development may be required to help achieve this. The optimum capacity of the site will be determined by through a design-led

					<p>growth. 2.2 Workspace welcomes the alterations to the Strategic Policies DPD in response to the London Plan, including the identification of Haringey Heartlands / Wood Green as a <b>‘Growth Area’</b> where site opportunities are to be maximised and 13,500 dwellings are to be provided (up from 5,000 previously) (Policy SP1); the increased housing requirement for Haringey Heartlands of 2,145 dwelling per annum (expressed as a minimum) up from 1,430 (Table 2); and the classification of Wood Green as a Regeneration Area appropriate for a mix of uses (Policy SP8). However, Workspace does not consider that Site Allocation SA19 has evolved sufficiently to reflect the growth strategies of the London Plan (2015) and draft alterations to the Strategic Policies DPD.</p>	<p>expressed as a minimum as per the London Plan and proposed alterations to Table 2 of the Strategic Policies DPD and in acknowledgement of the significant growth required to address housing and employment needs in the area.</p>	<p>approach in accordance with Policy DM1, having regard to the indicative capacities set out in the <b>site’s allocation</b> which accord with capacities set out in the London Plan.</p> <p>NB: The housing figures in column 1 of Table 2 are total housing figures for the whole plan period, as shown by the 5 year delivery breakdown in the remaining three columns. The minimum housing requirement for the Haringey Heartlands/Wood Green area is 4,600 homes net additional homes, and not 13,500 as suggested.</p> <p>No change</p>
9	RSA44	SA19	Not stated	Not stated	<p>In testing whether a plan is justified the NPPF identifies that the plan should be the most appropriate strategy when considered against reasonable alternatives and</p>	<p>At present site allocation SA19 only includes land to the east of Western Road. Workspace considers that the land to the west of Western Road (Quicksilver</p>	<p>The site to the west of Western Road is also allocated under Site Allocation SA25. The Council maintains that each allocation has a</p>

				<p>based on proportionate evidence.</p> <p>3.2 The site allocation seeks <b>‘comprehensive redevelopment.... for employment-led mixed use development with residential’</b>. It goes on to clarify that a coordinated approach to development will be expected. Workspace has prepared an illustrative masterplan to demonstrate how the area could be comprehensively redeveloped and to show that the detailed proposals on Workspace land will not fetter or prejudice the redevelopment of the wider allocation and adjoining allocations (namely SA18 and SA20). Workspace welcome acknowledgement that land parcels may come forward separately provided that they are compatible and result in a coherent redevelopment. It is considered that this approach to the redevelopment of the area is justified and appropriate.</p>	<p>Place) should also be included within SA19 as this land falls within the Cultural Quarter, represents an opportunity for further improvement and increase of employment floorspace and will be an integral part of the forthcoming planning application proposals on Workspace land. It would be justifiable in the context of the strategy for the regeneration and growth of the area to allocate this additional land for redevelopment as part of SA19.</p> <p>The site allocation refers to the Wood Green Cultural Quarter and encourages <b>‘Uses that positively support enhancement of the cultural quarter’</b>. However, <b>‘cultural quarter’ is not defined</b> in the document and a list of uses appropriate to a cultural quarter is not provided. Without this clarification it</p>	<p>distinct role to play, in providing the right type of uses, to achieve sustainable development and regeneration objectives across the area as a whole. Each site must therefore seek to deliver, in accordance with the allocation, the uses proposed on that site. Only in exceptional circumstances would off-site delivery be considered appropriate (i.e. where it can be demonstrated that off-site provision would result insignificant beneficial gain). Such an approach however, would require consideration of the site development potential off <b>the ‘off-site’ site to be</b> assessed in the first instance, and this to be accounted for across both sites.</p> <p>Cultural Quarter is defined in the London Plan.</p> <p>The Council acknowledges that a</p>
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					<p>is not possible to say whether such uses are justified.</p> <p>The redevelopment of the Chocolate Factory site is complex, not least as it involves the retention and refurbishment of the original Chocolate Factory building, provision of high quality public realm and remediation works owing <b>to the site's</b> industrial past. It is also located adjacent to a conservation area and careful consideration will need to be given to the impact on character in this regard. Owing to this, viability will be a key consideration in developing the proposals for the site.</p> <p>The strategy for the site should therefore provide for a mix of uses including <b>'higher value' uses such as</b> residential to allow for enhanced employment provision and the site-specific requirements. In our view, the site allocation should be updated to encourage the</p>	<p>mixed use development may be required to help achieve the intensification of employment outcomes from this designated employment site. This is recognised through the designation as an Local Employment Area – Regeneration Area. The optimum capacity of the site will be determined by through a design-led approach in accordance with Policy DM1, having regard to the indicative capacities set out in the <b>site's allocation</b> which accord with capacities set out in the London Plan.</p> <p>No change</p>
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						quantum of residential and other appropriate uses required to achieve this rather than seeking to limit it to <b>'some residential'</b> as currently worded.	
9	RSA45	SA19	Not stated	Not stated	In testing whether the policy is effective, we suggest that the test is whether the wording of the site allocation is sufficiently flexible and the level of prescription appropriate to allow the site to be delivered within the timescales envisaged. 4.2 Whilst, in our view, the level of prescription is appropriate and assists in outlining the vision for the area, we consider that additional flexibility could be embedded within policy wording to account for, inter alia, unforeseen issues and changes to market demand. For example, we support the retention of the Chocolate Factory and Workspace is committed to securing its long-term future. There are no known structural issues with the original buildings. However, should these be discovered, it may no longer be viable or feasible to retain	The benefit of connecting to a decentralised energy network is recognised. There is not currently a network in place within the local area. Should one become available the aspiration would be to connect to this. However, it is not considered reasonable to seek land owners to relinquish part of the site to provide an easement for such a network, nor in our view should this be necessary. We consider this element of the site allocation is overly prescriptive and should be omitted.	The policy test for effectiveness is set out in the NPPF and is whether what is proposed is <b>'deliverable' not whether the wording is 'flexible'</b> .  Any unforeseen issues will be an exceptional site circumstance, and will be a material consideration.  The site is currently designed for employment use, and the allocation for mixed use provision seeks an intensification of employment use. It is noted that capped commercial rents will have an impact on viability, but it is also noted that they will help to ensure long term viability of businesses in the borough helping to deliver sustainable development.

				<p>the building. The policy should allow for such circumstances.</p> <p>4.3 Additionally, Workspace is committed to providing employment space where viable.</p> <p>Workspace has concerns with the provision of capped commercial rents both in policy SA19 and the Development Management policy DM38 (separate representations have been prepared addressing DM matters). There is no supporting evidence looking at viability and we consider that its inclusion goes beyond the spectrum of planning and would be particularly hard to enforce. It is noted that draft Policy DM38(c) (iv) gives consideration to viability when determining affordable rents. Workspace requests that at a minimum viability matters should be expressly noted in the site allocation. If LBH seek to minimise rental income, this will be to the detriment of the type employment space that Workspace deliver and would create unnecessary uncertainty.</p>		<p>Capped rents are not considered to be outside the scope of the Local Plan is required to help meet local business needs and economic regeneration of an area of the Borough.</p> <p>The redevelopment of the site is predicated on it helping to achieve the wider regeneration of the Wood Green Area, this includes provision of a cycle/pedestrian crossing of Western Road to make the scheme acceptable in planning terms. As such, this is considered a requirement of the development and a development cost.</p> <p>The Council will continue to support the flexibility built into the development guideline governing decentralised energy infrastructure.</p> <p>No change</p>
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				<p>Workspace supports the provision of a dedicated cycle and pedestrian crossing of Western Road as envisaged in SA19. The site allocation states that this will be secured through development contributions. Haringey has an adopted Community <b>Infrastructure Levy ('CIL')</b> Charging Schedule (2014) which generates funds to support the delivery of infrastructure in the borough. The updated <b>Infrastructure Delivery Plan (2013) ('IDP')</b> which supports the local CIL includes projects such as transport and highway safety improvements, and the <b>'Heartlands east-west cycle route'</b> (see Table 4). By requiring development contributions alongside local CIL, <b>there is a risk of 'double charging'</b>. <b>The Council should</b> ensure that this does not occur. Furthermore, by expressly requiring development contributions to one item, the site allocation appears to prioritise this above any other works that may be required. We suggest</p>	
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					that the policy is reworded to clarify that this will be balanced against other funding priorities at the time. This recognises that priorities may change as the area evolves and allows for additional flexibility in this regard.		
232	RSA378	SA19	Not stated	Not stated		The Development Guidelines and Site Requirements should reference the need to contribute positively to the adjoining Wood Green Common conservation area and its significance.	<b>An additional site requirement guideline will be added to this effect.</b>

#### SA20: Wood Green Cultural Quarter (East)

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RSA55	SA20	No	Not stated	In your plans you mention the Cultural Quarter many times. For the last 19 years I have been part of that as a “creative” in <b>Chocolate Factory One</b> . Today (4 <sup>th</sup> March) I and 42 others lost our tenancies to the landlords Workspace because of an unrealistic rent hike and sleight of hand. Your failure to support and stand behind collage arts endeavours over the last 30 years to nurture this sector (which they have been totally committed to doing) is driving small business and artists out of the borough and out of London. I spent 40 years	Not stated	This representation does not relate to the Plan, but rather to a commercial decision by a landowner. While the Council is keen to secure an increase in creative workspace on this site, and to cap rents to levels

					educating creatives in East London and maintaining a vibrant art practice while doing so (in art collages and universities). I doubt in the future the next generation will be able to afford the housing or studio space to do so – they are moving to Amsterdam and taking their media skills with them. The creative industries have thrived in non-**** parts of London and contributed to their regeneration only to be priced out by developers and rapacious landlords. This cannot be good for <b>London’s position as a key player in the creative industries</b> without realistic rents and ownership of buildings the cultural quarter will not thrive.		local businesses and enterprises can afford, currently the Council has no influence over such matters. These are however, certainly a consideration on redevelopment of the site in accordance with the site allocations and other relevant Local Plan policies.  No change
11	RSA56	SA20	No	Not stated	Overall, we welcome the Wood Green Cultural Quarter (East) site allocation designating the site for employment-led mixed use development with residential accommodation. However, we are of the opinion that the bullet points outlined under the ‘Site requirements’ section are restrictive and there is a lack of clarity with how the overall Cultural Quarter area could come forward for comprehensive re-development. As such, we have outlined our comments against the relevant bullet points of the proposed site allocation policy below; <i>‘Development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets this policy and does not compromise co-ordinated development on the other land parcels within the Allocation’</i> The Site Allocations DPD does not specify who	Clarify who would co-ordinate the site wide masterplan	The Site requirements state that development proposals should be accompanied by a masterplan proposal. It is considered that this is clear, that when an applicant (i.e. the landowner, their agent or a developer) seeks consent for this allocation, that they will need to prepare a masterplan for the site addressing the issues identified in the allocation, as

					<p>would co-ordinate the site wide masterplan and to date, Safestore as a significant landowner within the area has not participated nor been consulted on the preparation of any masterplan prepared by or for the LB Haringey. It is unclear who will bring forward the masterplan. If the Council intends to bring forward a masterplan for the area itself then Safestore would welcome the opportunity to engage pro-actively and collaboratively with the Council in this process.</p> <p>We appreciate that a Masterplan could be a very effective method to aid the delivery of the comprehensive re-development of the site, however it is essential that landowners such as Safestore have the opportunity to participate in its formation. As such, we suggest that additional clarification is added to this policy on how the Council will seek to deliver a Masterplan.</p> <p><i>'Development should follow the principles set out in any future Council-approved masterplan'</i> As outlined under the first bullet point the Site Allocations DPD does not specify who would co-ordinate the site wide masterplan. Safestore have not participated nor been consulted on the preparation of any masterplan prepared by or for the LB Haringey and would welcome the opportunity to become actively involved in this process.</p>		<p>well as other policy requirements as set out in the DMDPD.</p> <p>No change</p>
11	RSA57	SA20	No	Not stated	<p><i>'The aim of this allocation will be to increase employment use on this site. Some residential will be permitted to enable increases in employment floorspace and jobs creation in the area'</i> Employment uses are the established land uses for</p>	Given the clear need for new housing, as well as employment	The Council notes that the NPPF promotes growth of all forms of development, not

				<p>this part of Wood Green. As such, we understand the proposals to increase employment use on the site to improve employment facilities and job creation for the benefit of the borough overall. However, we consider that the text, as drafted, is restrictive in nature and may not allow for the redevelopment opportunity of the site to be optimised.</p> <p>The NPPF states that Local Plans should be positively prepared, seeking opportunities to meet needs in their area. There is currently a clear growth agenda at a national and regional level seeking to optimise economic development, as well as housing. The NPPF sets an overarching emphasis on encouraging new development, ensuring it is not overburdened by the planning process, with a presumption in favour of sustainable development at its heart.</p> <p>Redeveloping brownfield employment sites such as this one is considered sustainable development and in accordance with the NPPF.</p> <p>The London Plan outlines that a rigorous approach should be taken to industrial land management to ensure a sufficient stock of land and premises is retained to meet the needs of different types of industrial and related uses. Where compatible the London Plan states that the managed release of surplus industrial land should be undertaken especially to provide more housing in appropriate locations, but ensure a sufficient stock of land and premises is retained to meet the future needs of industrial and related uses in different parts of London. The proposed site allocation does not</p>	<p>facilities, we consider it restrictive to limit the residential development to only the quantum required to allow for the maximum employment floorspace. Rather, we consider that the policy should be more aspirational in order to deliver the optimum amount of commercial and residential development (or any other use considered acceptable as the uplift).</p>	<p>just housing. The position set by the Council on employment led allocations, and non-allocated employment sites, is that it will approve schemes which come forward to bring new employment floorspace to Haringey which will support jobs growth. To enable this, in appropriate locations, such as the site in question, residential will be approved to sustain values to enable commercial floorspace. This is considered to be positively planning for sustainable growth.</p> <p>No change</p>
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					<p>seek to extinguish the existing employment use, but re-provide enhanced employment floorspace enabled through the provision of residential development.</p> <p>The policy as drafted seeks to ensure that employment uses are maximised and would only allow for a limited amount of residential development which would be required to enable the commercial aspects of the scheme to come forward. However, this may not allow for the optimisation of the residential development as required by the NPPF and London Plan Policy 3.3.</p> <p>Given the clear need for new housing, as well as employment facilities, we consider it restrictive to limit the residential development to only the quantum required to allow for the maximum employment floorspace. Rather, we consider that the policy should be more aspirational in order to deliver the optimum amount of commercial and residential development (or any other use considered acceptable as the uplift). These comments also apply to emerging Policy DM38.</p>		
11	RSA58	SA20	No	Not stated	<p><i>'Capped commercial rents will be expected in this area in line with Policy DM38'</i></p> <p><b>Draft Policy DM38: 'Employment-Led Regeneration' within the Development</b> Management DPD (Pre-Submission Stage) states that employment-led regeneration should provide demonstrable <b>improvements in the site's suitability</b> for continued employment and business use, having regard to the provision of an element of affordable workspace where viable. However, draft</p>	We consider that Policy SA20, as drafted, should be expanded confirming that any capped commercial rents are subject to	All development proposals will be subject to viability consideration. It is accepted that the provision of affordable commercial rent will compete for scheme value with other factors such as

				<p>Policy DM38 does not make any specific reference to <b>“Capped Commercial Rents”</b> and therefore this reference within proposed SA20 is unclear.</p> <p>We previously submitted representations, on behalf of Safestore, in March 2015 to the Site Allocation (Regulation 18) Consultation. Our previous representations outlined that applying a blanket policy of capped commercial rents in the area would be contrary to the London Plan unless it was subject to viability considerations.</p> <p><b>Within the Council’s response to the Regulation 18 consultation exercise it is stated that, “The Council is cognisant of the need for developments to be viable, and welcomes a range of approaches to delivering workspace that enables economic growth in Haringey”. In light of this response, and due to the lack of clarity regarding the policy position on ‘Capped Commercial Rents’, we consider that Policy SA20, as drafted, should be expanded confirming that any capped commercial rents are subject to viability considerations.</b></p> <p><b>Summary</b> Overall, Safestore supports the Wood Green Cultural Quarter site allocation designating the site for employment-led mixed use development with residential accommodation. However, we propose <b>that the ‘Site Requirements’ discussed in the bullet points above are amended as set out above.</b></p> <p>Safestore are keen to continue positively engaging with the Council throughout their review of the Local Plan and would welcome the opportunity to discuss this matter further.</p>	<p>viability considerations</p>	<p>affordable housing. The Council considers it is important to have a range of policy tools to ensure that a mix of affordable housing, and affordable commercial rents come forward in appropriate locations across the borough, to meet identified local employment and housing needs.</p> <p>No change</p>
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SA21: Claredon Square Gateway

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
8	RSA40	SA21 Para 2.54	No	Not stated	<p>We support the principle of the allocation of the Bittern Place site for a mixed use redevelopment, which is <b>consistent with Haringey's Strategic Policies</b> for Haringey Heartland/Wood Green Metropolitan Town Centre as a Growth Area, and an Intensification Area in the London Plan. It is however considered that the focus of the allocation should be to maximise the <b>site's development</b> opportunity in line with the Strategic Policy SP1. This allocation site lies within a Regeneration Area of the Local Employment Area ('LEA') (which permits a wide range of uses including residential), and the Wood Green Metropolitan Town Centre. As such, a wide range of employment generating uses and residential development should be considered appropriate in order to facilitate regeneration. We therefore <i>object</i> to mixed use <b>development being "employment-led"</b> in a sustainable town centre location, as a suitable mix of uses and quantum of each use should be considered based upon the marketing</p>	<p>Accordingly, we request that the wording of the site allocation and commentary is amended as follows: Proposed Site Allocation (Paragraph 2.54) <b><i>"Mixed use redevelopment to include employment generating uses (including town centre uses), and residential use and/or student accommodation, and the creation of a pedestrian/cycle link between Wood Green and Claredon Square, with a legible streetscape, subject to feasibility and viability."</i></b></p>	<p>This site is both identified as a designated employment area, and as a town centre site. As such the Council will seek to promote employment uses which are also town centre suitable. This will generally be high density employment uses.</p> <p>As the route (Brook Rd) is already a road, and there is no plan to stop this up, it is not considered appropriate to make reference to only a pedestrian/cycle link through this site. What the Council is seeking is a high quality cycle and pedestrian route between Wood Green and Claredon Square.</p>

					<p>demand/need, viability and design/layout which promotes the efficient use of land.</p> <p>It is unclear how the indicative development capacity (net residential units – 195 and employment – 6,734 sq.m) has been identified, for which we would request a further opportunity to comment once clarified.</p>		<p>Adding subject to feasibility and viability to the Site Allocation is considered unnecessary. The Council will work with landowners/developers to optimise outcomes on sites, with viability being considered on a case by case basis</p> <p>No change.</p>
8	RSA4 1	SA21 Para 2.55-2.56	No	Not stated	<p>Paragraph 2.55 states that the future development will cross subsidise a safe pedestrian and cycle link from Wood Green to Alexandra Palace Park via the Heartlands area and Cultural Quarter. Whilst we support the aspiration to create a pedestrian/cycle link, it should be aligned utilising the existing road, as otherwise it would minimise the development area which would make the redevelopment of the site unviable.</p> <p>Furthermore, we <i>object</i> to the draft policy which seeks the future <b>development to ‘cross subsidise</b> the pedestrian and cycle link, as the provision will be for the benefit of the wider public and the regeneration of Wood Green/Heartlands, rather than to serve the development of the allocated site alone. As such, the</p>	<p>Commentary (Paragraph 2.55-2.56) 2.55 This site plays an important role in linking the Haringey Heartlands area to Wood Green High Rd. The future development <i>should explore opportunities to facilitate the delivery of <del>will cross subsidise</del></i> a safe pedestrian and cycling link from Wood Green to Alexandra Palace Park via the Heartlands area and Cultural Quarter <i>through utilising the existing road in the masterplan.</i></p>	<p>The redevelopment of the site is predicated on it helping to achieve the wider regeneration of the Wood Green Area.</p> <p>The absence of the cycle/pedestrian link would mean the site fails to deliver a significant part of its contribution to that regeneration story and would render any proposal unacceptable being harmful to the realisation of wider regeneration benefits. Given that the proposed cycle/pedestrian route</p>

				<p>developers of the site should not be expected to fund the provision of the link, and such infrastructure should be funded by the CIL, as otherwise the regeneration of the site may become undeliverable due to viability issues. Accordingly, the provision of a new pedestrian and cycle network should be designed utilising the existing road in as part of any masterplan for the wider area, or in the emerging AAP, for <b>including in the Council's</b> Infrastructure Delivery Plan, and the Regulation 123 list, to secure the delivery of the provision.</p> <p>As expressed in the previous representations, the site is also considered appropriate for student accommodation if a requirement for further student accommodation is identified in the future. It is noted in paragraph 3.21 of the Proposed Submission Development Management document that Haringey has a role to play in fostering relationship with existing higher education institutions and in meeting the needs for purpose built student accommodation. In this respect, Policy DM15 specifically refers to Haringey Growth Areas and within or at the edge of a town centre as being suitable locations for future student accommodation, where required. As <b>the site's redevelopment is a long term</b></p>	<p>2.56 New commercial and residential development <i>and/or student accommodation</i> will be permitted along this route.</p>	<p>goes through the site, the design must enable this and as such is a development cost. The use of the term cross-subsidise is appropriate within this context.</p> <p>The Council has a policy which it will determine applications for student accommodation against (DM15). While this site fits a number of the criteria included in DM15, preference will generally be for more conventional housing types. The Council will determine applications for student accommodation on an ongoing basis, having regard to demand, rather than allocating it on particular sites.</p> <p>No change</p>
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					opportunity, we consider it appropriate to allow for flexibility to facilitate student accommodation in the allocation, in line with Policy DM15.		
8	RSA4 2	SA21 Site Requirements	No	Not stated	<p>Site Requirements</p> <p>The first bullet point (a site wide masterplan approach): We support the side wide masterplan approach as the allocation is in multiple ownerships. This approach would facilitate the delivery of regeneration of the site in a coordinated manner without undermining the delivery of part of the allocated site to come forward first. However, it is considered that minor amendment is necessary to ensure that the policy can facilitate phased delivery.</p> <p>The third and sixth bullet points (pedestrian and cycle link): These criterion states that a pedestrian and <b>cycle link along the “entire length of the site” and “the east-west linkage should be as straight as possible between Wood Green High Road and Clarendon Square.” We consider that this should be clarified as an alignment utilising the existing road.</b></p> <p>The fourth bullet point (employment floorspace): We welcome the removal of the previous criterion setting a target of 33% employment floorspace, and requirement to specifically provide Class B1 a and c uses. We are generally supportive of the amended</p>	<p>Suggested Wording of Site Requirements/Development Guidelines</p> <p>We consider that there are a number of combined <b>“requirements” and additional guidelines, particularly the prescriptive design requirements for the new pedestrian and cycle link, which would make the redevelopment of the site unviable. Policies should positively support redevelopment and provide details to guide/enable development in line with the Council’s objectives and visions as far as possible. Accordingly, we consider that the Site Requirements and Development Guidelines should be consolidated as</b></p>	<p>Regarding the alignment of the enhanced cycle/pedestrian link, the Council believe that as direct a route as possible is the most beneficial possible. This may or may not be along the alignment of one of the existing routes.</p> <p>The requirements for employment (rather than commercial) floorspace, and active frontages along the new/enhanced route, are considered clear and appropriate. The contribution of this existing employment designed site is to provide for more intensive employment use – the maximum feasible.</p> <p>The site is currently designed for</p>

				<p>criterion which seeks to secure the maximum quantum of employment floorspace feasible from redevelopment. However, in order to achieve strategic growth objectives, the type, quality and mix of <b>employment ‘generating’ uses will be</b> taking into account in the consideration of the commercial <b>viability of the site’s redevelopment</b> options.</p> <p>We consider that the requirement for <b>the provision of “employment floorspace”</b> is ineffective and does not provide sufficient flexibility to facilitate the delivery of redevelopment. The NPPF states that the Local Plan should allocate sites to promote development and flexible use of land. Therefore, all employment generating uses and economic development, as defined by the NPPF, should be considered for an appropriate mix of uses to deliver a viable regeneration scheme, subject to marketing demand and commercial viability.</p> <p>This criterion also requires maximum employment feasible to be provided <b>on site ‘once the connection has been secured.’ We object to this as it is not</b> sufficiently clear or justified.</p> <p>The fifth bullet point (active frontages): We are concerned with the <b>‘requirement’ to provide active frontages to both sides of a new</b></p>	<p><b>“Development Principles and Guidelines,” as follows:</b> Development Principles and Guidelines <i>Development proposals will be required to be accompanied by a site wide masterplan, showing how the land included <del>meets this policy and does not</del> compromise co-ordinated development on the other land parcels or phased delivery within the Allocation.</i></p> <p><i>No buildings are required to be retained.</i></p> <p><i>Tall buildings on the site are supported in order to maximise the <b>site’s redevelopment potential and increase the development capacity, subject to the required assessment under Development Management Policy DM6. Height of new buildings where they</b></i></p>	<p>employment use, and the allocation for mixed use provision seeks an intensification of employment use. It is noted that capped commercial rents will have an impact on viability, but it is also noted that they will help to ensure long term viability of businesses in the borough helping to deliver sustainable development.</p> <p>The site is within the envelope of the potential tall buildings area, as set out in DM6. This site is not identified in the UCS as a specific location suitable for a tall building. As such there will not be a reference within this policy, and the height of development permitted on the site will be determined in line with DM6.</p> <p>The “framing the space” guideline is</p>
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				<p>pedestrian/cycle link, as it is prescriptive in the absence of a scheme/masterplan for the adjoining site and how it would relate to a scheme for the site. Whether active frontages can be provided or is appropriate will depend on land uses, layout and relationship with adjoining developments. In order to ensure flexibility and that the delivery of a viable scheme is not compromised, it should be identified as a guide rather than a site requirement.</p> <p>The seventh bullet point (capped commercial rents): We strongly object <b>to the requirement of “capped commercial rents” as such a requirement would, fundamentally, constrain the deliverability of the regeneration scheme. There is no definition of and justification (including viability evidence) for the requirement to cap commercial rents. In principle, the requirement for capping the commercial rents goes beyond the purpose and scope of the Local Plan, and it is a concern as there is no clear policy objective and justification is stated. Fundamentally, this requirement, as currently drafted, will make the scheme unviable, as not only it is unrealistic to “cap” rents commercially, but it will act as an impediment to securing the necessary inward investment towards the</b></p>	<p><i>back onto the residential properties on Hornsey Park Road should be considered carefully to respect their residential amenity.</i></p> <p><i>The opportunity to create an east/west pedestrian and cycle link with appropriate landscaping, utilising the existing road should be considered as part of a Masterplan, subject to feasibility and viability, and funding available through CIL to deliver the link.</i></p> <p><i>Active frontages to the potential new pedestrian link should be explored, having regard to the site’s mix of uses and relationship to the enhanced public realm envisaged at the south of the allocated site.</i></p> <p><i>As part of mixed use development, the</i></p>	<p>considered to be appropriate to creating a new edge-of-centre location in Wood Green.</p> <p>The Council will continue to support the flexibility built into the development guideline governing decentralised energy infrastructure.</p> <p>PTAL of the site is 4, and with Piccadilly Line improvements, will only improve. The site is also within the Metropolitan Town Centre boundary. Consideration for car free development in this circumstance is considered appropriate.</p> <p>No change</p>
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				<p>regeneration of the area, particularly where there are substantial costs associated with redevelopment. We therefore strongly object to the capped rent requirement as it is not justified and would fundamentally affect the deliverability of regeneration of the site.</p> <p>Development Guidelines</p> <p>The first bullet point (height of buildings): We support the amendment made to the consideration given to the height of new buildings which backs onto the residential properties on Hornsey Park Road.</p> <p>Previously there was a criterion which supports the principle of tall buildings on the site. Whilst we objected to the limitation of the height, we were supportive of the principle of tall <b>buildings on the site. The site's</b> strategic designation is for growth and intensification and in order to increase the development capacity by making efficient use of the site, the policy should encourage and support the principle of tall buildings.</p> <p>The second bullet point (framing the space): It is considered that this requirement is unnecessary and too prescriptive as it would depend on the alignment of the link and should be considered as part of masterplanning of the allocated site.</p> <p>The fourth bullet point (decentralised</p>	<p><i>maximum quantum of commercial/employment generating floorspace feasible should be provided on this site, having regard to the type of uses which would contribute to the regeneration of the town centre site and job creation subject to market demand and viability.</i></p> <p><i>The Moselle River runs in a culvert under this site, and as been identified as being in a potentially poor condition. Any development of this area should ensure that as a minimum the culvert is made safe, and ideally the potential for the Moselle to be deculverted is expected.</i></p> <p><i>The site is identified as being an area with potential for being part of a decentralised energy network. This</i></p>	
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				<p>energy network): We would comment that any requirement for the site to provide an easement for the work should be deleted, where an existing network does not exist or it is not practically feasible or financially viable. This point is supported by the London Plan Policy 5.5 which states that boroughs should require developers to prioritise connection to existing or planned decentralised energy network, <u>where feasible</u>. As worded, the requirement to provide connection adds an unnecessary cost to the development, which could make the scheme unviable.</p> <p>The eighth bullet point (new street trees): We consider that the provision of new street trees is too prescriptive, as it should be considered as part of masterplanning and detailed landscape design.</p> <p>The ninth bullet point (car free development): It is considered that car free development <i>may be</i> appropriate for the site in the future when Crossrail 2 becomes operational (although we understand from the emerging AAP that it is to be delivered in the latter half of 2020s). Fundamentally, parking provision for any development proposals should be assessed as part of the Transport Assessment or Statement based on the London Plan's parking standards and in line</p>	<p><i>may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network, subject to feasibility and viability.</i></p> <p><i>Studies should be undertaken to understand what potential contamination there is on the site prior to any development taking place.</i></p> <p><i>A piling statement will be required prior to any piling taking place.</i></p> <p><i>Applicants must consult with Thames Water regarding wastewater and water supply capacity upon the preparation of a planning application.</i></p> <p><i>The provision of car parking will be assessed as part of the Transport Assessment or Statement. The site may be is suitable for</i></p>	
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					with the Development Management Policy DM32. As such, we consider that minor amendments to the criterion are necessary for clarity and consistency with Policy DM32.	<i>car free development due to its good, and improving public transport access in the long-term, which will be assessed in line with the London Plan and the Development Management Policy DM32.</i>	
12	RSA59	SA 21	No response given	No response given	<p>We write on behalf of our client, Oceanwave Estates Ltd. in relation to <b>Haringey's Local Plan Site Allocations</b> DPD Pre-Submission Version (January 2016), with particular regard to site allocation reference SA21 (Clarendon Square Gateway).</p> <p>In March 2015 we responded to the <b>'Site Allocations DPD Consultation Document (February 2015)'</b> which included SA26 (now renumbered as SA21). Our comments focused on the following two key items:</p> <p>1. The height should not be limited to seven storeys; instead the site should be promoted with a range of heights which acknowledge both existing and emerging developments; and</p> <p>2. The suitability of provision for light industry on this site was questioned; it was recommended that if Haringey wanted to create a new link between Wood Green and Clarendon Square, which included a legible streetscape,</p>	Not stated	Noted.

					then uses such as A1/A3/A4 should also be included.		
12	RSA6 0	SA 21	No response given	No response given	Having reviewed the SADPD Pre-Submission Version document, we note that the proposed allocation has been altered; height is no longer <b>'limited to 7 storeys'</b> . <b>Instead it states</b> where buildings back onto residential properties on Hornsey Park Road they should carefully consider and respect the residential amenity. This is welcomed.	Not stated	Noted.
12	RSA6 1	SA 21	No response given	No response given	In addition, we note that the extent of the site allocation has been extended which has resulted in an indicative development capacity of 195 residential units and 6,734sqm employment space to be provided on the site. This is greater capacity than <b>our client's initial assessment of the site</b> in which considered that 148 units could be provided on the site. The allocation for a greater number of residential units is therefore also welcomed and whilst we acknowledge the indicative provision of employment space to be provided, we still consider that the site should be a residential led mixed use development.	Not stated	Noted.
12	RSA6 2	SA 21	No response given	No response given	In light of the above, we therefore support the continued allocation of Site SA21 (formerly SA26) for mixed use redevelopment. Our client is keen to bring forward proposals for the redevelopment of the site and	Not stated	Noted.

					welcomes the opportunity to work alongside Officers at Haringey to ensure that the overall vision for redevelopment of Wood Green is achieved.		
12	RSA6 3	Wood Green AAP	No respo nse given	No response given	Finally, the Wood Green Area Action Plan Issues and Options Document which is currently out for consultation until 20 March 2016, makes reference to Clarendon Square Gateway as site allocation SA26; this is the old allocation reference and so for consistency purposes, we would recommend that the reference is updated to SA21 as detailed within the Site Allocations DPD Consultation Document.	Wood Green AAP to make reference to SA21 and not the old SA26	Noted. The next iteration of the Wood Green AAP will take this into account – but it may be that a new site reference is required, reflecting any changes as a result of the more detailed AAP.
13	RSA6 8	SA21	Not stated	Not stated	St William supports the redevelopment of this site as part of Wood Green Metropolitan Town Centre so long as it delivers the fundamental role of creating a new extended High Street to Wood Green and a gateway to Clarendon Road Gasworks. The site should importantly compliment site SA22.	We consider that the extension of the Metropolitan Town Centre boundary along the northern edge of the site may be of benefit to deliver the objectives of bringing forward town centre uses in this location, and tying the site into Allocation SA21 Clarendon Square Gateway adjacent.	Noted. However the Site Allocations does not promote a high-street typology for this site, but a mixed use development including employment. The connection through to Clarendon Square is required though.  It is noted that the mix of uses will be reviewed in the emerging Wood Green AAP.  No change

SA22: Clarendon Square

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA12	SA22	Not stated	Not stated	We welcome the proposed improvement to the pedestrian and cycling route to the Penstock Tunnel. The development should not just open up but also improve the ecological corridor along the New River.	Not specifically stated	Support is noted. With respect to the ecological corridor, such improvements are likely to fall to CIL – being outside of the development boundary - rather than as a requirement on the development.  No change
13	RSA69	SA22	Not stated	Not stated	St William support the mixed use proposed site allocation, and reference to the extant planning permission. Given the scope to consider an alternative masterplan at this site, as previously discussed in these representations, it is considered that the site allocation be appropriately refreshed to ensure a deliverable alternative to the extant permission. St William <b>support the proposed allocation of “residential, employment, a new urban square, and improved linkages through the area”</b> however <b>question the inclusion of “education uses”</b> . There is no evidence base to suggest that this use should be accommodated at this site, and therefore education use should be removed from the proposed site allocation.	Education use should be removed from the proposed site allocation.	The need for additional primary school capacity has been identified in the Infrastructure Delivery Plan and in the Issues & Options draft of the Wood Green AAP.  No change

13	RSA70	SA22	Not stated	Not stated	<b>In respect of the ‘Site Requirements’ Allocation</b> SA22 states that development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets the allocation policy and does not compromise co-ordinated development on the other land parcels within the Allocation. We accept that any future masterplan will need to be considered holistically both for this site, and adjacent sites, however we would not expect a separate masterplan to be adopted as a policy/planning brief, particularly given this allocation and the emerging AAP.	Not specifically stated	Noted. The intention is that the masterplan would support a planning application, showing how this site responds to its surroundings.  No change
13	RSA71	SA22	Not stated	Not stated	Finally it is considered that this site comprises a Central location for the purposes of London Plan Table 3.2. Policy 3.4 of the London Plan requires development to optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the London Plan. Wood Green is defined as only one of a handful of Metropolitan Boroughs within London and is a Central location, namely an area with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of a Metropolitan town centre (Notes to Table 3.2). Clarendon Road Gas Works benefits from a current PTAL of 3-4 within this Central location, albeit this will increase with the arrival of Crossrail 2. The London Plan Table 3.2 would support a density range up to 1100hr/ha or 405u/ha in such locations subject to local context. We consider that this classification should be confirmed to cover the Clarendon Gas Works site.	Consider that a <b>‘Central’</b> classification should be confirmed to cover the Clarendon Gas Works site.	Central density assumptions have been made regarding the indicative site capacities of development in Wood Green. It is noted however, that these are indicative capacities assumptions, and developments will be considered on a case-by-case basis.

13	RSA73	SA22	Not stated	Not stated	<p><b>We are not convinced that the “straightening” of the “existing kinks in Clarendon Road/Mary Neuner Way” is necessary</b> either in urban design or highway design terms, and it seems an unnecessary requirement which the extant permission does not deliver. This element should be deleted.</p>	Requirement to straighten the existing kinks in Clarendon Road/Mary Neuner Way should be deleted	<p>At present the <b>unnecessary “shicane”</b> along Mary Neuner Way is significantly sub-optimal in highway and urban design terms, and should be replaced in any future development on the Clarendon Square work.</p> <p>No change</p>
47	RSA140	SA22	Not stated	Not stated	<p><b>Encroachment of Local Plan Allocations on Consultations Zones – Hornsey Holder Station</b></p> <p>We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones. The land allocation that could be affected is the mixed use class allocation SA22 – Clarendon Square, Hornsey Park Road/Mayes Road/Clarendon Road, N8 (Haringey Heartlands). This allocation encroaches upon the inner, middle and outer consultation zones of the Hornsey Holder Station, Clarendon Road, Hornsey, N22 6UG operated by National Grid (HSE Ref. No. H1755).</p> <p>You are reminded that HSE has previously given relevant advice on this matter which has been included as a condition to planning application HGY/2009/0503 for the development of land at Haringey Heartlands, between Hornsey Park Road, Mayes Road, Clarendon Road and the Kings Cross / East Coast Mainline. In the</p>	Not stated	<p>It is noted that the Clarendon gas holder is at the centre of already consented planning application.</p> <p>In this regard it is considered that the advice given on 21/03/2012 is extant.</p> <p>No change</p>

					Decision Notice to the application dated 21-03-2012, and with regards to the matter of revocation of consent for land at the Hornsey Holder Station, condition 71 states: <i>No part of the development shall be occupied until The Hazardous Substances Consent for the gasholder station has been revoked or varied in accordance with the Planning Hazardous Substances Act 1990, as amended, such that the Health and Safety Executive (HSE) does not advise that permission should be refused on safety grounds, and written confirmation of the necessary revocation or variation has been issued by the London Borough of Haringey as local planning authority. Reason: In the interests of health and safety, it is necessary to ensure that the adjoining gas infrastructure will not present a risk to safety.</i>		
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#### SA23: Clarendon Road South

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA13	SA23	Not stated	Not stated	Development should add to and enhance the ecological corridor on its western edge.	Not specifically stated	Improvements to the ecological corridor are likely to fall to CIL – being outside of the development boundary - rather than as a requirement on the development.  No change
221	RSA346	SA25, SA27, SA28 and	Not stated	Not stated	We support a number of proposals, including SA25, SA27, SA28 and	This commitment, to enhance the adjacent green	<b>It is agreed that a comment regarding how the site impacts on the ecological corridor to the west</b>

		SA31  SA23, SA30, SA40 and SA54			SA31 where by a commitment is made in the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINCS.	spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.	<b>of site SA23 could be added.</b>  The other sites are considered to have appropriate references.
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#### SA24: NW of Clarendon Square

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RSA72	SA24	Not stated	Not stated	The site lies adjacent to Olympia Trading Estate. It is located within a Local Employment Area: Wood Green Regeneration Area (unlike Clarendon Gas Works). The site <b>allocation seeks "new high density employment-led mixed use development with residential"</b> . In addition <b>"Capped commercial rents will be expected in this area in line with the Policy DM38" and the "The maximum quantum of employment floorspace feasible should be provided on this site."</b> The development guidelines recognise <b>that the site is "identified as potentially suitable for a tall building"</b> as part of the Coburg/Western Roads tall building cluster. St William supports this allocation. Should this site be included within the wider redevelopment of SA22, then it	This site be included within the wider redevelopment of SA22	It was not included in SA22 as SA22 has an extant planning permission and therefore the allocation seeks to bring forward this additional parcel of land outside of that permission. Should St William acquire the land interest, the Council would support a planning application that included both SA22 and SA24 and could then recognise that the land use objectives for both sites could be met within the one overarching masterplan. At present however, it is appropriate that the sites remain in two allocations.  No change

					should be recognised that the land use objectives for this site could be consumed within the wider masterplan and visa versa.		
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### SA25: L/A Coronation Sidings

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA14	SA25	Not stated	Not stated	We welcome the proposal that the development should enhance the ecological corridor. Should this be made a site requirement?	Not specifically stated	The Council considers that a guideline that supports enhancement is sufficient.  No change
36	RSA120	SA 25	No	Not stated	<p><b>1. This is described as “Creation of employment-led mixed use development with residential, including a <u>landmark building</u> marking the entrance to Wood Green from Alexandra Palace and the west of the Borough”.</b></p> <p>2. The stated guidelines include: <b>“A new building on the corner of Coburg and the Penstock path should form part of the Coburg/ Western Roads taller building cluster. This could potentially be a <u>tall building</u>, complementing the development across Western Rd to the west. It should be designed in such a way to be</b></p>	While the APPCAAC welcomes stronger links between Alexandra Palace Park and Wood Green, we object to a tall building at this location and recommend the words and references be deleted from the SA25.	The Council is proposing a significant quantum of growth in the Haringey Heartlands area, which will noticeably change the character of the area east of the rail line, all of which is currently visible from much of Alexandra Palace Park.  No change

					<p><u>visible from Alexandra Palace Park, acting as a way marker, while respecting the setting of the Park.”</u></p> <p>3. The APPCAAC’s objection is that a “landmark tall building” at this site is unsound in the context of its adverse impact on the Alexandra Park and Palace Conservation. Such a building would be intrusive and alien in the landscape and views from and in within the conservation area. It would be in conflict with DM5, Locally Significant Views and Landscapes.</p>		
221	RSA346	SA25, SA27, SA28 and SA31  SA23, SA30, SA40 and SA54	Not stated	Not stated	We support a number of proposals, including SA25, SA27, SA28 and SA31 where by a commitment is made in the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINCS.	This commitment, to enhance the adjacent green spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.	<p><b>It is agreed that a comment regarding how the site impacts on the ecological corridor to the west of site SA23 could be added.</b></p> <p>The other sites are considered to have appropriate references.</p>

**SA26: Hawes & Curtis, Green Lanes**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
218	RSA335	<b>Sites SA6,</b>	Yes	Yes	We consider the site allocations sound	We prefer the	<b>Noted, this</b>

		SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57			however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	<b>amendment will be made.</b>
219	RSA337	SA26: Hawes and Curtis	Not stated	Not Stated	Concern over the heights of the building and impact on Green Lanes Site allocation is 73 units 141 units have been submitted for Planning Permission	Not stated	Concern noted, but heights will be determined at the detailed planning permission stage. Capacities quoted in the Site Allocations are indicative and

							modelled. Detailed designs will identify how many units can be accommodated on each site.  No change
228	RSA364	SA26	Not stated	Not stated	<p><b><i>NHS Requirement</i></b>  <i>NHS use has not previously been included within the emerging Site Allocations DPD and has therefore not been consulted on</i>  The requirement for an NHS facility was a late addition to the emerging Site Allocations document. Previous versions, including the Regulation 19 ‘Preferred Options’ document consulted on between February 2015 and March 2015 did not reference the need for a medical facility. The proposed allocation to include the NHS facility has therefore not until now been consulted on.</p> <p>Furthermore the NHS have not previously submitted representations to LB Haringey on their requirements for a new facility in this location.</p> <p><i>NHS requirement in this location not supported by evidence base</i>  The inclusion of the requirement for a new NHS facility is not wholly and robustly supported within the evidence base. The Draft Health Infrastructure Plan 2011-2026 dated October 2011 states that there is a</p>	Therefore, the policy wording needs to be amended to promote greater flexibility on the floorspace requirement for the NHS. It is suggested that a range may be suitable, for example from 700m2 to 1,000m2 which will be dependent on the viability of the scheme as a whole. In addition greater flexibility regarding the height and residential density the site can deliver needs to be reflected to allow for a viable Site Allocation.	This is not quite accurate. The Council has been working with the NHS to understand how the growth identified in the Local Plan will be catered for in terms of health facilities. A detailed piece of work examining growth assumptions, as well as changing NHS provision models has been undertaken to identify locations in which new facilities should be provided. It is this process which has informed the requirement for a new health facility on this site, rather

				<p>national target of 1GP per 1,700 of population (as established by the NHS Healthy Urban Development Unit). There are currently 191 GPs in Haringey in 54 premises. With a current population of 228,837, Haringey would be expected to have 135 GPs. Therefore, based on the current population figures the Borough as a whole exceeds its requirement for GPs.</p> <p>The document does note however that there is a geographical mismatch with a GP deficit in the south eastern area where there are pressing health issues, as well as in the east /north east Tottenham area. Therefore, given the current constraints on public spending, NHS <b>Haringey's</b> planning assumption is for an increase of 12 GPs by 2026, of which 8 GPs are associated with the east of the borough.</p> <p>The site at Green Lanes is situated centrally within the borough and is therefore not considered to be best located to provide an additional GP surgery to mitigate this disparity, given patients should be within walking distance of their local surgery. A new facility would be best located within the centre of the eastern part of the borough. This will ensure the catchment area captures the residents who currently suffer from the deficit of GPs in their area.</p> <p><i>Quantity of NHS Floorspace</i></p>		<p>than through a formal rep to the Local Plan.</p> <p>The floorspace quantum is a standard assumption for the town centre model (10% town centre, in this case health, 90% residential). The actual quantum may vary depending on a number of factors, including design on the site, viability, and NHS requirements.</p> <p>The Council understand that finding a financial agreement between NHS and the landowner will be possible. The statement regarding zero rent is spurious.</p> <p>NHS have confirmed that they will be shortly</p>
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				<p>Hadley has endeavoured to liaise with the NHS on a number of occasions to discuss their needs and operational requirements for a new facility in line with the emerging site allocation.</p> <p>Previous requests from the NHS have ranged in floorspace requirements from between 700m2 and 1500m2. The uncertainty on the exact NHS floorspace and operational requirements as well as position on financial contributions is leading to the stalling of the scheme and inability for a scheme to be progressed and come forward on this site.</p> <p>The current proposed allocation includes a 1500m2 floorspace requirement. There is however, no justification for this within the emerging site allocation nor has this been set out as a requirement within the evidence base. In addition, the NHS have not submitted representations to Haringey Council specifically requesting a new facility in this location, nor have they set out their required floorspace for a new facility.</p> <p><i>Viability</i> Any Local Plan designation or scheme brought forward by Hadley Property Group needs to be viable, taking into account the cost associated in providing an NHS facility. Policy SA26 must therefore comply with the NPPF paragraph 173 which reads:</p>		<p>bidding for the next 3 year capital programme to deliver the facility on this site.</p> <p>No change</p>
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					<p><i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”</i></p> <p>Ensuring the Site Allocation is viable is therefore fundamental to ensuring the delivery of a deliverable scheme on this site. As it stands the requirement to deliver an NHS facility at 1500m2 and lease at zero rent to the NHS renders the site allocation unviable, and therefore conflicts with Paragraph 173 of the NPPF.</p>		
228	RSA365	SA26	Not stated	Not stated	<p><b>Density</b> The site has the capacity to accommodate a significantly denser scheme than stated within the emerging Site Allocations document. Providing just 73 units in this highly sustainable location with a PTAL rating of 6+ is a conservative approach</p>	Revised density requirements in site allocation	Calculations regarding capacities are modelled and indicative. The capacity will be determined based

				<p>taken by the Council, given the strategic significance of the site. Furthermore, the site is approximately a 10 minute walk from the proposed new Crossrail 2 station at Turnpike Lane which would further improve the access, which must be taken into account when setting proposed site capacities.</p> <p>Not only is the site sustainably located in terms of public transport, but any new development has the potential to create a sense of place and a local community feature when entering Green Lanes. This opportunity must be maximised and encouraged within the wording of the emerging Site Allocations policy.</p> <p><i>Consideration of pre-application scheme</i> Paragraph 4.3 of Appendix 4 of the emerging Site Allocations document states <b>‘where details of pre-application proposals are available and considered reasonable, the relevant housing capacity and employment floorspace have also been used to inform the site allocation.’</b></p> <p>Since the publishing of this draft Site Allocations DPD, Hadley have held 2 pre-application meetings with LB Haringey for a residential led mixed use scheme.</p> <p>The formal pre-application written feedback from LB Haringey supports the principle of the scheme and density <b>stating, ‘the latest scheme presented to officers considered ambitious development</b></p>		<p>upon a robust design-led analysis of the site in accordance with Policy DM1. It is expected that they will vary from the indicative capacities set out in the Appendix to this document, which are used to demonstrate that <b>the Borough’s</b> strategic housing requirement can be met.</p> <p>No change</p>
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					<i>proposals but not in principle unacceptable in urban design and land use terms, provided the designs are of sufficient quality and resolve detailed challenges. Over the two pre-application meetings, the proposals have developed to a significant degree...the principle of developing the site for medical centre and residential purposes is considered to be acceptable in principle subject to the applicant providing floorspace in line with NHS requirements.'</i>		
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### SA27: Wightman Road

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA15	SA27	Not stated	Not stated	We support the requirement to preserve and enhance the ecological corridor, but we think the words <b>"where possible"</b> should be removed to strengthen the requirement.	Not specifically stated	The Council consider that it is important to ensure there is flexibility to enable delivery of sites. Any potential applicant will be required to justify what they can (or cannot) achieve in this regard.  No change
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26,	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones	<b>Noted, this amendment will be made.</b>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
		SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57			constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	(for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
219	RSA338	SA27 Wightman Road	Not stated	Not Stated	Loss of amenity with Jewsons, concerns with heights. Contribution should provide section 106 funds to help contribute towards construction of a lift service / disabled access to Harringay Station.	Not stated	Assumed this is regarding the loss of amenity from having access to a builders depot. This is not a strategic need, with new homes and a potential improvement in the access to Harringay station considered to be of a greater benefit.  No change
221	RSA346	SA25, SA27,	Not stated	Not stated	We support a number of proposals, including SA25,	This commitment, to enhance the adjacent	<b>It is agreed that a comment regarding</b>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
		SA28 and SA31  SA23, SA30, SA40 and SA54			SA27, SA28 and SA31 where by a commitment is made in the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINC's.	green spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.	<b>how the site impacts on the ecological corridor to the west of site SA23 could be added.</b>  The other sites are considered to have appropriate references.

### SA28: St Ann's Hospital Site

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA16	SA28	Not stated	Not stated	We support the requirement to enhance the SINC in the south of the site. We support the requirement for a north-south route through the site but ask that this should be an ecological corridor not just a walking/cycling route, to provide a link between the railway corridor and Chestnuts Park.	Not specifically stated	The connection is through to the street network and is primarily intended to improve accessibility for cyclists and pedestrians. There may however, be potential for this to form part of a wider green grid network once the connection route is established.  No change
218	RSA335	<b>Sites SA6, SA7, SA14, SA15, SA17,</b>	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording	We prefer the following wording to be applied to the above sites to	<b>Noted, this amendment will be made.</b>

		SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57			for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
219	RSA339	SA28: St Ann's Hospital Site	Not stated	Not Stated	Heights max 2/3 stories respecting heights of Warwick Gardens residents. Oppose access point at Warwick Gardens / Stanhope Gardens will become a potential crime route. Residents of the Warwick gardens – <b>“Homes for Haringey” flats will loose amenity / garages and green</b>	Not stated	Heights of development will be determined at the planning application stage.  It is considered that the creation of an improved pedestrian/cycling network in the centre of the borough, linking this site, Green Lanes District Centre, and parks at

					space. Concern on the numbers of cars impacting on the area with large development. No school proposed for the site, potential of Chestnuts Primary and Park View Academy could create annex on the site this could link with the development of the Warehouse Community, through the disused railway arch. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Many buildings and structures of historical interest should be saved and developed.		Chestnutts, Downhills and Lordship Rec, and south through the disused tunnel to the Harringay Warehouse District and ultimately Clisshold Park through the Woodberry Down development, is of significant benefit.  Development Management Policies exist to ensure new development is sustainably designed and impacts, such as traffic generation and parking, are assessed and taken into account through appropriate mitigation.  No change
221	RSA346	SA25, SA27, SA28 and SA31  SA23, SA30, SA40 and SA54	Not stated	Not stated	We support a number of proposals, including SA25, SA27, SA28 and SA31 where by a commitment is made in the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINCs.	This commitment, to enhance the adjacent green spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.	<b>It is agreed that a comment regarding how the site impacts on the ecological corridor to the west of site SA23 could be added.</b>  The other sites are considered to have appropriate references.
232	RSA379	SA28: St Ann's Hospital Site	Not stated	Not stated	We note that the Site Requirements advise that developments should preserve or enhance the appearance of <b>the St Ann's conservation area 'as per statutory</b>	We would suggest that this should be rephrased to ensuring developments conserve and	<b>Wording will be amended to this effect.</b>

					requirements'. We would suggest that this should be rephrased to ensuring developments conserve and enhance the significance of the conservation area and its setting. This approach reflects closely the NPPF and places a requirement upon understand the significance of the conservation area as part of the development process whether this is expressed in the conservation area appraisal and guided by an up to date management plan, or in a supporting planning application document . This approach should be applied to all other site allocations where there are heritage assets that could be affected by development e.g. sites that fall within or setting of heritage assets such as Highgate conservation area.	enhance the significance of the conservation area and its setting.	
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30,	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example	<b>Noted, this amendment will be made.</b>

		SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57			are also in Source Protection Zones.	site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
219	RSA339	SA28: St Ann's Hospital Site	Not stated	Not Stated	Heights max 2/3 stories respecting heights of Warwick Gardens residents. Oppose access point at Warwick Gardens / Stanhope Gardens will become a potential crime route. Residents of the Warwick gardens – <b>“Homes for Haringey” flats will loose amenity / garages and green space.</b> Concern on the numbers of cars impacting on the area with large development. No school proposed for the	Not stated	Heights of development will be determined at the planning application stage.  It is considered that the creation of an improved pedestrian/cycling network in the centre of the borough, linking this site, Green Lanes District Centre, and parks at Chestnutts, Downhills and Lordship Rec, and south through the disused tunnel to the Haringay Warehouse District and ultimately

					site, potential of Chestnuts Primary and Park View Academy could create annex on the site this could link with the development of the Warehouse Community, through the disused railway arch. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Many buildings and structures of historical interest should be saved and developed.		Clisshold Park through the Woodberry Down development, is of significant benefit.  Development Management Policies exist to ensure new development is sustainably designed and impacts, such as traffic generation and parking, are assessed and taken into account through appropriate mitigation.  No change
221	RSA346	SA25, SA27, SA28 and SA31  SA23, SA30, SA40 and SA54	Not stated	Not stated	We support a number of proposals, including SA25, SA27, SA28 and SA31 where by a commitment is made in the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINC.	This commitment, to enhance the adjacent green spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.	<b>It is agreed that a comment regarding how the site impacts on the ecological corridor to the west of site SA23 could be added.</b>  The other sites are considered to have appropriate references.
232	RSA379	SA28: St Ann's Hospital Site	Not stated	Not stated	We note that the Site Requirements advise that developments should preserve or enhance the appearance of <b>the St Ann's conservation area 'as per statutory requirements'</b> . We would suggest that this should be rephrased to ensuring developments conserve and	We would suggest that this should be rephrased to ensuring developments conserve and enhance the significance of the conservation area and its setting.	<b>Wording will be amended to this effect.</b>

					enhance the significance of the conservation area and its setting. This approach reflects closely the NPPF and places a requirement upon understand the significance of the conservation area as part of the development process whether this is expressed in the conservation area appraisal and guided by an up to date management plan, or in a supporting planning application document . This approach should be applied to all other site allocations where there are heritage assets that could be affected by development e.g. sites that fall within or setting of heritage assets such as Highgate conservation area.		
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**SA29: Arena Retail Park**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	RSA4	SA29	No	Not stated	In addition to the above points which are again relevant here, the NLP Study highlights a number of other key points which lend further credibility to the argument that the Council should recognise the existing	The proposed Site Allocation for SA29: Arena Retail Park should be amended	The Council recognises that specific levels of comparison and convenience retail will need to be reprovided on this site in order to ensure the ongoing viability of the centre.

					<p><b>Sainsbury's store as a key anchor for the district centre.</b> These include:</p> <ul style="list-style-type: none"> <li>• <b>The centre serves an important local function to shoppers from the borough and the Haringey locale</b> (paragraph 9.1); and</li> <li>• <b>Paragraph 9.6 confirms that the district centre primarily serves a convenience shopping destination and only has a limited selection of comparison shops.</b></li> </ul> <p>It is clear that the Green Lanes District Centres serves an important convenience shopping destination in the borough and, as a key anchor store, the Sainsbury's store will be critical in ensuring that the centre continues this role. As such, it seems remiss that specific provision is not made for the retention of the store as part of any potential redevelopment of the site.</p> <p>It is important to emphasise that <b>Sainsbury's is keen to explore</b> options which could allow for the redevelopment of the Retail Park, if redevelopment is deemed appropriate and suitable. However, the current wording again provides no security that a foodstore would be part of the scheme. This does not seem an effective or justified approach.</p>	<p>to state:  <i>Long-term potential for redevelopment of the existing retail park to produce access improvements to Haringay Green Lanes station and Finsbury Park, reconfigured road layout, and new residential and commercial development, including the suitable re-provision of the existing supermarket on-site</i></p>	<p>While this may include re-provision of a supermarket, it will be for the detailed planning application(s) to establish the development mix on site, including scale, orientation, unit floorplate sizes for the replacement retail provision, having regard to commercial and viability considerations. It is therefore not considered appropriate for the allocation to safeguard any specific A1 use for re-provision on the site.</p> <p>No change</p>
4	RSA17	SA29	Not stated	Not stated	We support proposals to increase density and reduce parking capacity	Not specifically	Noted.

					on the site, and to create a continuous SINC from the slopes into Finsbury Park.	stated	
14	RSA74	SA29	Not stated	Not stated	It is correct that <b>the land may be toxic, and it is also not stable</b> . The site comprises artificial Victorian mounds and slopes, and there is subsidence in gardens and roads. (The Arena was apparently built on dumped material from railway excavations, and rubbish from potteries.). This is probably why current developments are lightweight and low-level. - It is likely that 9 stories is too high on this unstable land, and new buildings should be closer to the height of surrounding buildings. - Plans must take account of possible damage to exiting housing during and after building work. For example, excavations for basements, or large infrastructure, could create substance problems for existing buildings at the time or later.	Not specifically stated	Noted. Building heights are not prescribed in the allocation and the height of any new buildings will require assessment against policy DM6. This and the other matters raised are considered to be the detailed issues that will need to be addressed and managed through the planning application process.  No change
14	RSA75	SA29	Not stated	Not stated	<b>Mature trees in the Arena/St Anne's Village</b> development should be retained, and plans should be policed and enforced. These trees are part of the original Arena/slopes history, and <b>contribute to the 'village' personality</b> . They are probably holding together some very unstable ground. (As a result of the recent Hermitage Road development, mature trees were cut	Not specifically stated	Noted, Local Plan policy SP13 seeks to protect trees within the borough, especially those of high amenity value.  No change

					down, despite being marked for retention. I reported this to Haringey Planning, and no action was taken.)		
14	RSA76	SA29	Not stated	Not stated	It is correct that there is <b>no need for a big car park</b> , as transport links are (potentially) very good. The present car park is a disaster, especially at weekends. However, the buses are often not as reliable as the schedules may suggest, because the Green Lanes traffic bottle-neck causes delays and bunching.	Not stated	Noted.
14	RSA77	SA29	Not stated	Not stated	<p>The <b>public footpath rights of way</b> from Finsbury Park Avenue/St Annes village, to Green Lanes and the Overground station should be preserved. The housing area is essentially a large cul-de-sac, and these foot routes avoid large detours, <b>and the likely overuse of cars to “get anywhere”</b>.</p> <p>Plans should consider the <b>access of emergency vehicles</b> to the present <b>St Anne’s housing development</b>, as there is currently only one narrow vehicle entrance (Finsbury Park Avenue), which is sometimes obstructed by poor parking. The existing flats are quite densely populated. The site is surrounded (the ‘slopes’) <b>by long grass and bushes</b> which is a fire hazard in summer.</p> <p>Development plans should take</p>	Not specifically stated	<p>Noted. Increased pedestrian permeability is supported by the Allocation.</p> <p>Emergency access requirements will be considered through the masterplanning process. It is considered that access to Finsbury Park Avenue meets necessary standards however.</p> <p>No change</p>

					account of the <b>maintenance of the whole (new and present) site.</b> Currently St Anns is maintained by L&Q Housing Association, and the service has been very poor for the past 20 years.		
14	RSA78	SA29	Not stated	Not stated	There is a mystery about <b>who owns the 'slopes'</b> - land running from the start of Finsbury Park Avenue, to Surrey gardens. L&Q deny responsibility, but cannot tell me who owns this, although I think L&Q sold it to the current owner. The result is lack of maintenance, dumping, and dangerous areas, e.g. when fences fall down exposing potential areas for rape and mugging, which make women nervous. (There was a rape in this area in 2000.) Can the development plans investigate and embrace this land?	Not stated	The allocation seeks to preserve and enhance this piece of land.  No change
14	RSA79	SA29	Not stated	Not stated	There has been a very impressive recent restoration of a building in Green lanes opposite the Arena/MacDonalds – <b>The Tramp restaurant.</b> (The owner was apparently a Greek refugee working in the original Arena, and squatting in this building. Decades later, having become very successful, he has returned and contributed a great deal to Green Lanes by funding this restoration.)The restoration is exemplary, and this building is nicely matched by the (less well-maintained)	Not stated	It is considered that the existing buildings on the western side of Green Lanes will remain largely as they are. It is hoped that any potential traffic improvement will benefit the amenity of users of these buildings. The design of any new development should take its inspiration from high quality development surround it. This would accord with Policy DM1.

					pub on the opposite corner. Can these two buildings become a core feature of the aesthetic of the new development, by being highlighted and inspiring good design? (In contrast, the shoddy new building opposite the Salisbury Hotel/pub, is poor and represents a missed opportunity to enhance Green Lanes.) Sorting this out is very welcome and, and well overdue!		No change
14	RSA81	SA29	Not stated	Not stated	<p>Extra housing will put further pressure on transport. TfL should consider improvements to (the potentially large) <b>Manor House underground station</b>, particularly disability lifts, which would be easy to install. (These are few-and-far-between along this section of the line.) This would benefit everyone – this is the Kings Cross/St Pancras and Heathrow line. People struggling with large suitcases a common sight.</p> <p>There should be a <b>security assessment</b> for the whole site. There has been a rape and several killings on this development. An assessment should have happened as part of the Hermitage Road development, but it <b>did not</b>. The <b>'slopes'</b> nature of the site makes houses vulnerable, there have been burglaries resulting from neglect, and crime prevention police have noted the problems are caused</p>	Not specifically stated	<p>The Council would support improvements here, and note that the Piccadilly Line is being upgraded in terms of frequency and capacity of services. TfL have proposals to make more underground stations fully accessible but this is subject to financing proposals.</p> <p>Any proposal for the site will undergo scrutiny by the Met <b>Police's Secured by Design</b> officer to ensure that the proposal has regard to the safety of future users.</p> <p>Materials and detailed architectural design are matters for the planning application process.</p> <p>No change</p>

				<p>by the surrounding wasteland. There is also informal use of wasteland, including footpaths, gardening, and chickens. This is not necessarily bad, but needs proper planning and management. Problems on L&amp;Q land have been ignored. Following years of complaints, improvements are now promised, but should be coordinated between Haringey and L&amp;Q. Part of the solution may be to extend private gardens, so that some of the waste land comes into personal control.</p> <p>Can the aesthetic of the whole development reflect <b>the former 'potteries' history</b> of Green Lanes, e.g. good high quality brick buildings, tiles, and pottery chimney design. Pottery and kilns could be a cultural factor linking traditional London and the newer Turkish/central Asian communities. The kiln chimneys are remarkably like the Turkish bread ovens, and clay cooking pots. Other local history contributions include the use of the sports arena in the first UK Olympics, and the dog track having one of the first electro-magnetic <b>"tote" computers</b>. Perhaps the new shopping development could have art reflecting these factors, or museum objects in display cases. (Photos exist. Local historians have more information.)</p>	
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15	RSA83	SA29	Not stated	Not stated	<p>Planware Ltd acts on behalf of <b>McDonald's Restaurants Ltd. The McDonald's restaurant is located to the North West corner of the current development site at Arena Retail Park Haringey, to which the above policy relates.</b></p> <p>We have considered the above policy and supporting text with regard to the principles set out within the Framework and associated Local Plan. Local Plans should plan positively for development; be justified, effective and consistent with the Framework.</p> <p><b>Planning Policy National Planning Policy Framework</b></p> <p>The National Planning Policy Framework <b>'forward'</b> confirms that sustainable development is about positive growth, making economic, environmental and social progress for future generations.</p> <p>The Policy is not consistent with para 19 and 21 of the Framework. Para 19 states:</p> <p><i>'Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.'</i></p>	<p>We cannot support this policy or the reconfiguration of the town centre Boundary to exclude the Arena Shopping Centre.</p>	<p>The change in question sought not to reduce the overall quantum of activity, or indeed commercial floorspace on this site, but rather seeks to establish a new urban form along Green Lanes, creating a <b>"High Street" frontage, rather than the set-back, car-dominated typology that exists at present.</b></p> <p>Currently there is a presumption that the creation of this new typology in the long term, will mean that the town centre boundary will shift to reflect this. There is however no need for the town centre boundary to reduce to meet the aims of the policy. Indeed a range of activity <b>being achieved "behind the High Rd"</b>.</p> <p>We agree with the respondents that there is no need to reduce the overall amount of retail floorspace in Green Lanes District Centre. It is at present a very successful centre with low vacancy, and vibrant daytime, and evening economies. The</p>
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				<p>Furthermore, para 157 highlights the guidelines to which Local Plans should be based on. These include:</p> <p><b><i>‘Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework.’</i></b></p> <p>It is considered the Policy is contradictive of the guidelines set out within the NPPF. Not only will the Policy disrupt the sustainable development of the town centre, but also act as an impediment to economic growth within the town Centre.</p> <p>No consideration has been given to the potential negative impact the policy may have on the local community, employment provision or to sustainability.</p> <p>The Planning System should contribute to building a strong and competitive economy ensuring it supports growth and innovation.</p> <p>In essence, an overriding presumption in favour of sustainable development is threaded throughout the NPPF and should be considered effectively in all Local Development Plans.</p> <p>Policy SP0: Presumption in favour of sustainable development states: <b><i>‘The Council will always work</i></b></p>	<p>Council would expect any proposal that comes forward on this site to further contribute to this.</p> <p><b>As such, and noting the co-ordinated responses from landowners on SA29, the Council will amend the Town Centre boundary on the proposed Policies Map, so that it matches that in the current Policies Map.</b></p>
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				<p><i>proactively with applicants to find solutions, which mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in Haringey.'</i></p> <p>Policy SP10: Town Centres states:</p> <p><i>'The Council will promote and encourage development of retail office, community, leisure, entertainment facilities, recreation uses, arts and cultural activities within its town centres according to the borough's town centre hierarchy. The district town centre of Green Lane will continue to be supported and strengthened as important shopping and service centres to meet people's day-to-day needs.'</i></p> <p>It is therefore considered Policy SA29 is contradictory of adopted Policy SP10, which does not support the retention of Green Lane District Centre. Arena Shopping Park contributes to economic vitality and viability for the town providing a variety of services for its residents. The Council have indicated in Policy SP10 that they wish to 'where possible secure development that improves the economic, social and environmental conditions in Haringey'; it is considered Policy</p>	
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				<p>SA29 is also contradictory of Policy SP0, as the removal of the Arena Shopping Park from the town centre will negatively impact its economic, social and environmental viability.</p> <p><b>Reasoned Justification</b>  Removing the Arena Shopping Centre from the town centre would lead to long term loss of economic prosperity and loss of a long term assured sustainable asset.  Removing the retail park from within the town centre boundary will further disrupt the legibility and walkability of the town centre.  Not only will the removal of the retail park from the town centre effect local residents, it will reduce the attractability of the centre, therefore causing a loss of appeal to the surrounding town thresholds.  No consideration has been given to the viability of the Arena Shopping Centre and the potential negative impact the policy could have on the local community.  We have demonstrated above that the policy is not consistent with National Planning Policy and contradicts Policy adopted in the Haringey Local Plan Strategic Policies (Adopted March 2013). The proposal <b>does not accord with the ‘golden thread’</b> running through the</p>	
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					<p>Framework which seeks to build a strong competitive economy.</p> <p>In light of the above, we cannot support this policy or the reconfiguration of the town centre Boundary to exclude the Arena Shopping Centre.</p>		
17	RSA92	SA29	Not stated	Not stated	<p>Our concerns here relate to the inclusion of the corner of Finsbury Park at the junction of Green Lanes and Endymion Road.</p> <p>Is this for a proposed new entrance? We have ourselves regularly proposed the creation of a new entrance gate near this junction. Why is Finsbury Park related in any way to the proposed Arena Park Development?</p> <p>We would robustly oppose any proposed loss of Finsbury Park Land (MOL) resulting from this proposal or any use of park land to facilitate the Arena development.</p> <p>Please can you confirm that there will be no loss of MOL.</p>	Not specifically stated	<p>There is no proposal for loss of MOL at this location. The proposal in this site allocation is to provide a new entrance to the Park at the north-eastern corner, to enable park users easy access to/from Harringay Green Lanes station. As and when a redevelopment of this site comes forward, the inclusion of this will ensure that opportunities to improve this access are not overlooked.</p> <p>No change</p>
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28,	Yes	Yes	<p>We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.</p>	<p>We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified</p>	<p><b>Noted, this amendment will be made.</b></p>

		SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57				in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
219	RSA340	SA29: Arena	Not stated	Not Stated	Any development should consider heights for residents affected in	Not stated	Amenity of all adjoining residents, including those

		Retail Park			<p>Stanhope Gardens residents (Northside of the railway line) development should be reduced at the North, South East and West of the site where residential properties face and adjoin the site.</p> <p>Car access needs serious consideration many mistakes have been made in the sites previous development and a road access point should be considered opposite Endymion Road creating a cross road.</p>		<p>across the rail line, will be considered when determining the height of development at the planning application stage, in accordance with Policy DM1.</p> <p>It is agreed that car access is a key issue on this site and one that redevelopment of the site can help to resolve.</p> <p>No change</p>
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### SA30: Arena Design Centre

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA18	SA30	Not stated	Not stated	We support the proposal for a connection <b>under the railway to the St Ann's site; and</b> the enhancement of the ecological corridor at the north of the site; and the new green <b>chain linking the 'slopes' towards Finsbury Park.</b>	Not specifically stated	Noted.
14	RSA80	SA30, SA31, SA32	Not stated	Not stated	Increased housing will be welcome, but will put further stress on <b>parking in Hermitage Road.</b> The current on-pavement systems is poor, and does not leave room for pedestrians to pass one-another with a reasonable distance. Women point out that this could lead to harassment, and it makes opportunistic mugging easy. Wheelchairs and buggies etc often cannot pass, if hedges		<p>Impact on parking will be minimised through requiring maximum parking ratios. As this site has a high PTAL, parking for residents will be limited.</p> <p>It is noted that Hermitage</p>

					are overgrown.  The <b>proposed footpath</b> from the Overground land into Finsbury Park Avenue (between 80-82) is interesting, but this needs to be planned with L&Q Housing, and adjacent residents need to be consulted. The path could create security risks as the back gardens of houses will become vulnerable, and ways for residents to improve or maintain fencing need to be considered.		Rd is already a Controlled Parking Zone. As such it would be possible to restrict new permits being given to occupants of the new site.  No change
16	RSA84	SA30	No	Not stated	ProveWell strongly objects to the designation of SA30: Arena Design Centre as a Local Employment Area: Regeneration Area. The site has no previous employment designation and no reasonable prospect of being used for employment purposes. The evidence base for the employment designation is unsound, unjustified, and as it fails to distinguish fundamental differences between the sites within the Haringey Warehouse district, is flawed.	Not specifically stated	The site at present has an existing Site Specific proposal stating its <b>existing use as “industrial, live/work”, and a proposed use of “Employed led mixed use development”</b> . As such, it is currently allocated for employment use, akin to a Regeneration Area, despite not being designated employment land. While it is noted that a number of the sites have become occupied by residential uses, the site is historically an industrial location, and still retains an element of employment use.  No change
16	RSA85	SA30	No	Not stated	This site is not currently allocated as	Not	The site at present has an

				<p>designated employment land within existing adopted Local Plan, including the Haringey UDP and Proposals Map 2006 and Core Strategy (2011).</p> <p>4.3 Indeed Policy HSG 1, and UDP allocates Arena Business Centre as a Housing Site its. <b>Paragraph 4.9 states the housing sites “are considered suitable for housing”</b></p> <p>Further, the nature of the site has changed considerably between 2006 and 2016, as a significant proportion of the site now has an established residential use. Only 10% of the site floorspace remains in employment use, with only 5 jobs as confirmed by our survey (Appendix E). Further details on the nature of the site at present are contained within our previous representations (see Appendix C).</p> <p>The Core Strategy Policy SP8 defines Local <b>Employment Areas as “local employment generating sites in the borough that need protection”</b>. The newly proposed designation of Arena Design Centre as an employment area therefore does not reflect this definition nor the purpose of LEAs in the Core Strategy, or the true nature of the site.</p>	specifically stated	<p>existing Site Specific proposal stating its <b>existing use as “industrial, live/work”, and a proposed use of “Employed led mixed use development”</b>. As such, it is currently designated for employment use, despite not being a DEA. While it is noted that a number of the sites have become occupied by residential uses, the site is historically an industrial location, and still retains an element of employment use.</p> <p>The Council is proposing to allocate this site for a mix of employment and residential (including warehouse living) uses, and as such, the most appropriate designation for this site is Regeneration Area, as it is the only designation within SP8 that offers protection (and potential expansion) to employment uses, and permits residential.</p> <p>No change</p>	
16	RSA86	SA30	No	Not stated	<b>National Planning Policy on Employment</b>	Not	With regard to the stock,

				<p><b>Designations</b></p> <p>The proposed employment allocation at Arena Design Centre conflicts with paragraph 22 of the NPPF, which states: <i>“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.”</i></p> <p>Arena Design Centre is predominantly in lawful residential use currently with very limited employment use. Only Units D and E are in an employment use supporting 5 jobs, their leases come to an end in 2017 when they will be looking to relocate.</p> <p>An assessment of lettable and demand for Units D and E at Arena Design Centre was undertaken in April 2015, by Currell Commercial surveyors (see appendix F). The letter concludes that the buildings are unlettable in their current state and less desirable than neighbouring units as a result of the conditions of accommodation and location. The letter concludes that the buildings are unlettable in their current state and less desirable than neighbouring units as a result of the conditions of accommodation <b>and location. The letter states that “even if the buildings could be refurbished to create high quality commercial space it will not be simple to secure a commercial occupier due to the off pitch location problematic access and mainly residential nature of the Arena Estate.”</b></p>	specifically stated	<p>and existing uses on the site, the Council is not proposing a restrictive or overly protective allocation.</p> <p>The policy position put forward enables opportunities for redevelopment, where it can be demonstrated that the proposed use will deliver sustainable outcomes in terms of both existing residential communities, and the local economy.</p> <p>The Council does not expect that the current residual employment floorspace has a great deal of demand in the marketplace, but the Workspace viability study does set out that if new employment floorspace is provided in this location, that it can be filled. Furthermore, the good, and improving residential amenity in the area, may be of benefit in achieving this.</p>
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					<p>For these reasons it is evident Arena Design Centre has little prospect of being an employment site and therefore should not be constrained by an allocation that protects it long term. The current Consultation on the proposed changes to national planning policy proposes to amend paragraph 22 of the NPPF to further reduce restrictions on unviable and underused employment land, emphasising that this land should be released unless there is significant and compelling evidence to justify why such land should be retained for employment use. Clearly the allocation of Arena Design Centre for employment use does not accord with <b>the government's aspirations for such land</b>, with no significant and compelling evidence justifying its retention.</p> <p>Also of relevance is the Appeal Decision for Appeal refs APP/Y5420/C/14/2212163 and APP/Y5420/C/14/2212166, dated 25th September 2014 (see Appendix G) at units on the neighbouring Eade Road site where the inspector considered that despite the allocation of the wider site as a LSIS, the premises were no longer suitable for business and no longer met the needs for modern industry should be released for more appropriate uses. Part of the justification for this the number of neighbouring residential units that had changed the character of the area.</p>		<p>The Council does not wish to simply protect old industrial units for industrial purposes in this area, but does wish to be proactive in setting a policy position which will permit mixed use development in the area.</p> <p>No change</p>
16	RSA87	SA30	No	Not stated	Evidently, the allocation of the site does not	Not	The Council disagrees,

				<p>reflect the character of the site, and is unjustified, given that there is little prospect of this allocation being realised. We have met with the Council and raised this issue on a number of occasions, listed below, yet this has not been taken into consideration through the development of the Local Plan:</p> <ul style="list-style-type: none"> <li>i. <b>Representations to Haringey’s Local Plan, Site Allocations DPD Preferred Options and Development Management Policies DPD Preferred Options March 2015</b></li> <li>ii. Representations to Site Allocations DPD (Reg 18) Consultation Document March 2014</li> <li>iii. Meeting with Haringey Council officers to discuss the masterplanning of Eade Road and Arena Design Centre sites to inform representations to the Site Allocations DPD July 2014</li> <li>iv. Meeting with Haringey Council officers to discuss the mixed-use development potential of Eade Road and Arena Design Centre and the Site Allocations Preferred Options Document Consultation August 2014</li> <li>v. Meeting with Haringey Council officers to present typologies of various development options of the live/work concept for the masterplan and the viability of the proposed masterplan September 2014</li> <li>vi. Meeting with Haringey Council officers to present typologies of various development options of the live/work concept for the masterplan and the viability of the proposed masterplan September 2014</li> </ul>	specifically stated	<p>and would cite the recent development of early masterplanning options as evidence that the landowner is engaging with the emerging policy framework.</p> <p>The Council has, and will continue to seek an appropriate balance of development and consolidation within the area, to produce balanced employment and residential outcomes for existing residents, and to help meet housing need.</p> <p>No change</p>
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16	RSA88	SA30	No	Not stated	<p>The Evidence Base documents used to inform the site designations include the Sustainability Appraisal (SA) of the Site Allocations DPD, the Haringey Employment Land Study Final Report 2015 and the Workspace Viability Assessment 2014. The SA sets out a systematic process of outlining <b>and G a set of “rules</b> to establish suitable site uses. Paragraph 10.2.5 states that:</p> <p><input checked="" type="checkbox"/> <i>A site is potentially suitable for <b>residential</b> development unless it is a Designated Employment Area (DEA: LSIS/EL/SIL)</i></p> <p><input checked="" type="checkbox"/> <i>A site is potentially suitable for <b>employment</b> development where it is a DEA, in a town centre, or where PTAL is good (4 or above).</i></p> <p>4.13 Table 10.1 of the Sustainability Appraisal sets out to identify potentially suitable sites based on this set of rules, and concludes that Arena Design Centre as a site that is</p> <p><input type="checkbox"/> potentially suitable for housing, and not suitable for employment <input type="checkbox"/> (see <b>Appendix H. Evidently, using the Council’s</b> own preferred methodology from the evidence base demonstrates that Arena Design Centre is not an appropriate location for employment, and is more suitable for residential development.</p> <p>4.14 On this basis, Arena Design Centre should be designated for residential development, as identified by the Sustainability Appraisal.</p>	<p>The site allocation for Arena Design Centre should be amended to solely a “<b>residential</b> allocation”</p>	<p>The Council commissioned the SA to examine the draft plan for potential sustainability impacts, not as an evidence document.</p> <p>The appropriate evidence documents to quote are the Employment Land Review, and the Workspace viability Assessment.</p> <p>As pointed out above, the Council considers this site to have an existing employment designation, but recognises that it is not a DEA. As such it was not assessed through the Employment Land Study (ELS). The designation is in part informed by the ELS however, having reference to the significant need to increase B1 floorspace in the borough.</p> <p>Work was commissioned in the form of the Workspace Viability Assessment to understand the range of potential outcomes for the site. This</p>
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				<p>The Site Allocations SA states in paragraph 14.8.5 that <i>PTAL is a key factor that has influenced the approach taken for particular sites. Generally, an increase in jobs is only sought on sites with a PTAL rating above 3 (i.e. accessible sites), whilst a decrease in jobs is only acceptable on sites with a PTAL rating of 3 or below. The SA then “notes” in paragraph 14.8.7 that the PTAL rating for Arena Design Centre is low, yet it fails to justify why this is considered to be an acceptable employment location regardless.</i></p> <p>Appendix A of the Haringey Employment Land Study 2015 shows a map of Defined Employment Areas (DEAS), and illustrates Arena Design Centre as being located within <b>DEA1 “Regeneration Area”</b>. However, the land area for DEA1 (1.6ha) clearly corresponds to Crusader Industrial Area only, and the analysis of DEA1 at paragraph 5.13-5.17 explicitly excludes Arena Design Centre. Therefore, whilst an in-depth analysis was carried out for the re-designation of Crusader Industrial Estate from LSIS to RA, no such examination was undertaken for Arena Design Centre. The proposed allocation of Arena Design Centre as LEA: RA has therefore not been tested by the evidence base, and is therefore flawed and unsound, and as such should be removed from an employment allocation.</p> <p>In addition the London Borough of</p>	<p>showed that with some cross subsidy from residential uses, commercial floorspace could be activated within this area.</p> <p>The policy additionally seeks to improve connectivity within and around the site through enabling the unblocking of the adjacent railway tunnel, and improving walking links through the area towards Manor House.</p> <p>No change</p>
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					<p><b>Haringey’s Workspace Viability Assessment 2014</b> provides an analysis on Arena Design Centre, as a workspace cluster grouped with Arena, Crusader and Omega Industrial Estate. The assessment incorrectly states that Arena Design Centre is mainly used as offices, but <b>recognises that “sections of Arena Business Centre have been in live/work for a long period, and a return to commercial use is not considered likely”</b>. Given this recognition, the designation as an employment area is therefore contradictory, the substantial level of residential accommodation on the site (as highlighted above), has not been reflected in the designation. It should also be noted that the Workspace Viability Assessment concludes that Cluster 1 (where both sites are located) offers a good opportunity to provide new workspace with value achieved from cross subsidies from residential development, yet this analysis uses an assumed housing mix that does not correspond to the needs of the borough</p> <p>For the reasons set out above together with previous representations, it is considered that the proposed employment designation at Arena Design Centre is flawed, as there is no sound justification for the designation of Arena Design Centre as an employment area within the evidence base. The site allocation for Arena Design Centre must therefore be <b>amended to solely a “residential allocation”</b>.</p>		
16	RSA89	SA30	No	Not stated	<b>Differentiation of Estates</b>	Not	It is considered that the

				<p>4.19 The Council negates the initial findings of the SA, and proceeds to select Arena Design Centre under the broad grouping of Haringey Warehouse District, to establish an alternative use for the wider site. This method of grouping the individual sites within the area ignores the individual characteristics of each site, failing to distinguish key differences between the sites. It fails to recognise that Arena Design Centre is a predominantly residential area, with approximately 275 residents living on site, and has only two commercial units employing 5 people.</p> <p>In contrast, Crusader Industrial Estate directly to the south is solely in commercial use, and has good public transport links and parking provision.</p> <p>4.20 The methodology used in the SA simply provides two options to Haringey Warehouse District. Option 1- <b>“Allow a mix of uses including residential”</b> or Option 2- <b>“Maintain as employment, reflecting employment designation.”</b> Considering Arena Design Centre is not an existing designated employment area, it clearly does not fit with this approach. Moreover, paragraph 14.8.10 of the SA states that <b>“the plan is set to deliver on ambitious jobs growth targets through a focus on increasing the employment density at a range of existing employment sites”</b> Arena Design Centre has not fully been taken</p>	specifically stated	<p>Warehouse Living Policy (DM39) offers, through the requirement for masterplanning of sites within the Haringay Warehouse District, there is ample opportunity for site specific design consideration.</p> <p>The allocating of these sites as employment land within the Local Plan is proposed in order to protect the vulnerable uses (both employment and warehouse living) from being lost in favour of the strong local residential market.</p> <p>No change</p>
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					<p>into consideration, as there has been no justification or detailed recognition of Arena Design Centre becoming an allocated Employment Area.</p> <p>4.21 Furthermore, it should be noted that whilst site SA35: Land between Seven Sisters and Tewkesbury Roads is allocated within Haringey Warehouse District, it is not proposed as a Designated Employment Area accordingly allowing for a greater residential mix, to reflect the existing characteristics of the site. We consider that given the individual nature of Arena Design Centre, a similar methodology of approach should be applied to SA30.</p> <p>4.22 Clearly there are vast dissimilarities between the sites, within Haringey Warehouse District that are not acknowledged under the proposed LEA: RA designation. Policy needs to allow for the differentiation between estates to ensure that site allocation aspirations can reasonably and realistically be achieved, and ultimately Arena should not be included with the employment area designation.</p>		
16	RSA90	SA30	No	Not stated	<p>Provevell disagree with the methodology for calculating densities in the Appendix to the Site Allocations. (see Section 4 of response 1/6 for more details.</p>	<p>As outlined above and evidenced in Appendix K, the Overbury and Eade Road site has 226</p>	<p>The capacities included in the appendix are included to demonstrate that the development allocated in the Plan meets the overall need in the borough. Actual capacities will differ, and will depend on</p>

						existing lawful residential units, and as such this should be the minimum indicative figure for site redevelopment, as any lesser figure would result in the loss of housing in the borough.	the design on each site.  No change
17	RSA93	SA30	Not stated	Not stated	Our concerns here centre on the height and scale of the proposed development as it will be clearly visible from Finsbury Park. We would like to see some reference inserted <b>along the lines that ‘Any proposed development should consider the impact, in terms of height, scale and massing, on nearby Finsbury Park to ensure that the development does not adversely impact the amenity provided by this Metropolitan Open Land’.</b> A development which harmonised with the height and mass of the recent nearby Jones Bros development would probably be acceptable. We are surprised that Finsbury Park is not mentioned under the ‘Planning designations’ section. Could ‘Adjacent to Finsbury park which is Metropolitan Open Land’, or something similar, be added please?	We would like to see some reference inserted along the lines that ‘Any proposed development should consider the impact, in terms of height, scale and massing, on nearby Finsbury Park to	Paragraph 7.56 of the London Plan states that MOL is to be treated equally as Green Belt. Paragraphs 79-92 of the NPPF outlines the five purposes of Green Belt: - to check the unrestricted sprawl of large built-up areas; - to prevent neighbouring towns merging into one another; - to assist in safeguarding the countryside from encroachment; - to preserve the setting and special character of historic towns; and

					<p>Please provide clarification as to whether the London Plan includes any guidelines on the development of sites immediately adjacent to Parks.</p>	<p>ensure that the development does not adversely impact the amenity provided by this Metropolitan <b>Open Land</b>'.</p>	<p>- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>The principal requirements for development <u>within</u> Green Belt (MOL) are that it must preserve the openness of the Green Belt and does not conflict with the purposes of including land within it. There is nothing in the NPPF or London Plan that requires development adjacent to MOL to have regard to the amenity of MOL. The implication is that development can directly abut Green Belt without impacting on its purpose. The addition of the requirement suggested would therefore be at odds with Green Belt (MOL) policy. Given the above, the suggested <b>addition to the 'planning designation' section</b> would have little bearing on the future redevelopment of SA30.</p>
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							No change
21 8	RSA33 5	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what</i>	<b>Noted, this amendment will be made.</b>

						<i>potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
219	RSA341	Harringay Warehouse District SA30: SA31 SA32 SA33 SA34 SA35	Not stated	Not Stated	Good well designed live work units are an opportunity to retain the talented artists, designers and musicians in the area with rent restrictions building upon this creative hub. Many developments such as these force such creative industries out of an area. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Concern on traffic impact in the area with such a development on all these sites and the 3-traffic road closures in place across the Hermitage Road Estate. Access to this development area needs careful consideration and its impact on the larger area. Overall concern on the heights of these developments	Not stated	<b>The Council's Warehouse Living</b> approach is designed to try and secure the future of the creative cluster, and share its benefits with the wider community.  It is not considered that the proposals will affect the road network at the current time.  Heights of development will be determined at the planning application stage in accordance with Policy DM1 and DM6.  No change
22	RSA34	SA25,	Not	Not stated	We support a number of proposals, including	This	<b>It is agreed that a</b>

1	6	SA27, SA28 and SA31  SA23, SA30, SA40 and SA54	stated		SA25, SA27, SA28 and SA31 where by a commitment is made in the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINCS.	commitment, to enhance the adjacent green spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.	<b>comment regarding how the site impacts on the ecological corridor to the west of site SA23 could be added.</b>  The other sites are considered to have appropriate references.
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#### SA31: Crusader Industrial Estate

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA19	SA31	Not stated	Not stated	We welcome the proposed connection of the green grid network, and improvements to the SINC on the west of the site.	Not specifically stated	Noted.
14	RSA80	SA30, SA31, SA32	Not stated	Not stated	Increased housing will be welcome, but will put further stress on <b>parking in Hermitage Road</b> . The current on-pavement systems is poor, and does not leave room for pedestrians to pass one-another with a reasonable distance. Women point out		Impact on parking will be minimised through requiring maximum parking ratios. As this site has a high PTAL, parking for residents will be limited.  It is noted that

					<p>that this could lead to harassment, and it makes opportunistic mugging easy. Wheelchairs and buggies etc often cannot pass, if hedges are overgrown.</p> <p>The <b>proposed footpath</b> from the Overground land into Finsbury Park Avenue (between 80-82) is interesting, but this needs to be planned with L&amp;Q Housing, and adjacent residents need to be consulted. The path could create security risks as the back gardens of houses will become vulnerable, and ways for residents to improve or maintain fencing need to be considered.</p>		<p>Hermitage Rd is already a Controlled Parking Zone. As such it would be possible to restrict new permits being given to occupants of the new site.</p> <p>No change</p>
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35,	Yes	Yes	<p>We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.</p>	<p>We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be</i></p>	<p><b>Noted, this amendment will be made.</b></p>

		SA47, SA53, SA57				<i>undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
219	RSA341	Haringay Warehouse District SA30: SA31 SA32 SA33 SA34 SA35	Not stated	Not Stated	Good well designed live work units are an opportunity to retain the talented artists, designers and musicians in the area with rent restrictions building upon this creative hub. Many developments such as these force such creative industries out of an area. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Concern on traffic impact in the area with such a development on all these sites and the 3-traffic road closures in place across the Hermitage Road Estate. Access to this development area needs careful consideration and its impact on the larger area. Overall concern on the heights of these developments	Not stated	<b>The Council's</b> Warehouse Living approach is designed to try and secure the future of the creative cluster, and share its benefits with the wider community.  It is not considered that the proposals will affect the road network at the current time.  Heights of development will be determined at the planning application stage in accordance with Policy DM1 and DM6.  No change
221	RSA346	SA25, SA27, SA28 and SA31	Not stated	Not stated	We support a number of proposals, including SA25, SA27, SA28 and SA31 where by a commitment is made in	This commitment, to enhance the adjacent green spaces, should be extended to SA23, SA30,	<b>It is agreed that a comment regarding how the site impacts on the ecological</b>

		SA23, SA30, SA40 and SA54			the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINCs.	SA40 and SA54 to ensure consistency within the local plan.	<p>corridor to the west of site SA23 could be added.</p> <p>The other sites are considered to have appropriate references.</p>
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### SA32: Omega Works

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA20	SA32	Not stated	Not stated	We welcome the proposed improvements to the SINC on the west of the site.	Not specifically stated	Noted.
14	RSA80	SA30, SA31, SA32	Not stated	Not stated	<p>Increased housing will be welcome, but will put further stress on <b>parking in Hermitage Road</b>. The current on-pavement systems is poor, and does not leave room for pedestrians to pass one-another with a reasonable distance. Women point out that this could lead to harassment, and it makes opportunistic mugging easy. Wheelchairs and buggies etc often cannot pass, if hedges are overgrown.</p> <p>The <b>proposed footpath</b> from the Overground land into Finsbury Park Avenue (between 80-82) is</p>		<p>Impact on parking will be minimised through requiring maximum parking ratios. As this site has a high PTAL, parking for residents will be limited.</p> <p>It is noted that Hermitage Rd is already a Controlled Parking Zone. As such it would be possible to restrict new permits being given to occupants of the new site.</p>

					interesting, but this needs to be planned with L&Q Housing, and adjacent residents need to be consulted. The path could create security risks as the back gardens of houses will become vulnerable, and ways for residents to improve or maintain fencing need to be considered.		No change
218	RSA33 5	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and</i>	<b>Noted, this amendment will be made.</b>

						<i>remediation strategy.</i>	
219	RSA341	Harringay Warehouse District SA30: SA31 SA32 SA33 SA34 SA35	Not stated	Not Stated	Good well designed live work units are an opportunity to retain the talented artists, designers and musicians in the area with rent restrictions building upon this creative hub. Many developments such as these force such creative industries out of an area. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Concern on traffic impact in the area with such a development on all these sites and the 3-traffic road closures in place across the Hermitage Road Estate. Access to this development area needs careful consideration and its impact on the larger area. Overall concern on the heights of these developments	Not stated	<b>The Council's</b> Warehouse Living approach is designed to try and secure the future of the creative cluster, and share its benefits with the wider community.  It is not considered that the proposals will affect the road network at the current time.  Heights of development will be determined at the planning application stage in accordance with Policy DM1 and DM6.  No change

#### SA33: Vale/Eade Road

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
14	RSA82	SA 33, 34, 35, 36	Yes	Not stated	No response	No response	No response.
218	RSA335	Sites SA6, SA7, SA14,	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the	We prefer the following wording to be applied to the above sites to ensure	<b>Noted, this amendment will be made.</b>

		SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57			wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
219	RSA341	Harringay Warehouse District SA30: SA31 SA32 SA33 SA34 SA35	Not stated	Not Stated	Good well designed live work units are an opportunity to retain the talented artists, designers and musicians in the area with rent restrictions building upon this creative hub. Many developments such as these force such creative industries out of an area. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Concern on traffic impact in the area with such a development on all these sites and the 3-traffic road closures in place across the Hermitage Road Estate. Access	Not stated	<b>The Council's</b> Warehouse Living approach is designed to try and secure the future of the creative cluster, and share its benefits with the wider community.  It is not considered that the proposals will affect the road network at the current time.  Heights of development will be determined at

					to this development area needs careful consideration and its impact on the larger area. Overall concern on the heights of these developments		the planning application stage in accordance with Policy DM1 and DM6.  No change
229	RSA366	SA33 and SA34	Not stated	Not stated	London Borough of Hackney is particularly interested in close working on key sites in the south of Haringey and specifically would like to be an active participant in any future masterplanning exercise for strategic sites identified in the south of the borough. The Council is of the view that sites adjacent to the borough boundary including two sites identified at Regulation 18 listed in the SADPD as <i>Site SA33: Vale Road/Eade Rd and Site SA 34 Overbury Rd/Eade Rd</i> would benefit from further detailed masterplanning to meet identified needs and Hackney would welcome the opportunity to play an active role in this process.	Not stated	The allocations require a masterplan be prepared to accompany any planning application. It is noted that LB Hackney has an interest in this area, and the Council will look forward to meeting with LB Hackney in line with <b>it's Duty to Co-operate</b> .

#### SA34: Overbury & Eade Roads

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA21	SA34	Not	Not stated	We welcome the proposed pedestrian	Not specifically	Improvements to the

			stated		and cycling route. The development should not just open up but also improve the ecological corridor along the New River.	stated	ecological corridor are likely to fall to CIL – being outside of the development boundary - rather than as a requirement on the development.  No change
14	RSA82	SA 33, 34, 35, 36	Yes	Not stated	No response	No response	No response.
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies</i>	<b>Noted, this amendment will be made.</b>

						<i>undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
219	RSA341	Harringay Warehouse District SA30: SA31 SA32 SA33 SA34 SA35	Not stated	Not Stated	Good well designed live work units are an opportunity to retain the talented artists, designers and musicians in the area with rent restrictions building upon this creative hub. Many developments such as these force such creative industries out of an area. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Concern on traffic impact in the area with such a development on all these sites and the 3-traffic road closures in place across the Hermitage Road Estate. Access to this development area needs careful consideration and its impact on the larger area. Overall concern on the heights of these developments	Not stated	<b>The Council's</b> Warehouse Living approach is designed to try and secure the future of the creative cluster, and share its benefits with the wider community.  It is not considered that the proposals will affect the road network at the current time.  Heights of development will be determined at the planning application stage in accordance with

							Policy DM1 and DM6.
							No change
226	RSA356	SA34	Yes	Not stated	<p>My representations are with regard to the Harringay Warehouse District, and in particular SA34 where I have lived and worked for the last sixteen years. I run New River Studios CIC which is a <b>community arts’ centre , education and training facility and venue</b>, and a separate large live/work development known as ExFed. Both are located within SA34.</p> <p>There was a great deal to comment on in the previous DPD, primarily because it represented a sea-change in the <b>Council’s position over warehouse living and the Harringay Warehouse District</b>. The result of this was that the resident creative community and the Council suddenly had a number of shared interests and objectives that we were excited to build on. In contrast, this latest version hardly departs from its predecessor, except where certain employment-related targets have been lowered.</p> <p>There is still a great deal to remain enthusiastic about, especially with regard <b>to the Council’s vision for the area</b>. The formalisation of gallery spaces and the introduction of a public-facing hub/venue for artistic activity are two goals that I am</p>	Not specifically stated	<p>The consultations in regard the preparation of the Local Plan have been in accordance with the <b>Council’s SCI (which does exist!)</b></p> <p><b>The Plan’s aim is to set parameters for acceptable development within the borough. This inevitably means what things will be “at the end of the day”. The purpose of including a masterplanning process in the allocation is to enable the principles included within the Local Plan to be explored in greater detail with the landowners and residents, and for implementation discussions to proceed.</b></p> <p>Regarding gentrification, which is manifesting itself as significant residential land value pressure, it is considered that by giving the sites</p>

				<p>currently working towards with New River Studios. A commitment to preserving the creative community here is obviously very welcome, as is the reduced target of 4,374 square metres of reintroduced employment space which is far less likely to radically alter the make-up of the community that the previous target of over 11,000 square metres.</p> <p>There is also little new ground covered, and currently insufficient detail in the proposals to make very meaningful observations. Although I am aware that there are inherent limitations, it is still difficult to know what we should expect from the process at this early stage. I have therefore limited my comments to issues which may pertain to the overall soundness of the document, and I concede that they may be down to unfounded expectations.</p> <p>In terms of consultation, the DPD states that <b>“the Council will work with local landowners and residents”</b>, but at what point should we expect this consultation to begin? The DPD states that the <b>“process of community involvement for the Plan in question should be in general accordance with the LPA’s Statement of Community Involvement (where one exists)”</b> but I am unable to find one for Haringey, and therefore assume that one does not exist. So the exact nature of</p>	<p>Employment designations, this will to some degree protect the existing community in their present surrounds, and provide time to ensure positive solutions are found.</p> <p>The Council will look forward to progressing these with landowners, residents, and businesses in the coming years.</p> <p>No change</p>
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				<p>consultation is a question that remains. I have contacted my ward councillor and the LPA on several occasions seeking a dialogue on these issues, and have not had a reply to any of my requests.</p> <p>Another area in which there is doubt is what happens between now and the time that development concludes? The DPD focuses almost exclusively on the Harringay Warehouse District post-development. I appreciate that controlling <b>the nature of development is the DPD's</b> key objective and that this focus is in line with those aims. However, given that the calendar for development extends ten to fifteen years into the future, and that the DPD also aims to preserve the existing creative community, there is understandable concern as to the lack of provision for what happens between now and then. Traditionally artists are quite used to sheltering in the period of time in <b>a building's lifecycle between planning</b> and development and they often make use of old properties until they are torn down. The situation here is quite different, with gentrification exerting significant pressure before development has even begun. The danger is that the creative community as we know it will have long gone by the time the time the measures in the DPD come into effect, and although it will obviously be possible to tempt some to return, the essential</p>		
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					<p>authenticity and patina of the place will have been lost, along with the irreplaceable networks that have organically developed and that are so valuable. This is of course a London-wide problem and not unique to these estates by any means.</p> <p>Despite these two reservations, I appreciate that we are still working with the broad brush strokes of planning policy, and in this context I have no reason to question the overall soundness of the DPD. I am enthusiastic about the future of the area, and I share many of <b>the Council's objectives</b> - the safeguarding of an artistic community, the creation of a limited destination, the support for new enterprise and the formalisation of cultural facilities. My regret is that there have been missed opportunities to work together to develop a genuinely progressive and successful community that will be an asset to the borough and to London. My fear is that if we continue to miss these opportunities, we will ultimately fail to realise the full potential of this opportunity. I sincerely hope to have the opportunity to work with the Council to make this vision a reality.</p> <p><b>I look forward to this Summer's public consultation.</b></p>		
229	RSA366	SA33 and SA34	Not stated	Not stated	London Borough of Hackney is particularly interested in close working on	Not stated	The allocations require a masterplan be prepared

					key sites in the south of Haringey and specifically would like to be an active participant in any future masterplanning exercise for strategic sites identified in the south of the borough. The Council is of the view that sites adjacent to the borough boundary including two sites identified at Regulation 18 listed in the SADPD as <i>Site SA33: Vale Road/Eade Rd and Site SA 34 Overbury Rd/Eade Rd</i> would benefit from further detailed masterplanning to meet identified needs and Hackney would welcome the opportunity to play an active role in this process.		to accompany any planning application. It is noted that LB Hackney has an interest in this area, and the Council will look forward to meeting with LB Hackney in line <b>with it's</b> Duty to Co-operate.
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#### SA35: L/B Seven Sisters & Tewkesbury Roads

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
14	RSA82	SA 33, 34, 35, 36	Yes	Not stated	No response	No response	No response.
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31,	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor</i>	<b>Noted, this amendment will be made.</b>

		SA32, SA33, SA34, SA35, SA47, SA53, SA57				<i>in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
219	RSA341	Harringay Warehouse District SA30: SA31 SA32 SA33 SA34 SA35	Not stated	Not Stated	Good well designed live work units are an opportunity to retain the talented artists, designers and musicians in the area with rent restrictions building upon this creative hub. Many developments such as these force such creative industries out of an area. Opportunity for green roofs, solar panels, wind power and self-sufficiency. Concern on traffic impact in the area with such a development on all these sites and the 3-traffic road closures in place across the Hermitage Road Estate. Access to this development area needs careful consideration and its impact on the larger area. Overall concern on the heights of these developments	Not stated	<p><b>The Council's</b> Warehouse Living approach is designed to try and secure the future of the creative cluster, and share its benefits with the wider community.</p> <p>It is not considered that the proposals will affect the road network at the current time.</p> <p>Heights of development will be determined at the planning application stage in accordance with Policy DM1 and DM6.</p> <p>No change</p>

SA36: Finsbury Park Bowling Alley

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
14	RSA82	SA 33, 34, 35, 36	Yes	Not stated	No response	No response	No response.
17	RSA91	SA36	No	Not stated	<p>We are grateful to Councillor Demirci and his Planning Department colleagues for meeting with the Friends of Finsbury Park on Tuesday 13<sup>th</sup> October 2015 to discuss our concerns over this proposed development. We were very pleased to receive assurances from Councillor Demirci that the Site Allocations document had been amended to remove all areas of Finsbury Park, (i.e. including all Metropolitan Open Land (MOL) and Parkland Walk land), from inclusion in the proposed development.</p> <p>We were further heartened to receive undertakings from Councillor Demirci that, if the plan to redevelop the Rowans site were to go ahead, no part of Finsbury Park would, even temporarily, be used for access to, or as part of, any construction site. The Friends of Finsbury Park are concerned about the potential detrimental impact on Finsbury Park arising from any major redevelopment of this site. We consequently wish to formally OPPOSE the proposed development on the following grounds.</p>	Not specifically stated	<p>1. <b>The Council's</b> evidence study sets that Finsbury Park station is a potentially suitable location for a tall building. Any proposals for a tall building within a suitable location will need to demonstrate that it will exhibit excellent design, and any negative externalities are appropriate, and appropriately managed and mitigated.</p> <p>The Council has removed prescriptive height limits from the document in favour of managing the heights of developments on a case-by-case basis, having regard to the specifics of each site and the requirements set out in Policy DM6.</p> <p>3. (and 3) There are no detailed plans of the proposed new entrance to the Park from Finsbury Park.</p>

				<p>(Our comments refer to the latest version of the plan)</p> <p>9. All reference to the height of the proposed buildings has been removed, other than where you <b>state that “taller buildings will be permitted on either side of the new entrance.....This site may be suitable for a tall building if designed in accordance with DM6”</b>. It is our view that any building higher than the low-level barrel-roofed Rowans would lead to a loss of amenity to the users of Finsbury Park. A tall building on this site would dominate Finsbury Park. This is the only point on the entire perimeter of Finsbury Park where a building (Rowans) directly borders the park and the replacement of Rowans with any higher structure would clearly adversely affect the park. The markedly increased overshadowing resulting from such a development would be very detrimental to the park amenity and would seriously compromise options for full use of this area of the park.</p> <p>10. The new vaulted entrance to Finsbury Park is represented as <b>some sort of ‘Champs de Finsbury’</b>. In reality, it would, if the previous</p>	<p>While it is highly unlikely that the bus stopping areas outside the rail station will change, there is ample space on the site to create a high quality new public realm, which complements the Park successfully.</p> <p>9. It is noted that Rowans is valued locally. The Plan requires provision of a new leisure facility on the site.</p> <p>10. It is not agreed that Rowans makes a positive benefit to Finsbury Park at present. The current building <b>turns it’s back on the Park</b>, and contributes very little to enclosing the space within the Park.</p> <p>11. A construction statement setting out how these issues will be managed will be included with any application.</p> <p>12. As stated above, heights will be considered as designs come forward using DMDPD design policies. It is not considered illogical that height could be greatest proximate to the rail line.</p> <p>13. A tri-borough Finsbury Park SPD has been adopted</p>
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					<p>plan is anything to go by, be a narrow wind corridor which would predominantly serve as a service/access road to the proposed new buildings. The claim that it would provide an improved and more direct access to Finsbury Park from Finsbury Park Station would only be correct if it was very much wider and if TFL abandoned Station Place and it were turned into a pedestrian piazza. This is a wonderful prospect but clearly one that cannot be realised as TFL have made it clear that they will not be giving up Station Place and that they see it as essential to the smooth running of bus services from Finsbury Park Station. As this is likely to remain the case, the most direct pedestrian route into Finsbury Park from the Station is the existing one via the entrance adjacent to the cycle park. Access via the newly sighted entrance would require a longer walk. There is also a false impression created that, under the proposed development, a greener prospect would confront people as they exit the Station. In fact, the present tree canopy clearly visible above Rowans presents a much greener outlook than the one achieved once tall buildings blocked out most of the tree canopy and it</p>	<p>by all of the three boroughs. Additionally, all consultation on the Local Plan have been carried out in accordance <b>with the Council's Statement of Community Involvement.</b></p> <p>No change</p>
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					<p>was replaced with just a limited and narrow view at the end of the proposed new entrance. The artists impression (given with earlier designs for the site) seeks to enhance this view by miraculously removing the extensive metal canopy from the front of the station; a most unlikely prospect, and markedly exaggerating the width of the new entrance.</p> <p>11. The absence of a more detailed plan makes it very difficult to visualise what is proposed and therefore it is more difficult for us to make any detailed or fully informed comment on any design or overlooking issues.</p> <p>12. The loss of the Rowans leisure amenity (even if only during the construction phase) would be regrettable; particularly as Finsbury Park is lacking many such facilities.</p> <p>13. <b>Rowans is a 'Landmark' building</b> which (with its low barrel-roof) provides a harmonious transition from the built environment to the Park environment. It does not significantly overshadow the Park or intrude sufficiently to have a seriously detrimental effect on the Park amenity.</p> <p>14. The noise, dust and pollution from construction vehicles immediately adjacent to the park would blight</p>		
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				<p>this end of Finsbury Park for its users for a lengthy period.</p> <p>15. <b>We wonder why the ‘stepping-down’ of height levels (under earlier drafts)</b> was more marked toward Seven Sisters Road than where the proposed buildings would directly overlook the park. The impact of the buildings is clearly greatest where they meet the park perimeter.</p> <p>16. In an earlier draft of the Site Allocations Document we noted that the site was listed as not having attracted a significant number of responses. We wonder whether this is mainly attributable to the fact that there is very low awareness of this proposal among local communities. That the site is at the junction of three boroughs is clearly also a factor. The Tri-Borough Regeneration initiative started well, with presentations including representatives of all three boroughs. Unfortunately, this tri-borough approach was quickly abandoned and this must have had some impact on awareness and thus responses. At a recent meeting of the Finsbury Park Station Users Group, it was clear that very few local people were aware of the proposed redevelopment of the Rowans site. We suggest that Haringey consults much more</p>		
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					widely with Hackney and Islington residents to establish a better understanding of community feeling.		
18	RSA94	SA36	Yes	Yes	<p>I am unhappy with a specific part of the site allocation part of the Local Plan. This is the Rowan's site at the sw corner of Finsbury Park. Rowan's is an historic building - an early cinema dating from the early 20th century and altered for various entertainment purposes. It now contains Rowan's famous bowling alley and rooms for hire above, some with the original plasterwork. The building is much used by locals and visitors. The site allocation proposes a tall building on the site, perhaps going up to 15 storeys. Rowan's is a designated community asset, and we should like to see it retained as such. A tall building in that tight space near the station would be out of place and overbearing. It would prevent views of the trees in the park. We already have two tall buildings going up at City North, which as a resident, I totally oppose, as it will have a negative visual impact on the low rise Victorian suburb that is Finsbury Park. They should not form a precedent for more new buildings in the area. We are in the process of setting up a Finsbury Park Neighbourhood Forum and preparing a Neighbourhood Plan, so will have ideas for the use or re-use of the Rowan's site which does not</p>	Not stated	<p>Regarding the heritage value of the building, it is neither listed, nor locally listed, and additionally is considered to make a poor impression on the Park, when viewed from within the Park.</p> <p>It is noted that Rowans is valued locally. The Plan requires provision of a new leisure facility on the site. Additionally the value <b>associated with Rowan's ACV</b> status will be taken into account at the time a planning application comes forward as a material consideration.</p> <p><b>The Council's evidence study</b> sets that Finsbury Park station is a potentially suitable location for a tall building. Any proposals for a tall building within a suitable location will need to demonstrate that it will exhibit excellent design, and any negative externalities are appropriate, and appropriately managed and mitigated.</p>

					include a new tall building. We should like to engage with the council's planning department, and Councillors to work on something appropriate for this site.		The Council will of course engage with and assist with the establishment of a Finsbury Park Neighbourhood Forum.  No change
19	RSA96	SA 36	No	No	<p>SA36: Finsbury Park Bowling Alley</p> <p>Parkstock Ltd are the freeholders of both 10 Stroud Green Road and 269 – <b>271 Seven Sister's Road located within Finsbury Park</b>. Overall we are supportive of SA36 which includes these sites.</p> <p>We have the following comments:</p> <p><b>Site Requirements:</b> the first bullet point includes the provision of a site wide masterplan to accompany development proposals, to demonstrate how proposals do not compromise other land parcels. Whilst we can understand the benefits of a masterplan approach and demonstrating how individual submissions would not compromise future proposals, it would not be appropriate for this policy to require one masterplan or submission to cover the whole site given the different land operations and ownership. Such an approach would hamper delivery and not be effective. The policy should</p>	<p>Please see modifications outlined in Section 5 above.</p> <p>(Council note: these have been repeated from comments in previous column).</p> <p>Site requirements (1<sup>st</sup> bullet) The policy should make it clear that individual applications for different parcels of land are appropriate</p>	<p>The purpose of including a requirement for a masterplan is to ensure that when an application for one land parcel on a site comes forward, others are not compromised. It is considered that stating that applications may come forward separately is redundant in this context.</p> <p>For clarity, reference to a new community facility will be removed from the Site requirement.</p> <p>It is agreed that the potential for a more comprehensive development exists if the cycle parking area is included within the development.</p> <p><b>It is agreed that the 11<sup>th</sup> bullet point under 'Development Guideline' should be amended to read 'preserve or enhance'.</b></p>

				<p>make it clear that individual applications for different parcels of land are appropriate in order to ensure a sound and effective plan.</p> <p><b>Site Requirements:</b> the sixth bullet point notes that an appropriate leisure / community facility use to replace the <b>existing Rowan’s bowling alley must be provided</b>. In addition, the text within <b>2.105 under ‘commentary’ notes that a new leisure facility should be provided</b>, but this text does not make reference to a community facility. It is important to ensure consistency so future requirements are clear. We consider policy should provide the flexibility to allow the provision of an appropriate leisure <b>or</b> community facility, depending on demand and commercial requirements. We therefore recommend that the text within 2.105 under <b>‘commentary’ is amended to state ‘a new leisure or community use ...’</b> to ensure the plan is sound and consistent.</p> <p><b>Site Requirements:</b> the seventh bullet point notes that the existing cycle parking facility will be replaced and enhanced. However, the red line on page 92 now excludes the cycle facility (the previous version of the plan included the cycle facility within the red line). We therefore question how the</p>	<p>in order to ensure a sound and effective plan.</p> <p>Site requirements (6<sup>th</sup> bullet) We consider policy should provide the flexibility to allow the provision of an appropriate leisure <b>or</b> community facility, depending on demand and commercial requirements. We therefore recommend that the text within 2.105 under <b>‘commentary’ is amended to state ‘a new leisure or</b> community</p>	<p>The indicative capacity has been identified to show that the suite of sites in the Local Plan documents meet Local Plan needs over the plan period. Capacities on sites will inevitably differ from the indicative capacities, and will be identified through a detailed design-led process.</p>
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				<p>cycle facility can be effectively replaced and enhanced if it is not included within the site allocation. We therefore recommend that the red line is amended to include the cycle facility to ensure the effective delivery of the policy objectives.</p> <p><b>Development Guidelines:</b> the 11th bullet point notes that new development should enhance the setting of the conservation area and the registered park. This is contrary to the Planning (Listed Buildings and Conservation Areas) Act 1900 which states that the character and appearance of conservation areas should be preserved or enhanced. The wording of the 11th bullet point should therefore be changed to note that <b>development should ‘preserve or enhance’ the setting of the conservation area and registered park</b> to ensure it is legally compliant.</p> <p><b>Indicative Residential Capacity:</b> the indicative net residential capacity notes 71 units for the site in totality. Through design studies we are of the opinion that between 80 – 150 residential units could be delivered on the Stroud Green Road site and between 20 – 40 residential units on 269 – 271 Seven Sister’s Road.</p>	<p><b>use ...’ to</b> ensure the plan is sound and consistent.</p> <p>Site requirements (7<sup>th</sup> bullet) We recommend that the red line is amended to include the cycle facility to ensure the effective delivery of the policy objectives.</p> <p>Development guidelines - The wording of the 11th bullet point should therefore be changed to note that development should <b>‘preserve or enhance’ the setting of the</b></p>	
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				<p>We have reviewed Appendix 4 A: Methodology for Assessing the Capacity of Allocated Sites and note that for sites without planning permission or which are not subject to pre-application discussions, a standard methodology has been applied which assesses the site capacity. We note that paragraph 4.4 on page 174 indicates that the development capacity attributed to each site using this methodology is an indicative minimum, and not prescriptive, and that the number of dwellings that may be achieved will be determined by many considerations such as design and layout, the size and type of the units, relevant development management policy requirements, site constraints, scheme viability, the site area and the PTAL.</p> <p>Whilst we fully acknowledge the above we are concerned that the standard approach which has been applied could be misleading and ineffective, particularly since the text indicating that a standard approach has been taken, and that the targets are minimums, is included within an appendix. We are concerned that by only including minimum residential units within the site allocations, this will cause unrealistic expectations for future planning applications and the policies will not</p>	<p>conservation area and registered park to ensure it is legally compliant.</p> <p>Indicative residential capacity - If this standard methodology is applied we consider that at the very least, to ensure the plan is sound, the explanation contained within Appendix 4 in terms of this approach should be stressed at the front end of the document so all readers are clear on the approach.</p>	
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					<p>effectively maximise development or assist delivery.</p> <p>If this standard methodology is applied we consider that at the very least, to ensure the plan is sound, the explanation contained within Appendix 4 in terms of this approach should be stressed at the front end of the document so all readers are clear on the approach.</p> <p>In addition, a note should be added to the <b>'indicative development capacity'</b> table on page 92 for SA36 which states that the development capacity, for both residential and town centre uses, is an indicative minimum to ensure consistency with Appendix 4 A.</p>	<p>In addition, a note should be added to the <b>'indicative development capacity'</b> table on page 92 for SA36 which states that the development capacity, for both residential and town centre uses, is an indicative minimum to ensure consistency with Appendix 4 A.</p>	
219	RSA342	SA36 Finsbury Park Bowling Alley	Not stated	Not Stated	Loss of the valuable leisure facility.	Not stated	<p>The allocation includes a requirement for a replacement leisure facility, but overall it is expected that the benefits of the redevelopment will justify the costs of development.</p> <p>No change</p>
234	RSA415	SA 36 –	No (?)	Not stated	THE principal feature of this site is that	Not stated	TfL, and LB Hackney, and LB

		Finsbury Park bowling alley			<p>exists on the boundary of two other Boroughs. It sits on the extreme periphery of Haringey, Hackney and Islington, far from the centres of the three Boroughs.</p> <p>The site allocation maximizes benefit to one Council (Haringey) at the expense of the local community and especially at the expense of the potential for a <b>genuine ‘town centre’</b>.</p> <p>If this SA36 is sound, it is sound only within the artificial confines and disregards the adjacent areas. It is not clear that a major stakeholder (Transport for London) was consulted. Given that this site is (a) adjacent to <b>one of London’s major transport interchanges</b> and (b) on the edge of the Borough and (c) adjacent to one of <b>north London’s largest parks</b>, this site should have been subject to different criteria from say, a similar site in the middle of the Borough.</p> <p>One of the main reasons for Neighbourhood Forums is to bridge Borough boundaries and to try to make sense of areas that make sense to the public, but that are currently subject to arbitrary and artificial borders.</p>		<p>Islington were all consulted, as statutory consultees.</p> <p>The premise of this response is not accepted. The creation of a new high quality urban realm linking the station and the park are considered to be of significant potential benefit to the local community, and the supposition that it is being treated differently because it is at the edge of the borough is spurious to say the least.</p> <p>The Council will look forward to seeing how the yet-to-be-formed Neighbourhood Forum will propose to <b>mediate across the “artificial and arbitrary” boundary</b> mentioned.</p> <p>No change</p>
234	RSA416	SA 36 and SA37	No (?)	Not stated	<b>Effective /Deliverable? Question 15</b> IN THE <i>Haringey Local Development Framework Core Strategy Submission</i>	Not stated	The Core Strategy was adopted in 2013 and the Inspector concluded the Plan

					<p><i>Soundness Self-Assessment</i>, key question number 15 asks, <i>Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</i></p> <p>The answer is couched in sweeping generalities: <b><i>LBH works closely with ..., and also works with ...; work together ...</i></b></p> <p>An oblique reference is made to SA36 and 37, where the document says that, <i>Other action areas of the borough which require partnership working with neighbouring boroughs include: ... ...</i></p> <p><b><i>... Finsbury Park and Manor House – with major regeneration projects at Finsbury Park station (in Islington) and at Woodberry Down (in Hackney).</i></b></p> <p>The difficulty is that cross-border co-operation is fitful, feeble and short-lived. Co-operation, or partnership is <b>needed but there's no evidence of it</b> being effective or sustainable in the current absence of a Neighbourhood Plan and Forum. As a consequence, SA36 and 37 are strictly limited in scope and lack ambition for the area as a whole.</p>		<p>met its legal compliance. The Council is confident that it has fulfilled its obligations under the Duty to Co-operate for this plan. It is within the gift of the local community to bring forward a Neighbourhood Plan should they wish, and the three local boroughs will support this process.</p> <p>No change</p>
234	RSA417	SA 36 and SA37	No (?)	Not stated	<p><b>Neighbourhood forum: not yet</b></p> <p>ALTHOUGH there exists the beginnings of a Finsbury Park Neighbourhood Forum in the area of SA36, the local community is at a disadvantage compared with other areas in that a Forum is not yet set up. When set up, it</p>	Not stated	<p>The Council looks forward to working with a Finsbury Park Neighbourhood Forum in the future. In the meantime it is not considered that this comment is pertinent to the Plan as written.</p>

					<p>is likely that its nucleus would be one of <b>London's most important</b> transport nodes: Finsbury Park station. It would encompass a significant area that would include all of SA36 and a large margin around (here is an draft area).</p> <p>The object of the Neighbourhood Forum would be to consider Finsbury Park area as a single whole. Because this locality exists on the edges of three Boroughs and at extreme corners, it has for decades been little regarded by the Boroughs (i.e. by Haringey, Hackney and Islington). Now and again efforts are made at co-operation between the three Boroughs about FP, but these have tended not to last long or be meaningful.</p> <p>It is this lack of common purpose for the area and the absence of meaningful responsibility, that is one of the driving forces for a NF, that would bridge the Borough Boundary borders (three of them).</p> <p>The current ambitions for this site are contained within the confines of the Borough boundary. It could be seen as local-council selfish plan to maximise Council tax receipts within, at this <b>'extreme' southernmost location of Haringey Borough</b>, with little regard for the needs of the area as the public sees it.</p>		No change
234	RSA418	SA 36 and	No (?)	Not stated	<b>Corridor for 'permeability'</b>	Not stated	There are no details about the

		SA37		<p>THERE is one aspect that relates to the neighbouring Borough that needs to be addressed. The corridor that might run between or through two large buildings has been said— in planner-jargon—to increase permeability. It has been advanced as a means of improving the view of Finsbury Park from the station (in Islington). However, not only is this not so, the proposed (over-) development of the site would <i>detract</i> from the current view.</p> <p>Firstly, the tall mature trees are currently easily visible over the Rowans building. Replacement buildings of anywhere near the heights proposed would obscure the trees from view from ground level anywhere near the bus station.</p> <p>However, this assumes that the trees remained. Despite assurances that any construction work would not take place on the park, due to their closeness to the proposed building site, there is no guarantee that this large stand of trees would not be felled. (A similar felling of mature trees occurred during building on the Jewsons site alongside Wightman road: now SA27).</p> <p>Secondly, the width of the corridor would likely be narrow and this corridor has been subject to misleading</p>	<p>design for the new urban realm linking the Park and the station. By having a policy, it allows this to be defended when an application comes in however, which is seen as positive.</p> <p>It is incorrect to suggest that the current view of the park over/around Rowans is superior to what it could be through a new urban realm. It is considered that the reference to removal of mature trees is disingenuous as policies in the Local Plan seek to retain mature trees, especially those of high amenity value.</p> <p>There is no indication from TfL that they intend to significantly change the way Finsbury Park Station operates, which as the respondent suggests, would alter the approach to the area. If they do, the Plan will be updated to reflect this. It is unclear how development as allocated would compromise this objective however.</p> <p>No change</p>
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				<p>depictions. A so-called artists illustration published by promoters shows a Champs Elyse sized avenue. This is a distortion of the narrow shopping arcade. The narrow angle of view through to the park could only be had by someone standing close to the central axis of the shopping arcade, looking directly down it. For the majority of people exiting the station, the gap would be unlikely to be noticed, let alone for the park to be seen.</p> <p>The alley/shopping arcade is the sole concession that the area is a major transport interchange. It is TfL and the station that ought to have a major <b>influence. The artist's impression put out by the promoters even airbrushes out the huge porch</b> by the bus station and indeed the bus station disappears altogether.</p> <p>There is already access to the park alongside the bicycle storage facility. The main difficulty with the proposed development at this site allocation is that it would preclude a superior solution for the area, if it were considered as a whole.</p> <p>There is little point in the planners talking about permeability to the park unless they</p>		
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					address east/ west permeability through/ over/ under the station.		
234	RSA419	SA 36 and SA37	No (?)	Not stated	<p><b>TfL and the railway station</b> A BIG chunk of residents so close to this key transport node is likely to create a constituency of nimbys who would likely object, frustrate or stop further change or improvement in the area. Housing is needed but it needs to be further away from this <i>key transport node</i>.</p>	Not stated	<p>This is speculative and depending on the design, untrue. The London Plan is clearly in favour of locating new housing in close proximity to transport nodes as a sustainable form of development for London. There are design considerations which can be overcome with elements such as double/triple glazed glass.</p> <p>No change</p>
234	RSA420	SA 36 and SA37	No (?)	Not stated	<p><b>A transport interchange</b> THE area is primarily a <i>transport interchange</i> and about the movement of people. We need statistics of what that movement is going to be and how the arrival of Thameslink would affect it (peak hour traffic to- and from- Highbury and Islington will be challenging, making a Finsbury Park Town Centre <i>less</i> desirable).</p> <p>Cycle routes: why are they not shown? One of the main ones goes down Finsbury Park Road – but that is not considered relevant to the development area. In the artist’s impression published a while back, part of proposal appears to abolish the East Bus terminus and put all the bus stops</p>	Not stated	<p>Cycle routes are shown in the Green Grid policy (DM20).</p> <p>It is not clear how the arrival of Thameslink will make Finsbury Park less desirable, and issues of permeability within the station are outside the scope of the Plan.</p> <p>No change</p>

					onto Seven Sisters Road increasing the walk distance from train – again making the interchange less not more efficient?		
234	RSA421	SA 36 and SA37	No (?)	Not stated	<p><b>Ticket gates</b>  THE <b>ticket gates</b> will stop people walking through the station between the two bus stations.  It is suggested that this inconveniences few and that the distance to walk is less via Stroud Green Road than through the foot tunnels. This depends on which bus you are catching and where you are dropped off at the terminals – some bus stops are not in the East Terminus but on Seven Sisters Road).</p> <p>There is some disingenuity here. The rail may go northsouth but the east west routes deserve proper consideration.</p> <p>Elsewhere they describe walking under the bridges as unpleasant to be avoided so a route through the station <b>might be desirable can't have it both</b> ways. To make transport interchanges work better they should interconnect <i>more</i> and that includes making bus station to bus station access better. Schemes that reduce amenity for bus users have been around for a long time. There are enough rail arches/ is sufficient space there to provide an independent walk through, although not a right of way obviously.</p>	Not stated	<p>This is outside the scope of the Plan.</p> <p>No change</p>

234	RSA422	SA 36 and SA37	No (?)	Not stated	<p><b>Footfall</b>  IF Islington and Haringey want more of a sense of place and seamless integration of commercial Stroud Green Road with commercial Seven Sisters Road and Blackstock Road then the <b>'key' is <i>not</i></b> footfall to Rowans.</p> <p>If this was a footfall issue, we would be talking about Arsenal Football Club match day attendances and how pressure on the Tube system could be relieved if there were more things to do and see before and after games.  (Holloway Road Tube station has to close during matches because the area regeneration proposals did not stretch to upgrading that station).</p> <p>Games are no longer solely a Saturday afternoon issue and the ground capacity at Emirates – at a nominal 60,000 – is 20,000 (= over 50%) higher <b>than Highbury's former 38,000. Should we be turning the area more into a hospitality zone – especially if Haringey want more events in the park?</b></p>	Not stated	<p>It is agreed that footfall between the Station and the Park is not the only issue here. The new link is planned to have leisure and other town centre uses within it, thereby increasing activity and vitality within the Centre</p> <p>No change.</p>
234	RSA423	SA36	No (?)	Not stated	<p><b>Would SA36:</b>  1) remove the play group/garden/playground facility? If so why? To be replaced where? In a south facing not east facing location? Near the tennis courts in winter maybe?  2) make it easier for parents with</p>	Not stated	<p>7) Local Plan policy SP12 is clear that community facilities will not be permitted to be removed unless alternative premises for their rehousing have been</p>

					<p>children to use park benching (and access toilets/ nappy change) near this playgroup area?</p> <p>3) increase the number of toilets generally for a popular park?</p> <p>4) stop local supermarkets selling cheap booze to alcoholics?</p> <p>5) take any account of the number of methadone users who use the chemist opposite for their (daily) fixes?</p> <p>6) answer the public safety issues/public fears regarding local stabbings (going back to the Zito case)? Highbury police station has closed for conversion to flats: Is the <b>'new' Blackstock Road shop unit</b> an effective replacement?</p>		<p>found. This is a detailed matter that will be investigated through a planning application.</p> <p>8) If this is a shortcoming of the existing facility, then whatever replaces it should be of a better standard in this regard.</p> <p>9) This is outside the scope of the plan</p> <p>10) This is outside the scope of the plan</p> <p>11) This is outside the scope of the plan</p> <p>12) This is outside the scope of the plan. And the borough.</p> <p>No change</p>
234	RSA424	SA 36 and SA37	No (?)	Not stated	<p><b>Retail and commerce</b></p> <p>TO MAKE more of a sense of place, the arches under the station need to be opened up to encourage movement (footfall) between the east and west commercial areas.</p> <p>The Arsenal Shop might have to give way. Arsenal could buy Rowans as their <b>own 'Nike Town', and show an interest</b> in developing park facilities and support the community life.</p> <p>People travel to <b>Fonthill Road Fashion Shops</b> from far and wide (even from south London): how could this vibrancy</p>	Not stated	<p>This is outside the Plan area, and the borough.</p> <p>No change</p>

					<p>be used to make the wider area more commercially viable?</p> <p>Some kind of rival to Petticoat Lane or Camden Market?</p> <p><b>Where is the planners' vision?</b> That part of Blackstock Road, known as Highbury Vale has secondary shopping on both sides of the road, so please show this on maps. Highbury Vale was known once upon time, in retail terms as the local 'Bond Street'. Where is the vision in the plan for Finsbury Park to be regenerated from the south?</p> <p><b>The T Bird Drapers's shop was once</b> commercially successful, but is now a wine bar. The area can still not sustain a fishmongers (nearest Nag's Head Market, Highbury Barn, Stroud Green Road, near Tesco). What indices/benchmarks will they be using to demonstrate success? Are any of them based on socio economic class presumptions or prejudices?</p>		
234	RSA425	SA 36 and SA37	No (?)	Not stated	<p><b>Concerts</b> THE impression given is that this all about Haringey getting planning gain money for some flats on the very edge of its borough. However, the narrow goal of selling more housing at this <b>point sharply conflicts with Haringey's</b> goal of monetizing the park in the shape of increased concerts. The owners of expensive flats will be the</p>	Not stated	<p>This is not pertinent to the <b>Plan. Meeting Haringey's</b> housing requirement is however the goal of the Local Plan.</p> <p>No change</p>

				<p>most vociferous in opposing the <b>Council's major events policy.</b></p> <p>Finsbury Park does have its charity shops, pound stores, pawn shops and pay day lenders: what exactly was being sold <b>in the artist's impression</b> market stalls? Why are there no proposal regarding alternative use of the British Transport Police site? (What <b>is BTP's role in preventing stabbings</b> at bus stops under the SSR Bridge?). Finsbury Park concerts are now associated with crime.</p> <p>How useful is the Blackstock Road Police (Shop Unit) for these events? (Or the British Transport Police office for that matter?).</p> <p><b><i>Once again a Town Centre concept is not about footfall to Rowans.</i></b></p> <p>The point about the 2,500 objections to more Emirates concerts (never mind Finsbury Park ones) is that many concertgoers arrive/ depart through Finsbury Park station.</p> <p>There can be little doubt a major part of the fans at the notorious Stone Roses fans were seriously inebriated before the shows started.</p> <p><b>'A dispersal zone was in place'. Any Town Plan for Finsbury Park has to show dispersal zones <i>on the map.</i></b> Should/shall there be more toilets?</p>		
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					<p>The park was ‘sticky for weeks’ – play there with your toddlers anyone? (Even the dog walkers complained of the underfoot conditions!)</p> <p>Should the artist’s impressions now include a <i>piss</i> artist’s impression. Who is taking the piss?</p>		
234	RSA426	SA 36 and SA37	No (?)	Not stated	<p><b>Alley way</b></p> <p>THE <b>block of flats</b> proposals features a new <b>alley</b> to the park which looks more <b>and more like a holding pen for ‘kettle-ing’ concert goers/ departers.</b> Would councillors propose living over a public urinal? Should we be kettle-ing people? Haringey makes money from concerts in the park: but where is the benefit for Islington + Hackney locals??</p> <p>At the Seven Sisters Entrance there is often a fun fair dominating the view. Do you know you can not even see a park bench from the entrance?</p> <p><b>Can’t see a circus bench or a pop</b> concert bench to sit on either. Poor people are often described as not having a pot to piss in; the park entrance does not have a bench to sit in (but is a great place to piss apparently). The park (and a sane town centre) is for all ages groups, all of the time.</p> <p>Especially ones too young to vote or too old or poor to afford pop tickets or to get pissed in public. Any Town Plan has to show how it manages big events involving non-locals. Window dressing</p>	Not stated	<p>It is considered that this is high on conjecture, and low on fact. The details of how the new piece of urban realm will be completed will be the subject of a detailed planning application in the future.</p> <p>No change</p>

					images of some cosy (provincial rural idyll looking Farmer's) market do not represent the reality of a hard-working urban environment that regularly has high participation metropolitan entertainment events (with which it struggles to deal).		
234	RSA427	SA 36 and SA37	No (?)	Not stated	<p><b>Town Centre planning</b>  <b>To present a Town Plan as merely about street frontages misses the point.</b> Town centres are about commercial activity: this means people movement and footfall.</p> <p>The Finsbury Park area needs to be looked at, not in a linear sense of the main roads only, but in terms of people flows, the existing aspects that promote and those that inhibit these flows.</p> <p>It is difficult to create a tranquil and bustling space next to a Red Route (Seven Sisters Road). Has anyone looked at Windrush Square in Brixton? Is it animated in the classic way we associate with Italian plazas or is it just a joyless open space that might only be used for tub-thumping rallies/ public speaking events?).</p>	Not stated	<p>The plan is concerned with town centre viability and vitality, and seeks to ensure this is maintained and enhanced through provision of certain activities and uses and control over others that detract from this objective. Movement will be considered as part of a detailed planning application.</p> <p>No change</p>
234	RSA428	SA 36 and SA37	No (?)	Not stated	<p><b>Red-route alert</b>  NON-RED route sites have to be designed properly too: has any one looked at the Town Square in Walthamstow? The junction of High Street and Hoe Street –</p>	Not stated	<p>This is not pertinent to the allocations.</p> <p>No change</p>

					<p>this triangular space is just a wide pavement. The animation is in High Street market only.</p> <p>Town squares have the characteristic of enclosure and for the most part (at ground level) human scale. To be human scale you might argue that you should probably be able to walk across the shortest dimension of a square in, say, less than a minute. The space occupied by City North/United House and faced by Wells Terrace could be reconfigured (under a long term plan) to make a great square unmolested by the red route (and complement the bustle of Fonthill road). (It would however reduce large scale local business premises – are they big employers though?).</p> <p>Why did not Islington propose the N4 Library site on Blackstock Road as a Town Square?</p> <p>Why are Islington supporting this proposal for flats in Haringey?</p>		
234	RSA429	SA 36 and SA37	No (?)	Not stated	<p><b>First and foremost, Finsbury Park is a transport interchange</b></p> <p>TOWN planning needs to consider Finsbury Park first and foremost as <i>a transport interchange</i>. Interchanges work best when all modes are close to each other so the time taken transferring between two modes is minimized /optimised.</p> <p>The most use of the rail is <i>through</i></p>	Not stated	<p>The cycle parking facility is protected in the plan, as intermodal connectivity is considered a key aspect of the area.</p> <p><b>Additionally the “artist impression” quoted is not Policy.</b></p>

					<p><i>traffic</i> but the bus stations are the <i>feeders</i> for commuting locals that live nearby and who support local businesses, on those days when there are no football matches or concerts in the park.</p> <p><b>Destroying the East Bus station would be a big step backwards.</b></p> <p>The <i>cycle park</i> is an initiative to make Finsbury Park more accessible for local commuters. Using bikes to get to the station reduces kiss and ride motorists (who slow traffic at peak times) and is therefore good for pedestrian and traffic flow (and healthier too). Where has the cycle park gone from the artists impression?</p> <p><i>Removal or placing the cycle park at a greater distance is regressive.</i> Similarly, for those disabled or otherwise unable to use buses, the Taxi is very important in their lives. Taxi drop off + pick up has to be as close as possible to station entrance. It is surprising—if not disgraceful—that the artist impression appears to have deleted the Taxi rank – this is so regressive (typical of one dimensional <b>where's-my-profit developers' thinking</b>). Is it not regrettable that Islington appears to be supporting this?</p>		No change
234	RSA430	SA 36 and SA37	No (?)	Not stated	<b>Step-free access and pedestrians LINKED</b> to this is the need for step-free	Not stated	This is outside the scope of the allocations to address.

				<p>access street to platform for the rail and tube services. Finsbury Park and Arsenal are among the very few deep level tube stations with no lift or escalator access.</p> <p>Stairs-only access make Finsbury Park unfriendly to visitors. People travel from <b>King's Cross to Angel and then catch a bus</b> to Finsbury Park because it is easier for them to carry their luggage that way.</p> <p>Retail at Finsbury Park suffers because of lack of step free access. Why is Finsbury Park not a (higher) TfL priority for escalators or lifts? Revenue loss between Heavy Rail and Tube has been an issue and turnstile gates are being included at last at Finsbury Park station. However this entails stopping bus station to bus station users transferring via the foot tunnels.</p> <p>This is <i>regressive</i>: it might meet the needs of TfL/ Network Rail revenue protection but it reduces the amenity for locals. Everyone agrees that walking under the still-pigeoninfested bridges on Seven Sisters Road and Stroud Green Road is miserable. TfL/NR benefits from mass attendance at sports and park events: why are they making life more difficult for locals (at</p>		No change
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					all times)?		
234	RSA431	SA 36 and SA37	No (?)	Not stated	<p><b>The key concept</b>  <b>The key to any concept of ‘Town Centre Finsbury Park’ is the station and improving East /West permeability.</b></p> <p>Opening up Station Place to the Public Park is quite literally a side issue (for reasons previously discussed). The railway arches under the rail viaduct could be opened up to encourage people movement: the ambience of these tunnels could match that at London Bridge?</p> <p>The more people movement there is the more retail opportunity, the more self-policing surveillance goes on. The poor management of <i>Live-Nation</i>- type events makes the Town Centre unattractive and makes it a no-go area <b>in people’s mind for not just concert days but other days too.</b></p> <p>Lots of people avoid shopping locally on match days. Let us see the <b>‘dispersal zones’ (for 30,000 people) on the Maps.</b></p> <p>Let us see some benchmarking against the measures Brent Council took in preparation for/response to the new Wembley Stadium (not all favourable/progressive). People-friendly initiatives are taking place: pavements have been widened to assist pedestrians going to/from the Emirates.</p>	Not stated	<p>This is not pertinent to the allocations.</p> <p>No change</p>

					<p>Cycle Routes are being taken off the main roads through side streets – but they should be recognised as part of the hierarchy of spaces and uses that contribute to a balanced and well-thought-out town centre. Let us see them <i>on Maps</i>.</p> <p><b>Successful town squares</b> are often one-street back from a ‘red route’ thoroughfare (looked at Christopher Place in relationship to Oxford Street?). Finsbury Park Station is a significant <b>asset on London’s transport</b> infrastructure (and a no-brainer missed opportunity for more commercial development): how many places in Zone two are so well served? (None, <b>probably, including Islington’s favourite</b>, Upper Street) Finsbury Park can support commercial activity in the form of office blocks. Workplaces, retail and social/leisure activities <i>should be close to the station</i>.</p>		
234	RSA432	SA 36 and SA37	No (?)	Not stated	<p><b>Housing</b> HOUSING, should be slightly further away so as not to be disturbed by trading. People also work shifts so bedrooms should be further away from noisy rail lines. It is noted that this block of flats is being promoted at the same time that house-owners in local streets are refused dormer windows to do loft conversions – an increase of housing density within walking distance of the station (or one or two bus stops)</p>	Not stated	<p>The Council disagrees with the premise, and supports appropriately designed mixed use development including residential uses in close proximity to rail hubs.</p> <p>No change</p>

				<p>that would be sustainable. (The local area is not a conservation area, dormers do not overlook the way high rise flats do – compare issues with those for redeveloping Camden Town.)</p> <p>Finsbury Park Station as a prime location could justify over site development, raising commercial activity density to finance escalators etc.</p> <p>Putting denser housing closer to a remote outer suburban station might be justified because reduced footfall means there is less scope for commerce (yes this can be a circular argument).</p> <p>Not for nothing does the Square Mile discourage housing because it becomes an obstacle to commercial redevelopment/ economic activity. Finsbury Park is so well connected to the transport system it should be a work destination: London plc has to use or sweat its assets if it is to provide employment (compete locally and globally).</p> <p>Along the Islington side of Blackstock Road in recent years, the Pickfords Depository and the petrol station sites that once provided employment were converted to housing (and one of them a gated community) not even work-live units. Unless local</p>		
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					<p>children grow up seeing (small) scale business around them, what ambitions will they have?</p> <p><b>Also we should be encouraging people to work locally and not commute long distances? What are the <i>Islington</i> Planners thinking of?</b></p> <p>Converting Rowans to housing is another (shameful) dumbing down of <b>the area's potential. This is not leafy suburbia</b>, it should be bustling city-life-driven commerce. The aspirations for the area across Stroud Green Road looks like a plan by Islington to <i>reduce</i> the potential of Finsbury Park.</p> <p>Housing this close to Finsbury Park is not ideal and the long term potential for Nimbyism is a conflict to be avoided.</p>		
234	RSA433	SA 36 and SA37	No (?)	Not stated	<p><b>Thameslink</b></p> <p>WHEN Finsbury Park gets Thameslink services (2018?) more transfers between trains will happen.</p> <p>At present at rush hour often the only way locals can get onto a Victoria (or Piccadilly) line train is because of the transfers taking place.</p> <p>Often locals have to wait several trains before they can board, never mind get a seat. This will get worse when Thameslink (otherwise very welcome) arrives. In the event of major incidents <b>at King's Cross, it is Finsbury Park that is used to de-train passengers, so</b></p>	Not stated	Noted.

					Finsbury Park has many strategic purposes. People using Thameslink may well want to transfer to the London Overground at Highbury and Islington to reach Docklands.		
234	RSA434	SA 36 and SA37	No (?)	Not stated	<p><b>Overground</b>  ALREADY this stretch of Victoria Tube line is at capacity. How long before the idea of a London Overground branch to Finsbury Park is revisited?  Where would such platforms (no) go?  And what objections would these newly arrived flat owners then raise?  Maybe a London Overground branch would/could not terminate at Finsbury Park and would need to go on to Alexandra Palace (to connect with Crossrail 2?)  <b>Any Finsbury Park Town Plan proposal has to look at the strategic future of Finsbury Park as a major London asset.</b>  Key urban sites (adjacent major transport hubs) should be active revenue generating: not passive housing. <i>The closer to mass footfall a site is, the more commercial it should be.</i></p> <p>If commuters/ employers/ planners of all three boroughs saw Finsbury Park as a destination, the potential for economic growth would be great because so many people can access</p>	Not stated	<p>This response seems to suggest that what is proposed is a purley residential scheme. It is not, it is a mixed use scheme seeking to secure a new active piece of urban realm in Finsbury Park.</p> <p>Issues of train frequency are outside the scope of the plan.</p> <p>No change</p>

					<p>the station. Turning prime sites next to the likes of Finsbury Park into sleepy housing is an abomination and is denying future work opportunities to the local economy. <b>This would be a seriously regressive, backwards step that is not easily reversed and will compromise future progressive ideas. These are half-baked plans. Whether or not planners manage to force them through, the documents will stand as a monument to lack of vision and a text book case as to how <i>not</i> to do town planning.</b></p>		
234	RSA435	SA 36 and SA37	No (?)	Not stated	In support of his representations, Councillor Carter attaches some general comments on the proposals from 2 years ago	Not stated	These have been taken into account in previous iterations of the Plan.

**SA37: 18-20 Stroud Green Road**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
232	RSA380	SA37	Not stated	Not stated		The Development Guidelines and Site Requirements should reference the need to contribute	<b>An additional site requirement guideline will be added to this effect.</b>

						positively to the adjoining Stroud Green conservation area and its significance.	
234	RSA414	SA 37 – 18–20 Stroud Green Road	No (?)	Not stated	THIS is described as a <i>New town centre frontage onto Stroud Green Road</i> , however in truth it is no more than a housing development. It's described as “an opportunity to create new town centre uses <b>within the Finsbury Park District Centre</b> ” but it is hard to see this as other than a residential development alongside Islington’s misnamed ‘town centre’. It’s hard to know what is meant by, <i>Town centre uses will be required at ground floor level on the Stroud Green frontage of this site.</i>	Not stated	The policy describes the uses that will be required on this site, should a planning application come in. Town centre uses contain retail, community, and high density employment functions.  No change
234	RSA416	SA 36 and SA37	No (?)	Not stated	<b>Effective /Deliverable? Question 15</b> IN THE <i>Haringey Local Development Framework Core Strategy Submission Soundness Self-Assessment</i> , key question number 15 asks, <i>Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</i> The answer is couched in sweeping generalities: <i>LBH works closely with ..., and also works with ...; work together ...</i> An oblique reference is made to SA36 and 37, where the document says that, <i>Other action areas of the borough which require partnership working with neighbouring boroughs include: ... .. Finsbury Park and Manor House – with major regeneration</i>	Not stated	The Core Strategy was adopted in 2013 and the Inspector concluded the Plan met its legal compliance. The Council is confident that it has fulfilled its obligations under the Duty to Co-operate for this plan. It is within the gift of the local community to bring forward a Neighbourhood Plan should they wish, and the three local boroughs will support this process.  No change

					<p><i>projects at Finsbury Park station (in Islington) and at Woodberry Down (in Hackney).</i></p> <p>The difficulty is that cross-border co-operation is fitful, feeble and short-lived. Co-operation, <b>or partnership is needed but there's no</b> evidence of it being effective or sustainable in the current absence of a Neighbourhood Plan and Forum. As a consequence, SA36 and 37 are strictly limited in scope and lack ambition for the area as a whole.</p>		
234	RSA417	SA 36 and SA37	No (?)	Not stated	<p><b>Neighbourhood forum: not yet</b></p> <p>ALTHOUGH there exists the beginnings of a Finsbury Park Neighbourhood Forum in the area of SA36, the local community is at a disadvantage compared with other areas in that a Forum is not yet set up. When set up, it is likely that its nucleus would be one of <b>London's most important transport nodes:</b> Finsbury Park station. It would encompass a significant area that would include all of SA36 and a large margin around (here is an draft area).</p> <p>The object of the Neighbourhood Forum would be to consider Finsbury Park area as a single whole. Because this locality exists on the edges of three Boroughs and at extreme corners, it has for decades been little regarded by the Boroughs (i.e. by Haringey, Hackney and Islington). Now and again efforts are made at co-operation between the three Boroughs about FP, but these have tended not to last long or be meaningful.</p> <p>It is this lack of common purpose for the area and the absence of meaningful responsibility,</p>	Not stated	<p>The Council looks forward to working with a Finsbury Park Neighbourhood Forum in the future. In the meantime it is not considered that this comment is pertinent to the Plan as written.</p> <p>No change</p>

					<p>that is one of the driving forces for a NF, that would bridge the Borough Boundary borders (three of them).</p> <p>The current ambitions for this site are contained within the confines of the Borough boundary. It could be seen as local-council selfish plan to maximise Council tax receipts within, at this <b>'extreme' southernmost location</b> of Haringey Borough, with little regard for the needs of the area as the public sees it.</p>		
234	RSA418	SA 36 and SA37	No (?)	Not stated	<p><b>Corridor for 'permeability'</b></p> <p>THERE is one aspect that relates to the neighbouring Borough that needs to be addressed. The corridor that might run between or through two large buildings has been said— in planner-jargon—to increase permeability. It has been advanced as a means of improving the view of Finsbury Park from the station (in Islington). However, not only is this not so, the proposed (over-) development of the site would <i>detract</i> from the current view.</p> <p>Firstly, the tall mature trees are currently easily visible over the Rowans building. Replacement buildings of anywhere near the heights proposed would obscure the trees from view from ground level anywhere near the bus station.</p> <p>However, this assumes that the trees remained. Despite assurances that any construction work would not take place on the park, due to their closeness to the proposed building site, there is no guarantee that this large stand of trees would not be felled. (A</p>	Not stated	<p>There are no details about the design for the new urban realm linking the Park and the station. By having a policy, it allows this to be defended when an application comes in however, which is seen as positive.</p> <p>It is incorrect to suggest that the current view of the park over/around Rowans is superior to what it could be through a new urban realm. It is considered that the reference to removal of mature trees is disingenuous as policies in the Local Plan seek to retain mature trees, especially those of high amenity value.</p> <p>There is no indication from</p>

				<p>similar felling of mature trees occurred during building on the Jewsons site alongside Wightman road: now SA27).</p> <p>Secondly, the width of the corridor would likely be narrow and this corridor has been subject to misleading depictions. A so-called artists illustration published by promoters shows a Champs Elyse sized avenue. This is a distortion of the narrow shopping arcade. The narrow angle of view through to the park could only be had by someone standing close to the central axis of the shopping arcade, looking directly down it. For the majority of people exiting the station, the gap would be unlikely to be noticed, let alone for the park to be seen.</p> <p>The alley/shopping arcade is the sole concession that the area is a major transport interchange. It is TfL and the station that ought <b>to have a major influence. The artist's</b> impression put out by the promoters even airbrushes out the huge porch by the bus station and indeed the bus station disappears altogether.</p> <p>There is already access to the park alongside the bicycle storage facility. The main difficulty with the proposed development at this site allocation is that it would preclude a superior solution for the area, if it were considered as a whole.</p> <p>There is little point in the planners talking</p>	<p>TfL that they intend to significantly change the way Finsbury Park Station operates, which as the respondent suggests, would alter the approach to the area. If they do, the Plan will be updated to reflect this. It is unclear how development as allocated would compromise this objective however.</p> <p>No change</p>
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					about permeability to the park unless they address east/ west permeability through/ over/ under the station.		
234	RSA419	SA 36 and SA37	No (?)	Not stated	<p><b>TfL and the railway station</b></p> <p>A BIG chunk of residents so close to this key transport node is likely to create a constituency of nimbys who would likely object, frustrate or stop further change or improvement in the area. Housing is needed but it needs to be further away from this <i>key transport node</i>.</p>	Not stated	<p>This is speculative and depending on the design, untrue. The London Plan is clearly in favour of locating new housing in close proximity to transport nodes as a sustainable form of development for London. There are design considerations which can be overcome with elements such as double/triple glazed glass.</p> <p>No change</p>
234	RSA420	SA 36 and SA37	No (?)	Not stated	<p><b>A transport interchange</b></p> <p>THE area is primarily a <i>transport interchange</i> and about the movement of people. We need statistics of what that movement is going to be and how the arrival of Thameslink would affect it (peak hour traffic to- and from- Highbury and Islington will be challenging, making a Finsbury Park Town Centre <i>less</i> desirable).</p> <p>Cycle routes: why are they not shown? One of the main ones goes down Finsbury Park Road – but that is not considered relevant to the <b>development area</b>. In the artist's impression published a while back, part of proposal appears to abolish the East Bus terminus and put all the bus stops onto Seven Sisters Road increasing the walk distance from train – again</p>	Not stated	<p>Cycle routes are shown in the Green Grid policy (DM20).</p> <p>It is not clear how the arrival of Thameslink will make Finsbury Park less desirable, and issues of permeability within the station are outside the scope of the Plan.</p> <p>No change</p>

					making the interchange less not more efficient?		
234	RSA42 1	SA 36 and SA37	No (?)	Not stated	<p><b>Ticket gates</b> THE <b>ticket gates</b> will stop people walking through the station between the two bus stations.</p> <p>It is suggested that this inconveniences few and that the distance to walk is less via Stroud Green Road than through the foot tunnels. This depends on which bus you are catching and where you are dropped off at the terminals – some bus stops are not in the East Terminus but on Seven Sisters Road).</p> <p>There is some disingenuity here. The rail may go northsouth but the east west routes deserve proper consideration.</p> <p>Elsewhere they describe walking under the bridges as unpleasant to be avoided so a route through the station might be desirable <b>can't have it both ways. To make transport interchanges work better they should interconnect <i>more</i> and that includes making bus station to bus station access better. Schemes that reduce amenity for bus users have been around for a long time. There are enough rail arches/ is sufficient space there to provide an independent walk through, although not a right of way obviously.</b></p>	Not stated	<p>This is outside the scope of the Plan.</p> <p>No change</p>
234	RSA42 2	SA 36 and SA37	No (?)	Not stated	<p><b>Footfall</b> IF Islington and Haringey want more of a sense of place and seamless integration of commercial Stroud Green Road with commercial Seven Sisters Road and</p>	Not stated	<p>It is agreed that footfall between the Station and the Park is not the only issue here. The new link is planned to have leisure and</p>

					<p>Blackstock Road then the 'key' is <i>not</i> footfall to Rowans.</p> <p>If this was a footfall issue, we would be talking about Arsenal Football Club match day attendances and how pressure on the Tube system could be relieved if there were more things to do and see before and after games. (Holloway Road Tube station has to close during matches because the area regeneration proposals did not stretch to upgrading that station).</p> <p>Games are no longer solely a Saturday afternoon issue and the ground capacity at Emirates – at a nominal 60,000 – is 20,000 (= over 50%) <b>higher than Highbury's former</b> 38,000. Should we be turning the area more into a hospitality zone – especially if Haringey want more events in the park?</p>		<p>other town centre uses within it, thereby increasing activity and vitality within the Centre</p> <p>No change.</p>
234	RSA42 3	SA36	No (?)	Not stated	<p><b>Would SA36:</b></p> <p>1) remove the play group/garden/playground facility? If so why? To be replaced where? In a south facing not east facing location? Near the tennis courts in winter maybe?</p> <p>2) make it easier for parents with children to use park benching (and access toilets/ nappy change) near this playgroup area?</p> <p>3) increase the number of toilets generally for a popular park?</p> <p>4) stop local supermarkets selling cheap booze to alcoholics?</p> <p>5) take any account of the number of methadone users who use the chemist opposite for their (daily) fixes?</p>	Not stated	<p>13) Local Plan policy SP12 is clear that community facilities will not be permitted to be removed unless alternative premises for their rehousing have been found. This is a detailed matter that will be investigated through a planning application.</p> <p>14) If this is a shortcoming of the existing facility, then whatever replaces it should be of a better</p>

					6) answer the public safety issues/public fears regarding local stabbings (going back to the Zito case)? Highbury police station has closed for conversion to flats: Is the 'new' Blackstock Road shop unit an effective replacement?		standard in this regard. 15) This is outside the scope of the plan 16) This is outside the scope of the plan 17) This is outside the scope of the plan 18) This is outside the scope of the plan. And the borough.  No change
234	RSA424	SA 36 and SA37	No (?)	Not stated	<p><b>Retail and commerce</b></p> <p>TO MAKE more of a sense of place, the arches under the station need to be opened up to encourage movement (footfall) between the east and west commercial areas. The Arsenal Shop might have to give way. <b>Arsenal could buy Rowans as their own 'Nike Town', and show an interest in developing park facilities and support the community life.</b></p> <p>People travel to <b>Fonthill Road Fashion Shops</b> from far and wide (even from south London): how could this vibrancy be used to make the wider area more commercially viable?</p> <p>Some kind of rival to Petticoat Lane or Camden Market? <b>Where is the planners' vision?</b> That part of Blackstock Road, known as Highbury Vale has secondary shopping on both sides of the road, so please show this on maps. Highbury Vale was known once upon time, in</p>	Not stated	This is outside the Plan area, and the borough.  No change

					<p>retail terms as the local 'Bond Street'. Where is the vision in the plan for Finsbury Park to be regenerated from the south?</p> <p>The T Bird Drapers's shop was once commercially successful, but is now a wine bar. The area can still not sustain a fishmongers (nearest Nag's Head Market, Highbury Barn, Stroud Green Road, near Tesco). What indices/ benchmarks will they be using to demonstrate success? Are any of them based on socio economic class presumptions or prejudices?</p>		
234	RSA42 5	SA 36 and SA37	No (?)	Not stated	<p><b>Concerts</b></p> <p>THE impression given is that this all about Haringey getting planning gain money for some flats on the very edge of its borough. However, the narrow goal of selling more housing at this point sharply conflicts with <b>Haringey's goal of monetizing the park in the shape of increased concerts.</b> The owners of expensive flats will be the most vociferous in <b>opposing the Council's major events policy.</b></p> <p>Finsbury Park does have its charity shops, pound stores, pawn shops and pay day lenders: what exactly was being sold in the <b>artist's impression market stalls? Why are there no proposal regarding alternative use of the British Transport Police site? (What is BTP's role in preventing stabbings at bus stops under the SSR Bridge?).</b> Finsbury Park concerts are now associated with crime.</p> <p>How useful is the Blackstock Road Police</p>	Not stated	<p>This is not pertinent to the <b>Plan. Meeting Haringey's</b> housing requirement is however the goal of the Local Plan.</p> <p>No change</p>

					<p>(Shop Unit) for these events? (Or the British Transport Police office for that matter?).  <i>Once again a Town Centre concept is not about footfall to Rowans.</i>  The point about the 2,500 objections to more Emirates concerts (never mind Finsbury Park ones) is that many concertgoers arrive/ depart through Finsbury Park station.</p> <p>There can be little doubt a major part of the fans at the notorious Stone Roses fans were seriously inebriated before the shows started. <b>'A dispersal zone was in place'. Any Town Plan for Finsbury Park has to show dispersal zones on the map.</b> Should/shall there be more toilets?  <b>The park was 'sticky for weeks'</b> – play there with your toddlers anyone? (Even the dog walkers complained of the underfoot conditions!)  <b>Should the artist's impressions</b> now include a <i>piss</i> artist's impression. <b>Who is taking the piss?</b></p>		
234	RSA426	SA 36 and SA37	No (?)	Not stated	<p><b>Alley way</b>  THE <b>block of flats</b> proposals features a new <b>alley</b> to the park which looks more and more like a holding pen for 'kettle-ing' concert goers/ departers. Would councillors propose living over a public urinal? Should we be kettle-ing people? Haringey makes money from concerts in the park: but where is the benefit for Islington + Hackney locals??  At the Seven Sisters Entrance there is often a fun fair dominating the view. Do you know you can not even see a park bench from the</p>	Not stated	<p>It is considered that this is high on conjecture, and low on fact. The details of how the new piece of urban realm will be completed will be the subject of a detailed planning application in the future.</p> <p>No change</p>

					<p>entrance?  <b>Can't see a circus bench</b> or a pop concert bench to sit on either. Poor people are often described as not having a pot to piss in; the park entrance does not have a bench to sit in (but is a great place to piss apparently). The park (and a sane town centre) is for all ages groups, all of the time.  Especially ones too young to vote or too old or poor to afford pop tickets or to get pissed in public. Any Town Plan has to show how it manages big events involving non-locals. Window dressing images of some cosy (provincial rural idyll looking <b>Farmer's</b>) market do not represent the reality of a hard-working urban environment that regularly has high participation metropolitan entertainment events (with which it struggles to deal).</p>		
234	RSA427	SA 36 and SA37	No (?)	Not stated	<p><b>Town Centre planning</b>  <b>To present a Town Plan as merely about street frontages misses the point.</b> Town centres are about commercial activity: this means people movement and footfall.</p> <p>The Finsbury Park area needs to be looked at, not in a linear sense of the main roads only, but in terms of people flows, the existing aspects that promote and those that inhibit these flows.  It is difficult to create a tranquil and bustling space next to a Red Route (Seven Sisters Road). Has anyone looked at Windrush Square in Brixton? Is it animated in the classic way we associate with Italian plazas or is it just a joyless open space that might only be</p>	Not stated	<p>The plan is concerned with town centre viability and vitality, and seeks to ensure this is maintained and enhanced through provision of certain activities and uses and control over others that detract from this objective. Movement will be considered as part of a detailed planning application.</p> <p>No change</p>

					used for tub-thumping rallies/ public speaking events?).		
234	RSA428	SA 36 and SA37	No (?)	Not stated	<p><b>Red-route alert</b>  NON-RED route sites have to be designed properly too: has any one looked at the Town Square in Walthamstow? The junction of High Street and Hoe Street – this triangular space is just a wide pavement. The animation is in High Street market only. Town squares have the characteristic of enclosure and for the most part (at ground level) human scale. To be human scale you might argue that you should probably be able to walk across the shortest dimension of a square in, say, less than a minute. The space occupied by City North/United House and faced by Wells Terrace could be reconfigured (under a long term plan) to make a great square unmolested by the red route (and complement the bustle of Fonthill road). (It would however reduce large scale local business premises – are they big employers though?).</p> <p>Why did not Islington propose the N4 Library site on Blackstock Road as a Town Square?  Why are Islington supporting this proposal for flats in Haringey?</p>	Not stated	<p>This is not pertinent to the allocations.</p> <p>No change</p>
234	RSA429	SA 36 and SA37	No (?)	Not stated	<p><b>First and foremost, Finsbury Park is a transport interchange</b>  TOWN planning needs to consider Finsbury Park first and foremost as <i>a transport interchange</i>. Interchanges work best when all modes are close to each other so the time taken transferring between two modes is</p>	Not stated	<p>The cycle parking facility is protected in the plan, as intermodal connectivity is considered a key aspect of the area.</p> <p>Additionally the “artist</p>

					<p>minimized /optimised. The most use of the rail is <i>through traffic</i> but the bus stations are the <i>feeders</i> for commuting locals that live nearby and who support local businesses, on those days when there are no football matches or concerts in the park. <b>Destroying the East Bus station would be a big step backwards.</b></p> <p>The <i>cycle park</i> is an initiative to make Finsbury Park more accessible for local commuters. Using bikes to get to the station reduces kiss and ride motorists (who slow traffic at peak times) and is therefore good for pedestrian and traffic flow (and healthier too). Where has the cycle park gone from the artists impression?</p> <p><i>Removal or placing the cycle park at a greater distance is regressive.</i> Similarly, for those disabled or otherwise unable to use buses, the Taxi is very important in their lives. Taxi drop off + pick up has to be as close as possible to station entrance. It is surprising—if not disgraceful—that the artist impression appears to have deleted the Taxi rank – this is so regressive (typical of one <b>dimensional where’s-my-profit developers’</b> thinking). Is it not regrettable that Islington appears to be supporting this?</p>		<p><b>impression”</b> quoted is not Policy.</p> <p>No change</p>
234	RSA430	SA 36 and SA37	No (?)	Not stated	<p><b>Step-free access and pedestrians</b> LINKED to this is the need for step-free access street to platform for the rail and tube services. Finsbury Park and Arsenal are among the very few deep level tube stations</p>	Not stated	<p>This is outside the scope of the allocations to address.</p> <p>No change</p>

					<p>with no lift or escalator access.</p> <p>Stairs-only access make Finsbury Park unfriendly to visitors. People travel from King's Cross to Angel and then catch a bus to Finsbury Park because it is easier for them to carry their luggage that way.</p> <p>Retail at Finsbury Park suffers because of lack of step free access. Why is Finsbury Park not a (higher) TfL priority for escalators or lifts? Revenue loss between Heavy Rail and Tube has been an issue and turnstile gates are being included at last at Finsbury Park station. However this entails stopping bus station to bus station users transferring via the foot tunnels.</p> <p>This is <i>regressive</i>: it might meet the needs of TfL/ Network Rail revenue protection but it reduces the amenity for locals. Everyone agrees that walking under the still-pigeoninfested bridges on Seven Sisters Road and Stroud Green Road is miserable. TfL/NR benefits from mass attendance at sports and park events: why are they making life more difficult for locals (at all times)?</p>		
234	RSA43 1	SA 36 and SA37	No (?)	Not stated	<p><b>The key concept</b> <b><i>The key to any concept of 'Town Centre Finsbury Park' is the station and improving East /West permeability.</i></b></p> <p>Opening up Station Place to the Public Park is quite literally a side issue (for reasons previously discussed). The railway arches under the rail viaduct could be opened up to encourage people movement: the ambience of</p>	Not stated	<p>This is not pertinent to the allocations.</p> <p>No change</p>

				<p>these tunnels could match that at London Bridge?</p> <p>The more people movement there is the more retail opportunity, the more self-policing surveillance goes on. The poor management of <i>Live-Nation</i>- type events makes the Town Centre unattractive and makes it a no-go area <b>in people's mind for not just concert days but other days too.</b></p> <p>Lots of people avoid shopping locally on <b>match days. Let us see the 'dispersal zones'</b> (for 30,000 people) <i>on the Maps.</i></p> <p>Let us see some benchmarking against the measures Brent Council took in preparation for/response to the new Wembley Stadium (not all favourable/progressive). People-friendly initiatives are taking place: pavements have been widened to assist pedestrians going to/from the Emirates.</p> <p>Cycle Routes are being taken off the main roads through side streets – but they should be recognised as part of the hierarchy of spaces and uses that contribute to a balanced and well-thought-out town centre. Let us see them <i>on Maps.</i></p> <p><b>Successful town squares</b> are often one-street back from a 'red route' thoroughfare (looked at Christopher Place in relationship to Oxford Street?). Finsbury Park Station is a <b>significant asset on London's transport</b> infrastructure (and a no-brainer missed opportunity for more commercial development): how many places in Zone two are so well served? (None, probably, including</p>		
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					Islington's favourite, Upper Street) Finsbury Park can support commercial activity in the form of office blocks. Workplaces, retail and social/leisure activities <i>should be close to the station.</i>		
234	RSA43 2	SA 36 and SA37	No (?)	Not stated	<p><b>Housing</b> HOUSING, should be slightly further away so as not to be disturbed by trading. People also work shifts so bedrooms should be further away from noisy rail lines. It is noted that this block of flats is being promoted at the same time that house-owners in local streets are refused dormer windows to do loft conversions – an increase of housing density within walking distance of the station (or one or two bus stops) that would be sustainable. (The local area is not a conservation area, dormers do not overlook the way high rise flats do – compare issues with those for redeveloping Camden Town.)</p> <p>Finsbury Park Station as a prime location could justify over site development, raising commercial activity density to finance escalators etc.</p> <p>Putting denser housing closer to a remote outer suburban station might be justified because reduced footfall means there is less scope for commerce (yes this can be a circular argument).</p> <p>Not for nothing does the Square Mile discourage housing because it becomes an obstacle to commercial redevelopment/ economic activity.</p> <p>Finsbury Park is so well connected to the</p>	Not stated	<p>The Council disagrees with the premise, and supports appropriately designed mixed use development including residential uses in close proximity to rail hubs.</p> <p>No change</p>

					<p>transport system it should be a work destination: London plc has to use or sweat its assets if it is to provide employment (compete locally and globally).</p> <p>Along the Islington side of Blackstock Road in recent years, the Pickfords Depository and the petrol station sites that once provided employment were converted to housing (and one of them a gated community) not even work-live units. Unless local children grow up seeing (small) scale business around them, what ambitions will they have?</p> <p><b>Also we should be encouraging people to work locally and not commute long distances? What are the <i>Islington</i> Planners thinking of?</b></p> <p>Converting Rowans to housing is another <b>(shameful) dumbing down of the area's</b> potential. This is not leafy suburbia, it should be bustling city-life-driven commerce. The aspirations for the area across Stroud Green Road looks like a plan by Islington to <i>reduce</i> the potential of Finsbury Park.</p> <p>Housing this close to Finsbury Park is not ideal and the long term potential for Nimbyism is a conflict to be avoided.</p>		
234	RSA433	SA 36 and SA37	No (?)	Not stated	<p><b>Thameslink</b></p> <p>WHEN Finsbury Park gets Thameslink services (2018?) more transfers between trains will happen.</p> <p>At present at rush hour often the only way locals can get onto a Victoria (or Piccadilly)</p>	Not stated	Noted.

					<p>line train is because of the transfers taking place.</p> <p>Often locals have to wait several trains before they can board, never mind get a seat. This will get worse when Thameslink (otherwise very welcome) arrives. In the event of major <b>incidents at King's Cross, it is Finsbury Park</b> that is used to de-train passengers, so Finsbury Park has many strategic purposes. People using Thameslink may well want to transfer to the London Overground at Highbury and Islington to reach Docklands.</p>		
234	RSA434	SA 36 and SA37	No (?)	Not stated	<p><b>Overground</b></p> <p>ALREADY this stretch of Victoria Tube line is at capacity. How long before the idea of a London Overground branch to Finsbury Park is revisited?</p> <p>Where would such platforms (no) go? And what objections would these newly arrived flat owners then raise?</p> <p>Maybe a London Overground branch would/could not terminate at Finsbury Park and would need to go on to Alexandra Palace (to connect with Crossrail 2?)</p> <p><b>Any Finsbury Park Town Plan proposal has to look at the strategic future of Finsbury Park as a major London asset.</b></p> <p>Key urban sites (adjacent major transport hubs) should be active revenue generating: not passive housing. <i>The closer to mass footfall a site is, the more commercial it should be.</i></p> <p>If commuters/ employers/ planners of all three boroughs saw Finsbury Park as a destination,</p>	Not stated	<p>This response seems to suggest that what is proposed is a purley residential scheme. It is not, it is a mixed use scheme seeking to secure a new active piece of urban realm in Finsbury Park.</p> <p>Issues of train frequency are outside the scope of the plan.</p> <p>No change</p>

					<p>the potential for economic growth would be great because so many people can access the station.</p> <p>Turning prime sites next to the likes of Finsbury Park into sleepy housing is an abomination and is denying future work opportunities to the local economy.</p> <p><b>This would be a seriously regressive, backwards step that is not easily reversed and will compromise future progressive ideas. These are half-baked plans. Whether or not planners manage to force them through, the documents will stand as a monument to lack of vision and a text book case as to how <i>not</i> to do town planning.</b></p>		
234	RSA435	SA 36 and SA37	No (?)	Not stated	In support of his representations, Councillor Carter attaches some general comments on the proposals from 2 years ago	Not stated	These have been taken into account in previous iterations of the Plan.

#### SA38: 460-470 Archway Road

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RSA99	SA38 – SA 45 & 2.108 to 2.128	No	Not stated	<p>The Highgate Site Allocations do not comply with <i>London Plan Policy 7.7</i> – <i>Location and design of tall and large buildings</i> and are inconsistent with Haringey <i>Strategic Policy 11 – Tall Buildings</i>.</p> <p>Part E London Plan Policy 7.7:  <b>“E) Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or</b></p>	<p>a) The Site Allocations DPD should record on Page 96, in preface to Highgate Sites, that:</p> <p><b>“On London Plan Policy 7.7 Haringey Council is required within Local Plans to identify areas that</b></p>	<p>The relevant policy in this regard is DM6 of the DMDPD, which identifies areas which may be suitable for tall buildings – building over 30m (the equivalent of a 10 storey building). It is noted that Highgate is not included as a</p>

				<p>inappropriate for tall and large buildings and identify them in their <b>Local Development Frameworks.</b>”</p> <p>Also:  <b>“7.25 Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline.”</b>  Historic England Advice Note 4 Tall Buildings:  <b>“2.3 An up-to-date local plan based on a sound evidence base will contain enough detail to allow the significance of heritage assets to be assessed and to secure a commitment to high quality design (paragraphs 169-170). This will help local planning authorities to identify in local plans areas where tall buildings would not be appropriate because of their adverse impact (paragraph 157)”</b></p> <p>The 2015 Preferred Options DPD set maximum heights of up to 7 storeys and would have produced buildings out of sympathy with the surrounding Conservation Area (eg, <b>Policy 7.8, London Plan; 132, NPPF</b>).</p> <p>In the revised Jan 2016 Site Allocations DPD, max height limits have been omitted for Highgate sites. The lack of limits will trigger applications for inappropriately sized apartment blocks. This expectation is justified by events and by supporting</p>	<p>are inappropriate for tall and large buildings. The Highgate Conservation Area is identified by this Local Plan as inappropriate for new tall and large buildings, these being buildings that are substantially taller than their surroundings which cause a significant change to the <b>skyline.</b>”</p>	<p>location suitable for a tall building. Large buildings are those that are two storeys higher than the surrounding building heights. It is not considered appropriate to identify locations within the Borough for ‘Taller’ buildings as taller buildings are considered suitable across the entire borough, including within conservation areas, subject to meeting the criteria set out in Policy DM6.</p> <p>No change</p>
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				<p>documents. Eg: The Council has approved a new seven-storey block at SA45 despite objections from local residents and stakeholders such as the Corporation of London</p> <p><b>The "Evidence Base" (2015 Highgate Urban Character Study - HUCS)</b> proposes five, six, seven -and even 9-storey blocks at Highgate sites and claims it determines maximum building height limits for the Conservation Area.</p> <p>Sample :</p> <p><i>"At the Aylmer Road and Archway Road gyratory, there is opportunity to create a cluster of taller buildings as a way-finder into the neighbourhood and to create an attractive gateway. These should be seven to nine storeys in height" p 215, HUCS</i></p> <p><b>This is not "evidence". The target development outcomes in the Character Study conflict with Haringey/London Plan/NPPF policies on tall building location, heritage protection etc.</b></p> <p>Historic England Advice Note 4, Tall Buildings:</p> <p><i><b>"3.1 In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development</b></i></p>	
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				<p><i>applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of the local plan. Techniques such as characterisation and building height studies provide evidence to support a local height definition for tall buildings and the identification of appropriate locations in local plans. This can be used to create clear core strategic policies, site allocations and development management policies, supported by supplementary planning advice where appropriate.”</i></p> <p>These sites’ appropriate scale and form has not been assessed, max local height definitions have not been set/supported. Inappropriate locations have not been identified as required (London Plan 7.7, E). London Plan Policy 7.8: <b>“Heritage assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.”</b></p> <p>Haringey Strategic Policy SP11: <b>“6.1.15 Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban</b></p>		
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					<p><i>development across the borough and 3-4 storey development in its town centres. The exception is Wood Green town centre, where buildings within its core area range between 4-9 storeys</i></p> <p><i>6.1.16 The Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their neighbours” And:</i></p> <p><i>6.1.18 The Council considers that currently only two areas, Haringey Heartlands/Wood Green and Tottenham Hale, have sites that may be suitable for some tall or large buildings... Elsewhere tall buildings are considered inappropriate to Haringey’s predominantly 2-3 storey residential suburban character.”</i></p> <p>Despite SP11, the Evidence Base and DPDs could provide a basis to allow tall/large buildings at the Highgate sites (as has already happened at SA45.)</p>		
22	RSA100	SA38	No	Not stated	<p><b>The Site Allocations DPD needs amendment to conform with London Plan Policies 7.17, 7.8 and NPPF 132 and Strategic Policies SP 11,12 &amp; 13 with regard to the following sites:</b></p> <p>SA38 is adjacent to Highgate Woods where existing development has</p>	<p>The DPD needs amending so the Local Plan meets the requirements of the London Plan and the NPPF for the preservation of the Conservation Area &amp; the openness of the</p>	<p>The Council feel that the key issue regarding the interface between this site and Highgate Woods is ensuring that the amenity of users within the Woods is not overly</p>

				<p>intentionally preserved valuable historic open local views to/from Highgate Woods MOL</p> <p>Views from Archway Road, across SA38, toward Highgate Woods are not as far reaching. However, there are wide gaps between the sheds and this has preserved an open aspect. The views explain why the 143 bus stop is named “Highgate Wood”, not “Wellington Gyratory”. Views should not be jeopardised by tucking new tall/large high-density blocks into an unsuitable location. The lack of DPD clarity about building scale, form and height limits in the Conservation Area results in <b>uncertainty about the proposals’</b> impacts.</p>	<p>MOLs and for the appropriate location of tall buildings and to meet Strategic Policies 11, 12 &amp; 13:</p> <p>a) For SA38: Delete whole second paragraph under “<b>Development Guidelines</b>” heading and insert the following sentence:</p> <p><b><i>“The site is adjacent to Highgate Wood designated Metropolitan Open Land (MOL). To meet London Plan requirements and SP12/13 any development proposed must ensure the existing overall level of openness of the Highgate Wood MOL is maintained, viewing from and to Archway Road.”</i></b></p> <p>b) Add the following two new paragraphs below:</p> <p><b><i>“Half the total gross</i></b></p>	<p>compromised by the development, and this is referenced in the policy.</p> <p>Neither the NPPF or Policy 7.17 address development adjacent to Green Belt/MOL nor a requirement therein to preserve its openness. By inference, such consideration is not consistent with the purpose of MOL.</p> <p>It is not considered that the views from Archway Rd, as they are at present, are sufficiently valuable to protect, and indeed that redevelopment on this site could be of benefit to the character of the area.</p> <p>The suggested further additional paragraphs are considered onerous. The first paragraph is not in keeping with a designed approach as</p>
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						<p><i>site space will be allocated to garden/green amenity space for occupant use - and to ensure that the existing overall level of openness of the Highgate Wood MOL is maintained, when viewing from and to Archway Road.</i></p> <p><i>The Site is on a Red Route with the highest recorded continuous pollution levels in Haringey and next to a busy, complex gyratory system with a high accident frequency and regular traffic delays. Development at this Site will be car-free to help meet sustainability objectives.”</i></p>	<p>advocated in the NPPF and provided for by Policy DM1. Parking standards will be set in line with Policy DM32 and the London Plan.</p> <p>No change</p>
232	RSA381	SA38 460-470 Archway Road & other sites in	Not stated	Not stated	it is important to ensure consistency in the guidance provided. For example the details provided on the Highgate conservation area and the need for development to respond to		The Development Guideline in SA38, and the Site Requirement in SA39 will be updated to

		the Highgate conservation area			its significance is not expressed consistently between SA38 & SA39 e.g. Site Requirement for SA38 makes no reference to the conservation area, yet SA39 does. SA38 considers these issues in the Development Guidelines only		reflect the Site Requirement in SA37.
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### SA39: Gonnermann Antiques Site and Goldsmith's Court

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
20	RSA97	SA 39 2.163	No	No	The consultation is a sham. Even doing this form is not at all user friendly and uses language that is not at all resident friendly. As someone who worked in local authority for 22 years, I am struggling already. The consultation has failed to meet the Statement of Community Involvement on <b>several counts. For example</b> • <b>By targeting consultation to make sure that relevant stakeholders are involved.</b> • <b>By ensuring the consultation methods used are appropriate in engaging affected parties.</b> Also the stated process shows stakeholder involvement at an much earlier stage. There has been a major omission of stakeholder involvement with the proposal for the Professional Development Centre - none of the residents in Belmont Avenue that back on to the site have been informed. It is by chance that I saw a small notice tied to the railings outside the	The only way to make it compliant is to restart the consultation ensuring that you do your duties to involve stakeholders.	Consultation has been carried out in line with the relevant Local Planning regulations, and the <b>Council's Statement of Community Involvement.</b> The form used for the consultation is that set out by the Planning Inspectorate in their guidance to Local Planning Authorities and ensure all relevant information is provided at this formal stage in the plan-making process.  No change

					building. Apparently you carried out a public consultation on the four draft Local Plan documents in 2015. If this contained plans for the site adjacent to our properties, again we were totally missed out. This is unacceptable.		
21	RSA98	SA39	Not stated	Not stated	I have noticed a printing error in your Site Allocations DPD pre-submission version Jan 2016. In the Highgate Section, the text on pp 100,101 has been transposed with that on pp102,103. This means that the maps SA 39 & 40 do not match the printed text. I feel sure that you will want to remedy this before Submission!	Correct the maps	It is accepted that the maps for SA39 and SA40 have been swapped over. This is a publishing error, and will be included for modification by the Inspector.
22	RSA103	SA39	No	Not stated	<p><b>Site Allocation SA39</b> (Gonnerman and Goldsmiths Court) in the DPD signally fails to point out that the main component of this site fronting the Archway Road consists of an <i>extant small Public Park, Coleridge Gardens...</i></p> <p>Although the existence of this park space goes unacknowledged, the DPD says: <b><i>“The highest part of the site should be at the corner of Shepherd’s Hill and Archway Rd. Heights should drop off from this point to the allotments and the existing pub to the south.”</i></b></p> <p>It can only be concluded that Council wants to demolish and build over the Public Park. To replace it with a new, tall residential block. This would be in direct conflict with other policies:</p> <p><b>London Plan Policy 7.4 - Local Character</b> – this existing green space makes a strong and very important</p>	The following modifications should be made: <b>Re Diagram on page 100, Site Allocations DPD:</b> a) The red ink boundary on Site Plan for SA 39 on page 100 of the Site Allocations DPD must be redrawn so the boundary of any intended development site clearly	<p><b>It is accepted that the maps for SA39 and SA40 have been swapped over. This is a publishing error, and will be included for modification by the Inspector.</b></p> <p>The proposed amendments regarding height cannot be <b>accepted</b>. Gonnermann’s in particular is a single storey building in a 2/3 storey area, so limiting heights to the existing is not appropriate.</p> <p>The Council believe it is appropriate that the Coleridge Gardens are</p>

				<p>positive contribution to character of this place, marking the commencement of Shepherds Hill, the first break in the brickwork for miles heading north, an open green view of the junction and providing essential pedestrian relief from the traffic, noise, pollution and dangerously narrow pavements of Archway Road.</p> <p><b>London Plan Policy 7.5 – Public Realm –</b> This Plan appears intent on obliterating <b>one of this Road’s scant green assets. The</b> small Park is the only thing that prevents this from becoming just another faceless and dirty London A-road. The Park visually and acoustically softens and moderates what can at peak times be an exceptionally busy and extremely dangerous road junction. It deserves to retain every calming feature and green border it has had the luck to retain (against very slim odds) this far into the 21st Century.</p> <p>What is needed to make the Park even more beneficial for the many gardenless local flat dwellers to enjoy during the <b>road’s regular quiet periods (eg summer weekends and evenings)</b> is its restoration, and reinstatement of the three missing wooden benches.</p> <p>This would help meet London Plan objectives: <b><i>“7.16 The quality of the public realm has a significant influence on quality of life because it affects people’s sense of</i></b></p>	<p>excludes the entirety of the extant Coleridge Gardens and does not include any other open public space (including any paved or asphalted seating areas).</p> <p>b) The boundaries between the remaining freeholds under different ownerships should be clearly demarcated on the plan, so:</p> <p><b>it is possible</b> to distinguish which land is private (separately label the Goldsmith Court and</p>	<p>considered with the developments site to ensure flexibility and to enable a more comprehensive development to take place. DM20 of the proposed Local Plan offers protection for open spaces such as Coleridge Gardens. Similarly, SP13 will need to be accorded with. It is considered that this gives the Garden significant protection in the event of redevelopment.</p> <p>No change</p>
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				<p><i>place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, public and private open spaces, and the buildings that frame those spaces, should contribute to the highest standards of comfort, security and ease of movement possible. This is particularly important in high density development (Policy 3.4). Open spaces include both green and civic spaces, both of which contribute to the provision of a high quality public realm”.</i></p> <p>Policy 7.7 Location and design of tall and large buildings means SA38 is the wrong place to put a new block. Such buildings should <b>“only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building.”</b></p> <p>The tall/large building design implicit within the DPD would obliterate the Park – and the feel and character of this junction, which has surprisingly retained a pleasant and open suburban character. It is sheer luck these few spare square feet of green and tree-lined space have not been allowed to become another struggling shop – or heavily polluted apartment block. (See also Policy 7.14 below).</p> <p><b>London Plan Policy 7.8 Heritage assets and archaeology</b> – The Council Plan has failed to give any reason why it should sweep up and dispose of an existing Public Park – a heritage asset – within</p>	<p>Gonnerman land areas) and which is in public ownership;</p> <p>the document can explain what development is being considered on which area/s of land – where are how many residential units being proposed.</p> <p>c) The text on page 100 should be amended to put beyond doubt that the site excludes Coleridge Gardens. Under the heading <b>“Commentary”</b> add the following end paragraph:</p>	
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				<p>some third-party scheme/s. There is no justification or explanation how this action could serve the public interest.</p> <p><i>D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.</i></p> <p>This requirement is unmet as far as Coleridge Gardens is concerned since, if the Local Plan is not modified, this Public Park will cease to exist. NPPF 132 has bearing given the lack of any justification for its destruction:</p> <p><b><i>“132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”</i></b> Furthermore:</p> <p><b><i>132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.</i></b></p> <p>Policy 7.14 Improving air quality – The site is situated within an AQMA. The Council’s own 2013 Air Quality Progress</p>	<p><b><i>“Coleridge Gardens, the existing Public Park between the Site and the Archway Road, will be retained and restored, with new flowers planted and public benches replaced and its asphalted pathways resurfaced.”</i></b></p> <p>d) The text on page 101 under the heading “Development Guidelines” should be amended to delete the second paragraph in its entirety (since the Park will not be obliterated by an apartment</p>	
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				<p>Report found “<i>Monitoring results continue to show exceedences of the hourly NO2 objective along the A1/ Archway road location.</i>”</p> <p>Use of this site for residential purposes would not “<i>minimise the increased exposure (of its new occupants) to poor air quality</i>” as required by the London Plan. The exact opposite would occur; the <i>use of this site for residential would MAXIMISE the exposure of occupants to poor air quality – with the worst measured results in the entire Borough</i>, found here on Archway Road. Furthermore, redevelopment of the Public Park would deprive the area of precisely the kind of “buffer zone” space that the London Plan advocates to help mitigate the air quality risks endured by present residents and local workers.</p> <p>The proposal conflicts with the Council’s own Strategic Policies as demonstrated by SP 13, “<b>Protecting our open spaces</b>”:  <b>“6.3.3 The Council will protect the borough’s designated and other open spaces as well as other suitable land with the potential to be used as open space. Development will not be permitted on these open spaces, unless it is for limited small scale development ancillary to an existing use on the land and for which there is a demonstrable need.</b>  <i>The Council will only allow development on designated open spaces or sites</i></p>	<p>block, it is redundant).</p> <p>e) The final para under Development Guidelines” on heights to be deleted and the following inserted in its place:</p> <p><b>“The height of any new residential buildings proposed on either the Gonnerman or Goldsmiths Court land identified in the overall site called SA 39 shall not be materially greater than the height of any current building on each site area in order to preserve and protect the</b></p>
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					<i>adjacent to an open space that respects the size, form and use of that open space and does not detract from the overall openness and character of the site, the appearance and historical significance of the setting, or harms the public enjoyment.”</i>	existing character of the Highgate Conservation Area.”	
23	RSA105	SA39	No	Yes	On the map on page 100 the site shown and described as “Gonnermann Antiques and Goldsmith’s Court” and is listed as site SA39.	Correction required	It is accepted that the maps for SA39 and SA40 have been swapped over. This is a publishing error, and will be included for modification by the Inspector.
221	RSA347	SA39	Not stated	Not stated	We are concerned about the inclusion of the wooded area and would support the inclusion of a support for proposals that preserve and enhance the trees at this site in line with policy.	Not specifically stated	The aim of this policy is to link areas of open spaces together, by extending the Parkland Walk through the site, and SA40 through to Highgate Wood.  No change

#### SA40: Former Highgate Rail Station

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
23	RSA106	SA40	No	Yes	On the map on page 102 the site shown and described as “Former Highgate Rail Station” and is listed as site SA40.	Correction required	It is accepted that the maps for SA39 and SA40 have been swapped over. This is a publishing error, and will be included for modification by the Inspector.

56	RSA151	SA40	Not stated	Not stated	The Friends of the Parkland Walk object to a practice that it regards as unsound of having the notation of a housing development site shown outlined in red on the policies map over an area of Metropolitan Open land, Nature Reserve, Green Chain, green corridor and SINC. A similar objection has been made to the Highgate Neighbourhood Plan and the view expressed there and repeated here, is that the developable land should be the site designated and allocated (in this case as SA 40 – in the case of the Neighbourhood Plan, KS5) and that the link referred to should be a different notation (in this case it could be the Green Chain notation to cover the desired link between the walkable part of the Parkland Walk and the connections to the north (in this case the footpath adjacent to Highgate Library).	We have mapped the modifications which would be necessary to make the Local Plan map legally compliant and sound. The consultation response software doesn't allow Friends of the Parkland Walk's map with the suggested revisions to be uploaded. We await instructions on how to send it.	The published red line boundary intentionally includes a section of the Parkland Walk within the site boundary as a key part of the policy seeks to extend the walking route of the Parkland Walk. Not including this section of MOL would not enable sufficient consideration of how the site can come forward comprehensively.  No change
221	RSA346	SA25, SA27, SA28 and SA31  SA23, SA30, SA40 and SA54	Not stated	Not stated	We support a number of proposals, including SA25, SA27, SA28 and SA31 where by a commitment is made in the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINCS.	This commitment, to enhance the adjacent green spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.	<b>It is agreed that a comment regarding how the site impacts on the ecological corridor to the west of site SA23 could be added.</b>  The other sites are considered to have appropriate references.

SA41: Highgate School

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
24	RSA107	SA41	Yes	Yes	Page 104 of the Site Allocations DPD wrongly includes the terrace of cottages in Castle Yard as part of the School's estate.	The red line around Castle Yard on page 104 should be removed.	<b>This information is noted, and it will be removed. Additionally, the map of P104 needs to be "zoomed out" to identify both precincts of Highgate School.</b>
221	RSA348	SA41	Not stated	Not stated	We are concerned about the potential loss of Metropolitan Open Land at High Gate School.	The Site Allocation should include a provision for the future SPD that ensures that the Metropolitan Open Land is protected and enhanced through any proposals for school expansion.	Metropolitan Open Land is already protected through the London Plan, and the Local Plan Strategic Policies.  No change
232	RSA382	SA41 Highgate School	Not stated	Not stated	It is important that where there are any listed buildings whether locally or statutorily defined details of their significance and capability to accommodate change should be described. This is relevant for this site, where there is a mixture of listed buildings and other site allocations e.g. SA42, SA44, etc... In addition it should be noted that the site falls within an area that possibly be a medieval settlement and recorded pre-school chapel.		<b>The Council will add a development guideline setting out the potential archaeological interest of this site.</b>

					We would therefore suggest that the Site Requirements highlight the potential for significant archaeology.		
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#### SA42: Highgate Bowl

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	RSA108	SA 42	No response given	No response given	<p>The Harington Scheme wishes to comment only on the Site Allocations DPD – specifically on SA 42 covering the Highgate Bowl.</p> <p>We are pleased to note that the map now includes the whole of the site occupied by the Harington Scheme within the red line, i.e. the area to be defined as Significant Open Land. In the previous draft the central area where we have our main classroom and office buildings was excluded from the red-lined area. Can you please confirm that this means that you will not allow commercial or residential development on our site; but that you might be ready to grant planning permission for development to expand the existing horticultural/educational use provided such development complied with other planning policies e.g. on heights of buildings?</p> <p>If the SLOL were to be redefined to</p>	Not specifically stated	<p>To clarify, the Plan now protects the non built-up part of the Bowl as SLOL from being developed for buildings.</p> <p>Development outside of the SLOL boundary will be subject to the remainder of the policy, although any development will be required to show how it retains the existing education/ horticulture use.</p> <p>The Walled Garden has been included in the SLOL, while the yards have not, giving them clear separation in planning terms.</p>

					exclude the central area of our site, as in the previous consultation document, we would need to ask for additional protections for the activities of the Harington Scheme. For example, no development should be allowed that would have a detrimental effect on the Harington Scheme. We would also point out – in the light of comments by Savills on the draft Highgate Neighbourhood Plan – that the walled garden which is very much part of our operations is <b>locally listed, was never part of “the yards”</b> , and in our view should be forever preserved from residential or commercial development		No change
26	RSA109	SA42	Not stated	Not stated	<p>Land Uses</p> <p>Aside from identifying the draft Allocation as open space, which is discussed in greater depth below, the emerging policy also supports the principle of some residential development within the boundaries of the allocation, focussed <b>towards Townsend and Duke’s Head yards</b>.</p> <p>Within the previous draft of the SA DPD (February 2015), there was support for residential development along the fringes of the allocation to provide circa 4,500sqm residential in total. To provide more flexibility and ensure that small scale, new residential development can be delivered on fringe location brownfield sites (other than on the two yards), these fringe locations should include the built</p>	On the basis of the comments made above, and in addition to the graphical modifications proposed at <b>Appendix 3</b> , the following modifications are proposed to ensure that the policy is sound and consistent with national, regional and local planning policy.	The Council feels that the policy is appropriate in that it protects both the SLOL use of the horticultural use, and protects the redevelopment of the building which would compromise the horticultural/ education <b>use. The Council’s view</b> is that a development may be possible, but the horticultural/ educational use should be protected, including their need for indoor space during and after the construction.

				<p>up area of the NHSPS site. Accordingly, proposed revisions to the wording of the draft Allocation are proposed below. Flexibility is required within this policy wording in order to maximise the designation of suitable land for housing development in accordance with the FALP's increasing housing target for Haringey and the NPPF's presumption in favour of sustainable development.</p> <p>Significant Local Open Land These representations are in general support of the preservation and protection of the open space character of the Highgate Bowl, however concerns are raised about the designation and boundaries of the proposed Significant Local Open Land within the boundary of draft Allocation SA42. As raised below, SLOL is not one of the open space typologies identified within FALP Table 7.2, nor is an adequate definition provided in any adopted or emerging regional or local policy. There also does not appear to be any evidenced recommendation for the designation of a large part of the Bowl area as SLOL.</p> <p>Within the Preferred Options SA DPD, whilst the part of site that currently accommodates the buildings associated to THS was excluded from the SLOL designation, the walled garden, which is essentially a private garden with built</p>	<p><i>Proposed Site Allocation</i></p> <p><i>Protection of the Highgate Bowl as open space, and improvement of public access to #</i></p> <p><del><i>through</i></del> <i>with limited residential redevelopment of Townsend and Duke's Head yards and at the built up area of The Harington Scheme site, as brownfield sites at fringe locations to the Bowl as identified on the site plan for SA42.</i></p> <p><i>Site Requirements</i></p> <p><i>The buildings facing the High Street, and their</i></p>	<p>It is noted that the SLOL designation has not appeared on the published Policies Map. This is a publishing error, and will be recommended for inclusion as a modification.</p> <p>The SLOL extent will continue to include the Walled Garden, which is contiguous with the remainder of the open space, and is used by the same users.</p> <p>The Council do not feel it is necessary to add specific reference to new residential units being flatted rather than traditional houses. This is a detailed planning matter that will be dealt with upon receipt of a planning application.</p> <p>It is considered that the wording recommended in relation to access to the bowl is appropriate.</p>
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				<p>footprint within it, and the grass verges on the southern side of the access road were included within the SLOL designation.</p> <p>Under the Pre-Submission draft SA DPD, such a boundary distinction is not made, with the text of the policy stating that <b>‘Highgate Bowl itself will be redefined as Significant Local Open Land’</b>. The map within draft Allocation SA42 removes the previous green boundary line that distinguished between the SLOL designation and the fringe areas of the bowl that may be suitable for modest development.</p> <p>The removal of this boundary is inconsistent with the second draft Neighbourhood Plan, which under its policy for Key Site 3 (Highgate Bowl) outlines a clear boundary demarking fringe areas for future development from the wider open land area of the Bowl that is to be protected. It is therefore suggested that the submission version of the SA DPD includes a clear definition of the boundaries of the SLOL and the developable fringe areas, in accordance with the emerging Neighbourhood Plan. As described under our previous representations, the built up area of the NHSPS site should be clearly removed from the SLOL designation.</p> <p>Notwithstanding the lack of definition of what constitutes SLOL, the walled garden (which is not available to the</p>	<p><i>burgage plots should be retained.</i></p> <p><i>Highgate Bowl itself will be redefined as Significant Local Open Land.</i></p> <p><i>Limited redevelopment of the garages and workshops in the two yard areas <del>will be allowed</del> and at the built area of The Harington Scheme site to create a range of house types to include flats and mews-style residential development.</i></p> <p><i>This should not involve the loss of employment floorspace on the site.</i></p> <p><i>Enhanced access to the Bowl will be provided through the arch</i></p>	<p>Height limits have not been included in the publication version of the document. This is a conscious decision by the Council that the heights of new developments will be assessed against the relevant Local Plan policies, including Policy DM6, when detailed proposals are received – enabling the circumstances of each site to be considered.</p> <p>All development will be subject to viability, and so it considered that adding reference to viability considerations into each site allocations would be superfluous.</p>
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				<p>public) and the grass verges do not make the same contribution to the protection of open space as the main area within the Bowl and these should therefore be removed from the proposed designation.</p> <p>The difference in character and function of the built up area, walled garden and verges, in comparison to the wider areas of the NHSPS site within the Bowl area, is emphasised by the fact that in the first version of the draft SA DPD, published in January 2014, did not even include the built up area, walled garden and verges within the boundary of the draft Allocation, which was then known as HG4.</p> <p>On the basis of the comments made above, a revised map is included for draft Allocation SA42 at <b>Appendix 3</b> which indicates the altered boundary for the SLOL designation within the Bowl area, removing the fringe developable areas of the Bowl. No other changes have been made.</p> <p>Access Through the Bowl</p> <p>One of the site requirements set out for draft Allocation SA42 states that “<i>public routes through the various land parcels that make up the Bowl will need to be introduced to unify the open space</i>”. This includes access into the Bowl through the site via Cholmeley Park.</p> <p>Whilst these representations support the general principle of improving pedestrian</p>	<p><i>of Duke’s Head Yard, and through Townsend Yard. Public routes through the various land parcels that make up the Bowl will need to be introduced to unify the open space, <b>subject to the operational requirements of existing landowners and/or occupiers.</b> The site lies within the Highgate Conservation Area and development should preserve or enhance its appearance as per the statutory requirements.</i></p> <p><i>Development Guidelines</i></p>	
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				<p>and cyclist access through the Bowl area, acknowledging the benefits that this could provide to the wider area, the aspirations and operational requirements of THS or another suitable user will need to be taken into account. A permanent pedestrian and cycle through-route might have a significant effect on the character and security of the site for the continuation of the existing or new community use, if it were to run through the site. It is noted that these routes are no longer indicated on the site plan under draft Allocation SA42 and we are supportive of this.</p>	<p><i>Where new development takes place, heights should be subsidiary to those on the High Street, <b>being generally up to 4 storeys following the precedent of “The Studio” site at Duke’s Head Yard.</b></i></p> <p><i>Due to the proximity of public amenity offered by the newly designated open space, development can occupy most of the available space, reflecting a mews-typology <b>and flat-led schemes.</b></i></p> <p><i>The entrances to the yard roads should signal the open space behind, with a visual link</i></p>	
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						<p><i>established where feasible.</i></p> <p><i>New users of the open space will be encouraged, while generally keeping it open for public use.</i></p> <p><i>Part of the site has a Local SINC designation, and this should be protected.</i></p> <p><i>Thames Water should be consulted with regards <b>to the</b> capacity of existing drains to move waste water from the site. Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition of planning</i></p>	
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						<p><i>consents.</i></p> <p><i>In line with policy SP9, if redevelopment results in a net loss of employment floorspace, it will be expected to be re-provided on site, where possible, or a financial compensation will be required as set out in the Planning Obligations SPD, <b>where viable.</b></i></p> <p><i>Studies should be undertaken to understand what potential contamination there is on the yards portion of the site prior to any development taking place.”</i></p>	
233	RSA388	SA42	No	Not Stated	While it would be placing a wholly unreasonable burden on the respondent to expect him to remedy the Council’s		Noted.

					failure to provide an evidence base, a number of broad points can be made about these issues. These lead inexorably to a different conclusion on the appropriate development of the Southwood Nursery site to the SADPD.		
233	RSA389	SA42			<p>The deliverability of the allocation and its SRDGs is thus profoundly in question. All the land is in fragmented private ownership and the deliverability of the <b>allocation's comprehensive land use</b> aspirations will require the use of compulsory purchase powers. The <b>Trust for London's recent study shows</b> Haringey is the most unequal borough in London, with over half of its wards being either very rich or very poor. Northumberland Park, a ward in the east of the Borough, is the most widely deprived ward in London.</p> <p>It is inconceivable that a Council with this spread of disadvantage could legitimately use resources to compulsory purchase private land in Highgate to provide open space in a situation where there is already ample open space locally (as the next section shows) – and impossible to see how the access sought could be achieved in any other way without complete cooperation from landowners, which will be denied.</p>		Noted.
233	RSA390	SA42			The allocation site is identified in HLP as being within the Highgate Conservation Area. <b>This is its only Proposal's Map</b>		Noted, the safeguarding of the heritage asset is included in this policy.

					<p>notation.</p> <p><b>HLP policy SP12 (Conservation)</b> says the Council shall ensure the conservation of the historic significance of Haringey's heritage assets, their setting, and that the wider historic environment should be used as the basis for heritage-led regeneration and as the basis for good design and positive change. Where possible, development should help increase accessibility to the historic environment.</p>		
233	RSA391	SA42			<p>In the SADPD the Council has failed to test its proposals for the allocation against the statutory test for development in Conservation Areas – that the decision on any development proposal affecting the proposed allocation must pay special regard to considering whether it harms (following South Lakeland) the Conservation Area's character or appearance - and the other relevant policy factors identified above – in summary:</p> <ul style="list-style-type: none"> <li>• There is no local or strategic need for public open space on the allocation;</li> <li>• There is no appraisal of the effect of housing development on the allocation on the Conservation Area;</li> <li>• There is policy support for heritage-led regeneration but no appraisal of the way this can be</li> </ul>		<p>The rationale for allocation of this piece of open space is on the basis of the open nature of the Highgate Bowl being the key feature of this part of the Conservation Area.</p>

					<p>achieved;</p> <ul style="list-style-type: none"> <li>• There is policy support for increased accessibility to the historic environment but no appraisal of the way this can realistically be achieved;</li> <li>• There is policy support for restoration of heritage assets in a way that puts them in a suitable viable use but no appraisal of alternative ways this can be done on the allocation;</li> <li>• There is policy support for the establishment and maintenance of sustainable communities and economic viability but no appraisal of the way this applies to the allocation.</li> </ul>		
233	RSA392	SA42			<p><b>NPPF para 158</b> requires each Local Plan to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. There is no published evidence base that supports the proposed allocation.</p> <p>It is a fundamental criticism of the SADPD that it is wholly inconsistent with the guidance in the NPPF. It means that the document is not fit for purpose in this respect. We are certain that, if the Council had undertaken an objective, transparent assessment of the development opportunities on the</p>		<p>There are a number of planning appeals that support the retention of this area as an open space that forms the heart of this part of the Conservation Area. In this regard the Conservation Area Management Plan provides the evidence.</p>

				<p>representation site as required by national guidance, this would have led to a very different vision for it that is set out below.</p> <p>The allocation itself has three elements:</p> <ul style="list-style-type: none"> <li>• the Bowl should be protected open space;</li> <li>• public access to it should be improved;</li> <li>• there should be limited redevelopment of Townsend and Dukes Head Yards.</li> </ul> <p>Its Site Requirements and Development Guidelines (SRDG - it is difficult to understand the difference between them) make twelve identifiable separate points:</p> <ol style="list-style-type: none"> <li>a. buildings facing the High Street and their burgage plots should be retained;</li> <li>b. the Bowl will be redefined as Significant Local Open Land;</li> <li>c. enhanced access to the Bowl through Kings Head and Townsend Yards;</li> <li>d. redevelopment of the garages and workshops in the Yards for 3-4-storey mews-style residential development;</li> <li>e. public routes through the various land parcels that make up the Bowl will need to be introduced to unify the open space;</li> <li>f. development should preserve or enhance the Highgate Conservation Area;</li> <li>g. the entrances to the yard roads should signal the open space hidden behind with a visual link established where</li> </ol>		
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				<p>feasible;</p> <p>h. new users of the open space will be encouraged, while generally keeping it open for public use;</p> <p>i. the Local SINC designation should be protected;</p> <p>j. Thames Water should be consulted on the capacity of existing drains;</p> <p>k. redevelopment that results in loss of employment floorspace will trigger financial compensation;</p> <p>l. contamination studies should be undertaken on development in the yards portion of the site.</p> <p>No evidence base has been produced by the Council to support any of these requirements. Before drawing the conclusion that these were the most appropriate uses for the site, the Council should have at least have thoroughly assessed:</p> <ul style="list-style-type: none"> <li>• Relevant Development Plan policy;</li> <li>• The physical and land use character of the allocation;</li> <li>• The need for additional open space in the area including <b>previous Planning Inspector's</b> conclusions on whether it should be identified as SLOL;</li> <li>• The need for and feasibility of additional public access to the area;</li> <li>• The likelihood of achieving its</li> </ul>		
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					<p>aspirations in the light of current ownerships and particularly if change of use from commercial will attract a financial penalty.</p> <ul style="list-style-type: none"> <li>• The feasibility of providing the access routes shown;</li> <li>• The relationship of its proposals to the conservation character of Highgate Village;</li> </ul>		
233	RSA393	SA42			<p>The <b>SRDG e</b> aspiration for public access routes through is linked to the <b>SRDG b</b> requirement for the site to be SLOL and <b>SRGD h</b> that new users should be found for the SLOL.</p> <p>The plans that shows the Council's aspirations for Allocation Site SA44 shows a wavering line crossing the site from the access to the Harington Project in Chomeley Park to the east through the SINC, the garden centre site and the Highgate School grounds to Kingsley Place in the west. New access are shown running to it from the south through Townsend and Dukes Head Yards.</p> <p>It is most surprising that the Council does not claim to have consulted the Metropolitan Police about the proposed footpaths. They are not overlooked and so will not be self-policing. Footpaths of this type are routinely objected to because they are escape routes for criminals and an</p>		<p>The allocation sets parameters for what any redevelopment of the yards should achieve (improved pedestrian access to the bowl). It does not prescribe that particular parts of it will come forward.</p>

				<p>obvious focus for anti-social activity that are impossible to police efficiently.</p> <p>The purpose, deliverability and safety of these footpaths is highly questionable in this area that already has ample open space criss-crossed by footpaths – some of the best dog walks in London!</p>		
233	RSA394	SA42		<p>The SA claims the Bowl is part of the London Green Grid. It explains in <b>para 14.14.2</b> that <i>'a solution</i> (it does not say to what) <i>is to apply a 'Green Grid' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. A DM Policy is set to be adopted that will establish the overall strategy, and a number of site allocations will help to ensure that it is implemented. In Haringey Heartlands it is notable that there is a strategic aim to create a network of 'pocket open spaces'. Across the borough, strategically important features within the Green Grid include Alexandra Palace Park (given its proximity to Wood Green), various areas of Metropolitan Open Land (MOL) and SINCS (where they are accessible). Another priority for the east of the borough is to open-up access to the Lee Valley Regional Park.</i></p>		<p>Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL. The green grid map shows current open space designations and the development management policies document states that new open spaces will be expected to link into the green grid.</p>

				<p>DMP Map 4.3 shows Haringey's Green Grid. It does not show the Bowl as a Green Grid site. Plainly the SA for this site and the proposed allocation in the SADPD has been prepared on an entirely false basis.</p> <p>SA para 14.14.3 shows the extent of the error that it has fallen into - <i>the following sites are set to contribute to the Green Grid, or otherwise ensure easily accessible open space -... SA 45: Highgate Bowl – The aim is to achieve protection of the Highgate Bowl as open space, and improvement of public access through limited redevelopment of Townsend and Duke's Head yards. The entrances to the yard roads should signal the open space hidden behind, encouraging new users of the open space.</i></p> <p>The SA properly identifies that Green Grid is a strategic policy – but says its identification of the Bowl as part of the Green Grid is based on draft DMP policy that was only published at the same time SADPD. It says the policy <b>'is set to be adopted'</b> but it is clear from the Plan above that the draft DMP does not include the Bowl in the Green Grid.</p> <p>Obviously the SA's indication that the draft DMP policy <b>'is set to be adopted'</b> unacceptably pre-judges the result of its</p>		
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					public examination and shows clear pre-determination, not the objective assessment that will be sought by the Examining Inspector.		
233	RSA395	SA42			<p>In any event, the SA does not apply the Green Grid concept appropriately. <b>Para 2.27 of the Haringey Open Space and Biodiversity Study</b> confirms the Green Grid is a strategic policy - <i>The All London Green Grid (ALGG) is a London-wide framework for managing London's green spaces and natural assets, and has been adopted as Supplementary Planning Guidance (SPG) supporting the London Plan. The ALGG also highlights areas of London where there are strategic gaps in provision of open space. The ALGG divides London into 12 Green Grid Areas, and most of Haringey falls within Green Grid Area 1 'Lee Valley and Finchley Ridge'.</i></p> <p>The ALGG is indeed a strategic policy and the GLA provides strategic guidance on this in its <b>Green Infrastructure and Open Environments: the All London Green Grid SPG</b> (March 2012). This identifies the Green Grid in this area in <b>para 5.16</b> <i>The Parkland Walk Link runs along a disused railway line connecting Finsbury Park to Highgate Wood and Queen's Wood and then onto Alexandra Park;</i> and <b>para 5.22</b> <i>The Hampstead Heath Ridge Link connects the Heath to Alexandra Park in the north via Highgate</i></p>		It is considered that new additions to the Green Grid will always be welcomed, and do not need to be specifically linked to over/under provision.

				<p><i>Wood and in part follows the northern arm of the Parkland Walk through Muswell Hill. Parts of the route pass through residential areas and alongside a golf course.</i></p> <p>Its <b>para 5.24</b> identifies the only strategic Green Grid opportunity in this area: <i>Improve the facilities of, and connections between, Alexandra Park, Highgate Wood, and Queens Wood along the Parkland Walk Link, in order to maximise their potential as a visitor destination of rich landscape character offering fantastic views across London.</i></p> <p><b>There is no support in the GLA's SPG for the proposition that the Bowl should be identified as SLOL within the strategic ALGG.</b></p>		
233	RSA396	SA42		<p><b>CONSERVATION CHARACTER OF HIGHGATE</b></p> <p><b>SRDG a</b> seeks to preserve the character of building fronting the High Street and their burgage plots, <b>SRDG d</b> seeks redevelopment for new of up to four storeys and <b>SRDG f</b> seeks to apply the statutory test to new development.</p> <p>The Inspector in the 2014 appeal on the garden centre site (<b>Annexe 2</b>) described the relationship of the Bowl to the High Street and the Conservation Area generally. <i>The historic core of the hilltop</i></p>		It is considered that the preservation of the area as SLOL guarantees the retention of the openness of the area in the future.

				<p><i>Highgate village includes the nearby buildings in the High Street. They are mainly characterised by C17 to C19 small scale terraced houses with traditional shop fronts, tight frontage development and long narrow plots. The mix of earlier buildings and fine C20 buildings contribute to the architectural diversity in the Conservation Area.</i></p> <p><i>The Highgate Bowl (the Bowl) includes an arc of privately owned, open backland lying roughly north of the High Street which falls steeply down from the ridge. It has survived as relatively undeveloped land for reasons including its former use as fairly low value service land, its hilly topography, and its restricted access. It is one of 2 major open spaces which contrast with the fine grained development of the village and its semi-rural character maintains the connection to its agricultural past. Although the Bowl is mainly characterised by its openness, there are few nearby public views into it. Even so, there are many views over and through it, from the buildings and spaces around and within it. The contrast between the Bowl and the development in the High Street is important to the appreciation of Highgate village as a historic hilltop settlement. Its general openness contrasts with the adjoining townscape, and at night, its relative darkness contrasts with its well-lit</i></p>	
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				<p><i>surroundings. The Bowl is significant as a remnant of the once rural village.</i></p> <p>There had been a nursery on the site for <b>more than 100 years and so the site's significance as part of the 'once rural village'</b> must be seen in this context. Before and after the Second World War there were two houses on the site and the extensive area of glasshouses shown on the 1937 OS map below. Townsend Yard is visible entering the nursery and running to a house now demolished about where the glasshouse visible on the aerial photo above now stands as <b>well as Whistler's Cottage that is still in place</b> on the southern boundary of the site currently used as offices. In this context the following points the Council might have relevantly identified the following points as relevant to its planned future:</p> <ul style="list-style-type: none"> <li>• There is no intention of disposing of the site or allowing public access across it.</li> <li>• About 10% of the site is occupied by buildings and a further 54% is hard standing used for open sales and storage and car parking;</li> <li>• <b>The site's commercial use is unsightly;</b></li> <li>• <b>The landscape contractor's business is in operation and generates considerable activity;</b></li> </ul>		
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				<ul style="list-style-type: none"> <li>• There is no reason why the garden centre use should not resume;</li> <li>• There is no public access to the site at present;</li> <li>• There are no access points to the site other than Townsend Yard and from the yard to the west of it;</li> <li>• General public access would inevitably be inconsistent with continued commercial use;</li> <li>• Commercial use of the site is historic and inconsistent with the poor access along Townsend Yard;</li> </ul> <p>In view of the historic context and its present semi-developed nature, the <b>Inspector’s analysis does not preclude</b> new development in the Bowl as long as this does not harm the character and appearance of the Conservation Area – principally by not reducing openness and retaining tree cover.</p>		
233	RSA397	SA42		<p>The Sustainability Assessment (SA) para 10.2.5 explains the systematic process used to evaluate sites involved defining a set of ‘rules’ that control the uses that might be suitable at each of the sites considered:</p> <ul style="list-style-type: none"> <li>• <i>A site is potentially suitable for residential development unless it is a Designated Employment Area (DEA: LSIS/EL/SIL),A</i></li> </ul>		There is a particular implication on this site that the Bowl forms an important part of the character of this part of the Conservation Area, and is being protected on that basis.

				<ul style="list-style-type: none"> <li>• <i>A site is potentially suitable for employment development where it is a DEA, in a town centre, or where PTAL is good (4 or above),</i></li> <li>• <i>A site is potentially suitable for town centre uses if it is within a town centre,</i></li> <li>• <i>A site is potentially suitable for community infrastructure uses where it has a high PTAL and/or is within a town centre. It may also be suitable for large scale infrastructure based on the size and quantum of development on the site. This will be explored at a later stage, incorporating the findings of the emerging Infrastructure Delivery Plan,</i></li> <li>• <i>A site is potentially suitable for open space where there is an identified deficiency.</i></li> </ul> <p>SA Table 10.1 identifies the Bowl as potentially suitable for housing and open space and unsuitable for employment, town centre and questionable for community infrastructure use. <b>Map 4.1 of the draft DMP</b> shows the Bowl is not in an area of open space deficiency and <b>Map 4.2</b> confirms it is not in a ward with an open space deficiency.</p> <p>As there is no identified deficiency of open space in Highgate, it is evident that SADPD's proposed allocation of the</p>		
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					Bowl as SLOL is inconsistent with the <b>Council's own decision-making</b> criteria.		
233	RSA398	SA42			<p>SADPD is also deficient because it fails to adequately respond the requirement identified in <b>National Planning Guidance paragraph: 006 Reference ID: 12-006-20140306</b> that:</p> <p><i>The Local Plan may also require a Habitats Regulation Assessment, as set out in the Conservation of Habitats and Species Regulations 2010 (as amended) if it is considered likely to have significant effects on European habitats or species, located in the local planning authority's area or in its vicinity.</i></p> <p>About 25% of the Allocation is a SINC that will be crossed by a new path and so the requirement for a Habitats Regulation Assessment must be screened for. We are unable to find any screening that has taken place.</p>		A habitats regulations assessment has been prepared as part of this planning process.
233	RSA399	SA42			<p><b>NPPF para 111</b> sets out the national policy for such land: <i>Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.</i></p> <p>The respondent's Southwood Nursery site is an illustration of the type of site</p>		Noted. It is considered that the Policy makes provision for an appropriate level of development, while protecting the heritage and biodiversity value of Highgate Bowl.

					where development could be inhibited by the policy as drafted. It has a commercial use, is largely open (about 10% of its site covered in buildings and more than 50% by hard standing), it has no public access, and it is virtually invisible in public views. A policy that restricts its development in principle would be inconsistent with the NPPF.	
233	RSA400	SA42			The Council has accepted for almost 20 years that the Bowl has no strategic or local open space significance. Its evidence to the 2005 RUDP inquiry that explains the reasons for this is at <b>Annexe 1</b> .	Noted.
233	RSA401	SA42			It is not surprising in this context that HLP does not say anywhere that the site should be treated as Local Green Space or its equivalent. As <b>NPPF para 76</b> indicates, this should only be designated when a Plan is prepared or reviewed. The Local Plan was adopted in March 2013 (two years after the NPPF issued in draft) and so there was ample time to include a policy to this effect that would have a spatial expression on the Proposals Map. <b>London Plan Policy 7.9</b> is part of the Development Plan for this area. It says the significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at	The Site Allocations forms part of the Local Plan, and is a suitable vehicle for amending open land designations.

					risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality. <b>NPPF paras 132 and 134</b> have similar requirements.		
233	RSA402	SA42			Despite Map 4.1 of the draft DMP (that was published at the same time as SADPD) the SA fails to consider whether there is a shortage of open space in Highgate. As there is no shortage, its decision to make the Bowl SLOL shows <b>a disregard of the SA's own decision-making criteria</b> . Its failure to identify its potential for residential development is similarly inconsistent with its criteria. It is also inconsistent with the HLP Proposals Map that does not show the Bowl as SLOL.		Noted, the Council does not claim there is a significant deficiency of open space here.
233	RSA403	SA42			Its last full use was as a Garden Centre (that closed in 2014 but the planning use has not been abandoned) and a <b>landscaping contractor's business</b> . Both of these are commercial uses that would be financially penalised under <b>Site Requirement and Development Guideline (SRDG) k</b> (employment floor space loss trigger financial compensation) if their use changed.  In March 2014 the Council refused a community nomination to include it in the <b>Council's list of Assets of Community Value</b> because the land did not		While the Harington scheme cannot be protected by name, a presumption that any development will retain, and where possible enhance the site for horticultural/education use.

				<p>constituted land of community value for the purposes of Section 88 - access to it was only possible when the Garden Centre was open and not otherwise and the main use of the land was retail and so its actual use was in fact an ancillary use (reliant on the Garden Centre being open and ancillary to it) that did not meet the criteria for nomination.</p> <p>There has never been public access to <b>the landscape contractor's part of the</b> site. The Garden Centre had a shop but no coffee shop and so was not a facility where customers lingered socially. Public access was restricted to commercial activities and its gates were locked at nights. They are now locked day and night.</p> <p>The Garden Centre had 30-40 unmarked parking spaces and large open storage areas serviced by vans, small lorries and large articulated lorries through the narrow and tortuous Townsend Yard. The car park and open storage area are mainly in the eastern part of the site adjoining Chomeley Crescent and are still used as storage by the landscape contractor.</p> <p>Other than in the circumstances outlined below, there is no intention of facilitating public access to the land or disposing of</p>		
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					it and so it is unavailable for public use sought by <b>SRDG e and h</b> . (public routes and new users will be encouraged)		
233	RSA404	SA42			The remainder of the allocation is also in private ownership with a disparate land use character and so its use is unlikely to facilitate the <b>SRDG h</b> (new users will be encouraged) aspiration. There is no access to the general public and it is remarkably inconspicuous in public views – only its boundary planting can be glimpsed from Chomeley Crescent to north, Kingsley Place to the west and at the end of Townsend Yard to the south. It is lost in long views against the wooded skyline of the Hampstead/Highgate Ridge.		Noted.
233	RSA405	SA42			Turning to the wider area, including the <b>subdivided respondent's site six distinct</b> areas of use can easily be identified on the allocation.  To the east is the Harington Project that provides horticultural and other training for young adults with learning disabilities and difficulties. Its character is of allotments and buildings. The special character of the users of the facility means that it is unlikely to encourage public access as sought by <b>SRDG e and h</b> (public routes and new users will be encouraged).  The respondent's site is separated from the Harington Project by the area of		While the Harington scheme cannot be protected by name, a presumption that any development will retain, and where possible enhance the site for horticultural/education use.

				<p>dense self-sown woodland visible on the aerial photo. The woodland is a privately-owned SINC. No screening appears to have been carried of the significance of the species it contains and as a result it is impossible to say whether the access through it sought by <b>SRDG e and h</b> is compatible with <b>SRDG i</b> (SINC be protected).</p> <p><b>To the south of the respondent's site</b> the allocation is the area of unkempt yards and garages in Townsend and Kings Head Yard behind the historic buildings in Highgate High Street. The <b>respondent's site is separated from this area</b> by a wall and dense vegetation. <b>SRDG c</b> requires the entrance through these yards to be enhanced, <b>SRDG d</b> that they should be redeveloped as mews houses, <b>SRDG g</b> that they should signal the open space behind but <b>SRDG k</b> says that change of their employment use will trigger a financial penalty.</p> <p>There can be no certainty they will come forward as the allocation requires in this context – why should the owners of this property undertake development that they will be penalised for?</p> <p><b>To the southwest of the respondent's site</b> are gardens containing two swimming pools behind houses in Southwood Lane and to the west is the</p>		
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				<p>Highgate School former Parade Ground and gymnasium building that have been part of the school grounds for at least a century and separate it from the post-war housing at Kingsley Place. It is hard to conceive that either of these will be made available for the private routes sought by <b>SRDG e</b> or for the new users of the Bowl sought by <b>SRDG h</b>.</p> <p>It is clear from this that there is no visual or functional relationship between the <b>respondent's site and the other areas of the allocation</b> – the woodland separates it from the Harington Project, the wall and dense woodland from the yards and gardens and a dense tree-line and embankment from the former Parade Ground and the gardens.</p>		
233	RSA406	SA42		<p>The proposed SLOL designation can only rely upon adopted HLPSP policy, the relevant <b>Policy SP13</b> of which says: <i>All new development shall...seek to secure opportunities for additional publically accessible open space especially in those identified areas of Open Space deficiency ... as set out in the Council's Open Space and Standards SPD.</i></p> <p>The policy recognises that new open space provision should be linked to development and principally applied where there is an open space deficiency - which (as shown above) does not apply in the area of the Bowl. The proposed</p>		<p>Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL.</p>

					SLOL designation is inconsistent with the adopted HLPSP as well as the emerging DMP.		
233	RSA407	SA42			<p><b>As shown below, the Bowl's function has already been considered by the Inspector at the 1998 UDP Inquiry who concluded it neither had the necessary features to be MOL or a SLOL. The Council fully accepted these conclusions and its evidence to the 2005 RUDP Inquiry refuted local claims that the site should be SLOL.</b></p> <p><b>The SADPD and SA's reliance on the ALGG concept and draft DMP policy is thus wholly misplaced. Its advocacy of designation as SLOL is wholly inconsistent with its position to date. It is evident that Council's decision that the Bowl should be SLOL is unsound because it is the result of flawed and inconsistent analysis.</b></p>		Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL.
233	RSA408	SA42			There is no policy in the RUDP 2006 or the Haringey Local Plan (HLP) 2013 that unequivocally constrains development in the Bowl to particular uses. The proposal that the site should be a SLOL is inconsistent with the Development Plan.		Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL.
233	RSA409	SA42			<p><b>TOWARDS AN EVIDENCE BASE FOR THE NEED FOR OPEN SPACE AND THE PROPOSED SLOL DESIGNATION</b></p> <p>This area has an exceptional quantity of public open space for London (the CACA calls it a wealth of open space and green surroundings). Within about a kilometre</p>		Due to its importance to the Conservation Area, it is considered that the site is protected as SLOL.

				<p>of the appeal site there is access to about 400ha of major open space including ancient woodland and open heath as well as more conventional urban open space. The entrance to Waterlow Park is about 100m from Townsend Yard.</p> <p>The allocation is not in an area of Local Open Space Deficiency and none of the reasons for refusal in the recent appeal on the site (<b>Annexe 2</b>) identifies a need to place the site in public open space use.</p> <p>The Council sought in the draft Haringey UDP 1998 to designate the Bowl as MOL. The UDP Inspector concluded it was not MOL and was also asked to consider whether it should be designated Significant Local Open Land (SLOL).</p> <p>On this he concluded that it was clearly not a public open space as access to it is extremely limited to places such as the private garden centre and private school and it does not meet any local recreational needs and has no recognised nature conservation value. As its value was said to come almost entirely from its relationship to the historic Highgate Village, this specific value was more appropriately protected by relevant policies dealing with Highgate village as</p>	
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				<p>a conservation area than policies designed to protect open space.</p> <p>It seemed wrong to the Inspector to try to force open space policies on a piece of land, about half of which comprises an artificially raised tarmac parade ground, a garden centre with substantial areas of hard surfaces and structures and rear gardens. He concluded it was not SLOL. Nothing has changed to justify a different conclusion.</p> <p>Even though there has been a long history of attempts to secure residential development on the site, there is no policy in the UDP 2006 or the Local Plan 2013 that unequivocally prevents this. Nor is there any statement in the CACA 2013 that is unequivocally hostile to residential development on the site; The Council has accepted for almost 20 years that the Bowl should not be SLOL as spelt out in its evidence to the 2005 RUDP inquiry (<b>Annexe 1</b>).</p> <p><b>Plainly designating the area as SLOL now would be fundamentally inconsistent with the Council's position over the past 20 years and would be wholly unreasonable. It follows that SRDG b that seeks that the Bowl should be a SLOL requires the most closely argued justification – but justification is wholly lacking in</b></p>		
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					SADPD and its SA criteria preclude this.		
233	RSA410	SA42			<p>This section first describes the key features of the respondent's land and moves on to put this in the context of the allocation generally.</p> <p>Southwood Nursery is an area of 0.9ha north of Highgate High Street in the western part of the 3.9ha Allocation Site SA44 in the Highgate Conservation Area.</p> <p>The CACA says it <i>has ... a notable tree cover around its boundaries and in clusters within the site. This screens the sheds and other structures within the site. Much of the site also contains raised beds to display plants which also reduce the amount of ground covered by hard standing as conventionally understood.</i></p> <p><i>This is an important factor in the contribution of the Nursery site to the Bowl as a whole. The largest building now present is the greenhouse, and although the development covers a significant amount of the site, it is not sufficiently dominant or visually intrusive to undermine the contribution the site makes to the apparent open tree-covered character of the Bowl.</i></p>		Noted.
233	RSA411	SA42			<b>AN ALTERNATIVE VISION FOR THE SOUTHWOOD NUSERY SITE CONSISTENT WITH THE EMERGING EVIDENCE BASE</b>		The site is protected as SLOL due to its importance to the conservation area.

				<p>As far as policy is concerned, the points identified above are relevant:</p> <ul style="list-style-type: none"> <li>• Policy support for heritage-led regeneration;</li> <li>• Policy support for increased accessibility to the historic environment;</li> <li>• Policy support for restoration of heritage assets in a way that puts them in a suitable viable use;</li> <li>• Policy support for the establishment and maintenance of sustainable communities and economic viability.</li> </ul> <p>As far as the criteria in the SA are concerned, this offers no support for a SLOL designation and considerable support for a housing allocation. In this context (as well as the lack of any identified funds to undertake the extensive acquisition and construction work the proposals entail) the proposals in the SADPD are plainly pie in the sky.</p> <p>Only allowing carefully controlled new residential development will secure a remedy for the manifest disadvantages of the use of the Southwood Nursery site at present and secure the public access sought by the Council.</p> <p>We object that the following has not been included in SADPD as a development brief for the Southwood</p>		
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					<p>Nursery site.</p> <ul style="list-style-type: none"> <li>• An area about 30m wide along the eastern boundary of the site running adjacent to the SINC from the Townsend Yard gate to the rear of the Chomeley Road houses shall be made available for public use;</li> <li>• A public access route along the north boundary of the site shall be designated between the SINC and the Highgate School Parade Ground if supported by the Metropolitan Police;</li> <li>• No more than three houses shall be permitted on the remainder of the site;</li> <li>• The houses shall be accessed from Townsend Yard;</li> <li>• One house shall be on the site of <b>Whistler's Cottage</b> and the other two on the lower western part of the site where they will not impact the setting the High Street;</li> <li>• Their total footprint shall not exceed the footprint of the existing buildings on the site;</li> <li>• Their scale, materials and height shall ensure they are visually subservient to Highgate High Street and the wider conservation area;</li> <li>• They must respect the local built form and vistas leading into the site;</li> </ul>	
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				<ul style="list-style-type: none"> <li>• The existing tree cover on the site shall be maintained and enhanced;</li> <li>• The proposed development shall protect the local SINC designation and wherever possible enhance the quality of the local landscape and habitats;</li> <li>• New development shall mitigate against any flood risk posed by local drainage issues;</li> <li>• Its illumination shall be less than the illumination that exists for the garden centre and the landscape contractor at present.</li> </ul> <p>This will secure all the Development Plan policy objectives set out above – it will create heritage-led regeneration; will increase public accessibility to the historic environment and it will support restoration of heritage assets in a way that puts them in a suitable viable use. The respondent would be very glad to discuss them with the Council and seeks a meeting to do so.</p>		
233	RSA412	SA42		<p>The SADPD is unsound on these measures. It does not:</p> <ul style="list-style-type: none"> <li>• contain an objective assessment of development and infrastructure requirements that supports identification of the Highgate Bowl as a SLOL;</li> <li>• evaluate its strategy in this respect against reasonable</li> </ul>		<p>Noted. The next stage of consultation (Regulation 19) will offer an opportunity to comment on the soundness of the plan. Following this, an independent Inspector will test the soundness of the plan.</p>

					<p>alternatives based on proportional evidence;</p> <ul style="list-style-type: none"> <li>consider whether its proposals are deliverable.</li> </ul>	
233	RSA413	SA42,			<p>We object that the draft SADPD would plainly fail the test of soundness that will be applied by the independent Inspector in the following respects:</p> <p><i>a.</i> There is no SEA or Habitats Assessment appraisal;</p> <p><i>b.</i> There is no evidence base <b>supporting the SADPD's conclusions</b>;</p> <p><i>c.</i> There is no thorough appraisal of the potential uses of the allocations SADPD identifies, particularly in respect of the decision to make the Bowl SLOL;</p> <p><i>d.</i> Its allocation of the Bowl as SLOL is <b>inconsistent with the Council's</b> published criteria and adopted policy;</p> <p><i>e.</i> It does not take into account the fact that there is no open space deficiency in the area;</p> <p><i>f.</i> The site is not shown as part of the <b>ALGG on the DMP's plan and so use</b> of the Green Grid policy to justify allocation of the Bowl as SLOL is entirely misplaced.</p> <p><i>g.</i> The issue of whether the site has a strategic or significant open space function was disposed of many years ago. Nothing has changed that would justify a different view being taken now;</p> <p><i>h.</i> Its failure to consider whether it</p>	<p>Noted. The next stage of consultation (Regulation 19) will offer an opportunity to comment on the soundness of the plan. Following this, an independent Inspector will test the soundness of the plan.</p>

					<p>should be a housing allocation is similarly inconsistent with the <b>Council's published criteria</b>;</p> <p><i>i.</i> It does not consider whether its proposals for the allocation are deliverable and so cannot be certain they are realistic;</p> <p><i>j.</i> It fails to align with the HLP policy SP13 and the Proposals Map, which do not identify a SLOL designation on the Bowl.</p> <p>We expand these objections below, where we conclude with a more practical <b>proposal for the respondent's element of the allocation</b>. This fulfils the reasonable planning requirements identified in our assessment of the relevant evidence base.</p>		
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#### SA43: Summersby Road

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RSA101	SA43	No	Not stated	<p>SA43 is adjacent to Queens Wood MOL where the existing development at SA43 also allows outstanding historic open views both towards and from the Queens wood MOL.</p> <p>Inadequately specified constraints in the DPD will foster development adversely impacting the openness of the MOL and</p>	<p>Delete the fourth paragraph on page 109 under the "Site Requirements" heading and insert the following paragraphs instead:</p> <p><b><i>"The site is adjacent to Queens wood</i></b></p>	<p>Neither the NPPF or Policy 7.17 address development adjacent to Green Belt/MOL nor a requirement therein to preserve its openness. By inference, such</p>

				<p>the existing character of the Conservation Area.</p> <p>Queens wood is:</p> <ul style="list-style-type: none"> <li>• known to have been present continuously since 1600</li> <li>• likely to have been present since prehistoric times</li> <li>• the most centrally placed ancient woodland in London (<i>Bevan 1998</i>)</li> </ul> <p><i>London Plan Policy 7.17 - Metropolitan Open Land</i></p> <p><b><i>“A The Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL. AND: Planning decisions</i></b></p> <p><b><i>B The strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt.”</i></b></p> <p>Both sites provide important views towards, and out from, the wooded MOL. This openness is integral to the area’s character - a key aspect of the heritage asset to be preserved.</p> <p>The view from above SA 43 on the Muswell Hill Road provides a far-reaching panorama over Queen’s wood</p>	<p><i>designated Metropolitan Open Land (MOL). To meet London Plan requirements and SP12/13 any development proposed must ensure the existing level of openness of the Queens wood MOL is maintained, with no loss of existing views from and to Muswell Hill Road. No buildings will be permitted directly fronting Muswell Hill Road. No buildings will be permitted that protrude above the level of existing buildings or that reduce or impair existing views of the MOL from Muswell Hill Road, Summersby Road and South Close. New building heights will preferably be lower to enhance the Conservation Area. New buildings on the</i></p>	<p>consideration is not consistent with the purpose of MOL.</p> <p>It is not considered that the views from Muswell Hill Rd, as they are at present across the site, are sufficiently valuable to protect, and indeed that redevelopment on this site could be of benefit to the character of the area.</p> <p>Height limits in the Site Allocations document have been removed in favour of a design-led approach as set out in Policy DM1 and the policy criteria of Policy DM6 of the DMDPD. This, it is hoped, will give greater ability to determine applications based upon the site-specific issues on each site.</p>
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				<p>and beyond to Epping Forest and the Essex hills. The present view only survives because the whole of the existing Builders Merchants was constructed on the slope beneath Muswell Hill Road street level. Existing buildings are largely below ground level as far as public views and landscaping are concerned. It is of immeasurable benefit to the conservation area that there are no buildings on this site fronting Muswell Hill Road at street level.</p> <p>The 2015 Draft DPD was couched in terms of “limiting” development fronting Muswell Hill Road to four stories. This would still annihilate the open views. It talked in terms of allowing seven storey blocks here without regard to the local context/impact.</p> <p>The present DPD now offers no intelligible constraints to insensitive redevelopment of SA43. Eg  <b>“The impact of the development on the Queen’s Wood should be minimised”</b>  <i>And:</i>  <b>“It is considered that higher buildings would be more appropriate at the east and south ends of the site.”</b>  “Higher” than what? How “minimised”?  The Local Plan should preserve the openness of the MOL and the fine views which have remained unspoilt for hundreds of years. This is a key part of what makes the area worth conserving.</p>	<p><i>site shall occupy no greater overall area in total than the site buildings removed. Remaining unbuilt site space shall be allocated to garden/ amenity space for occupants’ use and to preserve the openness of the MOL. Development at this Site will be car-free to help meet sustainability objectives.”</i></p>	<p>The indicative capacities included in the appendix to the site are modelled on the site size and public transport access level. The actual number of units that can be delivered on the site will be determined through a design-led approach.</p> <p>The suggested replacement ‘site requirements’ are considered onerous, especially as the current use of the site is as a building merchants, with limited buildings on site of very modest heights – lower even than the surrounding buildings.</p> <p>No change</p>
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				<p><i>NPPF 132</i>  <b><i>“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.”</i></b></p> <p><i>And:</i>  <i>London Plan Policy 7.8</i>  <b><i>“Heritage assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.”</i></b></p> <p>The Council says in SP12:  <b><i>“6.2.19 The Council will seek to protect locally important views that contribute to the interest and character of the borough. These may include:</i></b>  <b><i>•Views of and from large parks and open spaces.</i></b>  <b><i>•Views into, within and from Conservation Areas”</i></b></p> <p>Specific measures should be taken in the DPD to protect these views.</p> <p><b>How many units?</b>  The approved plan for SA45 allowed over 80 new residential units on a 0.5 Ha site. SA38 is almost twice this size. The Local Plan gives an indicative development capacity of only 72 units. SA 45 is virtually four times the size of SA 45: it</p>	
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				<p>has an indicative capacity of only 45 units. Are these definite limits or not? If the DPD has not set definite limits to size, scale (or described development form) these “indicative” capacity figures will be subject to pressure. As there are no maximum site heights, why would approvals not be sought for six, seven or more-storey blocks? (As was seen with SA45).</p> <p>The 2015 Highgate Urban Character Study (“Evidence Base”) does not set “maximum building heights” for these sites to correspond with the existing site heights.</p> <p>If new development was proportional with the level permitted at SA45, the result would be around 165 units at SA38 and 320 units at SA43.</p> <p>The addition of 500 new homes to the area would have significant new resource impacts, from education to health to road safety. (Both SA38 and SA43 are located on busy main roads close to common junctions that jam up routinely; SA 38 is located on the most polluted road in Haringey.</p> <p>Crashmap.co.uk shows that the sites - particularly SA38 - are located at accident black spots.</p> <p>The future of these sites needs fuller explanation and planning.</p> <p>NPPF Guidance - Local Plans - Preparing a Local Plan (Paragraph: 006) says:</p> <p><b>“Where sites are proposed for</b></p>		
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					<p><i>allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)”</i></p> <p>The required information re nature and scale is missing.</p>		
30	RSA113	Site Allocations DPD: SA 43: Summersby RD/ Chapter 02: Para beginning at 2.123 and seq: Page 108 - 109	No	No response given	<p>I would question the soundness of the plan in relation to the requirement for a proper assessment of the site as it is now defined in the Site Allocation DPD pre-submission version 2016 following changes as a result of the previous consultation, and how this relates to the stated site requirements and development guidelines on page 109. Firstly, I note that although the development area is now smaller, there has been no change to the hectare size of the area, which is still 1.7 hectares. If the previous information was correct, the size should now be 0.50 hectares as it was on the first 2013/14 map. This has significance in relation to how to the figure for the density of units that is considered appropriate for the size of the site is assessed. Secondly, in respect of the development that would be allowed on the site, the flats on Summersby Road are not afforded equivalent protection to that afforded the homes on Muswell Hill Road. As regards to the need to consider the amenity of neighbouring properties, the only neighbouring properties</p>	<p>In the last section I set out some alternatives as it made more sense to do it there but as your form asks for it again in this section I will repeat them. 1. Alteration to include the correct size in hectares of the area of the development site. 2. Proposed Alterations to site requirements and guidelines as follows:- a) This is what SA43 <b>states now: “The site</b> slopes significantly from west (high) to east (low). It is considered that higher buildings would be more appropriate at the east and south ends of the site.</p>	<p>The size of the site will be updated in the document.</p> <p>It is considered appropriate that the residential properties on Summersby Rd are mentioned in the same comment as Muswell Hill Rd properties.</p> <p>Regarding light and “good neighbour” building, it is considered that all development will be appraised for these issues under policy DM1. This applies to all development in the borough.</p>

				<p>mentioned are specified as 28-36 Muswell Hill Rd, while the Summersby Road flats are excluded. To apply criteria to some neighboring properties but not to others, is not justified and does not fulfill the duty of the Local Plan to contain objectively set requirements. It could not be described as a sound plan if the effects of any development on neighbours are not given either appropriate or equal treatment. - This is what SA43 states now: “The site slopes significantly from west (high) to east (low). It is considered that higher buildings would be more appropriate at the east and south ends of the site. Development adjoining the properties at 28-36 Muswell Hill Rd should be designed with regard to the amenity of neighbouring properties”. - I suggest that a more reasonable and appropriate alternative last sentence would be to state: “Development adjoining the properties at 28-36 Muswell Hill Rd and 33–44 Summersby Road, and across the narrow access road from the properties at 1 -33 Summersby Road, should be designed with regard to the amenity of these neighbouring properties”. Thirdly, a proper assessment of the site as it is in the Site Allocation DPD pre-submission version 2016, would show that it is the case that the site slopes down from west to east, but to say that the higher buildings would be more appropriate on</p>	<p>Development adjoining the properties at 28-36 Muswell Hill Rd should be designed with regard to the amenity of neighbouring properties”. I suggest that a more reasonable and appropriate alternative last sentence would be to state as a requirement that: “Development adjoining the properties at 28-36 Muswell Hill Rd and 33–44 Summersby Road, and across the narrow access road from the properties at 1 -33 Summersby Road, should be designed with regard to the amenity of these neighbouring properties”. b) To include as a requirement clause protecting the light of these neighbouring homes and stating</p>	
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				<p>the south end of the site is to ignore the significance of this for those who live in the blocks of flats on Summersby Road who are neighbours on that side. A more reasonable alternative would be to also <b>include additional clauses under the 'site requirements' and 'development guidelines' in relation to protecting the light of these neighbouring homes and what would be the appropriate style of 'good neighbour building' in this regard.</b> Fourthly, the site is accessible by road from Muswell Hill Road and only a small portion of it is accessible by way of Summersby Road. Summersby Road is narrow cul-de-sac, there are many families, some with children living in the <b>blocks of flats and there is a children's playground</b> (recently refurbished) at the bottom. It is therefore, a vital artery of access to those who live there. Given these facts it would be appropriate to include a specific clause in the site requirements to ensure that any development does not affect the <b>resident's use of their access.</b> <b>Fifthly,</b> given the particular position of this site, i.e. in a Conservation area, partially surrounded by dense residential buildings, being blocks of flats on Summersby Road and South Close, which are all of a pre WWII character that sit well together architecturally, there are insufficient clauses under the site requirements and guidelines that</p>	<p>what would be the appropriate style of <b>'good neighbour building' in this regard.</b> c) To include a specific clause in the site requirements to ensure that any development does not affect the <b>resident's use of their access road,</b> Summersby Rd. d) To include clauses under the development guidelines that any development should not compromise the appearance and setting of the existing surrounding buildings, and that development should not impact on the residential and neighbourhood amenity of the adjacent blocks.</p>	
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					recognise the peculiarities of this site and its spatial context. In this respect, it would be justified and not disproportionate to include clauses under the site requirements and development guidelines that any development should not compromise the appearance and setting of the existing surrounding buildings, and that development should not impact on the residential and neighbourhood amenity of the adjacent blocks. Such specific clauses have been included in the Site Allocation Document for other sites in the Highgate Neighbourhood area i.e. SA42 and 44.		
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#### SA44: Hillcrest

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RSA102	SA44	No	Not stated	<b>The plan for SA44</b> in the Site Allocations DPD aims to squeeze an unspecified number of blocks into existing open space at the Hillcrest Estate – in an area already identified by Fig 6.4 of the <b>Council's Strategic Policies as an area of Existing Open Space Deficiency (SP13)</b> <i>SP 13 says:</i> <b><i>“Developers will need to demonstrate ..How they will secure new open spaces and SINCs, through identifying and securing funding to purchase and enhance such sites in areas of</i></b>	The modification needed to achieve compliance with <b>The Council's</b> own Policies is the deletion of SA44 in its entirety and all references to it within the DPD/Evidence Base.	The allocation seeks to make the best use of this publically-owned housing site, acknowledging that development may be possible, and that a master planned approach will be required to ensure that the most sustainable approach can be arrived at.  Regarding the “communal

				<p><i>deficiency, such that there is a net increase in provision.”</i></p> <p>Despite this requirement, the Council’s plan and 2013 PRP consultants study actually proposes a <i>net reduction in provision of open space</i> at Hillcrest via the construction of up to three or more new blocks. Three years on, the plans remain unclear.</p> <p>The idea that this plan is a legitimate use of <b>“surplus” or “spare” land between the existing blocks on the Hillcrest estate</b> does not stand scrutiny.</p> <p>The land is described by the Plan merely as <b>“gaps”</b> (page111, DPD). However, it has been in continuous use by residents for over sixty five years. It is communal garden and amenity space. Generations of estate children – and their friends from neighbouring streets - have played games and sports here. Its <b>“Current Use”</b> use is wrongly described by the DPD as <b>“Residential”</b> because this <b>“site”</b> is a <i>Communal Garden</i> (and used by the wider community’s children).</p> <p>Three private housing estates border the Hillcrest Estate - Southwood House Estate. Would they be permitted to build new 7-storey blocks in their communal gardens?</p> <p>The extent of new affordable housing units here is not stated by the DPD. Assuming 40%, on the <b>“indicative”</b> numbers, perhaps 12 or so new small flats would be built on the gardens of the</p>		<p><b>garden land”, there are a number of estates with large landscaped areas across the borough (and London), which while valued by residents, can also accommodate new much needed housing. The Plan seeks to protect open spaces, particularly designated open spaces, while meeting the housing and employment needs of the borough’s residents.</b></p> <p>The issue of this site being publically owned is considered mute. If proposals were to come forward on privately owned sites, they would be determined in line with the policies in the Local Plan in the same way as Hillcrest.</p> <p>No change</p>
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					existing 200 or so residents. The equation fails to offer any worthwhile net benefit to the wider		
27	RSA110	SA 44 / Policies map	No	Yes	<p>This site allocation (SA44 Hillcrest) is in potential conflict with the emerging Highgate Neighbourhood Plan Policy 0S3 (Local Green Space).</p> <p>Specific open spaces on Hillcrest, lying within the boundary of SA44 have been allocated in the HNP as Local Green Spaces in accordance with NPPF 76 and NPPF 77. This designation in the Highgate Neighbourhood Plan has been subject to an independent SEA, which finds that designation of these areas of Hillcrest as Local Green Space is the most appropriate strategy when considered against the alternative (designation as housing land).</p> <p>The designation of these areas on Hillcrest as Local Green Space is robustly supported by credible evidence to demonstrate that the designation meets each criteria of NPPF 77 (proximity, specialness and local significance)</p> <p>The allocation of the entire Hillcrest site as a potential site for new housing conflicts with the local green space designation and is unsound in that it is:</p> <p>Unjustified: (It is not the most appropriate strategy when compared against</p>	<p>Hillcrest (SA 44) should be deleted as a Housing allocation and put forward as a local green space allocation in conformity with Para 76 of the NPPF. As SA44 designated the whole of Hillcrest as a housing site, it is unclear whether the local green space designations (which are redlined in the neighbourhood plan) could co exist with the housing allocation. If SA44 is not deleted it should be modified to show the boundaries of the housing allocation, which should not</p>	<p>The NPPF requires Neighbourhood Plans to be in conformity with strategic policies included in Local Plan documents.</p> <p>On this site there is a difference of opinion between the Neighbourhood Forum and the Council regarding how the site should be allocated.</p> <p><b>The Council's position is that there is potential for the site to accommodate new residential development which will help to meet the borough's housing need.</b></p> <p>As this site is in public ownership, it represents a particularly valuable opportunity to help deliver affordable housing outcomes in the borough, and it is considered deliverable for new housing to be delivered within the spaces between</p>

					<p>reasonable alternatives)</p> <p>Inconsistent with National Policy: The plan does not, as required in Paragraph 76 of the NPPF, support the ability of local communities to designate areas of particular local importance as local green spaces.</p>	<p>encroach on the designated local green spaces.</p>	<p>the existing buildings.</p> <p>It is noted that there is local opposition to development on the site, and that the Neighbourhood Forum are seeking to protect the existing open spaces on the site through the Neighbourhood Planning process. It is noted that a Neighbourhood Plan has been consulted on, but has not been examined, or adopted thus far.</p> <p>The Council is committed to seeking to achieve a housing outcome on the site, and will expect that the Neighbourhood Plan to conform to the strategy included in the Local Plan to achieve this.</p> <p>No change</p>
28	RSA111	SA 44	No	Yes	<p>We consider that the Haringey Local Plan Site Allocations DPD in its current form fails to meet some of the basic conditions and is unsound, for the following reasons</p> <p>- The inclusion of SA44 (Hillcrest) in the site allocations DPD is not based on a strategy which seeks to meet objectively</p>	<p>The following offers suggested amendments, in order to help ensure that the plan is sound: Hillcrest (SA 44) should be deleted</p>	<p>There are not at present any designated open spaces on this site. The Neighbourhood Plan-proposed open spaces are proposals, and have not been formally, published, examined, or adopted.</p>

				<p>assessed development and infrastructure requirements (is not positively prepared)</p> <p>- SA44 is not the most appropriate strategy when considered against reasonable alternatives (is not justified)</p> <p>- SA44 is inconsistent with provisions of the NPPF (is not consistent with National Policy)</p> <p>The evidence for these conclusions is laid out below.</p> <p><b>The Plan is Not Positively Prepared</b> SA44 proposes the allocation of Hillcrest housing estate and the surrounding woodland as a potential site for new housing. The allocations says that the <b>new buildings will be placed 'in the gaps that exist between the existing buildings.'</b></p> <p><b>The 'gaps'</b> on the estate consist of well-used amenity areas. One of these is an informal football pitch, supplied with goalposts and very heavily used for ball games. Additional housing on Hillcrest would almost certainly result in the loss of the informal football pitch. The impact of this loss on the health and wellbeing cannot be assessed as the council have not included in its evidence base a full open space strategy and playing pitch strategy. The existing open space and biodiversity study shows that Hillcrest</p>	<p>as a Housing allocation and put forward as a local green space allocation in conformity with Para 76 of the NPPF. As SA44 designated the whole of Hillcrest as a housing site, it is unclear whether the local green space designations (which are redlined in the neighbourhood plan) could co exist with the housing allocation. If SA44 is not deleted it should be modified to show the boundaries of the housing allocation, which should not encroach on the designated local green spaces and should not lead to the loss of</p>	<p>The Council has objected to these proposed designated open spaces, and as such there is a disagreement on this issue between the Neighbourhood Forum, and the Council in regard whether the parts of the site in question should be allocated with the potential for housing, or as open space. After consultation <b>with the Council's housing enabling team</b>, the Council as the landowner of the site continue to believe this is an opportunity to provide additional housing in the borough.</p> <p>The Council and the respondent are in agreement that the SINC area around the perimeter of the site should be preserved and enhanced. It is considered that it is appropriate that this part of the site is included so that any design is comprehensive and responds to the whole of the site.</p>
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				<p>(SA44) is in an area of deficiency for several categories of open space and play space, and the previous playing field study (Atkins 2008) revealed Hillcrest to be on the border of the area deficient in playing fields.</p> <p>Without an up to date playing field strategy the proposal to allocate an existing kick-about area for housing cannot be considered to be positively prepared. It is our understanding that Haringey is undertaking an open space and playing field study, but for the plan to be sound the evidence should come <i>before</i> the site allocations are made and not used to retrospectively support an allocation. The plan should be evidence led.</p> <p><b>The plan is not justified (does not provide the most appropriate strategy when considered against reasonable alternatives.)</b></p> <p>Site allocation SA44 in the Site allocations DPD is shown to include the whole of the Hillcrest Estate as well as the surrounding, SINC designated woodland. The site requirements say that the new buildings will be placed in the gaps between existing buildings on the site. The indicative capacity is given as 34 units.</p>	<p>designated or undesignated amenity/recreational green space.</p>	<p>The kick-about area is as stated <b>'informal' and</b> would therefore not appear in a playing pitch strategy. The area concerned is also not designated open space.</p> <p>It is noted that draft the Neighbourhood Plan seeks to protect the existing open spaces on the site. However, it is also noted that the Neighbourhood Plan has been consulted on, but has not been examined, or adopted thus far.</p> <p>The Council is committed to seeking to achieve a housing outcome on the site, and will expect that the Neighbourhood Plan to conform to the strategy included in the Local Plan to achieve this.</p> <p>No change</p>
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				<p><b>It must be presumed that the ‘gaps’</b> in question include the estate amenity areas. These areas have been chosen by the local community (Highgate Forum <b>Area) as a ‘Local Green Space’</b> in accordance with NPPF 76 and 77, this designation has been included as Policy OS3 in the emerging Highgate Neighbourhood Plan, which has been written in general conformity with the Strategic Policies of the emerging Local Plan.</p> <p>The neighbourhood plan and its Policy OS3 (Local Green Spaces) has been subject to an independent sustainability appraisal (AECOM 2016). The full appraisal can be read here:</p> <p><i>(Web-link included but has been removed for formatting reasons – see original response for full web-link).</i></p> <p>The appraisal determined the preferred option for Hillcrest to be allocated as Local Green Space:  <i>“Protecting the existing open and green space in the long term could lead to wide ranging benefits. Most significant are benefits to existing residents of the estate (which comprises social housing), but there are also notable benefits from a heritage and biodiversity perspective. As such, a policy to designate Local Green Space (Option 1) is the preferred option</i></p>		
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				<p><i>when considered in terms of the majority of sustainability objectives.”</i></p> <p>The evidence in support of the allocation as Local Green Space is included in the ‘2<sup>nd</sup> Draft for consultation (Dec 2015) of the Highgate Neighbourhood Plan and can be read here:</p> <p><i>(Web-link included but has been removed for formatting reasons – see original response for full web-link).</i></p> <p><b>The Plan is not Consistent with National Policy</b></p> <p>The NPPF requires that:  <i>76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them.</i></p> <p>The allocation of Hillcrest (SA44) for housing is not consistent with this policy.</p> <p>The NPPF requires that (155) <i>A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</i></p>	
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					Hillcrest is within the area of the Highgate Neighbourhood Forum (HNF). HNF contributed significantly to the previous draft of the Site Allocations DPD through the 'Call for Sites' process. The forum has worked hard with Haringey and <b>Camden Councils meet the borough's</b> housing targets while reflecting the vision for the area as laid out in the neighbourhood plan. Hillcrest was not included as a site by HNF because Hillcrest is not believed, by the forum, or the Highgate Community, to be a suitable site for sustainable development.		
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#### SA45: Highgate Magistrates Court

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RSA99	SA38 – SA 45 & 2.108 to 2.128	No	Not stated	The Highgate Site Allocations do not comply with <i>London Plan Policy 7.7 – Location and design of tall and large buildings</i> and are inconsistent with Haringey <i>Strategic Policy 11 – Tall Buildings</i> . Part E London Plan Policy 7.7: <b>“E) Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks.” Also: “7.25 Tall and large buildings are those that are substantially taller than their</b>	a) The Site Allocations DPD should record on Page 96, in preface to Highgate Sites, that:  <b>“On London Plan Policy 7.7 Haringey Council is required within</b>	The relevant policy in this regard is DM6 of the DMDPD, which identifies areas which may be suitable for tall buildings – building over 30m (the equivalent of a 10 storey building). It is noted that Highgate is not

				<p>surroundings, cause a significant change to the skyline.”</p> <p>Historic England Advice Note 4 Tall Buildings: <b>“2.3 An up-to-date local plan based on a sound evidence base will contain enough detail to allow the significance of heritage assets to be assessed and to secure a commitment to high quality design (paragraphs 169-170). This will help local planning authorities to identify in local plans areas where tall buildings would not be appropriate because of their adverse impact (paragraph 157)”</b></p> <p>The 2015 Preferred Options DPD set maximum heights of up to 7 storeys and would have produced buildings out of sympathy with the surrounding Conservation Area (eg, Policy 7.8, London Plan; 132, NPPF).</p> <p>In the revised Jan 2016 Site Allocations DPD, max height limits have been omitted for Highgate sites. The lack of limits will trigger applications for inappropriately sized apartment blocks. This expectation is justified by events and by supporting documents. Eg: The Council has approved a new seven-storey block at SA45 despite objections from local residents and stakeholders such as the Corporation of London</p> <p>The "Evidence Base" (2015 Highgate Urban Character Study - HUCS) proposes five, six, seven -and even 9-storey blocks at Highgate sites and claims it determines maximum building height limits for the Conservation Area. Sample : <i>“At the Aylmer Road and Archway Road</i></p>	<p>Local Plans to identify areas that are inappropriate for tall and large buildings. The Highgate Conservation Area is identified by this Local Plan as inappropriate for new tall and large buildings, these being buildings that are substantially taller than their surroundings which cause a significant change to the skyline.”</p>	<p>included as a location suitable for a tall building. Large buildings are those that are two storeys higher than the surrounding building heights. It is not considered appropriate to identify locations within the Borough for ‘Taller’ buildings as taller buildings are considered suitable across the entire borough, including within conservation areas, subject to meeting the criteria set out in Policy DM6.</p> <p>No change</p>
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				<p><i>gyratory, there is opportunity to create a cluster of taller buildings as a way-finder into the neighbourhood and to create an attractive gateway. These should be seven to nine storeys in height” p 215, HUCS</i></p> <p>This is not “evidence”. The target development outcomes in the Character Study conflict with Haringey/London Plan/NPPF policies on tall building location, heritage protection etc. Historic England Advice Note 4, Tall Buildings: <b>“3.1 In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of the local plan. Techniques such as characterisation and building height studies provide evidence to support a local height definition for tall buildings and the identification of appropriate locations in local plans. This can be used to create clear core strategic policies, site allocations and development management policies, supported by supplementary planning advice where appropriate.”</b></p> <p>These sites’ appropriate scale and form has not been assessed, max local height definitions have not been set/supported. Inappropriate locations have not been identified as required (London Plan 7.7, E). London Plan Policy 7.8:</p>		
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					<p><b>“Heritage assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.”</b></p> <p>Haringey Strategic Policy SP11:  <b>“6.1.15 Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough and 3-4 storey development in its town centres. The exception is Wood Green town centre, where buildings within its core area range between 4-9 storeys</b>  6.1.16 <i>The Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their neighbours”</i> And:  6.1.18 <i>The Council considers that currently only two areas, Haringey Heartlands/Wood Green and Tottenham Hale, have sites that may be suitable for some tall or large buildings... Elsewhere tall buildings are considered inappropriate to Haringey’s predominantly 2-3 storey residential suburban character.”</i></p> <p>Despite SP11, the Evidence Base and DPDs could provide a basis to allow tall/large buildings at the Highgate sites (as has already happened at SA45.)</p>		
29	RSA112	SA45	Not stated	Not stated	I have recently moved into the area [Church Road/Talbot Road, Highgate N6] and have just read a notice informing me about consultation in relation to SA45 Highgate Magistrates Court	Not specifically stated	It is correct that some allocations in the Local Plan will have existing

					<p>site. The notice refers me to your site allocations document which I have now accessed online. I note that consultation is open until early March.</p> <p>However, I note that planning permission for the SA45 site has been granted and that development has already begun. I am therefore wondering what scope there may be for meaningful consultation with regard to the SA45 site? Perhaps you could advise me – or give me the name and telephone number of someone I can telephone so that I have a better understanding of the consultation process.</p>		<p>planning consents. This is perfectly normal. The reason for this is that planning permission is usually granted for a period of three years, after which it expires. The allocation would guide any alterations, or any new applications on this site, should the extant planning permission not be implemented.</p> <p>No change</p>
231	RSA372	SA45	Not Stated	Not Stated	SA45 Highgate Magistrates Court and Police Station - TfL would expect to see vehicle and servicing access located off the TLRN	None	<p><b>It is considered that this can be added as a development guideline, in case any subsequent planning amendments come forward.</b></p>

**SA46: Hornsey Depot**

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Para					
232	RSA38 3	SA46: Hornsey Depot	Not stated	Not stated		The Development Guidelines and Site Requirements should reference the need to contribute positively to the Hornsey conservation area and its significance.	An additional site requirement will be added to this effect.

#### SA47: Cross Lane

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
31	RSA114	SA 47	No	Yes	<p>We write on behalf of Oakforest Properties Ltd the applicant for a planning application submitted on Land to the East of Cross Lane, Hornsey (HGY/2016/0086) for the 'erection of a part six storey, part seven storey development (plus basement parking) to create 79 residential dwellings and 1,274 sq m of flexible business (B1a) floorspace with associated access, landscaping, car parking and other infrastructure'.</p> <p>This site is included in the emerging Site Allocations DPD under Policy SA47 – Cross Lane. We do not consider that the allocation is sound for the following reasons.</p> <p><b>Replacing existing floorspace</b> The policy proposes 1,386 sq m of employment floorspace on site and that <i>'the existing floorspace should be replaced within the development site'</i>. The proposal to ensure there is no net loss of employment space on site is not</p>	<p>We recommend that the site allocation states that proposal seeks to deliver a significant increase of jobs on the existing proposal and the target level of employment space on site and the requirement to replace existing floorspace are removed.</p>	<p>The principal that this site allocation seeks to achieve is that the maximum amount of employment growth comes forward on the site. In return for that, the Council is willing to accept a level of residential development to cross subsidise the less viable use.</p> <p>While it is considered that replacement of the existing floorspace is a good starting benchmark, it is recognised that this may not be possible on all sites, notably larger office</p>

				<p>considered justified as it does not take account of the higher level of job creation from B1 floorspace in comparison to the B8 floorspace.</p> <p>The existing B8 units are not fully let and only support 13 full-time employees (FTE), however the proposed 1,274 employment space would deliver in excess of 150 FTE, despite the net loss of around 500 sq m of employment floorspace.</p> <p>In terms of developing an effective employment strategy for the site, we consider that this approach is of far greater economic value than re-providing floorspace that is proven to be unsuitable and poorly equipped to sustain jobs. Even if the units were fully let, which they are not, the proposal still equates to a very significant uplift of jobs on the site.</p> <p>The proposed policy allocation is not considered to be sound on the basis that it is neither justified nor appropriate</p> <p><b>Proposed residential units</b> The policy states that the indicative capacity of the site is 40 residential units. This figure is well below the proposed capacity on the site and we understand it was formulated without reference to the proposals for the site. No one within the project team was consulted on the figure that was used and we understand that</p>		<p>redevelopments. <b>To ensure consistency with other policies, the site requirement will be amended to require the maximum amount of employment floorspace deliverable on the site, as cross subsidised by a higher value use.</b></p> <p>The capacities quoted in the appendix to the Site Allocations document sets out a modelled capacity for the site based only on its PTAL and site size. The capacity of the site once completed may well differ from that included in the Appendix, which is only to demonstrate that the allocations in the document can meet the overall housing need for the borough over the plan period.</p>
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					<p>officers within the development management team working on the application site were not approached either.</p> <p>We therefore conclude that the indicative figure used in this policy is not based on <b>a reliable assessment of the site's</b> capacity and cannot be considered sound on the basis that it is not justified or based on a robust evidence base.</p> <p>We trust the above comments will be taken in to account within the submitted version of the plan and we would be happy to engage with plan makers to agree suitable and appropriate rewording of the allocation.</p>		<p>It should also be noted that the Planning application referred to has not yet been determined by the Council. It cannot and should not therefore form the basis for the development capacity of this site. Only once a planning permission has been granted should the application details form the basis of the allocation.</p>
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53,	Yes	Yes	<p>We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.</p>	<p>We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken.</i></p>	<p><b>Noted, this amendment will be made.</b></p>

		SA57				<i>Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
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**SA 48: Hornsey Town Hall**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
32	RSA115	SA 48	No response given	No response given	If there is to be development of the above site, it should only be permitted if: (a) it is of limited scale - and in particular limited height - so as to be consistent with the fabric, and preserve the amenity, of the neighbouring residential streets (b) it is not of an intensity such as to result in unreasonable demands on local infrastructure, including parking and (c) it results in (at least) the replacement of green space lost with space of equivalent amenity	As set out in the representation	It is considered that height and intensity issues will be addressed at the design stage using Policy DM1, having regard also to the planning permissions previously granted for the site, which although not implemented, set the precedent of what it considered acceptable development on this site.

							Regarding open space, SP13 and DM20 will ensure consideration of this issue will be given in determining any future applications.  No change
71	RSA181	SA 48 SA 49	No response given	No response given	The Crouch End Neighbourhood Forum and Crouch End Neighbourhood Area were approved and designated by the London Borough of Haringey in December 2015. The Forum is presently preparing a Neighbourhood Plan which will include site specific policies and potential Neighbourhood Development Orders. Our comments on the SADP document are below.  Two sites listed in the SADPD are within the Crouch End Neighbourhood Area: SA48 Hornsey Town Hall, and SA49 72-96 Park Road and Lynton Road.		Noted.
71	RSA182	SA 48	No response given	No response given	Haringey Council are currently disposing of the site to private developers under the terms of an OJEU procurement process. This process is due to complete in the latter part of 2016 and the site already possesses an implemented planning consent to build substantial residential units.	Note that the designations and description in the SADPD do not indicate the status of the Town Hall and Square as an 'Asset of Community Value', declared as such	<b>The ACV status of the building, and square will be noted in the Site Requirements of the allocation.</b>  <b>The Council shares the aspiration that the public square should be retained, and a site</b>

					<p>1. We note that the designations and description in the SADPD do not indicate the status of the Town Hall and Square as an 'Asset of Community Value', declared as such by the local authority in August 2015 under the terms of the Localism Act 2011. This should be rectified.</p> <p>2. Furthermore, we feel that there is cause to comment upon the inclusion of the public square within the site. The Town Hall square and green lie at the centre of Crouch End on Crouch End Broadway, and represent a well loved and well used open space and 'village green' to the local community. The public square, as mentioned, is an Asset of Community Value, and should also be protected under the Council's policies in the 2013 Local Plan (SP13). We ask that safeguards to full and unfettered public access to the public square be included in the site description, with any other identifiable constraints to development such as public highway status (three sides around the perimeter were the original access road) made clear.</p>	<p>by the local authority in August 2015 under the terms of the Localism Act 2011. This should be rectified.</p> <p>We ask that safeguards to full and unfettered public access to the public square be included in the site description, with any other identifiable constraints to development such as public highway status (three sides around the perimeter were the original access road) made clear</p>	<p><b>requirement will be added to this end.</b></p>
232	RSA384	SA48: Hornsey Town Hall	Not stated	Not stated	<p>the wording of the Site Requirements need to be amended in the context of enabling development. The significance of the Town Hall should be the primary consideration when assessing the appropriateness of new</p>		<p><b>The second Site Requirement will be amended as suggested.</b></p>

					development in its setting, thus reflecting the NPPF.		
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SA 49: 72-96 Park Road & Lynton Road

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
57	RSA 152	SA 49	No response given	No response given	<p>Whilst there have been some small changes made to this proposed development since it was known as SA 51, I still object to the proposal as it stands on the following grounds:</p> <p>Above all, there are only actual plans/elevations to comment on for the Park Road part of this area, owned by Orantes...all we are told about the area known as the privately-owned Courtyard is that nothing is to be retained and <b>that 'Heights should be restricted to protect the amenity of properties on The Grove, and heights should be restricted to the north of the site to protect the setting of the church, and preserve the amenity of the back gardens on Palace Rd.'</b></p> <p>This leaves the proposed height subjective and undefined. The sheltered homes are still vulnerable.</p> <p>As far as the council-owned Grassed area it states that <i>'the site contains a number of mature trees and these should be retained on site where possible.'</i></p> <p>This allows the trees to be moved to another part of the area...possibly out of general public</p>	Not specifically stated	<p>Heights will be determined based on the design of the development when a planning application comes forward.</p> <p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>The number of school places has been modelled in the School Place Planning report, and sufficient new classes to meet need planned for.</p> <p>Details of access and parking will be required at the</p>

				<p>access as it is now.</p> <p>Apart from this there are other considerations such as:</p> <p>The extra school places that will be needed in already bulging classes.  <b>Doesn't LB Haringey have a policy with restrictions governing expanding schools and building new schools?</b></p> <p>The pressure on the traffic flow at an already dangerous junction and part of Park Road. At present, Lynton Road is blocked off at the Park Road end, providing a safe and quiet harbor for the people in the 2-story sheltered accommodation in The Grove. For the safety of this small area, young and old, this road block must be continued?  Where will these new residents park their inevitable number of cars?</p> <p>Assuming these new residents have jobs, there will be more pressure on the transport system. Have you seen the queues for the W7 bus in the morning?</p> <p>The extra pressure on other public <b>services...doctors, refuse collections, the ailing sewers and drainage in the area.</b></p> <p>Crouch End has now a good reputation for its thriving, villagey feel with its small independent shopkeepers attracting people into the area for an 'alternative to huge shopping mall'</p>		<p>time of planning application in line <b>with the Council's DM Policies.</b></p> <p>Any development on this site will be assessed having regard to the Conservation Area adjacent.</p> <p>No change</p>
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					<p>afternoons shopping.</p> <p>This scheme will seriously detract from the neighbouring Crouch End Conservation Area. The fact that mistakes have already been made <b>(see 6 Middle Lane for example)...it doesn't</b> mean that more can be made in the future.</p> <p>Please, continue to reconsider this scheme with a little more sensitivity. I would also appreciate being kept informed about your further thoughts on this matter.</p>		
58	RSA1 53	SA49	No response given	No response given	<p>I am a business owner, and I currently rent office space at the Courtyard, Lynton Road.</p> <p>I have been contacted by local residents and forwarded the proposal document. (Regulation 19 Site Allocations DPD).</p> <p>We currently employ 17 professionals and are planning to expand this number to 40 by the end of 2017. I strongly object to the redevelopment of the site for a number of reasons.</p> <p>1. We have not been directly consulted and according to your consultation document we should have been, we have had no opportunity to object to these plans or even study them in any detail.</p> <p>2. There is a dire lack of office rental space in Crouch End suitable for our consultancy. There are a number of suitable sites in Haringey for building new apartments as identified in your</p>	Not specifically stated	<p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations and <b>the Council's</b> Statement of Community Involvement.</p> <p>No change</p>

					<p>document which don't involve turfing out local SME's who support the local economy.</p> <p>3. The majority of our staff currently live in Haringey close to the office, we have worked hard to cut travelling time for all of our staff according to our company environmental policy.</p> <p>4. This proposal is causing business uncertainty which is also damaging to the growth plans of <b>the SME's in the courtyard most notably ours.</b></p> <p>I look forward to receiving consultancy documents in due course, to enable our business to object using the proper channels.</p>		
59	RSA1 54	SA 49	No response given	No response given	<p>Proposed development site at 72-96 Park Road N8</p> <p>In reference to the Development Guidelines on page 125. I understand that the Plan is open to public consultation to March 4th, which I take to mean it may still be revised.</p>	<p>I would respectfully suggest that the present draft Guidelines for the site at 72-96 Park Road be amended to take into account the following 4 points.</p> <p>1. The Guidelines say <i>"Heights and elevation details should respond to the Park Road frontage and the</i></p>	<p>1. The height and design guidelines in the policy are designed not to be prescriptive in terms of design of new buildings on the site. Consideration of design will be had upon receipt of a planning application.</p> <p>2. The retention of the trees is a clear presumption that the open space will be preserved.</p>

						<p><i>established rhythm.”</i> The 72-96 site frontage has an established height of <b>2 storeys</b>. The Park Road frontage houses opposite the site are all <b>2 storeys</b>. Yet the proposed scheme for the site shows <b>5 storeys</b> (or by some accounts 4). This would in no way respond sympathetically to the existing frontage height.</p> <p>The Guidelines go on to say <i>“Higher elements may be possible on Park Road marking the entrance to Crouch End District Centre”</i>. This is at odds with the preceding Guideline, which</p>	<p>3. See answer to 1.</p> <p>4. Parking will be provided in line <b>with the Council’s</b> DMDDP.</p> <p>No change</p>
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						<p>stipulates that heights should respond (by implication sympathetically) to the existing frontage. In any case the existing Murray Arms Pub and the building opposite already do the job of <b>“marking the entrance”</b> to the Crouch End Conservation Area perfectly well. A building that is anything over 2-storeys at 72-96 Park Road would considerably detract from the entrance to Crouch End village.</p> <p>(The Veryan Court building to the north of 72-96 should not be taken into account in terms of its height</p>	
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						<p>because it is set back a significant distance from Park Road and has its own access road off Park Road. It should not count as Park Road frontage in the same way as 72-96 and the houses opposite. In any case this bland, uninspiring building should not be counted as a model for anything other than to do something different - more in sympathy with the established 2-storey Edwardian and Victorian character of the original housing in the streets around.)</p> <p>2. The Guidelines state that <i>“the site contains a number of mature</i></p>	
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						<p><i>trees and these should be retained on site where possible”.</i></p> <p>The existing green space should be retained unequivocally and, indeed, enhanced. It forms a necessary breathing space that benefits local families, individuals, businesses and people passing through alike.</p> <p>3. The proposed scheme for more housing is overall too big, too ambitious. It would spoil the existing character of the area and in particular detract from the amenities of elderly people living in The Grove.</p>	
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						4. There is nowhere near enough provision for new parking spaces in the scheme. There is already too much pressure on existing parking space.	
60	RSA1 55	SA 49	No response given	No response given	Reference SA 48. I would like to be added to the list of names on the petition objecting to the building on the green space at the junction of Lynton Road and The Grove.	Not specifically stated	Noted.
61	RSA1 56	SA 49	No response given	No response given	Reference SA 48. Please add my name to the petition objecting to the building on the green space on Lynton Road at the junction with The Grove.	Not specifically stated	Noted.
62	RSA1 57	SA 49	No response given	No response given	I am writing to issue my objections to the above proposal. As the owner of one of the flats at Truro Court the proposed building work referenced as SA49 would have a severe negative impact on myself and the local area.  Firstly the proposal of a 5 storey block of flats backing directly onto my garden would not only be a huge invasion of the privacy as any windows at the rear of the building would directly look into my property. Currently there are only roof windows and therefore any change to this would be an absolute invasion of my privacy.	Not specifically stated	The height and design guidelines in the policy are designed not to be prescriptive in terms of design of new buildings on the site. Consideration of design will be had upon receipt of a planning application.  Parking will be

					<p>Secondly it would block out the natural light we get into the back of our flat which, even with the current building is limited, any building higher than this would completely block out natural light, making our flat dark and arguably unhealthy increasing the risk of damp, especially with the blinds/screens we would have to install and used to have for privacy.</p> <p>Thirdly, the proposed number of flats would put a huge strain on the already limited parking. It is often extremely hard to park on Palace road and the surrounding roads, in the proposed plans there seems to be inadequate space to cater for the number of cars there may be which will therefore without doubt negatively impact the surrounding areas. In addition to this local transport is already stretched during peak time travel. additional flats in the area would put further strain on the local bus links which already cannot cope with the volume of use.</p> <p>Lastly, I moved to Crouch End as it is a charming area with beautiful characterful and historic buildings one of which is the old piano factory which my property backs onto. In the short time I have lived here the landscape of Crouch End has changed with modern, unsympathetic buildings being squashed between historic buildings. I feel strongly that we should be preserving the historic buildings which are being used for small local businesses and that all efforts should be made to retain these characterful buildings.</p>		<p>provided in line with the Council's DMDPD.</p> <p>No change</p>
63	RSA1	SA 49	No	No	I am writing to highlight my concerns about this	Not specifically	The retention of

	58		response given	response given	<p>proposed development.</p> <p>I strongly object to any destruction of the green space and trees at the corner of Lynton Road.</p> <p>Any new buildings should definitely not be any higher than 4 stories and preferably lower.</p> <p>Work spaces for existing business should be retained.</p>	stated	<p>the trees is a clear presumption that the open space will be preserved.</p> <p>The height and design guidelines in the policy are designed not to be prescriptive in terms of design of new buildings on the site. Consideration of design will be had upon receipt of a planning application.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>No change</p>
64	RSA1 59	SA49	No response given	No response given	As a resident of Lynton Road I object to the inclusion of this site within the Local Plan Site Allocation document. The council has suggested that they would 'if possible' modify	Point 1: Drawing the site so as to eliminate this space would	The retention of the trees is a clear presumption that the open space

				<p>the site plan so as to protect the established trees on the green at one corner of the site, across from The Grove, but this is not reflected in the plan. It makes no sense to have a vague undertaking to save the trees without any express intention to preserve the green space on which they grow. Keeping this space green is vital to preserve the public's need for some even minor relief from the intensity of the built environment in the area, which would be significantly increased by the development of the site.</p> <p>A second reason is that the massive building contemplated would compromise the privacy of residents of The Grove, a sheltered community of vulnerable people, as well as imposing significantly upon the homes on the Park Road end of Lynton Road and to some extent also upon the rest of the surrounding area of Lynton Road, which is a conservation area. The development would bring an abrupt change in character from small cottage-type Victorian terraces, within a conservation area, to a huge towering intensively populated block building of 4-5 storeys.</p> <p>A third reason is that the plan would needlessly wipe out valued non-retail industrial space that is integrated into the community and not relegated to ugly 'industrial zone'. It is a better mix of use to preserve some non-retail commercial property situated within residential areas. Doing so encourages low environmental impact employment because people employed</p>	<p>exacerbate the ugly imposition of a very large building on what has been a pleasant part of the area early because it preserves small scrapes of green and open space that can be used by the public. This incorporation of the green space is in my opinion the worst feature of the SA48 plan. However, there are many other reasons to require the modification of the plan.</p>	<p>will be preserved.</p> <p>The height and design guidelines in the policy are designed not to be prescriptive in terms of design of new buildings on the site. Consideration of design will be had upon receipt of a planning application.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>No change</p>
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					<p>there can continue to walk to work as many in the courtyard area do now. This type of commercial space is greatly diminished throughout Haringey. In addition, the plan would destroy attractive Victorian architecture in the courtyard.</p> <p>Fourthly, the plan does not realistically take into account the impact of adding a large number of flats with no additional provision for parking, not even for potentially disabled residents. It is nonsensical to assume that future residents will not own cars. As far as I am aware, car ownership is not yet illegal and not yet entirely preserved to the wealthy. The failure of the plan adequately to take into account the provision of additional car parking shows how little real evaluation has gone into its inclusion in the site allocation document.</p>		
65	RSA1 60	SA49	No response given	No response given	<p>I am writing to ask the Planning Inspectorate to challenge this plan. I am very concerned that despite so many comments submitted, even though consultation was not at all transparent, it appears the local authority intends to continue with this development. It does not seem that consultation was carried out properly and did not result in local people being listened to. Surely the planning/development process should take more account of the following issues:</p> <p>The effect on the vulnerable residents of The Grove, who are housed there because they have high needs, does not appear to have been considered at all. The height of any new building could have a very oppressive effect for</p>	<p>I hope the Planning Inspectorate will prevent Haringey from making this negligent set of decisions – local people have seen no evidence of adequate care being taken, with a sense of overwhelming pressure to increase housing at any cost.</p>	<p>Heights will be determined based on the design of the development when a planning application comes forward.</p> <p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>Details of access</p>

				<p>them, as would the disruption of the work, the increased parking problems etc.</p> <p>The issue of the height of the building does not seem to have been properly dealt with as no clear decision is recorded for maximum height to be allowed.</p> <p>The loss of green space should be looked into, and does not appear to have been – the small green space there is valuable relief in a built up area. I believe it is listed as green space in <b>Haringey’s strategy to have such spaces</b>, allowing a less built-up environment for us all. Surely it has some legal protection? I cannot understand why the very interesting old buildings currently there are not protected by law, nor why it would make any sense to destroy six working businesses, all so someone can profit from building flats. The employment provided is important in this area, and good evidence of its rarity was submitted to the LA. Even if such spaces were replaced, the disruption and extra cost would be enough to destroy at least some businesses.</p> <p>Parking problems here are already very real - it is usually necessary to park far from our front door – this is a very large number of new <b>dwelling, and the idea that they won’t have cars is absurd.</b></p> <p>The sheer density of the proposed development is surely unacceptable.</p>		<p>and parking will be required at the time of planning application in line <b>with the Council’s DM Policies.</b></p> <p>No change</p>
66	RSA1 61	SA49		<p>Haringey Council has pulled together 3 separate sites to make up this allocation as follows:</p> <p>a) 72-96 Park Road owned by an independent freeholder (Orantez), there are</p>	<p><u>This is an oversight that must be immediately addressed</u> – my</p>	<p>Heights will be determined based on the design of the development when a planning</p>

				<p>4 businesses on this site, plus some residential units. There is an extant planning permission on this site to add an additional 2 stories to the existing two storey building (Haringey Planning ref: <a href="#">HGY/2006/1839</a>).</p> <p>b) The Courtyard industrial estate on Lynton Road (owned by a second independent freeholder; all 9 businesses on the site lease their premises)</p> <p>c) Green space on the corner of Lynton Road and The Grove, owned by Haringey Council.</p> <p>However, the Council failed to adequately consult ANY of the 13 businesses potentially affected by the development of this site as proposed - <b>given one of the “Site Requirements” for this site is “No buildings need to be retained on this site”, any of the businesses risk as a minimum, facing relocation whilst development takes place or at worst, risk closure of their business due to a lack of ‘like for like’ premises provision in the new development and the scarcity of other suitable business premises in the North London area.</b></p> <p>At a meeting some fellow residents, Courtyard business owners and I held with the Council Members for Housing and Planning and various other staff from the housing and planning teams on 30th June 2015, the Council member for Planning admitted that each of the individual businesses had not been consulted by letter (or directly in any other manner), as only the</p>	<p>consultation feedback in January 2015 highlighted the proximity of our house (and the whole row we are on – 45 to 33 Lynton Road) to the development and that all of these properties have bedrooms on the front side of the property so stand to be severely impacted both in terms of privacy and loss of light by a tall development in such close proximity. Again, more robust evidence gathering, including visiting adjacent homes which overlook the site and assessing the importance of the immediately adjacent green</p>	<p>application comes forward. This will consider detailed appraisal of the impact of any proposals on adjacent properties.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations and <b>the Council’s</b> Statement of Community Involvement.</p> <p>The development guidelines are not contradictory. The</p>
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				<p><b>freeholder’s details were on their mailing system</b> and thus, they were also unaware of the presence of any businesses on the site (in the previous iteration of the Sites Allocation DPD document, the proposed development guidelines were for an entirely residential development).</p> <p>Whilst we welcome the changes in the new Sites Allocation DPD document to mixed use, in response to us highlighting this issue in June, it does not and will not protect all of the existing jobs and businesses on the site and it does not alleviate the fact that in the initial preparation of the Sites Allocation DPD, the research, evidence/information gathering and subsequent public consultation on this site was far from robust and consequently the potential development of this site is set to have a devastating impact on both employment floorspace and job numbers in Crouch End.</p> <p>Furthermore, there are contradictory statements within the Sites Allocation DPD <b>guidelines for SA49 with regards it’s mixed use allocation</b>, as follows, that also indicate that this element of the plan has been poorly researched and conceived:</p> <p>The Site Requirements state that:</p> <p><i>“No buildings need to be retained on the site”</i></p> <p><i>“Replacement employment floorspace will be required to be provided to replace the number</i></p>	<p>space opposite our houses, in terms of providing relief between two built up areas and also privacy, should have been conducted before preparing this plan.</p> <p>The corner of green space (with mature trees) currently included as one of the three sites in SA49 should not be included as a space for potential development for the following reasons:</p> <p>i) As mentioned above, the trees provide screening and privacy for the houses in Lynton Road, from the</p>	<p>expectation is that there will not be a loss, and could even potentially be a gain in employment floorspace within the site. The Council is required to plan flexibly however, so if the site does experience a reduction in floorspace, a local employment contribution will be sought in line with adopted Local Plan Policy SP9.</p> <p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>The amenity of all surrounding neighbouring properties will be protected through policy DM1.</p>
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				<p><i>of jobs on this site.”</i></p> <p>Whilst the Development Guidelines state that:</p> <p><b><i>“In line with policy SP9, if redevelopment results in a net loss of employment floorspace, a financial compensation will be required as set out in the Planning Obligations SPD.”</i></b></p> <p><b><i>“Any jobs lost through development of the site should be reprovided on site.”</i></b></p> <p>So, if, as above in the Site Guidelines, replacement employment floorspace needs to be provided to replace the number of jobs on the site and as per the development Guidelines, any jobs lost through the development of the site should be re-provided on the site, how can it also be possible to state that a development could also result in an uncapped and unquantified net loss of employment space for which the developer would have to provide financial compensation?</p> <p>As noted above, the site at 72-96 Park has an extant planning permission (Haringey Planning ref <a href="#">HGY/2006/1839</a>) to build up to two additional stories on the existing two storey building i.e. making four stories in total. The commentary for SA49 in the Sites Allocation DPD states that: <b><i>“2.140 There is an existing planning consent for the western portion of this site permitting development up to five storeys</i></b></p>	<p>business area opposite and provide some relief from the traffic noise of Park Road for the residents in sheltered housing in the Grove.</p> <p>ii) It is a busy, much used pedestrian route through from Park Road, down to the Grove and through to Palace Road and Priory Park, used particularly by parents with young children and their buggies, bikes and scooters and also by dog walkers.</p> <p>iii) There is a dog waste bin on the green space which means</p>	<p>The Piano Factory is not a listed building and as such does not receive specific protection in the Policy.</p> <p>No change</p>
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				<p><i>on the site.”. This is plainly incorrect and shows a lack of proper evidence gathering in relation to the preparation of this plan document.</i></p> <p>As a resident of 43 Lynton Road, one of the houses immediately opposite the current entrance to the site we stand to be affected the most by the development of this whole site, yet Lynton Road is not stated as one of the two roads whose amenity will be protected by the Development Guidelines within the Sites Allocation DPD <i>“Heights should be restricted to protect the amenity of properties on The Grove, and heights should be restricted to the north of the site to protect the setting of the church, and preserve the amenity of the back gardens on Palace Rd.”.</i></p> <p>Currently the Sites Allocation DPD provisions only provide possible protection for mature trees on the site – <i>“The site contains a number of mature trees and these should be retained on site where possible.”</i> - but make no provision for the protection of this much used and valued green space. Thus we feel this space has not been properly assessed before being included into this plan and earmarked for potential development – it is not justified to lose such a valued green space in this built-up area when as above, it provides many valuable uses for the surrounding community.</p>	<p>the grassy area is used by dog walkers as a toilet stop, thus preventing soiling of the nearby pavement areas.</p> <p>iv) The green space and trees also provides a welcome and attractive area of <b>‘green relief’</b> in an otherwise built up area.</p>	
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				<p>The Grove, one of the streets immediately adjacent to the site, contains sheltered housing for elderly and infirm Haringey residents. The Grove itself is a very narrow road, with single parking and is not wide enough for truck access (there have been previous issues with fire engine and delivery lorry access). With these two factors combined, it is blatantly not suitable for a very large, multiple-storey residential development with front doors opening onto The Grove, as proposed. Removing the parking spaces from The Grove to widen the access would simply serve to place more pressure on parking which is already under-served in the immediate area. Again, had the Council undertaken more robust evidence gathering in <b>relation to this site and it's surrounds, it would</b> have been obvious that this level and type of development on the Courtyard area of this site is not justifiable versus the impact on both vulnerable members of the community and the surrounding area.</p> <p>The Courtyard portion of the site contains a large and attractive Victorian building that is a former piano factory. This building currently serves as offices for some of the businesses on the site and thus is in very good condition. This site, as the Sites Allocation DPD notes, borders the Crouch End Conservation area, so literally a few metres further and this building would be afforded much more protection. However, at present the Site Requirements for SA49 state that: <b>“No buildings need to be retained on this site.”</b>. Meaning that this building could be</p>		
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					<p>completely destroyed. North London in the Victorian era had the greatest concentration of piano factories in the UK, so as such, this building represents part of the socio-economic history of this part of London:  <a href="http://www.londonpianotuning.co.uk/history-of-piano-development/">http://www.londonpianotuning.co.uk/history-of-piano-development/</a></p> <p>If the site was developed with up to 41 residential units as proposed, this would potentially place a significant strain on local amenities such as parking (which in the surrounding streets is already at a premium) and school places, which it has been well reported are already over-subscribed in the Crouch End area/Haringey:  <a href="http://www.theguardian.com/education/2014/apr/11/primary-school-places-offer-day">http://www.theguardian.com/education/2014/apr/11/primary-school-places-offer-day</a></p> <p>We have not seen evidence of an assessment of the impact on these two areas in relation to this proposed site development.</p>		
67	RSA1 62	SA49	no	no	<p>Haringey failed to consult with local residents in their drafting of this proposal. When challenged by the local residents who had found out about the proposal via a personal search for a separate planning matter, Haringey consulted an ad hoc number of residents some 10 days before the end of the 2nd consultation period. Haringey failed to provide sufficient time for vulnerable residents, particularly on the Grove, Lynton Road, to consider and respond on the matter; no consultation letters were issued to those for whom English is a second language.</p>	<p>Haringey should be required to re-consult on this proposal with all adjacent residents (Lynton, The Grove Lynton, Topsfield, Park and Palace Roads).</p>	<p>Consultation events in the preparation of this Plan have been carried out in accordance with <b>the Council's SCI</b> and the relevant regulations.</p> <p>No change</p>

					Haringey failed to notify or consult at any stage, and in any form, the existing commercial and industrial business units on the site.		
67	RSA1 63	SA49	No	No	<p>The proposal for SA49 development at 72-96 Park Road/Courtyard Lynton Road/adjacent green space is unsound and fails to comply for the following reasons:</p> <ul style="list-style-type: none"> <li>•Haringey failed to consult or inform residents or existing businesses on drafting of this proposal.</li> <li>•Residents found out about this proposal only via a personal search on another planning matter.</li> <li>•When challenged by residents, Haringey issued late and ad hoc consultation letters to a few residents on Lynton and Grove, Lynton Roads, some 10 days before closure of the consultation period.</li> <li>•Haringey failed to provide information to vulnerable residents in the Grove for whom English is a second language.</li> <li>•Haringey failed to inform or consult, at any time, in any format, the existing businesses on the industrial site, <b>locally referred to as “The Courtyard”</b></li> <li>•Haringey have coupled a legacy planning consent with the proposal to demolish viable businesses in the Courtyard, a well maintained and quaint industrial site.</li> <li>•The legacy planning consent has been misrepresented by Haringey in the DPD as <b>“2.140 There is an existing planning consent for the western portion of this site permitting development up to five storeys on the site”</b>.</li> </ul>	<ul style="list-style-type: none"> <li>• Remove from the plan inclusion of the green space, land and trees, in front of The Courtyard and Lynton Road.</li> <li>• Add protection of the amenity of those residents/properties on Lynton Road to the proposal.</li> <li>• De-couple the extant planning on 72-96 Park Road from the new proposal for the development of The Courtyard and the adjacent green space.</li> <li>• Run full and proper consultation on the proposal with the residents and</li> </ul>	<p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>The amenity of all surrounding neighbouring properties will be protected through policy DM1.</p> <p>It is not appropriate to de-couple the planning application that was granted for 72-96 Park Road, as the intention of the allocation is to seek a more comprehensive development across the two sites, which the Council believes will deliver better outcomes in terms of massing, layout, amenity</p>

				<p>The original application for 5 storeys was rejected and only a 4-storey development approved.</p> <ul style="list-style-type: none"> <li>• Haringey have failed to account for amenity considerations to the residents on Lynton Road who are directly opposite, and closest to, the proposed site to be demolished and built up to 5 storeys.</li> <li>• The proposal does not provide sufficient protection of the much-valued and used green space between Lynton Road and The Courtyard; it alludes only to the trees on the green space. The green space itself, therefore, is not secured.</li> <li>• Removal of the green space would result in an unacceptable loss of amenity to my home, including direct views into my young <b>daughter's bedroom</b> – the bedrooms of those houses facing on to the Courtyard at the front. This is also a cul de sac with narrow pavements in line with the conservation status of the area which begins on Lynton Road</li> <li>• The proposed demolition of the existing pretty and perfectly functioning Victorian buildings in the Courtyard is reprehensible.</li> <li>• There is insufficient space between The Courtyard and The Grove to provide units opening on to that road; at present ambulances and fire engines have difficulty navigating the road.</li> <li>• Parking is a major difficulty at the present time; a recent application for additional dwellings in Palace Road, adjacent to Lynton Road and in the conservation area, was rejected by Haringey Planning for that, and a</li> </ul>	<p>existing businesses in The Courtyard.</p> <ul style="list-style-type: none"> <li>• Restrict height of any planning proposal to a maximum of 3 storeys.</li> <li>• Protect existing businesses in The Courtyard now.</li> <li>• Protect the Victorian buildings in The Courtyard from demolition.</li> </ul>	<p>considerations and the mix of uses to be provided.</p> <p>Consultation was undertaken in accordance with national requirements and the Council adopted Statement of Community Involvement.</p> <p>It is not appropriate to restrict heights. The Council advocated a design-led approach where development heights must have regard to their surrounding context.</p> <p>Provision is made in the allocation to replace the existing employment floorspace to</p>
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					<p>number of other reasons. The proposal fails to deal with this adequately.</p> <ul style="list-style-type: none"> <li>•The Courtyard is a thriving industrial and commercial area, providing much needed premises for non-retail business locally. There is no other commercial provision in the area.</li> <li>•Jobs lost now, through demolition, would not be recovered at this site.</li> <li>•Local schools and services are already dealing with over-capacity issues; this proposal does not take that into account.</li> </ul>		<p>retain existing businesses.</p> <p>Unfortunately the Victorian building is not listed or locally listed to give it the protection sought.</p> <p>No change</p>
68	RSA1 64	SA49	No	Not stated	<p>I object to that part of the proposal that refers to the development of the Industrial site on Lynton Road and its adjoining grassed land (which I have called the 'Grassy Knoll').</p> <p>I would like to make the following comments on the Council's presentation:</p> <p><i>SA49 defined map area</i></p> <p>The drawing implies SA49 is a single site. This is not the case. 72-96 Park Road is already under development [HGY/2011/0905] and has been for some months. And to my knowledge the industrial site adjacent to the Grove is not under the same ownership and is, therefore, from the development point of view, a separate entity. The Grassy Knoll is immediately in front of the Industrial site facing Lynton Road and is managed by the Council.</p> <p><i>Commentary 2.140</i></p> <p>Commentary 2.140 says "There is an existing</p>	Not specifically stated	<p>It is considered appropriate that the sites are allocated together to ensure a comprehensive approach to development comes forward.</p> <p>The Council has no plan to change the "grassy knoll"</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p>

				<p>planning consent for the western portion of this site permitting development up to five storeys on this site. ...”</p> <p>Referring to the Notice of Planning Permission for HGY/2011/0905<sup>72</sup> [72-96 Park Road] <b>permission is granted for “... the erection of a further two floors to existing 2 storey building ...”</b>.</p> <p>Commentary 2.140 is therefore incorrect.</p> <p><i>Industrial site: employment issues</i></p> <p>Grouping together the following three paragraphs:</p> <p><i>[Site Requirements: point 2] Replacement employment floorspace will be required to be provided to replace the number of jobs on this site.</i></p> <p><i>[Development Guidelines: point 3] In line with policy SP9, if redevelopment results in a net loss of employment floorspace, a financial</i></p>		<p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations and <b>the Council’s</b> Statement of Community Involvement.</p> <p>Heights will be determined based on the design of the development when a planning application comes forward.</p> <p>No change</p>
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<sup>72</sup> HGY/2008/0966 amends HGY/2006/1839; and HGY/2011/0905 amends both HGY/2008/0966 and HGY/2006/1839. And HGY/2014/1610 is attached to HGY/2008/0966. HGY/2005/1463 amends a shop front but HGY/2002/1877 proposes a five storey building (the decision in this case being classified as a ‘Legal Agreement’). Understandably, but unfortunately, HGY/2006/1839 does not refer to either HGY/2008/0966 or HGY/2011/0905 or HGY/2014/1610. The latest drawings are in HGY/2008/0966.

				<p><i>compensation will be required as set out in the Planning Obligations SPD.</i></p> <p><i>[Development Guidelines: point 4] Any jobs lost through development of the site should be reprovided on site.</i></p> <p>There appears to be a contradiction between points 2/3 and point 4 that requires resolution.</p> <p>There are few sites that provide this type of workspace this side of the borough<sup>73</sup>. There is an assumption that retail premises are suitable for all, but for some businesses, for example, computer related, a shop window is not what is required. The facilities offered by this industrial site are unique in this area.</p> <p>Certainly the loss of industrial status will prevent investment in new and emerging commercial opportunities that could further benefit the borough.</p> <p>With regard to SP9 it seems odd to take jobs away, to support jobs elsewhere when there is no need.</p> <p><b><i>Industrial site: existing building issues</i></b></p> <p><i>[Site Requirements: para 3] No buildings need to be retained on this site.</i></p>		
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<sup>73</sup> London Borough of Haringey, Workspace Viability Assessment, December 2014

				<p>Removing the existing Victorian buildings is a lost opportunity. Firstly such buildings are popular<sup>74</sup> and secondly they provide a sense of scale that some modern developments choose to ignore. However from a developer's point of view a new build may have certain advantages and hence the inclusion of this paragraph.</p> <p><i>72-96 Park Road and Industrial site: building height issues</i></p> <p><i>[Development Guidelines: para 2] Attractive street frontage could be created to enhance the setting of the Conservation Area creating a 'gateway' to it.</i></p> <p>This statement implies more choice than there really is.</p> <p>The granting of planning permission by HGY/2011/0905 has established how this development will appear facing Park Road (front elevation), Lynton Road (side elevation), the industrial estate (rear elevation) and Veryan Court (side elevation).</p> <p>Consequently the only thing left is how the Industrial site interfaces with the rear elevation of 72-96 Park Road, The Grove, the Grassy Knoll, and part of Lynton Road.</p>		
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<sup>74</sup> London Borough of Haringey, Workspace Viability Assessment, December 2014

				<p><i>[Development Guidelines: para 1] The current blank brick façade on the approach to the Church on the Grove should be replaced with active building frontages, with front doors opening onto the street.</i></p> <p><i>[Development Guidelines: para 5] Heights should be restricted to protect the amenity of properties on the Grove, and heights should be restricted to the north of the site to protect the setting of the church, and preserve the amenity of the back gardens on Palace Rd.</i></p> <p>Parallel to the brick façade is a sheltered housing complex comprising 48 two-storey flats housing elderly and some vulnerable residents. The Lynton Road aspect contains two storey houses, eight of which opposite the Industrial site have front roof conversions. Lynton Road itself is part of the Crouch End Conservation Area.</p> <p>Consequently if the intention is to enhance the setting of the Conservation Area and protect the amenity of properties on the Grove, then any development onto the Grove should be no higher than two storeys.</p> <p>In addition, according to HGY/2011/0905, the interfacing elevation between 72-96 Park Road and Industrial site will remain at two storeys.</p> <p><i>[Development Guidelines: para 6] Heights and elevation details should respond to the Park</i></p>		
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				<p><i>Road frontage and the established rhythm.</i></p> <p>HGY/2011/0905 establishes a maximum of four storeys on the Park Road front elevation descending to two storeys on the Lynton Road and Grove side elevations.</p> <p><i>[Development Guidelines: para 7] Higher elements may be possible on Park Road marking the entrance to Crouch End District Centre.</i></p> <p>This contradicts HGY/2011/0905 which has set the height to four storeys.</p> <p><b><i>The Grassy Knoll</i></b></p> <p><i>[Development Guidelines: para 8] The site contains a number of mature trees and these should be retained on site where possible.</i></p> <p>A cynic may say that the Council has bundled in the Grassy Knoll simply to square off the shape of SA49.</p> <p>Whereas 72-96 Park Road and the Industrial site are freehold, the Grassy Knoll is managed by the Council on behalf of the public. And it should be noted that some local residents have made significant contributions to its upkeep.</p> <p>At the very least the potential loss of valuable public open space should be opened up for discussion; land should not be automatically confiscated by the Council for their own ends.</p>		
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				<p>As Simon Stevens, NHS England chief executive said earlier this month:</p> <p><b>“We want children to have places where they want to play with friends and can safely walk or cycle to school - rather than just exercising their fingers on video games. We want to see neighbourhoods and adaptable home designs that make it easier for older people to continue to live independently wherever possible. And we want new ways of providing new types of digitally-enabled local health services that share physical infrastructure and staff with schools and community groups.”</b></p> <p><b><i>SA 49: What hasn’t been said</i></b></p> <p><i>[Development Guidelines: para 9] Applicants must consult with Thames Water regarding both wastewater and water supply capacity upon the preparation of a planning application.</i></p> <p>Water is vital, but so are the other every day things of life.</p> <p>The increasing density of housing occupancy will lead to pressure on local services. As <b>examples, the Council’s stance on education is leading to bulge classes in schools. We note that there longer waiting times to see a GP. Try catching a bus? Try parking?</b></p>		
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69	RSA1 65	SA49	No	Not stated	<p><u>Red Line of the Site</u> Defend Crouch End Propose that the SSAD SA49 site boundary be tightened to exclude the western portion of the site owned by Orantez. The reason we propose this is that this part of the site is in separate ownership and on 14/12/2006 was granted permission for <b>planning application HGY/2006/1839</b> ‘<i>Erection of a further two floors to existing 2 storey building to create 4x two bedroom and 2 x one and 3x three bedroom flats and 4 additional commercial units. Development includes alterations to elevations, formation of 5 car parking spaces and provision of covered bin store</i>’.</p> <p>The owner has part implemented this consent and is still developing it out. For this reason Defend Crouch End do not consider it appropriate to incorporate this part of the site in the SSAD. This planning consent will deliver an additional 9 homes and 5 commercial units and is of appropriate density and design. There is no case for further intensification of this part of the site and anything larger than currently consented would be overbearing for residents opposite who live in two storey terraced cottage houses.</p>	<p>If, in any case, this part of the site remains in the SSAD the commentary at 2.140 on page 122 should be corrected. It currently states ‘<i>there is an existing planning consent for the western portion of this site permitting development up to five storeys on the site</i>’. This is incorrect and the residents propose that if this portion of the site is not removed from the SSAD the text be reworded to say ‘<i>there is an existing planning consent for the western portion of this site permitting development up to FOUR storeys on the site</i>’</p>	<p>He height of the roof of the consented site was raised under HGY/2011/0905</p> <p>It is considered that the most appropriate future allocation is to include both land ownerships together to ensure a comprehensive scheme comes forward.</p> <p>It is not considered that changing the boundary would aid implementation of this policy.</p> <p>Heights will be determined based on the design of the development when a planning application comes forward.</p>
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						<p>Page 122 Change the site boundary to exclude the Orantez Site ownership</p> <p>Page 122 2.140 replace incorrect <b>reference to ‘five stories’ with ‘four stories’</b></p> <p>Page 123 Development Guidelines:</p> <p>The current blank brick façade on the approach to the Grove [delete should replace with] COULD be replaced with active building frontages [delete with front doors] opening onto the street BUT OVERLOOKING SHOULD BE AVOIDED</p> <p>Attractive street frontage could be created to</p>	<p>The Site boundary includes both parcels of land to ensure a comprehensive approach to development is brought forward.</p> <p>The Piano Factory is not a listed building and as such does not receive specific protection in the Policy.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations and <b>the Council’s</b></p>
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						<p>enhance the setting of the Conservation Area creating a <b>'gateway' to it</b> AND THE OLD PIANO FACTORY SHOULD BE RETAINED RECOGNISING ITS CONTRIBUTION TO THE CHARACTER OF THE AREA</p> <p>[delete fourth bullet point with reference to loss of jobs] REDEVELOPMENT SHOULD INCREASE JOBS AND EMPLOYMENT OPPORTUNITIES ON SITE</p> <p>Fifth bullet point – Heights should be restricted to protect the amenity of properties on The Grove AND LYNTON ROAD,</p>	<p>Statement of Community Involvement.</p> <p>No change</p>
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						and heights should be restricted to the north of the site to protect the setting of the [delete church replace with] MISSION HALL BUILDING and preserve the amenity of the back gardens on Palace Road.	
69	RSA1 66	SA49	No	Not stated	<p><u>Retention of the Green Space</u> The Green is a very welcome and restful spot as you transition from the busy Park Road and move to the residential area. The Green is a place for dog walkers and in summer is used for sitting out; it also forms part of a green walking route to Priory Park to the north east of the site. It is populated by 8 mature trees, six of which are very attractive silver birch trees. There is a dog waste bin on the path and two areas of green land. While the Council have moved to retain the mature trees on the site Defend Crouch End do not consider this goes far enough and instead propose that the Green is RETAINED as an area of amenity and green space.</p> <p>The Green is used by a large number of people</p>	<p>Amend Development Guidelines:  [delete the eighth bullet point ]THE GREEN IS A LOCAL OPEN SPACE PROVIDING IMPORTANT AMENITY VALUE AND THE GREEN TOGETHETHER WITH THE MATURE TREES ON SITE SHOULD BE</p>	<p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>No change</p>

				<p>including those working in the businesses on their breaks, local dog walkers, students who walk through on their way to and from school. In particular the open space is welcomed by the older and sheltered residents in the Grove development who are happy with this local green as it is easy for them to access from their homes and is safe as it is overlooked by neighbours and near their homes; the trees also serve to help shield their homes from the noise of very busy Park Road nearby. The green also offers an amenity space for the local residents between their homes and the more intensive commercial uses within the site boundary. It will also be the nearest patch of amenity space for the new residential units in any site redevelopment as these units will not have gardens of their own and as such provides an important counterpoint to the further proposed intensification.</p> <p>The Green also allows an important set back of the current buildings from the low level two storey cottage houses on Lynton Road and if a development were to encroach this space their amenity would be severely impacted as these houses have living rooms and bedrooms facing the green.</p> <p><b>The Council's Local Plan Policy SP13: Open Space and Biodiversity states that '<i>New development shall protect and improve Haringey's parks and open spaces. All new development shall:</i></b></p> <ul style="list-style-type: none"> <li>▪ <i>Protect and enhance, and when and where possible, extend the existing boundaries of the borough's Green Belt, designated Metropolitan</i></li> </ul>	<p>RETAINED</p> <p>Sixth, seventh and ninth bullet points to be retained.</p>	
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				<p><i>Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development;</i></p> <ul style="list-style-type: none"> <li>▪ <i>Provide amenity space in accordance with the Council's Open Space and Recreational Standards Supplementary Planning Document (SPD);</i></li> <li>▪ <i>Manage the impact of such new developments in areas adjacent to designated open space;</i> <ul style="list-style-type: none"> <li>▪ <i>Secure improvements, enhancement and management in both quality and access to existing green spaces;</i></li> </ul> </li> <li>▪ <i>Seek on-site or financial contributions towards open space from new developments as set out in the Open Space and Recreational Standards SPD;</i></li> <li>▪ <i>Seek to secure opportunities for additional publicly accessible open space especially in those identified areas of Open Space deficiency .....</i></li> </ul> <p><b>Haringey's Open Space and Recreation Standards SPD (March 2008)</b> highlights areas where there is an open space deficiency and the area just south of the site covering central Crouch End is an area of open space deficiency (see figure B1). The SPD grades different types of open space in Table 1.1 which states that Amenity Greenspace should be determined on a site by site basis. The GLA Parks Hierarchy is also given in Table 1.2 and this defines this green space as a Small Local Park and Open Space due to its size. Defend Crouch End consider that while small this green space is still very valuable and so should be protected for its</p>		
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					<p>amenity value as a green space (not just the mature trees as currently stated in SA49) and that the SSAD is the appropriate document to do this as the site is now being considered within it and this approach is suggested by <b>Haringey's Open Space and Recreation Standards SPD</b>.</p> <p>Defend Crouch End have also separately made an application to protect the site as an Asset of Community Value as it has been a green for over 5 years and can foreseeably be retained as a green into the future. This application is being made concurrently with our response to the SSAD in February 2016. However, we are clear that the Local Plan documents are also appropriate documents with which to give a further form of protection to open space (as <b>stated in National Policy and Haringey's Open Space and Recreation Standard's SPD</b>) and, to reiterate, we are seeking that the Green should be protected in Local Policy by referencing and protecting this green space in the SSAD, and also on the Local Plan Policies Map.</p>		
69	RSA1 67	SA49	No	Not stated	<p><u>Protection of the Old Piano Factory</u>  <b>The SSAD states on page 123 that 'No buildings need to be retained on this site'.</b>  While the site is not in a Conservation Area it is adjacent to Crouch End Conservation Area. Defend Crouch End are of the view that the Old Piano Factory at the rear of the Courtyard is a very attractive Victorian era building that abuts the 1881 Mission House at 49 The Grove just outside the site to the north east. The Old Piano Factory is a two storey building of two wings which join on an angle at the top of the site,</p>	<p>Page 123 Site requirements to be replaced as follows</p> <p>The Old Piano Factory is locally listed and of important amenity value and efforts should therefore</p>	<p>The Piano Factory is not a listed building and as such does not receive specific protection in the Policy.</p> <p>Its potential retention is a design issue and will be dealt with</p>

					<p>with a sloping tile roof and made of London Stock brick with red brick window head detailing. It has a shaped pediment architectural detail above the main door on the western wing and an expressed lintel above the door of the north wing. The building is a rather delightful example of how Victorian architecture expressed details in even warehousing and employment buildings. The building adjoins the listed Mission building (which is just outside the site and contains two residential units). The Old Piano Factory building is also a much needed element of historic architecture in this locality, providing local heritage together with the Mission Building, among the modern buildings of the Grove, Lynton Road and Park Road which all date after 1970.</p> <p>It is proposed that the building be locally listed and that the SSAD be redrafted to express the desire to see the RETENTION OF THIS BUILDING or strong reasons given why not and a very high quality of design to be offered as an alternative. We consider this building would be most suitable for continued employment land and it is already being well used as such but could potentially be converted for residential use.</p>	<p>be made to retain this building on this site. A strong justification will be needed to show why that is not possible and very high quality alternative design will be required to allow its replacement.</p>	<p>at the detailed planning application stage.</p> <p>No change</p>
69	RSA1 68	SA49	No	Not stated	<p><u>Loss of Employment Land</u> Defend Crouch End has not had the time to conduct its own assessments but we would like to raise a number of studies and policy positions which would support our view that the site should be identified for AN INTENSIFICATION OF EMPLOYMENT USE/</p>	<p>Page 123 Site requirements to be replaced as follows</p> <p>Redevelopment of this site for</p>	<p>Amendments were made between the Regulation 18 and this consultation to include new commercial space</p>

				<p>EMPLOYMENT LED MIXED USE DEVELOPMENT.</p> <p>The site currently is host to a number of businesses who provide valuable services within the local economy and a number of jobs and rely on a relatively local customer base. Defend Crouch End consider the site should be primarily employment led redevelopment as despite the irrefutable need for additional homes in London there is also a need for mixed employment spaces, affordable workspace and the variety of jobs these sites offer. This site is not able to provide homes with gardens due to the requirement to retain the existing levels of employment land and the size of the site and therefore we contend the site should be intensified for employment use.</p> <p>The Haringey Core Strategy Policy SP8: <b>Employment states that</b> <i>'the Council will secure a strong economy in Haringey and protect the borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas. The Council will:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Protect B uses (under the Use Classes Order) including light industry, logistics, warehousing and storage facilities to meet the forecast demand of 137,000m2 floorspace up to 2026;</i></li> <li>▪ <i>Support local employment and regeneration aims;</i></li> <li>▪ <i>Support environmental policies to minimise travel to work;</i></li> <li>▪ <i>Support small and medium sized businesses that need employment land and space; and</i></li> <li>▪ <i>Contribute to the need for a diverse north London and London economy including the</i></li> </ul>	<p>intensification of employment use/employment led mixed uses will be permitted</p> <p>Replacement employment floorspace will be required to enhance the number of jobs on this site</p> <p>Page 123 Change Development Guidelines:</p> <p>REDEVELOPMENT SHOULD BE EMPLOYMENT LED/ENHANCE EMPLOYMENT FLOORSPACE [delete current third bullet point with reference to loss of employment floorspace]</p>	<p>in the development.</p> <p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations and <b>the Council's</b> Statement of Community Involvement.</p> <p>While the Council supports an intensification of the employment offer on the site, it is recognised that generally in the borough, the rental values generated by employment uses are not sufficient to cover the construction costs. As such the provision of an element of residential within mixed use schemes can be</p>
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				<p><i>need to promote industry in general in the Upper Lea Valley and in particular, promote modern manufacturing, business innovation, green/waste industries, transport, distribution and logistics.'</i></p> <p>The London Plan Policy 4.4 also seeks to ensure that industrial land and affordable floorspace in other locations is protected where there is demand.</p> <p>The Federation of Small Businesses and the New Economics Foundation both regularly make the case for retention and improvement of workspace for small businesses through the JustSpace Campaign <a href="https://www.justspace.org">https://www.justspace.org</a> . This site identifies an ongoing campaign by small businesses and other stakeholders not to see the continual erosion of industrial and employment land in London and in particular looks at ways the planning system currently contributes to the issue and how it can be used as a solution not a cause.</p> <p><b>London's Industrial Land: Cause for Concern</b> is a working paper produced by Jessica Ferm and Edward Jones of the Bartlett School of Planning UCL in February 2015 <a href="https://justspacelondon.files.wordpress.com/2015/02/ferm-jones-londons-industrial-land-working-paper-final1.pdf">https://justspacelondon.files.wordpress.com/2015/02/ferm-jones-londons-industrial-land-working-paper-final1.pdf</a> . They quote in section 3 p 15/16 a URS 2007 study that states <i>'between 2001 and 2006 90 ha per annum industrial land were lost to other uses, approximately double the GLA's proposed</i></p>		<p>used to help fund the intensification of employment sites.</p> <p>No change</p>
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				<p><i>managed release in its 2003 Draft Industrial Capacity SPG and that ‘for the period 2006-16 the GLA benchmark for loss remained at 48 ha per annum (GLA, 2008) while in reality 86.75 ha per annum was released between 2006 and 2010 (GLA, 2012)’. On page 18 they further quote a paper by Lima (2014) which was a study of Haringey that ‘revealed of 54 sites identified for redevelopment in the Council’s Site Allocation Document five were Locally Significant Industrial Sites and six others were other industrial sites. Haringey is identifies in the London Plan (GLA, 2011, Map 4.1) for “limited” transfer of industrial land’. The authors of this study conclude on pages 37-39 that development pressure and planning policy have played a role in the loss of employment land as well as deindustrialisation, exacerbated by the Government’s permitted development rights facilitating the conversion of industrial land to residential. The go on to say that ‘in contrast to what downward spiralling projections suggest evidence on the ground indicates that manufacturing is changing but not dead’. The articulate that ‘hidden industrial sites house businesses that are part of the local economic ecosystem and that relocation of these businesses is more problematic than often appreciated’ a point we would reiterate. The allocation of this site for a mix of residential and employment uses will likely result in a further loss of employment land above the planned level of release intended for London and Haringey.</i></p> <p><b>Haringey’s own Employment Land Study</b></p>		
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				<p>(February 2015) provides an analysis of the local property market. Due to its size this site is not classified as a Defined Employment Area within the borough but it is an employment area none the less. At 3.7 on page 13 the report notes ‘<i>there is a perceived lack of supply of build developments catering for industrial and warehousing uses, local commercial agents noted there was high occupancy in the existing protected areas. The stakeholder consultees identified the Borough was suffering from limited industrial stock and competing pressure from other uses e.g. residential</i>’. At 3.18 the report notes there is ‘<i>a lack of suitable B1c/B2 stock across the borough. There is an insufficient supply of employment locations with enough capacity to accommodate additional B1c/B2 industrial uses across the Borough. Local commercial agents consider that additional sites need to be brought forward ...in order to accommodate SME’s.</i>’ Figure 5.1 in the report shows there has been a steady decline in industrial floorspace since 2004.</p> <p>We contend the evidence shows that the businesses currently on the site would find it very hard to identify other suitable premises in the area due to the overall lack of supply. This loss would potentially lead to a loss of jobs. Furthermore the evidence points to a greater than planned loss of employment land and a demand for such sites to provide jobs and support the London economy. Defend Crouch End consider the site has potential for intensification as employment use and should be classed a suitable for intensification of</p>		
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					employment use/ employment-led mixed use development.		
70	RSA1 69	SA49	No	Not stated	<p>Issue 1: Change in use, protection of jobs, variety of local employment opportunities, premisses for SME and micro-businesses</p> <p>We believe the Site Allocation DPD is not consistent with national policy and I would like the plan to be modified and have provided suggestions for improvement. The national policy is The Current London Plan, Chapter 4 - <b>London's Economy that recognises the importance of workspace for SMEs and for new and emerging industries is also required including for the needs of micro-firms. Here is the relevant policy extract:</b></p> <p><b>"Policy 4.4 Managing industrial land and premises</b></p> <p>4.18 Even an increasingly service-based economy needs space for less high-value activities crucial to sustaining the city's metabolism, including 'services for the service sector, manufacturing and maintenance, waste management and recycling, wholesale and logistics. Sufficient space to accommodate demand for workspace suitable for SMEs and for new and emerging industries is also required including for the needs of micro-firms."</p>	Not specifically stated	<p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>No change</p>
70	RSA1 70	SA49	No	Not stated	The proposed change in use from industrial to Mixed use Commercial and Residential will adversely affect the mix of employment and employment opportunities in the area	I would like to see protection of current mix of light industrial and	It is considered that the creation of additional residential, in addition to the

						retail use	replacement employment floorspace, will help to meet the <b>borough's</b> identified housing need.  No change
70	RSA1 71	SA49	No	Not stated	The indicative development capacity for employment of just 718 by m2 as we believe that this must be an underestimate given that the current site is stated as being '0.5 ha' {5,000 m2} i.e. indicative capacity is just 14% of the current footprint. By not increasing this the type and range of employment possible on the site will be restricted to only high-density type.	Therefore the required employment capacity should be increased.	The capacity is indicative, and the actual amount to be delivered will be determined at planning application stage.  No change
70	RSA1 72	SA49	No	Not stated	The Development Guideline guideline that states 'In line with policy SP9, if redevelopment results in a net loss of employment floorspace, a financial compensation will be required as set out in the Planning Obligations SPD.' appears to remove the safeguard to retention of employment 'floorspace'.  Further, it appears to contradict another Development Guideline that states 'Any jobs lost through development of the site should be reprovided on site' and the Site Requirement that 'Replacement employment floorspace will be required to be provided to replace the number of jobs on this site.'	This development guideline should be removed from the plan	This would only apply if there is a loss of employment floorspace. While this is not envisaged, the policy (SP9) will remain in force, and as such a reference is considered appropriate.  No change
70	RSA1	SA49	No	Not stated	We welcome the Development Guideline 'Any	And would like	Noted. It is not

	73				jobs lost through development of the site should be reprovided on site.'	this guideline lo be strengthened so that it is safeguarded requirement.	possible to require this, but the development guideline requires that the principle is explored.  No change
70	RSA1 74	SA49	No	Not stated	Issue 2: Protecting green space- trees and public rights of way. We value the public green space and right of way that is part of the site and it offers an effective and important break between the busy park road and the beginning of the residential area. We believe that the Site Allocation DFD is not consistent with national policy as National Planning Policy Framework paragraph 75 which states that 'Planning policies should protect and enhance public right* of way and access.' We also think that this land has potential to be designated as Local Green space as it meets criteria listed in the National Planning Policy Framework paragraph 77 in so far as it is 'reasonably close proximity to the community it serves ;and 'where the green area concerned is local in character and is not an extensive tract of land. Without specific protection of the green space in the plan we fear this resource will be lost.	Our view is that the plan should have a requirement for the existing green space and public right to be retained, enhanced and even extended	The retention of the trees is a clear presumption that the open space will be preserved.  No change
70	RSA1 75	SA49	No	Not stated	Linked to this point, we welcome the spirit of the Development Guideline that states that 'The site contains a number of mature trees and these should be retained on site where possible.' We are very worried about the inclusion of the words 'where possible' as these appear to allow a mechanism not to retain the	The plan should in to the effect that any trees that can't be retained MUST be replaced [:y an increased	The retention of the trees is a clear presumption that the open space will be preserved.  No change

					trees.	number of comparable trees within the development.	
70	RSA1 76	SA49	No	Not stated	<p>issue 3: Protection of buildings significant to the heritage of the local area</p> <p>There is a Site Requirement that states 'No buildings need to be retained on this site.' We think that this is not justified and want to point out that there are several Victorian buildings including an attractive historical Piano Factory, which represent the heritage of the area, are in apparently good condition, and should be retained. I understand that the plan must be justified on robust and credible evidence, however, no evidence has been made available on how the conclusion that no buildings need to be retained was reached and therefore we question if the plan can valid in this respect.</p>	Please amend the plan to include retention of these buildings within the context of development that is complementary and enhances their setting	<p>The Piano Factory is not a listed building and as such does not receive specific protection in the Policy.</p> <p>No change</p>
70	RSA1 77	SA49	No	Not stated	<p>issue 4: Disproportionate scale of development, lack of specific safeguards and contradictory Development Guidelines regarding heights"</p> <p>We have not seen specific evidence of sound infrastructure and delivery planning that would justify the scale of residential development and I believe ii represents an over development of the area. We do not believe the plan is justified</p>	We request that the stated number of residential dwellings is significantly reduced from the proposed indicative capacity of 41	<p>Heights will be determined based on the design of the development when a planning application comes forward.</p> <p>No change</p>
70	RSA1 78	SA49	No	Not stated	<p>We do not believe the plan is sound in so far as these two Development Guidelines appear to be contradictory</p> <p>1. Heights and elevation details should</p>	therefore the second should be removed	Heights will be determined based on the design of the development when a planning

					<p>respond to the Park Road frontage and the established rhythm.'</p> <p>2. 'Higher elements may be possible on Park Rd marking the entrance to Crouch End District Centre'</p>		<p>application comes forward.</p> <p>No change</p>
70	RSA1 79	SA49	No	Not stated	<p>We do not believe the plan is sound as while it acknowledges the need to limit heights to protect amenity of the surrounding area, there is no safeguard to ensure this will happen. Relying on current development management policies is not satisfactory as there is no guarantee that the development management policies will not change in the future. Specifically, the plan contains the Development <b>Guideline that "Heights should be restricted to protect the amenity of properties on The Grove, and heights should be restricted to the north of the site to protect the setting of the church, and preserve the amenity of the back gardens on Palace Rd.'</b></p>	<p>Please add specific restriction on the restrictors of the heights for the Grove, Lynton Road and the north of the site of 2 stories.</p>	<p>It is considered that the DM policies dealing with height are sound, and as such the approach of appraising heights on a site by site basis is sound, in that it takes into account the surrounding context.</p> <p>No change</p>
70	RSA1 80	SA49	No	Not stated	<p>We suggest that a specific Site Requirement for parking provision is included. This can state that parking, including to meet the needs of disabled employees, residents and visitors to site in line with BS 8300. Must be provided within the development scheme and that on-street residential parking permits will not be available to the development. This is needed as there is already insufficient local parking for residents. I believe that the council has the power to add this to the Site Allocation plan and the Council should not simply delegate this to the DMDPD.</p>		<p>Details of access and parking will be required at the time of planning application in line <b>with the Council's DM Policies.</b></p> <p>No change</p>

71	RSA1 81	SA 48 SA 49	No respon se given	No response given	<p>The Crouch End Neighbourhood Forum and Crouch End Neighbourhood Area were approved and designated by the London Borough of Haringey in December 2015. The Forum is presently preparing a Neighbourhood Plan which will include site specific policies and potential Neighbourhood Development Orders. Our comments on the SADP document are below.</p> <p>Two sites listed in the SADPD are within the Crouch End Neighbourhood Area: SA48 Hornsey Town Hall, and SA49 72-96 Park Road and Lynton Road.</p>		Noted.
71	RSA1 83	SA 49	No respon se given	No response given	<p>1. The development guidelines seek to safeguard the number of jobs and the employment floorspace on site. The Forum are also keen to retain employment in the local area, which is under threat, and supports the Council's intention. However it is not clear to us how this is deliverable – clauses state that financial compensation will be payable for loss of employment floorspace, but that jobs lost through development will have to be re-provided on site, an apparent contradiction. We ask that both aspects of employment – jobs and floorspace – be ensured.</p> <p>2. We note that the description seeks to protect mature trees, but in our view fails to pay due regard to the value of the green open space in the SE corner, or provides options for its retention, particularly as the threat to the green received significant numbers of comments in the original consultation and is plainly valued by</p>	<p>We ask that both aspects of employment – jobs and floorspace – be ensured.</p> <p>We ask that due regard is paid to the green space, or that it be removed from the red line.</p>	<p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>The consultations carried out in the preparation of the Local Plan have been in line with national regulations and <b>the Council's</b> Statement of Community Involvement.</p>

					<p>local residents. It is not clear to us why it was necessary to include this amenity within the red line of the site, given the earlier representations. The space would also serve to protect existing residents from excessive density or massing in any future development. We note in this regard the Council's policy to retain, provide and protect local amenity space in the 2013 Local Plan (SP13). The retention and protection of local open space will also form part of the Neighbourhood Plan. We ask that due regard is paid to the green space, or that it be removed from the red line.</p>		<p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>No change</p>
72	RSA1 84	SA49	Not stated	Not stated	<p>I would like to object to the proposed compulsory purchase and development of the above site, in particular to my workplace, Unit 6, The Courtyard, Lynton Road.</p> <p>The business I am employed by is a growing structural engineering practice, providing employment for 18 local people, with planned recruitment this year and next of a further 15 people. My primary reason for choosing to work here is the locality, and the ease at which I can get home for school runs etc; I am not convinced the company would be able to find another workplace as beautiful or convenient as this one in the local area, which would mean a number of staff would have to consider moving to other company, which was be a great financial blow to the company, and its growth. The building, a converted Victorian piano factory, is not only beautiful, but has had considerable investment to improve facilities since I started working here in 2014, and there</p>	Not specifically stated	<p>There is no compulsory purchase planned on this site.</p> <p>Amendments were made between the Regulation 18 and this consultation to include new commercial space in the development.</p> <p>No change</p>

					<p>is investment planned for the site for this financial year.</p> <p>The Courtyard has a community of small businesses, all employing locally, it is a great asset to the local area and has a rigorous maintenance schedule to ensure its upkeep. I <b>don't think developing the site to provide 41</b> residential units would be financial viable when you consider the loss of investments in the local communities by the resident companies should the development go ahead.</p>		
73	RSA1 85	SA49	Not stated	Not stated	<p>As landlord of The Maynard Arms I want to place my objection to the planned building at Lynton Road SA48 as a resident of Crouch End and a patron of the Maynard Arms. I object to them taking away the green space used by many locals, blocking the sunlight into the pub garden, increase in traffic, increasing the number of residents living in close proximity opposite the pub who will no doubt place complaints about the pub/noise (this will be if significant concern if it happens) and we will no longer have a view of Alexandra palace. We also support our neighbours and the adverse impact this will have on their day to day lives.</p>	No specifically stated	<p>Heights will be determined based on the design of the development when a planning application comes forward. This will include consideration of impacts on the public house.</p> <p>The retention of the trees is a clear presumption that the open space will be preserved.</p> <p>The number of school places has been modelled in the School Place Planning report,</p>

							<p>and sufficient new classes to meet need planned for.</p> <p>Details of access and parking will be required at the time of planning application in line <b>with the Council's DM Policies.</b></p> <p>The view to Alexandra Palace from the pub is not a strategic view, and as such is not protected.</p> <p>No stated</p>
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### SA 50: St Luke's Hospital

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
232	RSA385	SA50: St Luke's Hospital	Not stated	Not stated	The Development Guidelines and Site Requirements should reference the need to contribute positively to the Muswell Hill conservation area and its significance. In addition the setting of the statutorily and locally listed building, and their significance should be highlighted as a development consideration.		<b>Two site requirements will be added covering the Conservation Area and setting of listed buildings.</b>

SA 51: Cranwood Care Home

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
33	RSA116	SA 51	Not stated	Not stated	<p>Pursuant to the above, I write to provide you with our feedback on the proposed development of Cranwood Care Home and 102-116 Woodside Avenue, Muswell Hill N10 (reference: SA51).</p> <p>Our key concerns relate to increase in traffic, further problems for on-street parking in the surrounding streets, and the urgent need for a CPZ in Woodland Rise and neighbouring streets. The new buildings must also be low rise (no more than 5 storeys) in order to fit in with the local period housing.</p> <p>We live at and own 3 Woodland Rise, London N10 3UP, which is approximately 150 yards from the site of the Cranwood Care Home. As you will be aware, now that the St Luke's redevelopment has been approved by the council and is in the process of construction, there is already going to be a significant increase in the number of residents and, in particular, in the volume of car transport and demand for car parking spaces in the immediate area. As a part of the St Luke's consultation, we repeatedly expressed our concerns that insufficient consideration was being given to the</p>	<p>Accordingly, <u>it is imperative that there be at least one designated on-site parking space available for each unit of accommodation at Cranwood and that there also be adequate provision for visitor parking too</u>, so as to avoid a further increase in the demand for car parking in the area.</p> <p><u>We are also extremely supportive of any proposal to create a controlled parking zone for the benefit of residents in Woodland Rise, N10.</u> We understand that there will be a consultation on this in due course.</p> <p>Finally, it is imperative that any new building be sympathetic to its surrounding environment</p>	<p>Concerns are noted. It is considered that Policy DM1 will ensure that the development is designed in such a way that is in keeping with the character of the surrounding area, including acceptable building heights.</p> <p>Parking standards will be provided in line with the London Plan. CPZ implementation is not an issue for the Local Plan.</p> <p>No change</p>

				<p>impact on the availability of parking spaces, both for residents of the new development, for residents in the surrounding streets and their respective visitors.</p> <p>There is no CPZ in the surrounding roads of Woodland Rise, Woodland Gardens, Onslow Gardens or Cranley Gardens. The area is extremely popular already with those who are visiting Highgate Wood, the shops on Muswell Hill Road/the Broadway and those from outside of London whom have discovered that those streets contain the nearest parking areas to Highgate underground station that are not subject to a residents parking scheme.</p> <p>Accordingly, we and our neighbours are already often finding it difficult to park within 150 yards of our front door on Woodland Rise. There are a number of families (including ours) with young children and disabilities, for whom this is a huge and unnecessary inconvenience.</p> <p>Whilst the number of new residences proposed for Cranwood is smaller than St Lukes, it will still have an impact on the local demand for parking and the absolute amount of traffic in area. It is not only the residents of the new development that will want to park in surrounding streets, but also their</p>	<p>of Edwardian terraced properties. To that end, the new buildings must be low rise and no more than 5 storeys in height.</p>	
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					<p>visitors. Accordingly, <u>it is imperative that there be at least one designated on-site parking space available for each unit of accommodation at Cranwood and that there also be adequate provision for visitor parking too</u>, so as to avoid a further increase in the demand for car parking in the area.</p> <p><u>We are also extremely supportive of any proposal to create a controlled parking zone for the benefit of residents in Woodland Rise, N10.</u> We understand that there will be a consultation on this in due course.</p> <p>Finally, it is imperative that any new building be sympathetic to its surrounding environment of Edwardian terraced properties. To that end, the new buildings must be low rise and no more than 5 storeys in height.</p>		
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SA 52: Pinkham Way

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA22	SA52	Not stated	Not stated	We recommend that the employment use designation should be removed and the site should become wholly a SINC. If development does take place then the potential to deculvert the stream should be included.	Not specifically stated	The Council believes it is necessary to preserve this site for employment

							<p>use in the future in order to meet identified employment demand.</p> <p>It is considered that a deculverting of the site may not be possible due to the complexities created by the <b>site's historical</b> use.</p> <p>No change</p>
34	RSA118	SA52	No	Yes	<p>North London Waste Authority supports the proposed planning designation for this site.</p> <p>However we remain concerned about the requirements to optimise pedestrian and cycling connectivity through the site as part of any new development, including from the existing estate on Alexandra Road to New Southgate station, which Crossrail 2 is proposed to be connected to.</p> <p>The site is not accessible at present to members of the public, (it is securely fenced off). Therefore, whilst we are pleased to see that a proposed route through the site has been removed from the site diagram in this</p>	NLWA proposes that the development guidelines for the site SA52 be amended as follows (with proposed amendments in bold italics):	<p>Agreed in part. It is important that the Council seek opportunities to promote access to areas of nature as well as to future growth areas and Transport nodes.</p>

				<p>version of the Site Allocations DPD the proposal that pedestrian and cycling connectivity through the site should be optimised as part of the design of any new development is opposed by NLWA as an absolute requirement.</p> <p>Such access could severely compromise the development of the site for employment use. If the site was used for waste management purposes for example, then health and safety constraints would be most likely to prevent pedestrian and cycling access. Any such route through the site would in any case have to be so fenced in (for health and safety reasons) as to be at best an unwelcoming route, and at worst an unsafe route from a crime perspective.</p>	<p>Pedestrian and cycling connectivity <i>from either side of</i> <del>through</del> the site, including <i>from</i> the existing estate on Alexandra Road, to New Southgate station, which Crossrail 2 is proposed to be connected to, should be optimised as part of the design of any new development <i>if it is safe to do so, recognising that the route and nature of any connectivity optimisation will depend upon the nature of the development</i></p>	<p><b>Amend to read:</b> The design of any new development should have regard to the opportunity to provide a pedestrian and cycle connection from the existing estate on Alexandra Road, to New Southgate station, which Crossrail 2 is proposed to be connected to.</p>
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35	RSA11 9	SA52	No	No	<p>Haringey's allocation of the land at Pinkham Way based on the evidence of a draft Strategic Flood Risk Assessment is of some concern. This concern is then heightened by the statement made by JBA Consulting in their Executive Summary that the assessment <i>"looks exclusively at flood risk within the London Borough of Haringey."</i> As required under the NPPG Haringey must use the Strategic Flood Risk Assessment to determine flood risk to and from surrounding areas in the same flood catchment. In the case of Pinkham Way part of the surrounding area lies in London Borough of Barnet and the land is situated within the Bounds Green Brook flood catchment and working collaboratively with other authorities, local planning authorities Haringey can develop a Strategic Flood Risk Assessment covering a wider area and at a river catchment level.</p> <p>The question that Haringey has to answer is "Will development of the land at Pinkham Way increase flood risk elsewhere". The only way they can answer this question is with a non-isolationist and compliant Strategic Flood Risk Assessment that assesses, in detail, the geology and hydrology of the allocated land and identifies where the sources of flood risk from the land, if any, will impact elsewhere.</p> <p>If the assessments prove that flood risk will be increased then development cannot be permitted and the risks must be eliminated and or managed by means of Strategic Flood Risk Infrastructure that will guarantee the safety of the people, property and essential infrastructure so affected.</p> <p>If the flood risks will occur in two or more LPA's outside Haringey then they have a "Duty to Co-</p>	Not specifically stated	<p>In preparing the Local Plan, the Council has undertaken two sequential tests, and a Strategic Flood Risk Assessment. These note that Pinkham Way is partially in an area of flood risk. In the development guidelines to the allocation it is noted that a Flood Risk Assessment will be required to show how development will ensure that there is no increase in risk of flooding either on or off the site.</p> <p>The Council</p>
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				<p>operate" with those LPAs and prove that such co-operation has been ongoing and meaningful. Failure to meet this requirement will mean that Haringey's Local Plan will be unsound.</p> <p>Our Strategic Flood Risk Assessment of the land at Pinkham Way clearly demonstrates that development will increase flood risk elsewhere and the impacts of those risk will be felt in both the London Borough of Barnet and the London Borough of Enfield and the other LPA's downstream in the Lower Lea River network.</p> <p>Haringey Planning has the information requested because it has published a Strategic Flood Risk Assessment and this should, if sound, have identified the drainage outfall route for the area identified. See the following:-</p> <p><i>" NPPF Section 100. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe <b>without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment</b> and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:</i></p> <p><i>. applying the Sequential Test;</i></p>		<p>are surprised that given there is no detailed proposal for development, that a FRA has been prepared <b>which</b> "clearly demonstrates that development will increase flood risk elsewhere and the impacts of those risk will be felt in both the London Borough of Barnet and the London Borough of Enfield and the other LPA's downstream in the Lower Lea River network"</p> <p>It is the <b>Council's view</b> that the site, if developed, presents an opportunity to</p>
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					<p><i>. if necessary, applying the Exception Test;</i>  <i>. safeguarding land from development that is required for current and future flood management;</i>  <i>. using opportunities offered by new development to reduce the causes and impacts of flooding;</i>  <i>and</i>  <i>. where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations."</i></p> <p>A critical part of the SFRA is to produce evidence to identify areas/land/sites which can be developed "<b>without increasing flood risk elsewhere</b>". We therefore request that you answer our question <b>based on Haringey's Strategic Flood Risk Assessment</b> as stated in our original email of 30-08-15.</p>		<p>improve drainage within the area, and mitigate drainage rates to Greenfield levels. Indeed, if development is to proceed, it will be required to demonstrate that flood risk has not been increased in accordance with the policies set out in the Development Management Policies DPD.</p> <p>No change</p>
218	RSA336	SA52/general	Yes	Yes	<p>We are pleased that site SA52 (Pinkham Way) has now been included in the sequential test. As outlined in the response form, the Site Allocations documents should reflect the wording in the sequential test and be clear that no more vulnerable development will be permitted in areas of Flood Zone 3.</p>	<p>-change of wording to reflect the wording in the sequential test and clarify that no more vulnerable</p>	<p><b>Noted, this amendment will be made.</b></p>

						development will be permitted in areas of Flood Zone 3.	
23 1	RSA37 3	SA52	Not State d	Not Stated	SA52 Pinkham Way - The Mayor of London has revealed further details to redesign a number of key road networks in the capital in order to unlock growth and make the capital a more attractive place to live <b>and work in line with the Mayor's 2050 Infrastructure Plan</b> and the recommendations of the Roads Task Force. One of these locations is the A406 in New Southgate, where decking or a mini-tunnel over this junction on the North Circular would unlock land for new homes and connect the area around the proposed Crossrail 2 station. TfL welcomes the ongoing discussions with Haringey (as well as Barnet and Enfield) Councils.	As such we would suggest including a new bullet in the development guidelines of " <i>TfL is investigating options for decking or a mini tunnel over this part of the North Circular Road as recommended by the Roads Task Force, which if progressed could change the development context for this site.</i> "	<b>Noted. This will be added as a development guideline.</b>
23 5	RSA43 6	SA52: Pinkham Way	No	Not stated	[Strategic Risk Assessment Prepared by: Paul Scott BSc(Hons) Dipl Arch Cert APDM ARB RIBA - Chartered Architect & Project Manager also	Not stated	The Council continue to view this site

				<p>attached in support of Pinkham Way Alliance reps]</p> <p><b>Introduction and summary</b></p> <p>1 This submission will argue that the local plan documents are not sound because they are not in compliance with NPPF, The London Plan 2015, <b>Haringey’s Local Plan 2013 and planning guidance</b>. In particular, the planning decisions on the Pinkham Way site are not justified because they are not positively prepared and are not based on sound objective evidence. Instead we believe they have been driven by political pressure.</p> <p>2 The Council is treating this site as if it was a derelict brownfield site suitable for development, rather than a green open space that is an important part of a larger ecological complex and corridor, including other <b>SINC’s (Hollickwood Park, Muswell Hill Golf Course, Tunnel Gardens and Bluebell Wood, Albert Road Rec and Rhodes Avenue Spinney)</b>.</p> <p>3 The site has been mainly undisturbed for over 50 years “making it a rare resource for Haringey of high ecological value.”<sup>75</sup> As such, it should be given the highest protection in the local plan.</p> <p>4 The plans are not Positively Prepared. In so far as Pinkham Way site is concerned the Site Allocations DPD and the Development Management DPD have not been positively prepared and are not based on an</p>		<p>as a brownfield site which is suitable for development, specifically that which makes a contribution to <b>the borough’s</b> strategic employment need.</p> <p>The Council disagrees that the plan is not positively prepared, as it takes account of the wider strategic needs of the borough to which this site has the potential to contribute.</p> <p>It should be noted that the</p>
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				<p>objective assessment/strategy for development on the site.</p> <p>5 For example, there are no development plans or indicative development capacity shown for the site in the Site Allocations DPD unlike all the other sites and no cognisance has been taken of the fact identified by LUC in the Open Space Study that there is a deficiency of local open space in the western zone of the borough.</p> <p>6 The plans are not Justified. There is no justification for this site to be included in the Site Allocations DPD as there are no proposals for its future use. No other site is included simply to protect its planning designation.</p> <p>7 The Council has produced no evidence to support its inclusion and has not explored reasonable alternative uses for the site.</p> <p>8 The plans are not Effective. Atkins in their Employment Study 2015 advised that the Pinkham Way site is unlikely to be brought forward for development during the plan period; The GVA viability assessment on the Pinkham Way site found that the <b>site was not viable “there was no analysis of a 100% commercial scheme as this returned a negative residual value under any scenario”</b>; LUC advised in the Open Space Study 2014 that the site was of high ecological value and a rare resource for Haringey, indicating that the site is not deliverable. The Environment Agency advised the Council that the site falls within flood zones 1 2 and 3 classified by the National Planning Practice Guidance as having a low</p>		<p>site is included in the draft NLWP as a potential area of search for the provision of waste management facilities. The landowners have also confirmed the site is available and deliverable for its allocated use.</p> <p>No change</p>
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					medium and high risk of flooding from rivers. <sup>76</sup> This increased flood risk affects the deliverability of the site.		
23 5	RSA43 7	SA52: Pinkham Way	No	Not stated	<p><b>The Pinkham Way Site and political pressure</b></p> <p>1.12 The Pinkham Way site currently has a dual planning designation: Site of Importance for Nature Conservation, Borough No 1 value and Employment Land.</p> <p>1.13 It is an open green space that has been vacant for over 50 years. Its ecological value is acknowledged by its SINC designation. See <b>Haringey Council's site map of Pinkham Way SINC</b> below.<sup>77</sup></p> <p>1.14 It is part of a larger ecological complex and corridor including other SINC's (Hollickwood Park, Muswell Hill Golf Course, Tunnell Gardens, Bluebell Wood, Albert Road Rec and Rhodes Avenue Spinney).</p> <p>1.15 A watercourse running in a culvert beneath the site is highlighted in the London Rivers Restoration Action Plan for de-culverting.</p> <p>1.16 There is a substantial amount of sound evidence to support retention of the SINC designation which the Council has accepted. However, there is no sound objective evidence to support retention of the Employment designation.</p>	Unless this change was made for sound planning reasons and unless the Council can justify it, the delineation of DEA 6 should retain its original boundary.	It is agreed that the site has ecological value, and the Site Allocation makes provision for how biodiversity can be preserved and enhanced through any redevelopment .  Regarding the ecological corridor overlapping with the 2013/2006 SSP/DEA, the <b>Council's view</b> is that it is appropriate that the site boundary does not include the

				<p>On the contrary, as will be seen later in this submission, there is a substantial amount of evidence to support its removal.</p> <p><b>Political Pressure</b></p> <p>1.17 The current attempt by Haringey Council to cling on to the employment designation in the absence of sound evidence to support it is, we believe, driven by political pressure, not by sound objective evidence.</p> <p>1.18 This political pressure arises from Haringey Council's conflicted position as Local Planning Authority for the Pinkham Way site and as a member of the North London Waste Authority. Over the past five years, PWA and residents have watched the Council's losing struggle to manage this conflict.</p> <p>1.19 The catalyst for the conflict was the NLWA's purchase of the majority of the Pinkham Way site at a cost of more than £12m in December 2009.</p> <p>1.20 At the time of the purchase the site was a designated Site of Importance for Nature Conservation, and was part of a designated Ecological Corridor. It was also designated for employment but had no planning consent and no established use. It was acquired secretly,<sup>78</sup> and in haste,<sup>79</sup> from Barnet Council, in anticipation of a PFI bid to support the major Waste Procurement</p>		<p>section of Ecological Corridor. It is noted at present that the DEA currently overlaps the Ecological Corridor, but the proposed Site Allocation boundary does not. It is considered appropriate that the DEA and Site Allocation are the same. <b>As such the DEA will be amended to reflect the Site Allocation.</b></p> <p>The allocation is based on evidence of need and</p>
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				<p>the NLWA was pursuing at that time.</p> <p>1.21 Following completion of the purchase in 2011, a joint Barnet/NLWA planning application was submitted to Haringey Council for (a) an MBT Waste Facility for the Waste Authority and (b) a Refuse Collection Vehicle Depot and passenger transport depot for Barnet Council.</p> <p>1.22 Subsequently, the MBT Waste project was abandoned as unnecessary, the PFI bid and the Waste Procurement failed, and the planning application was withdrawn.</p> <p>1.12 The Waste Authority is now holding a 4.5 ha open green space, all of which is subject to a <i>dual designation of Site of Importance for Nature Conservation, Borough No 1 value and Employment Land</i> and part of which is <i>designated Ecological Corridor</i>.</p> <p>1.13 The importance of retaining the employment designation was pointed out at a meeting of the NLWA last year<sup>80</sup> <b>“If the employment designation for the site is removed, and the site is only designated as a SINIC, it is unlikely to pass any screening assessment ..... in the North London Waste Plan and it will be very difficult for NLWA to seek a waste use on the site.”</b></p> <p>1.14 Haringey Council is unable to produce sound</p>		deliverability
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				<p>objective evidence to support the retention of the Employment designation on this site. As we will demonstrate in this submission, all the objective evidence provided to the Council (by their own consultants as well as others) supports the removal of this designation.</p> <p><b>Identification, size and extent of the site</b></p> <p>1.15 This site has been given many different identities and references by Haringey Council, and others, over the years. It has been referred to variously as SA 46; SA 49; SA 53; MH3; DEA 6; and LEA 4.</p> <p>1.16 In the current Site Allocations document it is referred to as SA52: Pinkham Way but its planning designations are set out as: Local Employment Area: Former Friern Barnet Sewage Works employment land and SINC Borough grade I: Friern Barnet Sewage Works.</p> <p>1.17 Constantly changing references tend to lead to confusion. The site has not been used as a sewage treatment for over 50 years. For the sake of clarity, we propose that the Council simply uses the name Pinkham Way Site and then follows with whatever planning designation applies.</p> <p><b>Employment Land designation</b></p> <p>1.18 It would appear from comparing the plan of SA52 shown on page 128 of the Council's Pre-Submission Site Allocations DPD 2016 and the plan identified as DEA 6 on the Council's proposals map that the area of the designated Employment Land for the Pinkham Way Site has been altered.</p>		
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				<p>1.19 The site area on the above plan is given as 6.6 ha. The eastern boundary of the site is shown as part of the designated Ecological Corridor listed No 2 in Schedule 6 of the Reg 19 Site Allocations DPD as: Great Northern Line Railsides from Finsbury Park to Bowes Park and New Southgate stations and Wood Green Tunnel Gardens.</p> <p>1.20 This was confirmed by the Council on 22 February 2012 when they answered the Inspector’s question “Is the site part of a designated green corridor?”<sup>81</sup></p> <p>1.21 The answer given was “A small portion of the north-east corner of the site forms part of a designated ecological corridor. This can clearly be seen on the UDP map dated 2006 in the middle of the eastern side of grid reference E4. The portion of the site that is a designated ecological corridor forms part of the embankment of a railway line. That part of the site that forms part of the ecological corridor comprises 2544 msq”.</p> <p>1.22 However, the map in the Site Allocations Pre-Submission 2016 version no longer shows the site as part of the Ecological Corridor and the size of the DEA appears to have shrunk from 6.5ha to 5.95ha.</p> <p>1.23 The description has also changed. The DEA is no longer referred to as part of the Ecological Corridor but we are now advised that “The area in the vicinity of the north eastern corner of the site (along the rail line) is an</p>		
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				<p>ecological corridor and any development should serve <b>to enhance this function.</b>”</p> <p>1.24 No explanation is given for this change and we can find no reference to it. If there is a sound planning reason for changing the area of the DEA it should be set out. If there is no sound planning reason then it should not have been changed. Either way, it should have been flagged up as a proposed change in the Site Allocations DPD.</p> <p>1.25 The Council is proposing to delete SSP5 as part of the current local plan review. The protection given to the Pinkham Way site in this policy is stronger than the protection given in the new SP13 and we would object to its removal in the event that the Employment Land designation is retained on the site.</p> <p>1.26 A core principle of the NPPF is that planning should be genuinely plan led. Planning authorities should objectively balance assessed needs against adverse impacts that would significantly and demonstrably outweigh the benefits.</p> <p>1.27 A policies map must illustrate geographically the application of policies in a development plan. The policies map may be supported by such other information as the Local Planning Authority sees fit to best explain the spatial application of development plan policies.</p> <p>1.28 The National Planning Policy Framework (NPPF) <b>(2012) sets out the Government’s national policies</b> on different aspects of planning in England. Section 10 paragraphs 109 to 125 detail planning policies on the</p>		
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				<p>conservation and enhancement of the natural environment.</p> <p>1.29 Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. In summary, it states that the planning system should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> <li>• <i>'minimising impacts on biodiversity and providing net gains in biodiversity where possible,</i></li> <li>• <i>contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.</i></li> <li>• <i>opportunities to identify land where development would be inappropriate, for instance because of its environmental or historic significance; and</i></li> <li>• <i>contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.</i></li> </ul> <p>1.30 Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p> <p>1.31 There is no evidence that the Council gave any consideration to the implications of changing the</p>		
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				<p>boundaries of this DEA or to the implications of changing the boundary of the designated Ecological Corridor.</p> <p>1.32 It appears that this change has not been made on proper planning grounds but rather at the request of the NLWA. We set out our reasons for taking this view below.</p> <p>1.33 In its response to the Call for Sites in 2013, the NLWA enclosed an extract the map of DEA6 (see above) and identified certain points of the DEA 6 site boundary which were contiguous with the surrounding MOL boundary.</p> <p><b>1.34 They also stated that “The adjacent railway line and cutting to the east of the site forms a designated Ecological Corridor.”</b></p> <p>1.35 The NLWA referred to an enclosed plan (Pinkham Way Site Ownership MOL Plan) and proposed that the DEA boundaries “be redrawn to remove such anomalies ....”.</p> <p><b>Conclusion</b></p> <p>1.36 Unless this change was made for sound planning reasons and unless the Council can justify it, the delineation of DEA 6 should retain its original boundary.</p> <p><u>Footnotes</u></p> <p><sup>2</sup>EA letter of 25 March 2015 to LBH</p> <p><sup>3</sup> Haringey Open Space and Biodiversity Study Oct 2014 - Site B7</p> <p><sup>4</sup>The contract for sale dated 17 Dec 2009 contained a</p>		
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					<p><b>'no disclosure of purchase' secrecy clause (para 20.01)</b>  <sup>5</sup>The seven London Councils which make up the NLWA were given 24 hours' notice to sign up to the PFI bid  <sup>6</sup>NLWA Report 'Consultations and Policy Update' 25 June 2015  <sup>7</sup>Haringey Councils list of written Inspectors Questions for EiP hearing on 22 February 2012</p> <p>[representation also contains maps]</p>		
23 5	RSA43 8	SA52: Pinkham Way	No	Not stated	<p><b>Section 2.</b>  <b>The Site Allocations DPD Pre-Submission version is not sound for the following reasons:</b>  <b>Not Positively Prepared</b></p> <p>2.1 In so far as Pinkham Way site is concerned this document is not positively prepared. It is not based on an objective assessment/strategy for development on the site.</p> <p>2.2 Under the heading Proposed Site Allocation, it <b>states "protection of the site for employment use, subject to appropriate protection of nature conservation status."</b> Under Indicative Development Capacity, none is identified.</p> <p>2.3 All other sites include proposals for various types of redevelopment and have indicators of indicative development capacity expected from the site – even sites such as Alexandra Palace and Tunnel Gardens which also have no indicative development capacity identified have proposals for a range of additional uses, improved connections, renewal/replacement of defective housing etc.</p> <p>2.4 There are no proposals whatsoever for the</p>	As set out	<p>This Site Allocation, as PWA posit, is principally a renewal of the dual designation Employment Land and SINC designations the site currently holds.</p> <p>It is noted that a range of options have been proposed for delivery of the site, notably from the landowners that the site is appropriate for</p>

				<p>Pinkham Way site other than to protect its employment designation. No anticipated indicative capacity is shown. For what purpose is it allocated in the SA DPD? If the Council can identify no other purpose than protecting the employment designation then it should be removed.</p> <p><b>Not Justified</b></p> <p>2.5 There is no justification for this site to be included in the Site Allocations DPD as there are no proposals for its future use. No other site is included simply to protect its planning designation.</p> <p>2.6 The Council has produced no evidence to support its inclusion and has not explored reasonable alternative uses for the site which it might reasonably have been expected to do given that</p> <ul style="list-style-type: none"> <li>• the Biodiversity Study advised that the site was “of high ecological value and a rare resource for Haringey”</li> <li>• the Open Space study identified deficiency of local open space in the vicinity of the site,</li> <li>• the Employment Study advised that the site was not suitable for the type of employment uses anticipated in Haringey over the plan period and that it was unlikely to be brought forward anyway during the plan period because of its location and contaminated state.</li> <li>• the GVA Viability Assessment of Pinkham Way, even with its sympathetic approach which we discuss elsewhere, found that a development that was purely employment would not be viable</li> </ul>		<p>continued employment use, from the PWA who have suggested a range of uses focusing on ecological, educational, residential, retail, hotel, and open space uses, and more recently from TfL/ GLA as potential for high density redevelopment linked to a Crossrail 2 and A406 decking proposal.</p> <p>In terms of proposing a positive use for the land, it is considered that the employment designation is appropriate as</p>
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				<p>under any scenario on this site.</p> <p>2.7 Reasonable alternatives to explore might have been its potential value as local open space or as a Local Nature Reserve, or as natural green space providing educational value and access to nature for local people and schools.</p> <p>2.8 To support such a proposal, PWA submitted a Five Year Site Management Plan to Haringey in 2014. This had wide community support and over 100 people gave their commitment to ensure its practical implementation. The Plan remains with the Council pending consideration.</p> <p>2.9 Enfield Council, in its response to the Site Allocations DPD consultation 2014, requested discussions with Haringey about future uses of the site in the context of the Enfield Action Area Plan. That plan includes the development of a significant number of additional residential dwellings close to the boundary of both boroughs, a large number of which have already been erected with no provision for local open space. PWA considers this a lost opportunity for cross borough cooperation which could have provided some natural green space for the wider community.</p> <p><b>Not Effective</b></p> <p>2.10 Atkins advised it is unlikely to be brought forward during the plan period and LUC advised it was of high ecological value and a rare resource for Haringey – presumably they did not have in mind its development as a waste transfer station, for example.</p>	<p>it secures a designation that the landowners believe is deliverable and meets identified strategic needs.</p> <p>If a more ambitious future for the site comes forward, as indicated by GLA/TfL, it is considered that ensuring the employment designation is retained is consistent with ensuring the deliverability of the current landowners aspirations, without compromising any future development.</p>
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					<p>2.11 The only joint working we are aware of is the participation of Haringey in the North London Waste Plan preparation where the site has been identified as a potential waste site although any reference to this possibility has been positively avoided in this document and throughout the consultation process.</p> <p><b>Not Consistent with National Planning Policy</b>  2.12 The document is not consistent with National, Regional or Local planning policy and we have dealt with this in some depth on pages 25-26.</p>		<p>It is considered that the alternative option, a removal of the designation, and an open space designation as proposed by PWA would compromise both the current landowners aspiration, and a potential long term vision from GLA/TfL.</p> <p>No change</p>
23 5	RSA43 9	SA52: Pinkham Way	No	Not stated	<p><b>Section 3 Local Plan Documents are not in compliance with the Statement of Community Involvement (SCI) 2015</b></p> <p>3.1 Page 9 of the SCI sets out a list of Aims for the Haringey Planning Service. This section will comment on the first, second and fifth aims.</p> <p><b>First Aim is to ‘Ensure Consultation is Effective’:</b></p> <ul style="list-style-type: none"> <li>• <i>By providing relevant information and sufficient</i></li> </ul>	As set out	<p>The council believe the Plan to be in conformity with the SCI.</p> <p>In all of the examples cited, the Council has published information in</p>

				<p><i>reasons for any proposal to permit intelligent consideration and response by all affected parties.</i></p> <p>3.2 The Council concealed material evidence prepared <b>by their consultants, GVA, about Pinkham Way's non-viability</b> as employment land during the consultation process, and failed to include it or refer to it at any of the Council Committees during the process of considering changes to the Local Plan.</p> <p>3.3 The council was finally forced to disclose it under FoI, in May 2015, several weeks after the consultation period ended, and it continued to try and diminish its <b>importance by claiming it was not 'evidence' but a 'think piece', 'presentation slides' etc.</b> it is however <b>listed on the Council's website as supporting evidence</b> for the local plan documents.</p> <p>3.4 When the Council passed PWA's response to the Regulation 18 to the NLWA in May 2015 with an invitation to make further post-consultation comments, it again concealed the document, as it was not passed to NLWA, nor was it passed to Atkins when they undertook the Employment Study. The Council also <b>failed to disclose to NLWA both PWA's critique of the GVA viability assessment and the ongoing correspondence about it and about other matters relevant to the local plan evidence.</b> Thus NLWA only received part of the picture.</p> <p>3.5 The resulting response from NLWA, prepared by ARUP at public expense, was therefore compromised as they were unable to address the material issues of the viability evidence and our critique of it and of other</p>	<p>a timely manner once it has been requested.</p> <p>The argument relating to non-viability of the site is mute, as the owner supports the existing designation and confirms an employment use of the site is deliverable without giving rise to viability concerns.</p> <p>No change</p>
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				<p>matters.</p> <p>3.6 As a result of this, the Council is not in a position to give full consideration to the viability evidence produced by GVA. See pages 34-35, where we discuss <b>the reliance of the Council on the landowner's claim</b> that the site is viable<sup>82</sup>.</p> <p>3.7 It is clear to PWA that the assessment was concealed because it did not provide the evidence the council was hoping for; it did not support the decision to retain the Employment designation on the Pinkham Way SINC.</p> <p><b>3.8 On the contrary, it confirmed the site's non-viability in that "there was no analysis of 100% commercial scheme as this returned a negative residual value under any scenario"</b><sup>83</sup></p> <p><b>Second Aim is to 'Ensure Consultation is Transparent</b></p> <ul style="list-style-type: none"> <li><i>By being up front about any potential conflicts of interest and how these are to be appropriately managed to meet public expectations of integrity.</i></li> </ul> <p>3.9 During the last review of the local plan in 2010 the <b>Council responded to NLWA's urging by re-designating the site as Locally Significant Industrial Land, with the justification that it: 'Complies with pre-</b></p>		
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				<p><i>application discussions which have already taken place to use part of site for recycling centre and other part as waste station,' leaving a revealing image of bullying by a powerful developer towards a subservient planning authority that has resonated ever since.</i></p> <p>3.10 PWA challenged the re-designation and the Inspector refused to allow it on the grounds it was not justified by supporting evidence.</p> <p><b>3.11 After the publication of the EiP Inspector's Report</b> rejecting the redesignation, the Council felt obliged to issue a public statement on Pinkham Way in March 2013, in which it committed itself to openness and transparency, thus setting out, in the words of the SCI, <b>the 'integrity the public should expect' as far as its dealings on the Pinkham Way site were concerned.</b> The reality, as this submission illustrates, has been quite the opposite.</p> <p><b>3.12 The Council has been less than 'upfront' about</b> the link between the North London Waste Plan and the Site Allocations DPD in so far as the Pinkham Way site is concerned.</p> <p>3.13 Section 1.3 of the LUC Open Space and <b>Biodiversity Study 2014 states that it is to 'inform and support' the Local Plan and the NLWP.</b> Of all the Haringey sites in the NLWP, Pinkham Way alone required Open Space assessment. It is thus the <u>only</u> link between the Open Space study and NLWP.</p> <p><b>3.14 Haringey's conflict was how to avoid assessing as</b> open space a site whose status was a matter of fact and not a matter of judgement. We discuss how it</p>		
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				<p>dealt with that conflict, whilst simultaneously concealing it, in the section on Open Space.</p> <p><b>Fifth Aim is to ‘Ensure consultation findings are Accountable’</b></p> <ul style="list-style-type: none"> <li>• <i>By publicising the responses and providing feedback to participants</i></li> </ul> <p>3.15 The Council undertakes that <i>‘All responses will be made available online’</i> (SCI 5.3.1). However, it omitted PWA’s submission from the consultation responses uploaded on June 30<sup>th</sup> 2015. PWA had to ask twice before the Council finally uploaded it some two weeks later and were unable to give a satisfactory reason for this omission. (The variety of explanations from the planning officer, Mr Goldberg, became known within PWA as “The Goldberg Variations”!) During that two weeks it had been unavailable for inspection by Regulatory Committee and Cabinet members preparing to consider the draft North London Waste Plan. When we raised this we were told that “members had been fully briefed on PWA’s concerns.”</p> <p><b>Consideration of Local Plan - Regulatory Committee (21 September 2015) and Cabinet (20 October 2015)</b></p> <p>3.16 We believe that the reports to both these committees deliberately concealed the extent of concern felt by local residents about the site and the strength of support for the PWA submission by referring to it as a <i>‘petition’</i>.</p> <p>3.17 We pointed this out, and, at the full Council</p>		
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				<p>meeting on 23<sup>rd</sup> November 2015 a verbal correction was made. However, this correction was omitted from the Council minute of that meeting. So there is still no formal record of our submission and supporting evidence or of the extent of support for it in the local community.</p> <ul style="list-style-type: none"> <li>• <i>By explaining how the responses to consultation have been conscientiously taken into account</i></li> </ul> <p>3.18 At a meeting between the Council and PWA<sup>84</sup> the <b>Council admitted to not having read PWA's March 2015 submission</b>, a 26-page document of substantive and detailed evidence with 10 appendices. The Council also told PWA at the same meeting that the site had been included in the forthcoming draft NLWP, which was published shortly afterwards. So far from being <b>'conscientiously taken into account'</b>, PWA's evidence (and presumably evidence from other respondents) had not even been opened before the Pinkham Way Site was offered up as waste site fodder.</p> <p>3.19 Subsequent to that meeting, the Council advised PWA that <sup>85</sup></p> <p><i>We have now had sufficient time to digest and consider the submission, including seeking the views from the Council's Nature Conservationist and it is our conclusion that the evidence submitted does not support</i></p>		
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					<p><i>automatic exclusion of the site and therefore it is reasonable to test the site through the development plan process and allow all parties to express their views before taking a decision on the future of the site.</i></p> <p>3.20 What the Council is effectively saying here is that <b>‘evidence submitted’ is insufficient to reverse a</b> decision which breached the established consultation rules and was anyway based on evidence the Council would reasonably have known to be wholly unsound.</p> <p>3.21 No evidence was produced on the Conservation Officer’s views. Thus PWA cannot comment except to say that, were they as described, their emphasis would have differed from his views written on behalf of the Council’s Parks’ Service a few months previously where he said that</p> <p><i>“if employment uses were not economical for this site then it should remain undeveloped for its ecological importance and the employment designation should be removed”.</i></p> <p>3.22 And in response to the proposed relocation of businesses from regeneration areas in other parts of the borough to improved premises on Pinkham Way he said</p> <p><i>“this is not acceptable as if existing or alternative sites exist for development then a SINC should not be developed”.</i><sup>86</sup></p> <ul style="list-style-type: none"> <li>• <i>By linking decision-making to robust,</i></li> </ul>		
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					<p style="text-align: center;"><i>consistent and sound grounds.</i></p> <p>3.23 Since the March 2013 public statement on Pinkham Way, the Council has repeatedly said both publicly and in meetings with PWA that decisions will <b>only be made that are 100% 'evidence-based' and that the process would be 'open and transparent'</b>. As is shown elsewhere in this submission, the Council either simply ignored inconvenient material evidence or refused to seek it.</p> <p>It has:</p> <p>a) ignored unambiguous evidence from its professional <b>advisors on the site's unsuitability for employment and</b> recommendations for such sites whilst itself having offered no positive evidence;</p> <p>b) as a basis of its strategic policy, relied on claims of viability from one site-owner, evidence for which is apparently unavailable</p> <p><b>c) failed to assess properly the site's Open Space</b> value as it had promised, and in particular failed to apply both its own definition of Open Space and relevant Local Plan commentary;</p> <p>d) quoted other specious grounds to support its decision that the site is not Open Space;</p> <p>e) distorted its own Open Space &amp; Green Grid policy DM20 to exclude Pinkham Way SINC from the Haringey Green Grid as a SINC/natural green space,</p> <p>f) regarding the culverted water course, has failed to apply its own policy properly</p>		
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					<p><u>footnotes</u></p> <p><sup>8</sup>Letter from LBH to PWA dated 6 July 2015 from Assistant Director of Planning</p> <p><sup>9</sup>Email from LBH to E Ryan 26 May 2015 (Gavin Ball LBH)</p> <p><sup>10</sup> Meeting 20 May 2015 between PWA and council officers</p> <p><sup>11</sup>Email from LBH to E Ryan PWA 29 May 2015</p> <p><sup>12</sup><b>Ian Holt's internal response to Haringey's Site Allocations DPD Reg 18 consultation Document October 2014</b></p>	
235	RSA440	SA52: Pinkham Way	No	Not stated	<p><b>Section 4</b></p> <p><b>Open Space Status</b></p> <p>4.1 PWA considers that the Pinkham Way SINC, shown in the picture below, is open space. We set out evidence below to show that not only does it fall squarely within the definition of Open Space given in the NPPF, the London Plan 2015 and <b>the Council's</b> own Local Plan glossary, but that it has been used as open space for recreation by local residents and others over a long period.</p> <p>4.2 Haringey Council does not agree that the site is open space and set out the following reasons for that view in a letter last September 2015: <sup>87</sup></p> <ul style="list-style-type: none"> <li>(v) its secure enclosure,</li> <li>(vi) the remains of existing structures,</li> <li>(vii) the outcome of the Village Green</li> </ul>	The Council do not believe that the site is open space. It is privately owned land which the owner intends to develop. To provide it with an open space designation would not only be undeliverable, as the landowner has not indicated any intention

				<p>(viii) Application and the adopted designation in the Development Plan</p> <p>4.3 These reasons are unsound. The Council has produced no evidence to support them and therefore is not justified in its refusal to acknowledge and protect the Open Space status of the site in the Local Plan and has no justification in refusing to undertake a proper assessment of the quality of its open space value.</p> <p><b>Definition of Open Space</b></p> <p>4.4 The Council defines Open Space in the glossary to the Local Plan as “All land in London that is <i>predominately undeveloped</i> other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, <i>whether in public or private ownership</i> and <i>whether public access is unrestricted, limited or restricted.</i>” (our emphasis).</p> <p>4.5 The definition does not support the Council’s view.</p> <p><b><u>LBH Reason (i) “its secure enclosure”.</u></b></p> <p>4.6 In a letter dated 6 July 2015 the Council stated that “Pinkham Way was excluded from the LUC Open Space Study in October 2014 because it was not publicly accessible – a key requirement of the study.</p> <p>4.7 The open space definition is quite specific on accessibility. A site may be completely fenced off and completely inaccessible to the public and still be classified as open space. As it happens, the public had</p>	<p>to develop the land for this purpose, but would also compromise meeting the <b>borough’s</b> objectively identified employment needs.</p> <p>The Council does not believe that this Site is, should be allocated, or is deliverable as open space.</p> <p>It is considered that the evidence offered shows that there is not a need for an additional local open space on and around this site, which is well served by Hollickwood</p>
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				<p>access to the site and used it for recreational purposes up to 1994<sup>88</sup>.</p> <p><b>4.8 SP13 sets out the Council’s policy for Open Space and Biodiversity. Paragraph 6.3.4. states that “the level of public access is not a criterion for definition. Where desirable, and where the open space in question has identifiable value, the council will resist any development that results in a net loss of this open space”</b></p> <p>4.9 It is difficult to see why the Pinkham Way site was singled out for exclusion from the review since the following sites were included in the LUC Open Space Study even though they had no public access either. Plevna Crescent/Ermine Rd; West Junction, Markfield Railway Triangle; The Park/Southwood Lane Wood; Station Road (Palace Gates Embankment); Tile Kiln Lane covered reservoir; Railway Line; Cranford Way and Tewkesbury Close.<sup>89</sup></p> <p>4.10 In our view the Council has not justified the exclusion of Pinkham Way from the open space study.</p> <p><b><u>LBH Reason (ii) “the remains of existing structures”</u></b></p> <p>4.11 This reason is more relevant to the issue of brownfield land which we deal with later but for the purposes of this section we will address it here also.</p>		<p>Park, and the Park immediately north of the A406. It is also not an area which is planned to accommodate the borough’s growth in the current spatial strategy.</p> <p>No change</p>
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				<p>4.12 The open space definition requires land to be <b>predominately undeveloped</b> except for buildings or structures that are <b>ancillary to its use as open space</b>, for example, benches, pavilions, huts, sheds etc. Pinkham Way SINC is totally undeveloped and the site has been vacant for over 50 years.</p> <p>4.13 The fact that there are no buildings on the site was accepted by the Council when it agreed to remove the Pinkham Way site from a proposed Article 4 <b>Direction aimed at protecting the Council’s strategic</b> employment sites from unsuitable development.</p> <p>4.14 The recorded minutes of the Regulatory Committee meeting on 21 September 2015 state;</p> <p><b>“Pinkham Way Alliance had made a representation</b> seeking the removal of the Pinkham Way site from the Article 4 Direction. Officers had subsequently agreed to this removal on the basis that there were no buildings on the site to which the permitted development provisions would apply. The map at appendix A of the report would be amended to reflect <b>this”</b>.</p> <p>4.15 In the Environmental Statement for NLWA in 2011<sup>90</sup> <b>Arup’s set out the history of the site. It explains</b> that by 1968 the sewage works had gone, the majority of structures having either been removed from or buried on the site and <b>the site was shown as open land with trees.</b></p>		
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<sup>90</sup>NLWA and LBB Development at Pinkham Way – Environmental Statement Vol 2 Main Text Rev A May 2011  
 LB Haringey Local Plan – Site Allocations DPD – Responses to Publication consultation with Council responses

				<p>4.16 Atkins listed the Pinkham Way site as Open Space in Figure 1-0 – Open Spaces Sites. See site No 89 - Former Friern Barnet Sewage Works.<sup>91</sup></p> <p>4.17 For the purposes of the Open Space definition we would argue that remnants of buried structures and foundations - now absorbed by nature, do not amount to buildings, nor can they be said to constitute predominantly developed land. This reason is therefore not justified.</p> <p><b><u>LBH Reason (iii) “the outcome of the Village Green Application”</u></b></p> <p>4.18 An application to register the Pinkham Way Site as a Town or Village Green was made in 2011 by local residents. The application was unsuccessful on two grounds. It was submitted too late, and it failed to provide <b>sufficient evidence to show that a ‘significant number of people’ used the site for recreation.</b></p> <p>4.19 However, the Assessor found, and the objectors accepted, that there was sufficient evidence to show <b>that there was “reasonably open access to the site up to 1994.”</b></p> <p>4.20 Evidence was given by a number of witnesses at the hearing of the type of activities that used to take place on the site when it was accessible. Children met <b>up and hung out there, played ‘run out’, people picked</b></p>		
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				<p>flowers, searched for golf balls (from the adjacent Muswell Hill golf course), some people liked to observe nature, eg watching birds, frogs and newts, looking for foxes. Some people picked fruit (there were apple and cherry trees) and blackberries. Some people used it for motorbike scrambling. It had always been popular with dog walkers. It was used for quiet reflection.</p> <p>4.21 Dr Oliver Natelson gave evidence that David Bevan, (who had been an Environmental Officer for Haringey Council) told him that a number of unusual and rare plants had been recorded on the site. They visited the site and found golden dock, a very rare plant. Dr Natelson also explained that he sometimes gave guided tours of the site. In the summer of 2011 he had led a party looking for bats, and the previous April he had gone there with bird experts. His last visit to the site was in Summer 2011.</p> <p>4.22 Barnet Council gave evidence that the fencing around the site was not secure at all points and due to fear of occupation by third parties (particularly by travellers) decided to secure it. In May 2009 Barnet commissioned the work for the fence to be secured.<sup>92</sup></p> <p>4.23 The outcome of the application for registration of the site as a town or village green does not affect a decision about whether this site should be designated open space or not, except in so far as it provides evidence (given under oath) as to the uninterrupted access to the site over a long period and the use of the</p>		
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				<p>site by local people and others for recreation.</p> <p>4.24 The photo below, taken from Google Earth, shows the site with tracks throughout. Clear evidence that people were accessing the site and using it as recreational open space.</p> <p><b>LBH Reason (iv) “the adopted designation in the Development Plan”</b></p> <p>4.25 The current designation for this site in the adopted Local Plan 2013 is SINC Grade 1 Borough Importance and Employment Land. But the previous Examination in Public had left a proviso that the site be assessed for its open space value amongst other features.</p> <p>4.26 Evidence had also been given at the hearing about the value of the biodiversity and open space on the site. The outcome was a recommendation by the Inspector in his report that the Council should take the opportunity at the next Site Allocations DPD review, to consider the status of the site taking into account as necessary, the outcome of the Village Green Application and other evidence including considerations of its open space value, its biodiversity and its specific site features such as the culverted water course.</p> <p>4.27 The Council has <b>wilfully ignored the Inspector’s</b> recommendation to review the Open Space Value of this site. When LUC were commissioned to undertake <b>a review of the borough’s biodiversity and open spaces</b>, the Pinkham Way Site was conspicuous by its absence.</p>		
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				<p>4.28 The Council’s <b>Open Space strategy</b> summarises the benefits of open space and the important contribution it makes overall to quality of life.</p> <p><b>“It provides a sense of freedom and relief from our built environment, somewhere to relax and leave behind the strains and pressures of day to day life, somewhere to play, enjoy flora and fauna, to meet with our friends and family, to exercise and to learn about our natural environment.”</b></p> <p><b>“In developing the Open Space Strategy, Haringey Council is seeking to provide a framework for the future management and development of open space within the borough which will enable the whole community – residents, community organisations .... to work in partnership in order to obtain the maximum benefit from our open spaces.”</b></p> <p><b>“... we want to particularly stress the importance we will place on our desire to involve the whole community in shaping the future of our open space.”</b></p> <p>4.29 The Council advised PWA in July 2015<sup>93</sup> that <b>“the LUC Open Space Study identified a primary deficiency in the east of the borough. Pinkham Way is not well placed to address this deficiency effectively.”</b></p> <p>4.30 What the Council omitted to mention was the finding by LUC that in fact large parts of the borough</p>		
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				<p>are deficient in access to local open space, especially the Western zone of the borough.</p> <p>4.31 On page 85 they state:</p> <p><b>“Local open space</b></p> <p><b>7.37</b> Large parts of the borough are deficient in access to local open space. The Western zone has large areas of deficiencies at this level of the hierarchy”</p> <p>4.32 Among the areas in the western zone LUC identified the Eastern parts of Alexandra Ward and in the Central zone they identified central parts of Bounds Green Ward (para 7.32) as being deficient in local open space Fig 7.7 below.</p> <p>4.33 The Pinkham Way site is very well placed to address these deficiencies.</p> <p>4.34 In 2003, Atkins also found there was open space deficiency in the northern part of Bounds Green. Since no new open spaces have been identified in this area since then we presume that this deficiency persists. See extract from Atkins 2003 Open Space and Sports Assessment below.</p> <p><b>4.35 PWA is certain that the Council’s wilful decision to avoid assessing the open space value of this site, and its subsequent disregard of LUC’s evidence of deficiency in the western zone, were driven by concern that the aspiration to set the site aside for waste use would be thwarted.</b></p> <p>4.36 The evidence for this is the Council’s decision to</p>		
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				<p>include the Pinkham Way site in the emerging North London Waste Plan where it is identified as a potential Area for a wide range of waste facilities.</p> <p>4.37 The Council included the site in the NLWP without considering evidence submitted as part of the Local Plan Site Allocations consultation<sup>94</sup>, without having properly assessed the site, and in full knowledge that to carry out such an assessment of its open space value was not within the remit of the NLWP, which can only assess sites against specific criteria for sifting out those suitable for waste.</p> <p><b>4.38 It is Haringey Council's job as local planning authority to properly review this site before any consideration is given to whether it can be developed, for waste or for anything else. By shirking its job the Council falls foul of national and regional policy.</b></p> <p>4.39 Paragraph 73 of the NPPF requires planning policies to be based on robust and up-to-date assessments of the needs for open space and opportunities for new provision. The assessments should be qualitative as well as quantitative. No up to date assessment of the open space value of Pinkham Way exists.</p> <p>4.40 Paragraph 74 of the NPPF prohibits building on existing open space unless an assessment has been undertaken which has clearly shown the open space to be surplus to requirements or that the loss would be replaced by equivalent or better provision in a suitable</p>		
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				<p>location or the development is for sports or recreational needs that clearly outweigh the loss.</p> <p>4.41 Retention of the Employment Land designation on the site and Including it in the Site Allocations DPD exposes this open space to development likely to be detrimental to its open space and biodiversity value. The whole of the designated employment land site is a SINCS of high ecological value as the LUC study found. Any development on any part of it will result in the loss of that particular part of the open space contrary to national and local policies set out here.</p> <p>4.42 Paragraph 74 of the NPPF was considered by Mrs Justice Patterson in the case of Anne Marie Loader v Rother DC <sup>95</sup> in June 2015, where it was found that <b>“the criteria in paragraph 74 of the NPPF need to be interpreted to include the quality of the open space. In that case no assessment of the amenity value of the open space had been undertaken and no assessment had been undertaken to show it was surplus to requirements and that was found to be a material error.”</b></p> <p>4.43 The NPPF states that the planning system should contribute to and enhance the natural and local environment and at paragraph 114 directs local planning authorities to set out a strategic approach in their local plans, planning positively for the creation, protection, and enhancement and management of networks of biodiversity and green infrastructure.</p>		
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				<p>4.44 Policy 2.18 of The London Plan requires Local Planning Authorities to identify priorities for addressing deficiencies and should set out positive measures for the design and management of all forms of green and open space.</p> <p>4.45 Policy 7.18 of The London Plan which deals with Protecting Open Space and addressing deficiency states that Local Development Plans should ensure that open space needs are planned in accordance with green infrastructure strategies to deliver multiple benefits.</p> <p><b>Haringey's Green Grid</b></p> <p>4.46 In the ALGG SPG 2012, the All London Green Grid is defined as a 'network of high quality, well designed and multifunctional green and open spaces'.</p> <p>4.47 Aim 3 of the ALGG (section 1.4, p 14), is: To secure a network of high quality, well designed and multifunctional green and open spaces to establish a crucial component of urban infrastructure able to address the environmental challenges of the 21st century – <b>most notably climate change.</b>",</p> <p>4.48 The aim is not about increasing access to open space. Every one of the 12 Green Grid Area Maps includes 'Private Open Space' in its legend. The map for GGA1, Lee Valley and Finchley Ridge, includes the Pinkham Way site under this category.</p> <p>4.49 The Council's <b>determination to avoid declaring the site as Open Space</b> does not end with its contradiction</p>		
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				<p>of its own OS policy, but extends to Development Management policy DM20 ‘Open Space and Green Grid’, which has, absurdly, enabled it to exclude the Pinkham Way SINC from its own GG map.</p> <p>4.50 The commentary on that policy, at 4.16 on page 42, says that ‘Haringey’s network of open spaces should be regarded as integral infrastructure which will contribute to the ‘London wide Green Grid’. This, as far as it goes, is 100% correct.</p> <p>4.51 Misleadingly, however, the omission of any mention of Haringey’s green spaces in the ALGG is asking the reader to infer that Haringey’s contribution to the Grid begins and ends at ‘its network of open spaces’. Consequently, the Council’s ‘Green Grid’ policy makes no mention of the inclusion in that grid of Haringey’s Green Spaces/Nature Conservation sites.</p> <p>4.52 These contradictions and convolutions in policy mean that the Council has excluded on two criteria a site which qualifies for inclusion in the Green Grid on both.</p> <p>4.53 PWA notes Natural England’s submission to the SA consultation that highlights Haringey’s lack of Green Infrastructure policy. PWA also notes the Council’s subsequent belated inclusion in the Site Allocations Sustainability Assessment of a list of Green Infrastructure sites, among which is Pinkham Way (Section 10.15.3).</p> <p>4.54 That will take the Council some way, at least, to fulfilling NPPF Section 114.</p>		
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					<p>4.55 However, DM20 is still left as an unsound policy that requires wholesale redrafting.</p> <p><u>Footnotes</u></p> <p><sup>13</sup>Letter dated 21 September 2015 to E Ryan PWA from <b>Haringey Council’s Assistant Director Planning</b></p> <p><sup>14</sup>Report of Independent Assessor – Philip Petchey, 30 May 2013</p> <p><sup>15</sup>Appendix 3 Open Space Study October 2014 LUC</p> <p><sup>16</sup>NLWA and LBB Development at Pinkham Way – Environmental Statement Vol 2 Main Text Rev A May 2011</p> <p><sup>17</sup>Haringey Open Space and Sports Assessment October 2003 - Atkins,</p> <p><sup>18</sup><b>Village Green Application Inspector’s report</b></p> <p><sup>19</sup><b>Letter dated 6 July 2015 from Haringey’s Assistant Director of Planning to Stephen Brice Chair of PWA</b></p> <p><sup>20</sup><b>Email from Haringey’s Assistant Director Planning to E Ryan PWA 20 May 2015</b></p> <p><sup>21</sup>The Queen on the Application of Anne-Marie Loader v Rother DC v Churchill Retirement Living Ltd [2015] EWHC 1877 (Admin)</p>		
23 5	RSA44 1	SA52: Pinkham Way	No	Not stated	<p><b>Section 5</b></p> <p><b>The Culverted Water Course</b></p> <p>5.1 The previous Inspector recommended the Council to consider ‘... <i>site specific features such as the culverted water course</i>’. In its March 2013 statement, <b>the Council promised that ‘Decisions taken on ... the Pinkham Way site will take into account the findings and recommendations of the Haringey Local Plan: Strategic Policies Inspector’s Report.’</b></p>	As set out	Local Plan Policy SP5 supports deculverting wherever possible, and as such the feasibility of achieving this will be expected to be

				<p>5.2 Haringey's BAP states that '<i>... other opportunities to restore water courses exist on the former Friern Barnet Sewage Works site.</i>'The 2010 draft Core Strategy listed as options for the site: '<b>Employment generating uses &amp; opportunity to deculvert stream</b>'(LBH, BAP 2009, Page 42)</p> <p>5.3 Our detailed Risk Assessment submitted in 2015 included evidence on the development constraints imposed by the culvert.</p> <p>5.4 As we have said above, the Council's comments in the 21<sup>st</sup> September 2015 report to the Regulatory Committee would have left members none the wiser. In answer to its own summary of PWA's evidence about the culvert  '<i>Culverted watercourses make the site unsuitable for development</i>',  the Council says this:  '<b>Specific requirements</b> to consider the impact upon the culverted watercourse are contained <b>within the policy.</b>'(DM28)</p> <p>5.5 If members had studied '<b>the policy</b>', DM28, they would have found it comprehensive and robust, and exactly the quality of strategic planning a LPA should aim at. It is an extension of the Harrow policy so admired by the Environment Agency in its 2015 submission. If members had then looked to see how it had been applied to Pinkham Way, the substantive policy is missing. The Development Guideline about the Pinkham Way culvert says this:  <i>Evidence that the development will not prejudice or compromise the integrity of the</i></p>	<p>investigated through any development proposal for this site.</p> <p>No change</p>
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					<p><i>culverted stream will be required as part of any planning application.</i></p> <p>5.6 In the commentary on DM28, the Council says: <i>Culverts are considered flood defences. Sites with existing culverts will be expected to investigate the feasibility of deculverting within the Flood Risk Assessment. Where the implementation of measures to restore section of the watercourse is not considered possible, clear and robust justification must be provided. (DM – 4.101)</i></p> <p>5.7 The result of robust and sound application of DM28 on Pinkham Way would have been stringent development guidelines in line with local, regional and national policy. The Council chose only a diluted version of part of Section 4.101, having apparently already decided that the problem of de-culverting should not trouble the developer. Once again it has failed to apply its own policy.</p>		
23 5	RSA44 2	SA52: Pinkham Way	No	Not stated	<p><b>Section 6</b> <b>The site should no longer be considered as Brownfield Land</b></p> <p>6.1 The Council asserts this site should be treated as brownfield land suitable for development.</p> <p>6.2 The NPPF defines PDL as follows:  <i>“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 infrastructure. This excludes: land that is or has been occupied by agricultural or forestry</i></p>	As set out	<p>The council contends that the site is Brownfield land capable of meeting strategic needs for employment provision.</p> <p>No change</p>

				<p><i>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.”</i></p> <p><b>6.3 The NPPF focuses explicitly on “permanent structure” and “associated fixed surface infrastructure”, and the exclusion depends on the extent to which these things have or have not blended into the landscape in the process of time. It does not refer to ground levels and contours, and the authors of the policy have been careful to be specific about what it is that is to be assessed.</b></p> <p>The site accords with the exclusion from the definition of PDL in the NPPF.</p> <p>6.4 Only a very small element of the permanent structures remain, on a very small portion of the site, and even those structures – whilst still visible from certain vantage points – have effectively blended into the landscape when the site is considered as a whole.</p> <p>6.5 Pinkham Way is just the sort of site the authors of the NPPF had in mind when formulating the exclusion from the definition. The site is now in a condition which is positively beneficial in planning terms (both in terms of its ecological value, its open space value and as a visual amenity), and thus it is no longer:</p> <p>a. the sort of site that requires redevelopment in order</p>		
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				<p>to be put to beneficial use; or</p> <p>b. which ought to be preferred for redevelopment over sites which have never previously been developed, because of the harm associated with developing green field sites – the same harms would arise on Pinkham Way.</p> <p>6.6 Similar considerations apply to the London Plan 2015 definition of Brownfield land and are analysed in the table below</p> <table border="1"> <tr> <td colspan="2"> <p><b>“Both land and premises are included in this term, which refers to a site that has previously been used or developed and is not currently fully in use, although it may be partially occupied or utilised. It may also be vacant, derelict or contaminated. This excludes”<sup>96</sup></b></p> </td> </tr> <tr> <td>Exclusion</td> <td>Is this exclusion applicable to Pinkham Way?</td> </tr> <tr> <td>Open Space open space is defined in The London Plan as:</td> <td> <p><b>Clearly applicable:</b> The land is predominantly undeveloped. The last use <b>ceased in the early 1960’s</b>. There are no buildings on it.</p> <p>The previous development</p> </td> </tr> </table>	<p><b>“Both land and premises are included in this term, which refers to a site that has previously been used or developed and is not currently fully in use, although it may be partially occupied or utilised. It may also be vacant, derelict or contaminated. This excludes”<sup>96</sup></b></p>		Exclusion	Is this exclusion applicable to Pinkham Way?	Open Space open space is defined in The London Plan as:	<p><b>Clearly applicable:</b> The land is predominantly undeveloped. The last use <b>ceased in the early 1960’s</b>. There are no buildings on it.</p> <p>The previous development</p>		
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Open Space open space is defined in The London Plan as:	<p><b>Clearly applicable:</b> The land is predominantly undeveloped. The last use <b>ceased in the early 1960’s</b>. There are no buildings on it.</p> <p>The previous development</p>											

					<p>“All land in London that is <b>predominantly undeveloped</b> other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open space within London, <b>whether in public or private ownership and whether public access is unrestricted, limited or restricted</b>” (London Plan)<sup>97</sup></p> <p>land where the remains of previous use have blended into the landscape,</p>	<p>(sewage works) commenced in 1883 and ceased in the early 1960s. Prior to 1883 the site was undeveloped agricultural land. There were allotments in the western corner of the site up until the <b>early 1950’s Attached plans</b> show the site prior to construction of sewage works, fully developed sewage works, post sewage works, and as it is today (Appendix A)<sup>98</sup></p> <p>There is no requirement that the site should have public access and therefore it is irrelevant whether it has or has not GOT public access.</p> <p>When the sewage works <b>closed in the early 1960’s</b>, most of the structures were removed from the site or</p>		
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					<p>or have been overtaken by nature conservation value</p>	<p>were buried on the site. The remaining vestiges of the previous use have long since blended into the landscape and are no longer identifiable to the passing observer as sewage beds.. See photos attached at Appendix B<sup>99</sup></p>		
					<p>or amenity use and cannot be regarded as requiring development</p>	<p>In 2014 a Biodiversity Study for Haringey Council described Pinkham Way as a <b>“Mosaic of semi-natural woodland, scrub, tall ruderal vegetation, ephemeral habitats and rough grassland.</b> A small part of the site was recorded in the study as MOL and the remainder as SINC.</p> <p>Pinkham Way is designated a Site of Importance for Nature Conservation No 1 Borough Importance in <b>Haringey’s Local Strategic</b></p>		

					<p>Plan 2013. In 2014 its ecological value was confirmed by the LUC Biodiversity Study in which it <b>was referred to as “... a rare resource for Haringey of High ecological value.”</b><sup>100</sup>The site supports a large number of birds, insects, invertebrates and bats</p> <p>Pinkham Way acts as a visual amenity for Hollickwood Park, Muswell Hill Golf Club and for passing traffic on the busy NCR. It acts as sound buffer from the NCR for the local <b>residents and also as a ‘lung’</b> absorbing pollutants etc from the heavy passing traffic..</p> <p>The site therefore falls into the London Plan definition of Open Space as being <b>“predominantly undeveloped”</b>, indeed wholly</p>		
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					undeveloped in this case		
					<p>Footnotes</p> <p><sup>22</sup> London Plan 2015 Glossary p387</p> <p><sup>23</sup> London Plan 2015 p397</p> <p><sup>24</sup> OS old map 1951-2 <a href="http://www.old-maps.co.uk/maps.html">http://www.old-maps.co.uk/maps.html</a> (coordinates 528736 191624)</p> <p>[Footnote 25 omitted in submitted rep]</p> <p><sup>26</sup> Haringey Open Space and Biodiversity Study Final Report Oct 2014 – Appendix 7 Site B7</p>		
23 5	RSA44 3	SA52: Pinkham Way	No	Not stated	<p><b>Section 7</b> <b>Employment Designation not appropriate</b></p> <p>7.1 Haringey has had to isolate Pinkham Way’s employment designation in a planning ‘clean room’, protecting its fragility and lack of substance from the contaminating reality of proper site appraisal, rigorous planning policy, and the deadliest threat of all – sound evidence. <b>As though it was Miss Havisham’s disintegrating wedding dress.</b></p> <p>7.2 Section 4 of Atkins (Employment Land Study 2015) analyses the potential demand for space in Haringey. It is in the context of the growing demand it forecasts for B1/B2 that Atkins emphasises the need to safeguard sites. <i>Atkins4.19</i></p> <p>7.3 Both Atkins and GVA Grimley (Workspace Viability Assessment 2015) dismiss the site’s suitability for employment generally, with Atkins emphasising its unsuitability for B1/B2 uses.</p>		It is not considered that any evidence base document preclude the potential for employment to be accommodated on this site. Indeed the ELS identifies that it is suitable for retention as Employment Land, and the Workspace study excerpts identifies that

				<p>7.4 This mirrors Further Alterations to the London Plan Policy 4.4(e) that LPAs should ‘...<i>take account of quality and fitness for purpose of sites.</i>’ <b>GVA dismisses the site in 9 words: ‘Some of the sites such as Pinkham Way ... <i>have limited workspace drivers to support future workspace delivery.</i>’ (PWA italics)</b></p> <p><b><i>Atkins 5.40-5.41; GVA 6.4</i></b></p> <p>7.5 <b>Atkins’ logic</b> can be traced easily through Sections 4 and 5 to Section 8, where it states the need to safeguard <u>suitable sites</u>, adding that <b>‘there is little benefit’ in safeguarding unsuitable, which should be considered for release for alternative uses. <i>Atkins 8.6, 8.17, 8.19</i></b></p> <p>7.6 In reports to members and in draft DPDs, as well as in correspondence with PWA, Atkins has been misrepresented; Atkins advice at 4.19 has been quoted <b>out of context whilst Section 8’s recommendations have simply been omitted; GVA’s dismissal</b> of Pinkham Way is conveniently forgotten.</p> <p>7.7 The clear sense in reports and DPDs is that Haringey must protect <u>all employment sites</u> irrespective of suitability. The Council appears to rely on Key Performance Indicator 9 in FALP Table 8.2 <b>‘Ensure that there is sufficient employment land available’</b>, while disregarding Policy 4.4(e) quoted above about the suitability of that land.</p> <p>7.8 The Regulation 19 SA DPD says about Pinkham Way: <i>This site can play an important role in providing</i></p>	<p>employment development would be possible with an element of residential cross-subsidy. Finally, the owner of the site identifies that they intend to bring it forward for employment use.</p> <p>No change</p>
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				<p><i>employment floorspace capacity to meet the borough's objectively identified employment needs, as set out in the Employment Land Study</i></p> <p><b>7.9 What 'important role'?</b> There is no floorspace and no potential for it according to the two consultants who looked at the site, GVA and Atkins. The site is vacant open green space with no buildings. If this site is to be listed under Employment at all, it should be listed under vacant land as it was last time round when Atkins did the 2012 update to the Employment Land Study 2009.</p> <p>7.10 The same consultants who objectively identified employment needs also, objectively, judged the site unsuitable to meet those needs. Pinkham Way was the only site among the 22 assessed that Atkins judged <b>'unlikely to meet future business needs.'</b></p> <p><b>Atkins – Viability of Pinkham Way</b></p> <p>7.11 The clarity of Atkins' report makes the appearance of Sections <b>5.42</b> and <b>5.43</b> so incongruous that PWA believes them to be a later addition, some trundling retrospective acknowledgement of the suppressed October 2014 GVA viability assessment on Pinkham Way.</p> <p>7.12 <b>5.43</b> rolls condition into condition, its tortured syntax reminiscent of Groucho Marx: <i>'If we had some eggs we could have eggs and ham if we had some ham.'</i></p> <p>7.13 It mentions 'suitable mitigation' as a pre-condition</p>		
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				<p>for retention of the employment designation. In six years, Haringey has taken not a single step to address <b>the site's irreconcilable dual designation</b>. 'Suitable mitigation of nature conservation issues' has therefore never entered the discussion. This cat's cradle of conditions means nothing.</p> <p><b>GVA Viability Assessments</b>  7.14 A number of viability assessments were undertaken by GVA Grimley for the Council during the preparation of the plan documents. The viability assessment for Pinkham Way in particular used less demanding financials compared to the wider study. The Council has not been able to explain why there was such a discrepancy. We therefore recalculated scenarios in the Pinkham Way viability study, applying <b>the difference in the cost figures used in GVA's</b> borough-wide viability study.</p> <p><b>The GVA Grimley Haringey Borough –wide Site Viability Assessment February 2015</b></p> <p>7.15 This borough-wide study of 12 sites factored in the following development costs: Residential £1800 per M2, employment £1500 per M2.</p> <p>7.16 GVA gave the figures their full professional endorsement:  <i>Standard construction and development costs have been applied - 1.7</i>  <i>These assumptions are based on BCIS, alongside evidence from comparable schemes and in-house expertise – 4.14</i></p> <p><b>The GVA Grimley Pinkham Way Viability</b></p>		
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				<p><b>Assessment – October 2014</b></p> <p>7.17 For the Pinkham Way study, the respective development costs were: residential £1600 per M2, employment £1000 per M2(respectively 16% and 33% less than the Haringey study). GVA offers no in-house endorsement of these different development costs is, <b>just the stark ‘BCIS’</b>.</p> <p>7.18 The Council maintains that GVA supplied no background documentation; without this, both the lower costs per se, the rationale for using different costs within the same borough, and the existence of two BCIS indices offering conveniently different statistics, remain a mystery. For public consultation purposes the study exists in a vacuum.</p> <p>7.19 Tellingly, the Council stated that <i>‘There was no analysis of a 100% commercial scheme as this returned a negative residual value under any scenario’</i>.</p> <p>7.20 PWA believes that, given the many ecological constraints on the site which needed consideration, a realistic assessment would have tended to factor in higher development costs than the borough wide study rather than significantly lower.</p> <p>7.21 As part of our analysis, we drew up a simple spreadsheet factoring into the Pinkham Way calculation the development costs used in the Haringey study, and profit on almost all scenarios disappeared. The Gilbertian result was that employment on Pinkham Way could only really be viable with 100% residential development.</p>		
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				<p><b><u>Contamination costs underestimated</u></b></p> <p>7.22 We have looked at the 2008 guidance used by <b>GVA, and the more recent H&amp;CA's Guidance on Dereliction, Demolition and Remediation</b> (March 2015) which updates the 2008 document, and we consider that the cost figure used by GVA should have been substantially higher. We have assumed GVA have based their figure on Site Category B, Low water risk, with proposed end use Residential and Employment (Table 1).</p> <p>7.23 GVA estimated £250k per hectare</p> <p>7.24 We consider that the more appropriate category should be Site Category C, High water risk (Moderate Sensitivity). The figures for this category are: £485 - £1,305k per ha (residential flats without gardens) or £540 - £1,460k per ha (residential with private gardens)</p> <p>7.25 We say this because the 2015 guidance explains on page 13 that a long unused site, with old contamination, is likely to be worse and therefore nearer the top end of the range [of cost]. In Annex B it also identifies <b>landfill waste</b> in Site Category C (Annex B, Fig 10 p26). As you are aware, the former sewage works <b>closed in the early 1960's (50 years ago). This length of time qualifies it as 'long used'. Subsequent to closure, Environment Agency records show that the Pinkham Way site was used for landfill waste up until 1980. The site also has a history of sporadic fly tipping. Therefore the range of contamination falls within Category C, a more expensive category than allowed for by GVA's figures.</b></p>	
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				<p>7.26 Lead and asbestos have been found on the site, Jacobs Report (2008). The 2015 guidance states, on page 6, that the presence of asbestos, even at low levels, may significantly increase costs.</p> <p>7.27 As to whether the calculation should be within the Low or High Water risk category, PWA considers the High Water category is more appropriate because the Environment Agency considers the site a major aquifer and a Source Protection Zone 2 (EA response to NLWP1, 2009).</p> <p>7.28 Also, the EA response to the <b>Council's 2014 SA</b> consultation advised that the water course under the site should be de-culverted – it laid out clear guidelines re 8 metres access space on either side etc. We have set out in some detail the implications of these guidelines in the Strategic Risk Assessment attached at Appendix 1</p> <p>7.29 If the higher remediation figure is accepted as more appropriate, and we consider it should be, it will have the effect of exacerbating the unviability of cross subsidising Employment on the site.  <b>The NLWA 'evidence' on viability preferred</b></p> <p>7.30 The Council has dismissed the GVA viability assessment on Pinkham Way and has made no response to our analysis save to tell us that it prefers instead to rely on a statement subsequently made by the NLWA, saying that:  <b><i>"Representations received from the landowners to the local plan consultation claim a viable employment use is deliverable under its current and</i></b></p>		
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					<p><b>proposed designation (SINC and Employment). ...</b>  <i>The site could be used for owner occupier purposes which represents a different viability picture to those faced by a speculative developer.”</i></p> <p>7.31 When we asked the Council for evidence supporting the NLWA’s assertion, we were advised to <b>“approach NLWA directly for the information that they are basing their response to the Council upon. Officers are satisfied that the submission from NLWA is sufficient.”</b></p> <p>7.32 If the Council has not seen the information on which the NLWA has based its assertion about the viability of the site, and we believe it has not, then the Council has no justification for relying on that assertion.</p> <p>7.33 It is unclear whether Barnet Council, the Landowner of the other part of the site has come up with any viability evidence. Presumably the NLWA viability assertion applies to its own area of ownership.</p> <p>7.34 Whether NLWA has factored the original £12m purchase price into its claim, as required for VfM considerations, is another issue where no information is available.</p>		
23 5	RSA44 4	SA52: Pinkham Way	No	Not stated	<p><b>Section 8</b></p> <p><b>Employment designation is contrary to the Council’s own Policies</b></p> <p>(1) Employment</p>		It is considered that this site is appropriate for retention as an employment area. While

				<p><b>8.1 Policy SP8 Employment: The Council will ... protect the borough’s hierarchy of employment land, Locally Significant Industrial Sites (LSIS) and Local Employment Areas (LEAs)</b></p> <p>Para 5.1.12 LSISs are well established industrial areas</p> <p>Para 5.1.14 [LEAs] ... In principle, mixed use development including residential, employment and community facilities may be appropriate ...</p> <p><b>8.2 Haringey’s Draft DMP advises potential developers to “ensure that development proposed is appropriate to the location ...”<sup>101</sup></b></p> <p>8.3 The Pinkham Way SINC does not fall within the definition of a LSIS and therefore is not suitable for uses within this designation as set out in the London Plan (see later). Nor is it suitable for designation as a LSIS because it is not an established industrial area. The site has been unused for almost 50 years and has developed into an established open green space.</p> <p>8.4 We do not consider it is any longer suitable for employment use for the reasons set out below, and that the Employment Use designation should be removed because it leaves the site vulnerable to inappropriate development proposals coming forward which could irreparably damage the nature conservation and/or biodiversity value of the whole</p>		<p>other sites with good town centre and public transport access are suitable for regeneration into mixed use typologies, this site has the potential to accommodate lower density uses thanks to <b>it’s location</b> in close proximity to the SRN.</p> <p>No change</p>
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<sup>101</sup> Draft DMP Section 1 Getting the right development in the right place

				<p>site.</p> <p>8.5 Of all the nine Borough Grade 1 SINCs in Haringey, Pinkham Way is the only one to have a dual designation. All the others are simply designated Borough Grade 1 Site of Importance for Nature Conservation.</p> <p>8.6 The Pinkham Way site lies within the Muswell Hill Area Neighbourhood<sup>102</sup>. The Council has identified the policies that take priority in this neighbourhood as ‘<b>Design, Town Centres, Open Space and Biodiversity; Community Facilities and Housing</b>’<sup>103</sup>.</p> <p>8.7 Note that employment is not identified as a priority policy because the Council considers unemployment in this area as being well below the borough average<sup>104</sup>. The number of currently vacant units on the Bounds Green Industrial Estate indicates a lack of need for (or surplus of) employment land in the vicinity.</p> <p>8.8 Haringey Council conceded at the public examination into the Local Plan (February 2012) that the Pinkham Way site was not a well established industrial area as it had remained unused for almost 50 years. Nor is it necessary to retain this site as a vacant employment site.</p> <p>8.9 In the course of the hearing, Richard Coburn, a Senior Economic Planner at W S Atkins, consultants to the Council on their employment policy, spoke on the</p>		
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<sup>102</sup>Fig 1.10 page 27 Local Plan – Strategic Policies 2013

<sup>103</sup>1.3.64 p26 Local Plan – Strategic Policies 2013

<sup>104</sup>1.3.57 p26 Local Plan – Strategic Policies 2013

				<p><b>Council's behalf. The Inspector asked whether</b> removing the Pinkham Way site from the pool of vacant employment land would result in the policy being unsound. Mr Coburn advised the Inspector that removal would make little difference, since the vacant land remaining would still be within the accepted frictional rate for employment land vacancy.</p> <p>8.10 We notice the site is no longer listed as vacant land. It is vacant, why is it not listed as such?</p> <p><b>(2) Poor Site Accessibility</b></p> <p><b>8.1.1 The Council's own advisers say that sustainable</b> modes of transport should be a key consideration with any major regeneration of a DEA site.<sup>105</sup> Although part of the Muswell Hill Area Neighbourhood is reasonably well served by buses, this particular site is not.</p> <p>8.1.2 It is identified as being badly provided for by public transport. It is scored as 1a – 1 being the lowest possible level of scoring in the Local Plan.<sup>106</sup> The reasons that the public transport score is so low are a) because the nearest station is more than 900m from the site boundary and b) only one bus route operates within 460m of the site and that is the 232 which runs every 20 minutes.</p> <p>8.1.3 This lack of public transport is a major obstacle to employment use on this site. It would encourage car use (for those who could afford it) and as</p>		
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<sup>105</sup> p22 (Point No 11) of The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement

<sup>106</sup> Fig 3 page 85 Local Plan – Strategic Policies 2013

				<p>demonstrated, access would be difficult for those who could not afford cars.</p> <p>8.1.4 In November 1998, lack of transport accessibility was given as one of the reasons for refusing a planning application for housing development on the site. Another reason for refusal was loss of ecological value. In the 15 years since refusal, the transport accessibility has not changed but the ecological value has been retained as confirmed by the ecological survey (attached).</p> <p><b>(3) 40:20 Carbon Commission Report</b></p> <p>8.2.1 Working towards a low carbon borough is now a key challenge for the Council – indeed Haringey has taken the initiative in setting itself targets with its own <b>40:20 Carbon Commission Report</b>. The Council’s policy now requires the efficient use of land and buildings in order to reduce car dependency.<sup>107</sup> The encouragement of car use on this site is contrary to this policy<sup>108</sup></p> <p><b>8.2.2 The Council’s overall strategy for managing</b> future growth in Haringey is to steer new development with high transport demand to areas with significant redevelopment opportunities at, or near, transport hubs in order to discourage car use.</p> <p>8.2.3 The key growth areas identified in the Local Plan are Haringey Heartlands and Tottenham Hale. It is in</p>		
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<sup>107</sup> 4.1.6 p71 Local Plan – Strategic Policies 2013

<sup>108</sup> Policy SP4 of the Haringey Local Strategic Plan 2013

				<p>these areas that the most significant amount of houses, jobs and infrastructure will be delivered during the life of the Plan, not in the Muswell Hill Area Neighbourhood.<sup>109</sup></p> <p><b>8.2.4 The Council’s Air Quality Action Plan<sup>110</sup> aims to ensure that “new development does not have a negative effect on local air quality and that public exposure to air pollutants is reduced in areas which breach the government’s air quality standards”. Air pollution is regarded as a material planning consideration.</b></p> <p>8.2.5 PWA has, under the aegis of Barnet Council, sponsored an air quality measurement device at the Alan Day car showroom opposite the Pinkham Way site. Readings are provided annually; the readings for the final 6 months of 2012 showed an average of 91.5ug/m3.</p> <p>8.2.6 This contrasts with the EU permitted upper limit of 40ug/m3 and therefore breaches it by 130%. Any development on this site is likely to further add to the pollution levels and therefore pollution should be considered a material planning consideration and given appropriate weight in light of the very high existing levels of pollution at this location.</p> <p><b>(4) Open Space and Biodiversity</b></p>		
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<sup>109</sup> Paras 2.1.4 and 3.1.6 of Haringey’s Local Plan – Strategic Policies 2013

<sup>110</sup> Haringey Air Quality Action Plan 2010-2018 section 3.3 Non Transport Measures

				<p>8.3.1 The Local Plan sets out the following targets for its policies on Biodiversity and Open Space:<sup>111</sup></p> <p>SP 13a: no loss of any areas of open space  SP13b: no loss of the 60 SINCS in the borough  SP13d: enhance areas of identified open space deficiency  The target for the London Plan Key Performance Indicator No 18 (Protection of Biodiversity habitat) is “no net loss of SINCs”.</p> <p>8.3.2 All of these policies and statements favour the protection of Pinkham Way SINC as a green open space, not as an employment site.</p> <p>8.3.3 Open Space and Biodiversity have been identified as priority policies for the Muswell Hill Area Neighbourhood.<sup>112</sup> The Pinkham Way site is a verdant open space that is recognised as having high nature conservation value. Haringey has designated it a Borough Grade 1 SINC.</p> <p><b>8.3.4 The definition of open space covers “all land that is predominantly undeveloped other than by buildings or structures that are ancilliary to the open space use. The definition covers a broad range of types of open space within London, whether in public or private</b></p>		
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<sup>111</sup> Strategic Policies 13: Open Space and Biodiversity (p177 Local Plan – Strategic Policies 2013)

<sup>112</sup> page 26 Local Plan – Strategic Policies 2013 para 1.3.64

				<p>ownership and whether public access is restricted, <b>unrestricted or limited</b><sup>113</sup> so the site qualifies for protection as open space.</p> <p>8.3.5 The site forms part of an ecological chain from Alexandra Palace through Rhodes Avenue Spinney, Albert Road recreation, Tunnel Gardens, Bluebell Wood and Muswell Hill Golf Club and thence to Coppetts Wood and Glebelands Local Nature Reserve (LNR).</p> <p>8.3.6 The site is bounded on two sides by adjacent open space, Hollickwood Park and Muswell Hill Golf Course, both recognized as important green spaces and SINCs in their own right. Because of this particular juxtaposition, the sites gain additional value from each other. Atkins Consultants advised Haringey in December 2010 that <b><i>“Strategic landscape and open space resources should be maintained, enhanced and, where possible, linked.”</i></b><sup>114</sup></p> <p>8.3.7 “Despite being located off the A406 which receives high traffic densities, mature trees at the boundaries of the site as well as woodland habitat provide screening from traffic noise and disturbance which creates a feeling of being outside an urban area.</p> <p>8.3.8 Views over the adjacent Muswell Hill Golf Course can be seen from areas of higher ground, towards the southern boundary. The diversity of bird and</p>		
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<sup>113</sup> London Plan Glossary p305

<sup>114</sup> Appendix 4 Extract p4 Haringey Atkins LIP Strategic Environmental Assessment 2010

				<p>invertebrate species in particular butterflies as well as the rich diversity of wildflowers adds to the aesthetic appeal of the site.”<sup>115</sup></p> <p>8.3.9 Development of any significance on the Pinkham Way SINC would, we believe, have a detrimental impact on the SINC itself and on the perception of greater space and openness, and enhanced views which benefit the adjacent SINCS.</p> <p>8.3.10 The Mayor of London recognizes the current and potential value of open space to London communities, and The London Plan 2015 requires London boroughs to protect local open space and address local open space deficiencies.<sup>116</sup></p> <p>8.3.11 The Council has stated that development will not be permitted on designated and other open spaces, and on suitable land with the potential to be used as open space, unless it is for limited small scale development ancillary to an existing use on the land and for which there is demonstrable need.<sup>117</sup></p> <p><b>8.3.12 Employment is not one of the Council’s priorities for this part of the borough and the Local Plan states that “There is no major development planned for the area, however, preservation and enhancement of conservation areas and green spaces are important issues”<sup>118</sup></b></p>		
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<sup>115</sup> P 24, box 2, Aesthetic appeal - Preliminary Ecological Appraisal – Report for PWA October 2013 Ref:2013\_012

<sup>116</sup> **London Plan Policy 7.18 p304**

<sup>117</sup> **6.3.3 page 199 Local Plan – Strategic Policies 2013**

<sup>118</sup> **Local Plan – Strategic Policies 2013 p26 para 1.3.61**

				<p>8.3.13 The Pinkham Way site is an open space and <b>therefore according to Haringey’s own policy is not</b> suitable for employment use. The current dual designation of SINC/DEA is therefore not in line with this open space policy.</p> <p><b>(5) SINC</b>s</p> <p>8.4.1 The Council states in its Local Plan that it will not permit development on SINC’s unless there are exceptional circumstances <u>and</u> the importance of the development outweighs the nature conservation value of the site; in such circumstances appropriate mitigation measures must be taken <u>and</u>, where practicable and reasonable, additional nature conservation space must be provided.<sup>119</sup></p> <p>8.4.2 The London Plan Policy requires planning <b>authorities to “avoid adverse impact to the biodiversity interest” when considering proposals that would affect</b> SINC’s:</p> <p>8.4.3 It is difficult to see how any significant employment use on the Pinkham Way site could be implemented without its having a serious adverse impact on the nature conservation value of the site itself and on the adjoining open spaces and SINC’s. Indeed, the employment policy is seen as one of the <b>policies in the Council’s Local Plan “to have the most potential for negative impacts mainly related to environmental objectives”</b><sup>120</sup></p>		
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<sup>119</sup> 6.3.24 Local Plan – Strategic Policies 2013

<sup>120</sup> Page 25 The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement

				<p>8.4.4 Given that Haringey Council has been advised of this, and given that the priorities in its own Local Plan for this location do not include employment,<sup>121</sup> and given no major developments are anticipated in this neighbourhood, it is difficult to see how the retention of a dual designation of employment/SINC can continue to be justified for the life of the Plan.</p> <p>8.4.5 Loss of habitat and biodiversity and the potential for fragmentation would appear to be at odds with the <b>Council's Objectives relating to Ecology, Biodiversity, Climate Change and Accessible Open Spaces</b></p> <p><b>(6) Preservation of Woodland</b></p> <p>8.5.1 The NLWA Tree Survey carried out in November 2012<sup>122</sup> found more than 1,500 trees of various species and ages on the site, some covered by Tree Preservation Orders. The Council considers that Trees play a significant role in improving environmental <b>conditions and people's quality of life. The Council's</b> Tree Strategy 2008-2011 aims to ensure that trees within the borough are managed in a pro-active and systematic manner.<sup>123</sup></p> <p>8.5.2 The Council states in its Biodiversity Action Plan <b>that it aims to conserve and enhance Haringey's</b> woodland for the benefit of both current and future</p>		
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<sup>121</sup>1.3.64 p26 Local Plan – Strategic Policies 2013

<sup>122</sup> Tree Survey Report, CBA Trees for NLWA November 2012

<sup>123</sup>Para6.3.30 Haringey Local Plan Strategic Policies

				<p>generations. It has set itself the target of increasing the extent of woodland habitat in Haringey by 0.5 hectares by 2015<sup>124</sup>. 55% (3.6ha) of Pinkham Way is covered by woodland (ie 55% of 6.5 hectares); the council cannot afford to lose this extent of woodland when it is simultaneously trying to increase woodland in the borough. All of the older trees and most of the rest would be lost if, for example, a waste facility were permitted on the site.</p> <p><b>(7) Watercourse – opportunity to deculvert</b></p> <p>8.6.1 There is potential to deculvert the watercourse under Pinkham Way (thought to be approximately 300m in length). This flows into Bounds Green Brook and thence into the Blue Ribbon Network at Pymmes Brook. A recent ecological report prepared for PWA noted that <b>“If current conditions allow, the reinstatement of this watercourse would further enhance the biodiversity value of the site”</b><sup>125</sup></p> <p>8.6.2 The Environment Agency has advised that all development on sites with culverted watercourses will be expected to investigate the feasibility of de-culverting<sup>126</sup></p> <p>8.6.3 Moreover, the opportunity to deculvert is <b>recognised in Haringey Council’s Biodiversity Action</b></p>		
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<sup>124</sup> LBH Biodiversity Action Plan 2009 p29

<sup>125</sup> Preliminary Ecological Appraisal Report October 2013 for PWA: Table 7 Box 1 p24

<sup>126</sup> EA letter to LBH 25 March 2015

				<p>Plan,“ ... opportunities to restore water courses exist on the former Friern Barnet Sewage Works site ... ”.<sup>127</sup>. Development on this site would therefore be contrary to the Council’s aim to protect water courses.</p> <p>8.6.4 The EA has also identified SA52 as lying in Flood Zones 1, 2 and 3 and has recommended that the Council’s guidelines should be amended to reflect this<sup>128</sup>.</p> <p><b>(8) Potential to create Cycle path/walkway through the Pinkham Way site</b></p> <p>8.7.1 It is physically possible to create a cycle path/walkway to the Pinkham Way site from the top of Cline Road, and/or Blake Road, along the railway land. The site has potential for access to be provided to the area of Bounds Green shown as deficient in open space (280m).<sup>129</sup> The cycle path/walkway could also provide access through the Pinkham Way site and over the bridge to the Retail Park on the other side of the NCR.</p> <p>8.7.2 There is potential also to open access from the Bounds Green Industrial estate to the Retail Park and vice versa for residents and businesses on the retail park side of the NCR. There is sufficient land along the side of the railway to create a comfortable path and it is possible to access the railway land from Cline Road</p>	
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<sup>127</sup> BAP Haringey 2009 para 9.3.3

<sup>128</sup> EA letter of 25 March 2015 to LBH

<sup>129</sup> Page 126 Fig 6.4 Local Plan – Strategic Policies 2013

				<p>or from Blake Road via Tunnel Gardens SINC. See <b>Council’s Policy SP7</b><sup>130</sup></p> <p><b>8.7.3 Haringey’s monitoring arrangements in its Local Strategic Plan</b> are intended to identify adverse effects of various policies so that remedial action can be taken. Logically this can be only after any damage has been done. In the case of a valuable SINC like Pinkham Way that has developed its biodiversity value over 50 years, the likelihood is that the damage would be irreparable.</p> <p>8.7.4 The Council will note from the Ecological Report<sup>131</sup> <b>that “ ... the site is positioned along an ecological corridor and offers an important greenlink between other sites. This is noteworthy within the context of inner London where well connected sites are becoming increasingly rare.”</b></p> <p><b>8.7.5 It is also worth noting here that “Given the geographical context of the site which is situated in a heavily urbanised area, the number of notable species recorded is considered significant.”</b><sup>132</sup></p> <p><b>Wider Ecological Importance of SINCs and Biodiversity</b></p> <p>8.8.1 The first White Paper on the natural environment for over 20 years was published in April 2012.</p>		
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<sup>130</sup> Local Plan: Strategic Policies 2013-2026 SP7 p83 paras 4.4.13 - 4.4.21

<sup>131</sup> Preliminary Ecological Appraisal Report (Oct 2013) for PWA p23 Box 6 Recreatability

<sup>132</sup> Preliminary Ecological Appraisal Report (Oct 2013) for PWA p23 Box 2 Species Richness

				<p>Introducing the White Paper, The Secretary of State said <b><i>“by properly valuing nature today, we can safeguard the natural areas that we all cherish and from which we derive vital services ..... this White Paper aims to strengthen connections between people and nature, to the benefit of both”</i></b>.<sup>133</sup></p> <p>8.8.2 In May 2013, a groundbreaking report was published by a coalition of leading conservation and research organisations. Scientists working side-by-side from 25 wildlife organisations have compiled a stock take of our native species – the first of its kind in the UK. The State of Nature report reveals that 60% of the species studied have declined over recent decades. In the Foreword to the report, Sir David Attenborough said <b>“This important document provides a stark warning: far more species are declining than increasing in the UK, including many of our most treasured species.</b></p> <p>8.8.3 Alarmingly, a large number of them are threatened with extinction. The causes are varied, but most are ultimately due to the way we are using our land and seas and their natural resources, often with little regard for the wildlife with which we share them. The impact on plants and animals has been profound.</p> <p>8.8.4 Dr Mark Eaton, a lead author on the report said: <b>“These declines are happening across all countries and UK Overseas Territories, habitats and species groups, although it is probably greatest amongst insects, such</b></p>		
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<sup>133</sup> The Natural Choice <http://www.defra.gov.uk/environment/natural/whitepaper/>

				<p>as our moths, butterflies and beetles. Other once common species like the lesser spotted woodpecker, barbastelle bat and hedgehog are vanishing before our eyes”<sup>134</sup>.</p> <p>8.8.4 The 2013 Preliminary Ecological Appraisal carried out for PWA found that the Pinkham Way SINC “is used as a breeding site by no less than six notable bird species (UK BAP Priority Species or RSPB Red or Amber Status). Priority Species, Slow worm and Cinnabar moth caterpillars were also identified.</p> <p>8.8.5 The site is likely to provide roost sites for common pipistrelle bats and mature trees at the boundary of the site have the potential to provide roost sites for a diversity of bat species.</p> <p>8.8.6 There is clearly growing awareness of the importance of protecting our biodiversity and open spaces including in Haringey. The Pinkham Way Alliance commissioned an independent Ecological Report on the Pinkham Way site which is attached. This confirms that the Pinkham Way site continues to meet the criteria for Borough Grade 1 Site of Importance for Nature Conservation.</p> <p><u>Footnotes</u>  <sup>27</sup> Draft DMP Section 1 Getting the right development in the right place  <sup>28</sup> Fig 1.10 page 27 Local Plan – Strategic Policies 2013</p>		
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<sup>134</sup> <http://www.wildlifetrusts.org/news/2013/05/22/state-nature-60-uk-species-decline-groundbreaking-study-finds>

				<p><sup>29</sup>1.3.64 p26 Local Plan – Strategic Policies 2013</p> <p><sup>30</sup>1.3.57 p26 Local Plan – Strategic Policies 2013</p> <p><sup>31</sup> p22 (Point No 11) of The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement</p> <p><sup>32</sup>Fig 3 page 85 Local Plan – Strategic Policies 2013</p> <p><sup>33</sup> 4.1.6 p71 Local Plan – Strategic Policies 2013</p> <p><sup>34</sup> Policy SP4 of the Haringey Local Strategic Plan 2013</p> <p><sup>35</sup> <b>Paras 2.1.4 and 3.1.6 of Haringey’s Local Plan – Strategic Policies 2013</b></p> <p><sup>36</sup> Haringey Air Quality Action Plan 2010-2018 section 3.3 Non Transport Measures</p> <p><sup>37</sup> Strategic Policies 13: Open Space and Biodiversity (p177 Local Plan – Strategic Policies 2013)</p> <p><sup>38</sup>page 26 Local Plan – Strategic Policies 2013 para <b>1.3.64</b></p> <p><sup>39</sup> London Plan Glossary p305</p> <p><sup>40</sup> <b>Appendix 4 Extract p4 Haringey Atkins LIP Strategic Environmental Assessment 2010</b></p> <p><sup>41</sup> P 24, box 2, Aesthetic appeal - Preliminary Ecological Appraisal – Report for PWA October 2013 Ref:2013_012</p> <p><sup>42</sup> London Plan Policy 7.18 p304</p> <p><sup>43</sup> 6.3.3 page 199 Local Plan – Strategic Policies 2013</p> <p><sup>44</sup> Local Plan – Strategic Policies 2013 p26 para <b>1.3.61</b></p> <p><sup>45</sup>6.3.24 Local Plan – Strategic Policies 2013</p> <p><sup>46</sup>Page 25 The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement</p> <p><sup>47</sup>1.3.64 p26 Local Plan – Strategic Policies 2013</p> <p><sup>48</sup> Tree Survey Report, CBA Trees for NLWA November 2012</p> <p><sup>49</sup>Para 6.3.30 Haringey Local Plan Strategic Policies</p>		
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					<p><sup>50</sup> LBH Biodiversity Action Plan 2009 p29</p> <p><sup>51</sup> Preliminary Ecological Appraisal Report October 2013 for PWA: Table 7 Box 1 p24</p> <p><sup>52</sup>EA letter to LBH 25 March 2015</p> <p><sup>53</sup> BAP Haringey 2009 para 9.3.3</p> <p><sup>54</sup>EA letter of 25 March 2015 to LBH</p> <p><sup>55</sup> Page 126 Fig 6.4 <b>Local Plan – Strategic Policies 2013</b></p> <p><sup>56</sup> Local Plan: Strategic Policies 2013-2026 SP7 p83 paras 4.4.13 - 4.4.21</p> <p><sup>57</sup> Preliminary Ecological Appraisal Report (Oct 2013) for PWA p23 Box 6 Recreatability</p> <p><sup>58</sup> Preliminary Ecological Appraisal Report (Oct 2013) for PWA p23 Box 2 Species Richness</p> <p><sup>59</sup>The Natural Choice  <a href="http://www.defra.gov.uk/environment/natural/whitepaper/">http://www.defra.gov.uk/environment/natural/whitepaper/</a></p> <p><sup>60</sup><a href="http://www.wildlifetrusts.org/news/2013/05/22/state-nature-60-uk-species-decline-groundbreaking-study-finds">http://www.wildlifetrusts.org/news/2013/05/22/state-nature-60-uk-species-decline-groundbreaking-study-finds</a></p>		
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SA 53: Alexandra Palace

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
36	RSA121	SA 53	No	Not stated	1. Ownership of the site is indicated as being “unified public ownership”. This claim is misleading and unsound because the whole of Alexandra Park and Palace (the site) is owned under trust law by the Alexandra Park	The APPCAAC recommends ownership to be corrected to “Alexandra Park and Palace Charitable Trust”.	The statement is not considered to be incorrect, and is consistent with the referencing of the rest of the document.  No change

					and Palace Charitable Trust.		
36	RSA122	SA 53	No	Not stated	2. Under the heading 'Site Requirements' there is a claim: "The site is the centrepiece of the Alexandra Palace Conservation Area ..." Again, this is misleading and unsound – it suggests the site is simply a part (albeit centrepiece) of a conservation area. In fact, Alexandra Park and Palace comprises a designated CA	The APPCAAC recommends the seventh bullet point under Site Requirements be amended to show the conservation area comprises the totality of the Park and Palace.	It will be clarified that the Palace is the centrepiece of the Conservation Area, which includes the Park.
36	RSA123	SA 53		Not stated	3. Under the heading 'Development Guidelines' there is an absence of any reference to the fact that the Palace is listed by Historic England as Grade II, which limits the scope of development and change to the fabric of the building. This needs to be corrected	The APPCAAC recommends an additional bullet point here to show: Alexandra Palace is listed Grade II and as such there are conditions and restrictions on the form and development of changes that may be considered.	This is set out in the list f 'Planning designations'  No change
37	RSA124	SA 53	Not stated	Not stated	It is clear that the palace and grounds should be preserved and that only this would be consistent with the Council's sustainability policy in relation to open spaces. Preservation includes of its environs and views. There should be no major change to Alexandra Park and Palace without full London-wide consultation,	1) address is incorrect 2) planning designations header should include 'Grade 2 listed Historic <i>Park</i> ' (palace is mentioned but not the park) 3) 'unified public ownership' should be clarified. It is very important to understand that it's a charitable trust <i>for the benefit of the people of London</i> and governed by its	1. The address will be modified to reflect the Palace and the Park. 2. This is agreed for clarity. 3. The statement is not considered to be incorrect, and is consistent with the referencing of the rest of the document.

				<p>since the amenity and its preservation are London-wide, if not national, concerns and enshrined in its own statutes.</p> <p>I note that there is a further consultation being carried out in relation to Wood Green (Area Action Plan), which includes consideration of where the Cross Rail 2 stations might be. It is difficult properly to comment when two consultations overlap and in my view it is relevant to the Local Plan and the future of Alexandra Palace and Park and to air quality in the area that there should be excellent public transport links. For that reason the preservation of Alexandra Park and Palace should include enhancing access for the public and planning for a new station there.</p> <p>No decisions which affect the Wood Green area should be taken without waiting for the full responses to the relevant consultation later in March. Furthermore, full account should be taken of the fact that consultations have been</p>	<p>own statutory instruments. It is for that reason that the Council should or will have to consult more widely on changes which have a major effect on the Palace and Park.</p> <p>4) Where it is said "Indicative Development Capacity- none identified" – this should be changed to make it clear that none is appropriate for the Palace and Park.</p> <p>5) Clause 2.151 any works to open space must be consulted upon London wide according to dedicated Acts of Parliament. Improvement should be subject to taking on board the advice of the Garden History Society, as <b>it's a listed historic garden as</b> statutory consultees. Works should have a historic restorative context.</p> <p>6) 'opportunities to improve open space will be supported' - again as above, subject to it's historic designation, listed status and guidance from the Garden History Society.</p> <p>7) "the site is the centrepiece of the Alexandra Park and Palace Conservation</p>	<p>4. It is not correct that there will be no development, there will be heritage-led development to ensure sustainable uses are found for the existing Palace buildings, and Park.</p> <p>5. This is noted, but there is not considered to be a need to go into this level of detail in the commentary to this policy.</p> <p>6. As above, it is not necessary to go into this level of detail regarding legislative requirements. They will be required as per the legal requirements.</p> <p>7. <b>It will be clarified that the Palace itself is the centre piece of the Conservation Area</b></p> <p>8. Support for enhancement is noted. The Council will continue to work with Historic England. Views to and from the</p>
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					held on Cross Rail stations, and a station at Alexandra Park and Palace is supported, as is stated in the Sustainability Appraisal of Site Allocations document pages 28, 31, 32. Page 33 <b>para 10.14.6</b> "will help to ensure the regeneration of <b>Alexandra Palace...given the introduction of CR2, to support the development of restaurant and hotel</b> ".	Area.." This is not strictly correct and indicates an insufficient understanding of the APPCA. The site is not the centrepiece, but is one and the same as the APPCA. 8) "Alexandra Park is a historic park and opportunities to enhance its setting should be explored". I would support enhancing its setting - subject to the restoration or conservation guidelines of The Garden History Society and Historic England. For this reason, developments which are detrimental to the view from and of the Park should not be permitted.	Park are protected in the DMDPD.
218	RSA335	Sites SA6, SA7, SA14, SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35,	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.	We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this</i>	<b>Noted, this amendment will be made.</b>

		SA47, SA53, SA57				<i>site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	
232	RSA386	SA53: Alexandra Palace	Not stated	Not stated	the Development Guidelines should be expanded in relation to any proposed works to the listed building. Currently the wording focuses on not harming the historic fabric of the building and the need to be sensitive to it. This should be expanded to include the need to avoid harm to the significance of the listed building, thus taking into account other heritage interests associated with the Palace and which supports its designation as a grade I listed building. In addition it would be useful to link the guidelines to any supporting documentation that describes the significance of the Palace and the surrounding gardens.		Expanded the Development Guidelines to include the need to avoid harm to the significance of the listed building,

#### SA 54: Tunnel Gardens

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
38	RSA125	SA54	Yes	Yes	Not stated	None	Noted.
39	RSA126	SA 54  Para 2.148-	No	Yes	The plan is contradictory: on the one hand it says 'no additional capacity identified' and then it talks of 'potential for	Please see previous comments.	The Council do not believe that this is contradictory. This site has been identified as potentially requiring the replacement of the

		2.149		<p>intensification'. It is unclear as to what this means as the impact of increasing the population on the local environment needs to be considered; schools, footfall, traffic, healthcare. It does not note that development should respect the back gardens of the properties on Wroxham gardens that are adjacent, nor the effect on the houses on Blake Road. There are three surrounding roads that are effected Winton Avenue, Wroxham Gardens and Blake Road and all three need to be acknowledged. The border that has been drawn is right on the line of Wroxham Gardens which is currently a no through road. On numerous occasions the Council has clearly stated that this would be retained as it is too dangerous to have the road as a cut through. How this will be retained is worryingly unclear. One of the mature trees referred to that 'should be retained where possible' is integral to this being a no through road. It is therefore requested that the document states that all the mature trees should be retained where possible.</p> <p>The document states: 'Development should reflect the</p>	<p>existing housing, which due to their construction, are considered to be defective. No additional housing is proposed in this document, and a detailed timeframe is not known, but it is considered that some redevelopment may happen over the Plan period.</p> <p>Should some or all of the properties require replacement, given the current housing pressures in London, intensification will be considered. This policy does not state that it will happen, but it is considered sound that this is considered.</p> <p><b>It is agreed that reference to adjoining properties on Blake Rd and Wroxham Gardens can be added to the first Development Guideline.</b></p> <p>The Council is comfortable with its development guideline regarding potential heights of development, and the protection of trees, noting that any development will need to accord to all relevant policies set out in the Local Plan.</p> <p>Consultation has been in accordance with the council's</p>
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				<p>existing suburban character of the site, and any replacement housing should retain the rhythm of the housing in the area. Some intensification may be possible, but development above 3 storeys would need to be very carefully justified'. Development about 2 storeys would be out rhythm of the housing in the area and thus 3 storeys is way out of keeping. There is no mention that this site is on elevated land as it is on top of a hill and therefore it is imperative that a low build is maintained and thus in keeping with the housing in the area. Compliance with the adjacent residents right to light is also affected by the site elevation.</p> <p>The process thus far does not seem compatible with the statement of community involvement i.e the extent to which local residents that will be affected have been communicated with. In addition, this is a very complex document to feed back on, it is clearly not intended for lay people as it does not appear to comply with the Plain English Campaign. Whilst it is appreciated that there have been 'drop in sessions' these are not accessible by all, and thus the transparency of this process is</p>	Statement of Community Involvement.
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					questionable. Local stakeholder have not been openly and sufficiently consulted with in regards to the rebuilding of Tunnel Gardens. When talking of stakehodlers I am referring to the immediately adjacent streets and thus the residents of; Blake road, Winton Avenue and Wroxham gardens.		
221	RSA346	SA25, SA27, SA28 and SA31  SA23, SA30, SA40 and SA54	Not stated	Not stated	We support a number of proposals, including SA25, SA27, SA28 and SA31 where by a commitment is made in the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINCS.	This commitment, to enhance the adjacent green spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.	<b>It is agreed that a comment regarding how the site impacts on the ecological corridor to the west of site SA23 could be added.</b>  The other sites are considered to have appropriate references.

#### SA 55: Coppetts Wood Hospital

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
40	RSA127	SA 55	Not stated	Not stated	On behalf of our client, Catalyst Housing Group (CHG), we submit formal planning representations in <b>response to the Council's</b>	As set out in the representation	Noted.

					<p>draft Site Allocations DPD, specifically to draft Policy SA55 concerning the draft allocation of Coppetts Wood Hospital (CWH). CHG are the freeholders of the site having acquired the property from the NHS. We object to the following points identified in draft SA55:</p> <ol style="list-style-type: none"> <li>1. <b>The site's assumed PTAL 1 rating.</b></li> <li>2. The cited net development capacity of 21 units across the former hospital site and former school.</li> <li>3. That both the former hospital and school sites are being considered together as a single allocation.</li> <li>4. The citing of testing for hospital uses on the CWH part of the site.</li> <li>5. The citing of the retention of the mortuary building within the CWH site.</li> </ol>		
40	RSA128	SA 55	Not stated	Not stated	Site has been redundant now for many years, since 2000.	For clarification purposes, under the site description " <i>current/previous use</i> " CWH should be referred to as a " <i>former</i> " hospital given the site has been redundant now for many years, since 2000.	<b>Noted, this will be amended.</b>

	RSA129	SA 55	Not stated	Not stated	<p><b>1. The Site's PTAL Status</b></p> <p><b>Within the Site Allocations DPD, the site's PTAL rating is incorrectly cited as PTAL rating 1. The PTAL rating is based on the site's accessibility to a range of public transport modes (bus, rail and tube), which are discussed below and which draws from transport advice taken from CHG's appointed transportation consultations who have undertaken a specific PTAL analysis.</b></p> <p>There are a range of local facilities within Muswell Hill that are within an acceptable walking and cycling distance with the local infrastructure supporting safe and convenient movement. Furthermore, Finchley, Barnet and Highgate are all within an acceptable cycling distance with suitable, supporting infrastructure.</p> <p>The nearest bus stops are the Coppetts Wood Hospital bus stops located on Coppetts Road, just beyond the eastern site boundary. These bus stops offer Route 234, which operates between Barnet and Highgate providing regular daily services. An additional four services can be accessed along Colney Hatch Lane, within an easy walking distance of the site and along well-lit routes.</p> <p>New Southgate Rail Station is approximately 2.2 kilometres east of the site in addition to Alexandra Palace, approximately 2.5</p>	<p>Planning approvals in the past for residential redevelopment at the CWH site had been consented on the basis of the site benefiting from a PTAL 2 urban setting and thus alteration to draft Policy SA55 should be amended to reflect this.</p>	<p>The site is predominantly within PTAL 1 as can be <b>shown using TfL's</b> online PTAL analysis toolkit. So little of the site is within 2 that changing this is not merited. The setting of this area has been identified in the Urban Characterisation Study as being suburban in character.</p> <p>No change</p>
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					<p>kilometres to the east. These stations offer three trains an hour in either direction including services to central London.</p> <p>With regards to the London Underground Network, the site is located centrally to multiple stations offering services along the Northern and Piccadilly Lines. The nearest London Underground station is East Finchley, a Northern Line Station operating between High Barnet and Morden offering fast connections to key locations in central London. East Finchley Station is within a 2.6 kilometre walking distance of the site. Alternatively, the Route 234 bus provides a direct connection from the site to the station. It is therefore concluded that the site is readily and safely accessible by foot and cycle to local services, as well as being accessible to fast and frequent public transport services linking with wider destinations that provide excellent access to employment, education, healthcare and retail. There can be no doubt, therefore, that the site has a PTAL 2 rating at this location based on its public transport accessibility.</p>		
40	RSA130	SA 55	Not stated	Not stated	<p>2. The Proposed Net Residential Development Capacity</p> <p>For a site with a PTAL 2 rating and within an urban location (such as CWH), the London Plan density matrix recommends a range between 200-450 habitable rooms per hectare.</p> <p>Of relevance, the planning permission</p>	<p>We therefore recommend that a density range of 200-450 habitable rooms per hectare is cited for the <b>site's</b> development</p>	<p>Notwithstanding that the Council disagrees with the assumptions for density calculation as suggested, the indicative capacities as set out in the Appendix to the Site Allocations document is not a limit</p>

				<p>granted at Coppetts Wood Hospital in 2010 (referenced HGY/2008/2196) was approved <b>on the basis of an officer’s report at the time citing that the “London Plan sets densities for development in urban areas and recommends a density range of 450-700 habitable rooms per hectare. Policy HSG9 states that residential development in the borough should normally be provided at a density of between 200-700 habitable rooms per hectare” which relates to a higher density</b> range than the above London Plan guidelines. For the avoidance of doubt, this approved scheme concerned the hospital site only.</p> <p>Draft Policy DM11 of the Pre-Submission Development Management DPD (January 2016) states that “the Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach.” The London Plan (2015) identifies that the density matrix are guidelines only and should not be applied mechanistically where a design led approach should be taken with again the aim to optimise housing potential. Furthermore, one of the core planning principles within the NPPF (paragraph 17) is the need to encourage the effective use of land by re-using land that has been previously developed (i.e. brownfield land such as the former hospital site).</p> <p>In view of the above, we strongly object to</p>	<p>capacity in relation to the CWH part of the site only, in line with adopted and emerging policy.</p>	<p>for development on the site. The amount of development permissible will depend on a rigorous design-led analysis, detailing how the proposed development responds to local site circumstance. The indicative capacity is there to show that the suite of allocations within the Local Plan will meet objectively identified need across the borough.</p> <p>No change</p>
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					the cited net development capacity of 21 units across the former hospital site and former school. This density of development is entirely contrary to adopted and emerging local policy and would fail to optimise the <b>site's development potential which is</b> contrary to draft Policy DM11, London Plan policy and the NPPF/ NPPG guidelines.		
40	RSA131	SA 55	Not stated	Not stated	4. Single Allocation  It is unclear as to why both the former hospital and school sites are being considered together as a single allocation. The sites are under separate ownership and the former hospital site, which is owned by CHG, is vacant and has been for the many years. We understand the school site is currently in use and likely to be retained in education use.	The sites should, therefore, be considered individually and the timeframe for delivery of the former hospital site should be cited as deliverable within the next five years (2015-2020).	It is not considered that by allocating these sites together it reduces deliverability. Conversely, it does ensure the opportunity for more comprehensive development is adequately considered and assessed.  No change
40	RSA132	SA 55	Not stated	Not stated	4. Testing Hospital Use  Our comments in this respect relate to the former hospital site only, which is within <b>CHG's ownership</b> .  There is no dispute that residential redevelopment is acceptable on the site. The site has been vacant for many years and there has been no interest in it for continued hospital use. The site has a planning history of recent planning permissions which establish the residential land use; and in	In the light of the above, it has already been established that there is no demand for the continued use of the site as a hospital and that residential development, a priority use, is acceptable. We	Noted. This case will be made upon receipt of any subsequent planning application.  No change

					particular the Council granted planning approval in 2010 for the change of use to residential to provide 55 dwellings, where it <b>was cited within the officer's report that "The Royal Free Hampstead NHS Trust seeks to transfer its unit at the Coppetts Wood hospital a former infectious disease hospital closer to the Royal Free Hospital. As such the site provides the opportunity to provide much needed new housing in the Borough."</b>	therefore recommend that this is reflected in draft SA55.	
40	RSA133	SA 55	Not stated	Not stated	5. Retention of Mortuary Building  On behalf of CHG, Turley Associates have undertaken an independent Heritage Assessment which concludes that the mortuary building does not contain any special architectural or historic interest in the national or local context. Retaining the mortuary building would create design difficulties in bringing forward a viable residential redevelopment of the site forward to optimise its housing potential at this important site location. This aspect is also a specific, detailed matter which requires evidential justification at the planning application stage and is not in our view a consideration for draft policy S55 without the Council providing their own evidence to support the statement.	We propose this matter is dealt with correctly through the planning application process.	Noted.

SA 56: Park Grove & Durnsford Road

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure / Para					
41	RSA1 34	SA56	No response given	No response given	I don't know if the plan is legally compliant or 'sound' whatever that means. We are directly affected by the proposals at tunnel gardens living on the adjoining street and not once have we been notified by Haringey as to the proposed ideas or plans for the site. I am therefore assuming that the development proposal will have NO IMPACT WHATSOEVER on my family, my neighbours my home, my noise levels, my quality of life, the resale value of my home, my ability to take my children to school on blake road, the feel of the street. The plan is full of jargon - so i cant comment on whether I approve or have concerns about 'uplift' 'restrictive covenant impact. Intrigued by the statement 'suburban nature of scheme will not change' - the whole neighbourhood is semi detached homes with gardens... that is the suburban nature of the neighbourhood. This does not align with the 'flats' proposition mentioned briefly in the site section.	Better communication accountability and transparency in plans consult with people likely to be affected - if I am not affected I apologies for wasting your time Do as you have done in Highgate - build to sell. build and sell a portion to private market - homes here go for c£1m so you can get a fair bit of money to build more properties elsewhere and to retain the 'suburban nature of the neighbourhood'	The Council considers that the allocation has been drafted to ensure any future redevelopment will have regard to the need to protect residential amenity of neighbouring properties, while making the best use of the site. Based on the location of this site there is potential for some uplift in housing numbers, but this will be managed in a way that ensures good quality reprovision for existing residents, and minimal disruption for the wider area. Any change to the density or mix of housing on this site will need to

							be supported by detailed reports, including a transport assessment, which will assess any impact on the surround road network and whether mitigation measures are required.
							No change
42	RSA1 35	SA56	No	No	<p>The present density of housing in this area is already unsustainable – mixture of <b>houses/maisonettes/flats built on “RAMUS TILE”</b> site/now known as Baily Close. Replacement of static portacabin type homes next to Aneurin Bevan recently demolished and flats built on it.</p> <p>Family houses that have been split into 2 or more accommodations, Rental/bedsit properties by private landlords/ with or without the necessary planning permission/ nearby family houses with 10-12 bell-pushes and a plethora of wheelie-bins on frontage. Hedges cut down for hard-standing for 1/2/more vehicles. Bounds Green school so over-subscribed already with children from Muswell Hill/also houses split into <b>2/3 accommodations that can't get places</b> in Muswell Hill schools/ Rhodes Academy etc.</p> <p>Even with the expansion of classes being</p>	<p>When Park Court was re-roofed and had double-glazing fitted, <b>why wasn't Park Grove and Durnsford Rd (and Tunnel Gardens)</b> included when the works would have been far cheaper in labour and <b>materials than today's</b> estimates.</p> <p>We as a collective of free-holders/ lease holders and tenenets have visited homes in Chingford that were upgraded by Waltham Fores Council,</p>	<p>Regarding infrastructure, the Council has published an Infrastructure Delivery Plan, which identifies how education and health facilities will need to expand to meet the needs of a growing population.</p> <p>The nature of the Orlit housing means that further retrofitting is not cost</p>

				<p><b>“added” on the play-ground</b> of Bounds Green Infant &amp; junior school to double or triple the number of dwellings on this site will be adding to an even greater problem for the future. If made into a ¾ form entry then the similar number of secondary places would need to be made available in the future. Many parents locally are not getting any of their school choices for their secondary aged children! But allocated another not even on their preferred option list!</p> <p>How can this be considered acceptable practice when year on year so many families are disappointed and so many more are going through the appeal process route?</p> <p>When children with additional special needs/ medical physio/ speech and language plans etc are being placed in main-stream schools under <b>“Integration and inclusion” banner</b>. When statements of special needs (that were legally binding) are now being monitored and the <b>money devolved down to the schools’ budget</b>- whether or not that particular head is a good <b>“budget-manager” and actually ring-fences</b> that money to meet the individuals needs/ care-plans- <b>input from other “professionals”/ physio/speech and language etc.</b></p> <p>Many autistic and aspergers spectrum diagnosed <b>children are being “looked after”</b> by people untrained to meet their complex and varied medical and social needs. Basically <b>because it’s cheaper that a residential/ home</b></p>	<p>Individuals given a choice of upgrade and finish to the exteriors of their homes to make them warmer/ cheaper to heat/improve the exterior insulation/ new doors/ porches and windows, upgrade the bathrooms and kitchens, without the added expense of <b>decanting”/paying compensation to/ rehousing people</b> whilst works were carried out.</p> <p>It took 10-12 weeks by companies employed to do the upgrades. The people could remain in their homes whilst it was being done, so therefore no need for compensation/ removal fees/ payments for moving utility companies/ TV company etc.</p> <p>People reported to be</p>	<p>effective. It is considered that the majority of the remainder of this representation relates to management issues outside the scope of the Local Plan.</p> <p>No change</p>
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				<p>tuition/ “special-school” placement.</p> <p>This practice is derisory/ discriminatory against often single-parent family members and with the withdrawal of benefits/ introduction of universal credits etc/ bedroom tax etc. Is again causing more stress and family-breakdown and added financial problems. The closure of day-centres/ luncheon-clubs/ community centres having their funding cut year on year only adds to the continued pressure and when housing needs/ the disability needs of young adults as well as the elderly in our community. When these relationships break-down as the carers of their loved ones are under constant pressure 24/7 there is no respite for them. The woefully funded mental-health budgets and the inadequate “care in the community” at present being provided by the private sector agency staff on 10-15 minute time slots is woefully inadequate and leaves many vulnerable people open to physical/ emotional/ financial and neglectful abusive behaviour by largely untrained staff. It is in fact illegal for someone not medically approved to give out and administer medications!</p> <p>People working for minimum wages to sustain their own cost of living expenses. Many part-time students subsidising their own rental/ utility bills/ food prices etc whilst also studying in whatever field they wish.</p> <p>The onus put on the agencies to check-out their employment record/ previous experience and training etc, visa status etc. It’s been proved that</p>	<p>very happy with the look of their homes/ the upgrades/ their cheaper gas and electricity bills.</p> <p>Some people had private surveys done if they bought under the right to buy Thatcher legislation. Although the Council are now saying the properties are “defective” and “not mortgageable”, people have been given mortgages on some houses quite recently. Different and conflicting information has been given to different families.</p> <p>Some misinformation and conflicting advice from different people, even within the same department.</p> <p>If as the Council has stated that they were declared defective why has the Council been moving new</p>
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				<p>many such persons are “under the radar”/ have false documents etc.</p> <p>Whilst our own children and grandchildren will have to move out of London to afford to get on the property ladder and afford a family home of their own to start a family, unable to afford to buy even a 1 bedroom studio flat in the town of their birth!</p> <p>Local people feel marginalised and have to make the difficult choices of moving away from family and friends or emigrating to get the quality of life our generation took for granted.</p> <p>Leaving new-built properties for rich outsiders/ young professionals/ city-workers/ and investment funds from abroad to replace our local families with young children/ students/ to never be in a financial position to buy or even rent at today's expensive prices.</p>	<p>people with young children and babies into the properties in this area. Their children are now settled in local schools and do not wish to unsettle them by a major move.</p> <p>We have been told over the years we were included in the decent homes programmes for window-renewal given a time-line for the upgrades/ then it not happening-“<b>next year</b>”, “<b>next year</b>”, but it never happened!</p> <p>Many of us have spent our own money making these houses safe and warm for our families and are even <b>being told “unless you’ve kept all your receipts for building materials/ paint/ wallpaper/ new toilets/ showers/ kitchen-units etc, then you cannot be</b></p>	
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						<p>compensated for your loss.</p> <p>Haringey Council failed in their duty of care to us tenants – they did nothing to the properties before we moved in as we were working parents.</p> <p>We had no choice but to do the work ourselves or pay someone to do it for us. As our landlord the London Borough of Haringey failed to maintain and repair the properties to a safe standard.</p> <p>Ever since this proposed process started we were told to <b>“still report” repair</b> jobs and there would be no difference to how and how quickly it should be dealt with!</p> <p>In reality even <b>“emergency” crisis</b> problems, a leaking</p>	
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						<p>roof or burst pipes were not dealt with quickly or efficiently. Often weeks even months of waiting in for workmen that <b>don't turn up/</b> contractors that claimed for jobs they <b>hadn't done!</b></p> <p>Becasue no one was checking up on them on completion.</p> <p>A simple job often necessitates 2/4/6 different operations and outside contractore for a simple repair.</p>	
22 7	RSA3 57	SA56-65	No	Not Stated	<p>Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <i><b>Our Tottenham network brings together 50 key local community groups, projects and campaigns</b></i> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.</p>	Not specifically stated	Noted.

					<p><b>Organisations affiliated to the <i>Our Tottenham</i> network include</b>  (as of 1.03.2016):</p> <ul style="list-style-type: none"> <li>Bull Lane Playing Fields Campaign / Weir Hall Action Group</li> <li>Chestnuts Community Centre</li> <li>Clyde Area Residents Association</li> <li>Day-Mer</li> <li>Defend Haringey Health Services</li> <li>Dissident Sound Industry Studios</li> <li>Find Your Voice</li> <li>Friends of Downhills Park</li> <li>Friends of Lordship Rec</li> <li>Growing-In-Haringey Network</li> <li>Haringey Alliance for Public Services</li> <li>Haringey Defend Council Housing</li> <li>Haringey Federation of Residents Associations</li> <li>Haringey Friends of Parks Forum</li> <li>Haringey Green Party</li> <li>Haringey Housing Action Group</li> <li>Haringey Independent Cinema</li> <li>Haringey Justice for Palestinians</li> <li>Haringey Left Unity</li> <li>Haringey Living Streets</li> <li><b>Haringey Needs St Ann's Hospital</b></li> <li>Haringey Private Tenants Action Group</li> <li>Haringey Solidarity Group</li> <li>Haringey Trades Union Council</li> <li>Living Under One Sun</li> <li>Lord Morrison Hall / Afro International</li> <li>N.London Community House</li> <li>Peoples World Carnival Band</li> <li>Selby Centre</li> <li>The Banc</li> <li>Tottenham and Wood Green Friends of the</li> </ul>	
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				<p>Earth  Tottenham Chances  Tottenham Civic Society  Tottenham Community Choir  Tottenham Community Sports Centre  Tottenham Concerned Residents Committee  Tottenham Rights  Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March</b> Organising Group  <b>20's Plenty for Haringey</b>  See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a></p> <p>This response, formulated by the <i>Our Tottenham</i> Planning Policy Working Group (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham</i> Local Economy Working Group, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham</i> network at our</p>	
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				<p>first Community Conference on 6 April 2013 (available here: <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>). This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham</i> network are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p><b>[Attached as an appendix to the representation]</b></p> <p><b>This response builds upon the previous responses we submitted:</b></p> <p>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>;</p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here: <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf</a>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in</p>	
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					<p>conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (thereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.  <b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>		
227	RSA358	SA56 Park Grove and Durnsford	Not stated	Not stated	<p>See our detailed comments about the <b>soundness of the Housing Estate ‘renewal and improvement’ approach taken by the Council</b> in our separate responses on the <i>Alterations to Strategic Policies</i> and on the <i>Tottenham AAP</i>. <b>We contest the ‘red lining’ of housing estates for future redevelopment into ‘mixed communities’</b> on the grounds explained in our comments. We demand to see structural reports that would indicate that the homes here are uneconomic to improve. The presumption in favour of demolition is opposed. We find the case for inclusion on the site allocation not made to any extent. We demand improvement not demolition as an alternative to the unsound and unsubstantiated inclusion of this site on the list of site allocations.</p>	<p>We demand the following principles to be explicitly included in the Site Requirements and Development Guidelines in the Site Allocation DPD:  No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing resident tenants as the drivers of all the decision-making related to their homes. Such programmes should prioritize improvements to the existing housing</p>	<p>The Council has, and will continue to engage with residents affected, or potentially affected by estate renewal programmes a required under s105 of the Housing Act. The Council is undertaking a programme of estate renewal in order to renew or increase the <b>borough’s stock</b> of affordable housing, and considers this is essential to help meet the full range of housing need within the</p>

						<p>estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants. There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. Social housing in this context is housing at rents equivalent to existing council housing levels with permanent, secure tenancies.</p>	<p>borough. No change</p>
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**SA 57: Myddleton Road Local Centre**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
218	RSA335	Sites SA6, SA7, SA14,	Yes	Yes	We consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different	We prefer the following wording to be applied to the	<b>Noted, this amendment will be</b>

		SA15, SA17, SA26, SA27, SA28, SA29, SA30, SA31, SA32, SA33, SA34, SA35, SA47, SA53, SA57			wording to other sites which are also in Source Protection Zones.	above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12). <i>The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.</i>	<b>made.</b>
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22 2	RSA35 2	SA57	Not stated	Not stated	<p>These comments are made on behalf of a local community group, We Love Myddleton Road. While Myddleton Road is outside of the Wood Green Area Action Plan, making the online form largely irrelevant, the Guidance Note 2012 for Myddleton Road is apparently planning to be adopted under this plan (specifically in the section specified in the subject of this email).</p> <p>For this reason, we would like to make the following comment:</p> <p><b>INTRODUCTION</b></p> <p>In its current form, the Guidance Note 2012 contains misleading and inaccurate information. Indeed, even in 2012, the information it contained was arguably out of date. In light of recent changes on Myddleton Road, as of March 2016, it requires fundamental revision.</p> <p>The following is not exhaustive, but rather intends to highlight the need for a new guidance note or some revisions prior to the adoption of this one.</p> <p><b>COMMENTS</b></p> <p>The following sections need corrections and additions:</p> <ul style="list-style-type: none"> <li>- 1.2.2</li> <li>- 1.2.3</li> <li>- 2.1.2</li> </ul> <p>Numbers 64-72 should be included as 64 and 66 are of particular interest.</p>	Revision of the Myddleton Road Guidance Note prior to adoption	<p>It is not considered that these responses relate to the Local Plan. The SPG quoted is an unadopted Local Plan guidance note. It is considered that this would need to be in conformity with Policy SA57 once adopted, and would likely be reviewed.</p> <p>It may however be appropriate to place the information provided</p>
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				<p>- 2.1.9</p> <p>- 2.2.3 It should be noted that Numbers 95 and 99 are currently being restored.</p> <p>- 3.2 This entire section draws on studies conducted between 2008 and March 2012. However, the calculations of the vacancy rates and how they were reached, as well as the usage designations needs updating.</p> <p>- 4.5 to 4.7 We strongly disagree with the suggestion that less than one in three frontages being A1 (Shops) would ever be appropriate. Indeed, at the time of writing, there is an acute shortage of retail space on Myddleton Road, with a number of local entrepreneurs seeking premises.</p> <p>Moreover, deciding that <b>“going forward, all of the vacant or closed united should be regarded as being in A1 use”</b> is unhelpful and sets a bias toward allowing conversion to non-retail use. Unless the Council takes an active role in <b>ensuring that “Vacant/Closed/Storage/Undisclosed”</b> become actual A1 use, this should not be the policy.</p> <p>- 6.1.4 We are unclear whether this happened.</p> <p>As noted, there is now high demand for office and retail space on the street and many changes have already taken place. Since the beginning of 2015, the Council finished restoration of four shopfronts and three existing businesses subsequently decided to do the same. Nine new businesses opened on the street, and two existing</p>		<p>as an addendum to the SPG to ensure its use remains current until such time as it formally reviewed and published as an SPD.</p> <p>No change</p>
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					<p>businesses cleaned up and expanded (the café at number 87 and Vrisaki at 71).</p> <p>So far in 2016, two more new businesses are about to open (numbers 112 and 120A), the timber merchant at number 78 is being converted to a DIY store, and sensitive restoration work is underway at two of the landmark buildings on the street (numbers 95 and 99), which will provide two more additional usable commercial units and good accommodation space.</p> <p>Furthermore, as noted, We Love Myddleton Road receives frequent enquiries from people who want both office and retail space.</p> <p>An audit of Myddleton Road should take place before the Guidance Note 2012 is adopted.</p>		
22 7	RSA35 7	SA56-65	No	Not Stated	<p>Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <i>Our Tottenham</i> network brings together <b>50 key local community groups, projects and campaigns</b> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.</p> <p><b>Organisations affiliated to the <i>Our Tottenham</i> network include</b> (as of 1.03.2016): Bull Lane Playing Fields Campaign / Weir Hall Action Group Chestnuts Community Centre</p>	Not specifically stated	Noted.

				<p> Clyde Area Residents Association  Day-Mer  Defend Haringey Health Services  Dissident Sound Industry Studios  Find Your Voice  Friends of Downhills Park  Friends of Lordship Rec  Growing-In-Haringey Network  Haringey Alliance for Public Services  Haringey Defend Council Housing  Haringey Federation of Residents Associations  Haringey Friends of Parks Forum  Haringey Green Party  Haringey Housing Action Group  Haringey Independent Cinema  Haringey Justice for Palestinians  Haringey Left Unity  Haringey Living Streets  <b>Haringey Needs St Ann's Hospital</b>  Haringey Private Tenants Action Group  Haringey Solidarity Group  Haringey Trades Union Council  Living Under One Sun  Lord Morrison Hall / Afro International  N.London Community House  Peoples World Carnival Band  Selby Centre  The Banc  Tottenham and Wood Green Friends of the Earth  Tottenham Chances  Tottenham Civic Society  Tottenham Community Choir  Tottenham Community Sports Centre  Tottenham Concerned Residents Committee  Tottenham Rights </p>		
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				<p>Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b>  See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a>.</p> <p>This response, formulated by the <i>Our Tottenham Planning Policy Working Group</i> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham Local Economy Working Group</i>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham network</i> at our first Community Conference on 6 April 2013 (available here:  <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>.  This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham network</i> are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p>[Attached as an appendix to the representation]</p> <p>This response builds upon the previous responses we</p>		
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					<p><b>submitted:</b></p> <p>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>;</p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here:  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf</a>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (thereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.</p> <p><b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>		
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**SA 58: Red House Care Home**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA23	SA58	Not stated	Not stated	We welcome the proposed extension of the open land and ask that this should be ecologically enhanced.	Not specifically stated	The open space on site needs to work in tandem with the management

							t of the adjoining open space and should meet deficiencies in open space function in the area. This may or may not include ecological enhancement.
							No change
227	RSA357	SA56-65	No	Not Stated	<p>Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <b><i>Our Tottenham network brings together 50 key local community groups, projects and campaigns</i></b> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.</p> <p><b>Organisations affiliated to the <i>Our Tottenham</i> network include (as of 1.03.2016):</b>  Bull Lane Playing Fields Campaign / Weir Hall Action Group  Chestnuts Community Centre  Clyde Area Residents Association</p>	Not specifically stated	Noted.

					Day-Mer Defend Haringey Health Services Dissident Sound Industry Studios Find Your Voice Friends of Downhills Park Friends of Lordship Rec Growing-In-Haringey Network Haringey Alliance for Public Services Haringey Defend Council Housing Haringey Federation of Residents Associations Haringey Friends of Parks Forum Haringey Green Party Haringey Housing Action Group Haringey Independent Cinema Haringey Justice for Palestinians Haringey Left Unity Haringey Living Streets <b>Haringey Needs St Ann's Hospital</b> Haringey Private Tenants Action Group Haringey Solidarity Group Haringey Trades Union Council Living Under One Sun Lord Morrison Hall / Afro International N.London Community House Peoples World Carnival Band Selby Centre The Banc Tottenham and Wood Green Friends of the Earth Tottenham Chances Tottenham Civic Society Tottenham Community Choir Tottenham Community Sports Centre Tottenham Concerned Residents Committee Tottenham Rights Tottenham Theatre		
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				<p>Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b></p> <p>See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a>.</p> <p>This response, formulated by the <i>Our Tottenham Planning Policy Working Group</i> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham Local Economy Working Group</i>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham network</i> at our first Community Conference on 6 April 2013 (available here: <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>). This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham network</i> are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p>[Attached as an appendix to the representation]</p> <p>This response builds upon the previous responses we submitted:</p> <p>i. in March 2014, in response to the public consultation on <i>the</i></p>	
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					<p><i>draft Tottenham APP Regulation 18 Consultation Document;</i></p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here:</p> <p><a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_net_work_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_net_work_-_pp_working_grp_sa_overall_response.pdf</a></p> <p><a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_net_work_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_net_work_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (thereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.</p> <p><b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>		
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#### SA 59: Haringey Professional Development Centre

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
43	RSA 136	SA59	Not stated	Not stated	I am writing with regards to the Haringey development plan document and in particular to the proposed site allocation for the Haringey Professional Development Centre on Downhills Park Road N17. Indeed, it was rather disquieting to discover that the consultation process with regards to future uses of this space had closed in March 2015 without any adequate publicity being given to it with local residents in the area. It seems that the only opportunity we now	Retain the use of the identified Haringey Professional Development Centre for educational purposes and in particular its destination should be a secondary	The consultation has been carried out in accordance with the Council's Statement of Community Involvement,

				<p>have is to comment on the legality of the plan as consultation is now closed. This is utterly unacceptable considering that Haringey's policy document "Statement of Community Involvement" details more efficient ways of involving the local community in the democratic decision making process relating to the life of the community.</p> <p>More specifically, local residents believe that the site where the Haringey Professional Development Centre currently resides should continue to serve educational purposes in consideration of the growing needs to schools in the area as a result of current and future increase in residential homes.</p> <p>Indeed, while the number of primary schools in N17 and N15 is rather substantial, there are only 2 secondary schools in the area, a number clearly inadequate to serve its growing youth, forcing young people to travel to other areas of the borough which makes them feeling often uncomfortable and not well received.</p> <p>Primary schools in the area include:  Brook House Primary School, Bruce Grove Primary School, Chestnuts Primary School, Crowland Primary School, Devonshire Hill Primary School, Earlsmead Primary School, Ferry Lane Primary School, Park View, Tottenham UTC</p> <p>Secondary schools:  Harris Academy Tottenham, Northumberland Park Community School</p> <p>In light of the above it seems crucial to retain the</p>	<p>school.</p>	<p>and the relevant regulations.</p> <p>It is noted that the site requirements in the policy protect the existing building for a potential education use, subject to need being identified in the IDP. It is noted that the Plan at present provides sufficient sites to accommodate current demand for primary and secondary school places.</p> <p>No change</p>
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					<p>use of the identified Haringey Professional Development Centre for educational purposes and in particular its destination should be a secondary school. This is especially important considering the increasing number of future teenagers as a result of young families having moved to Turnpike Lane in recent years. Future transport connections will also facilitate recruitment of members of staff and facilitate the production and fruition of cultural activities in the area, which is currently lacking.</p> <p>Indeed, the need for residual community infrastructure in the area is of great importance. While the local artist and professional community is growing in numbers, there are currently no facilities to capitalise on such presence and promote activities that would increase the economic development of an area where a substantial number of vulnerable disadvantaged young people live. The current car park area would be an ideal location for a community infrastructure that could play an important synergic role in linking up school provision with other socialising and professionally qualifying opportunities for the young.</p> <p>In light of the above I would strongly recommend the council to review the use of the site in question, in line of the educational needs of its fast growing population.</p>		
44	RSA 137	SA59 Haringey professional developm	No	No	As a local resident directly affected by the plans in Sa59 in the sites allocation development plan, I was not informed or consulted on the matter by Haringey council. The council should follow their guidelines specified in Haringey's Statement of Community	Inform residents affected by the proposal directly in writing to allow them to react to the	The consultation has been carried out in accordance

		ent centre			Involvement otherwise their proposal is not legal.	proposal in a timely manner. Otherwise the plans go ahead without residents having an opportunity to contest it.	with the <b>Council's</b> Statement of Community Involvement, and the relevant regulations.  No change
45	RSA 138	SA59 The Site Allocations Development Plan Document // Policies Map Code 1	No	No	I write with specific reference to pages 144-145 of the Site Allocations DPD, covering SA59, the Professional Development Centre (PDC) on Downhills Park Road. I dispute most strongly the legal compliance of the Local Plan on a number of grounds, most specifically that none of the consultation has been done properly, as at no point were any of the residents to be most affected informed. I live on Belmont Avenue, overlooking the site covering SA59, and after checking with other residents who overlook the site, all were completely unaware of the plans and consultation under taken last year, which these current plans seem to suggest was undertaken. In some communication with Erik Nilsen, who works in Planning Policy at Haringey, he quotes: "For this site, and all others included in the draft Plan, notification letters have been sent to owners and occupiers of buildings and land within the identified site allocation boundary. As agreed in the draft Statement of Community Involvement update, we have also posted notices around the sites to inform the wider community about the consultation." We have received no such notification, neither about this year's consultation,	I feel very strongly that no proper consultation has been undertaken with those who will be most affected by these proposed changes. I would therefore argue for a new consultation process.	The consultation has been carried out in accordance with the <b>Council's</b> Statement of Community Involvement, and the relevant regulations.  No change

				<p>nor about the initial consultation that was done last year. Is Mr Nilsen suggesting that a letter was sent to the PDC itself? This would make very little sense! It is the properties on the boundaries of the site allocation that should have received these letters - these were not sent last year or this year.</p> <p>Regarding notices, none have been posted in our street at any point and none were posted outside the PDC last year. We have checked Ivatt Way, which is the other side of the boundary and no notices were posted there either. This year's notices consist of 2 small pieces of paper at the entrance to the PDC. If a resident of Belmont Avenue's commute does not take them past the entrance to the PDC, how are they to know about the consultation process? Yesterday morning we received a letter about the proposed changes to the CPZ with a chance to comment on these. This is a simple and direct approach that works. So one part of Haringey considers this necessary to fulfil their obligation of consultation whilst another in effect hides something from local people that would have a far bigger impact on our lives than where we park our cars.</p> <p>The LDP is a complex set of documents that are not easy to plough through for the average person and it takes some effort to even find the allocations document on the website yet alone SA59. And if we don't even know that we should be looking for this, what chance do we have to comment? To really do what it says you should do in the Statement of Community Involvement, a copy of SA59 should have been posted through our doors with a covering letter in February 2015. For this, I maintain that there has been a failure in your consultation process that invalidates the consultation and therefore the</p>		
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					proposals.		
22 7	RSA 357	SA56-65	No	Not Stated	<p>Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <i>Our Tottenham</i> network brings together <b>50 key local community groups, projects and campaigns</b> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.</p> <p><b>Organisations affiliated to the <i>Our Tottenham</i> network include</b> (as of 1.03.2016):</p> <ul style="list-style-type: none"> <li>Bull Lane Playing Fields Campaign / Weir Hall Action Group</li> <li>Chestnuts Community Centre</li> <li>Clyde Area Residents Association</li> <li>Day-Mer</li> <li>Defend Haringey Health Services</li> <li>Dissident Sound Industry Studios</li> <li>Find Your Voice</li> <li>Friends of Downhills Park</li> <li>Friends of Lordship Rec</li> <li>Growing-In-Haringey Network</li> <li>Haringey Alliance for Public Services</li> <li>Haringey Defend Council Housing</li> <li>Haringey Federation of Residents Associations</li> <li>Haringey Friends of Parks Forum</li> <li>Haringey Green Party</li> <li>Haringey Housing Action Group</li> </ul>	Not specifically stated	Noted.

				<p>Haringey Independent Cinema  Haringey Justice for Palestinians  Haringey Left Unity  Haringey Living Streets  <b>Haringey Needs St Ann's Hospital</b>  Haringey Private Tenants Action Group  Haringey Solidarity Group  Haringey Trades Union Council  Living Under One Sun  Lord Morrison Hall / Afro International  N.London Community House  Peoples World Carnival Band  Selby Centre  The Banc  Tottenham and Wood Green Friends of the Earth  Tottenham Chances  Tottenham Civic Society  Tottenham Community Choir  Tottenham Community Sports Centre  Tottenham Concerned Residents Committee  Tottenham Rights  Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b>  See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a></p>		
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				<p>This response, formulated by the <i>Our Tottenham Planning Policy Working Group</i> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham Local Economy Working Group</i>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham</i> network at our first Community Conference on 6 April 2013 (available here: <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>). This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham</i> network are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p><b>[Attached as an appendix to the representation]</b></p> <p>This response builds upon the previous responses we submitted:</p> <ul style="list-style-type: none"> <li>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>;</li> <li>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>.</li> </ul>		
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					<p>Our response (in two parts) is available here:  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf</a>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf</a>  The present response needs to be read in conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (thereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.  <b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>		
227	RSA 359	<b>SA59: Haringey Professional Development Centre:</b>	Not stated	Not stated	In line of the acute need for social infrastructure of all kinds in the Eastern part of the Borough, this publically owned site should be prioritized for such uses.	Not specifically stated	<p>Noted, it is considered that the Allocation provides for this, if it is necessary, as does Policy DM49</p> <p>No change</p>

**SA 60: Keston Centre**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA24	SA60	Not	Not	We oppose any encroachment on the MOL.	Not	The policy

			state d	stated		specifically stated	requires any impact to be carefully mitigated, which is an appropriate position to ensure the site comes forward in the most suitable way.  No change
22 1	RSA34 9	SA60	Not state d	Not stated	We are concerned that the comments do not go far enough to ensure that future proposals protect the MOL:	additional criteria to the justification of impact and mitigation allowances should include <b>reference to a need to illustrate very special circumstance s.</b>	Metropolitan Open Land is already protected through the London Plan, and The Local Plan Strategic Policies.  No change
22 7	RSA35 7	SA56-65	No	Not Stated	Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <i>Our Tottenham</i> network brings together <b>50 key local community groups, projects and campaigns</b> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a> ). We	Not specifically stated	Noted

				<p>work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.</p> <p><b>Organisations affiliated to the <i>Our Tottenham</i> network include</b>  (as of 1.03.2016):</p> <ul style="list-style-type: none"> <li>Bull Lane Playing Fields Campaign / Weir Hall Action Group</li> <li>Chestnuts Community Centre</li> <li>Clyde Area Residents Association</li> <li>Day-Mer</li> <li>Defend Haringey Health Services</li> <li>Dissident Sound Industry Studios</li> <li>Find Your Voice</li> <li>Friends of Downhills Park</li> <li>Friends of Lordship Rec</li> <li>Growing-In-Haringey Network</li> <li>Haringey Alliance for Public Services</li> <li>Haringey Defend Council Housing</li> <li>Haringey Federation of Residents Associations</li> <li>Haringey Friends of Parks Forum</li> <li>Haringey Green Party</li> <li>Haringey Housing Action Group</li> <li>Haringey Independent Cinema</li> <li>Haringey Justice for Palestinians</li> <li>Haringey Left Unity</li> <li>Haringey Living Streets</li> <li><b>Haringey Needs St Ann's Hospital</b></li> <li>Haringey Private Tenants Action Group</li> <li>Haringey Solidarity Group</li> <li>Haringey Trades Union Council</li> <li>Living Under One Sun</li> <li>Lord Morrison Hall / Afro International</li> <li>N.London Community House</li> <li>Peoples World Carnival Band</li> </ul>	
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				<p>Selby Centre  The Banc  Tottenham and Wood Green Friends of the Earth  Tottenham Chances  Tottenham Civic Society  Tottenham Community Choir  Tottenham Community Sports Centre  Tottenham Concerned Residents Committee  Tottenham Rights  Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b>  See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a></p> <p>This response, formulated by the <i>Our Tottenham Planning Policy Working Group</i> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham Local Economy Working Group</i>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham network</i> at our first Community Conference on 6 April 2013 (available here: <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>). This was followed up by two more Community conferences in February and October 2014. All the materials</p>		
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					<p>produced by the <i>Our Tottenham</i> network are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p><b>[Attached as an appendix to the representation]</b></p> <p><b>This response builds upon the previous responses we submitted:</b></p> <p>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>,</p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here:  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_to_tt_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_to_tt_network_-_pp_working_grp_sa_overall_response.pdf</a>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_to_tt_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_to_tt_network_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (thereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.</p> <p><b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65</b></p>		
227	RSA360	<b>SA60: Keston Centre:</b>	Not stated	Not stated	<p>In line of the acute need for social infrastructure of all kinds in the Eastern part of the Borough, this publically owned site should be prioritized for such uses.</p>	<p>We want clarification of exactly how the existing day centre and nursery centre uses could be</p>	<p>This is a detailed matter to be determined through a planning permission.</p>

						reprovided on the same site.	No change
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#### SA 61: Barber Wilson

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA25	SA61	Not stated	Not stated	We welcome the proposed deculverting of the Moselle here, especially as it is just upstream from the deculverted stretch in Lordship Rec.	Not specifically stated	Noted.
46	RSA139	SA61 Site Allocations Development.	Not stated	Not stated	We have been successfully living within site SA61 since we gained planning permission in early 2013 to convert our building into a live/ work residence. We run 2 viable design businesses on the ground floor on this site as well as living on the first floor. Some of the local industries all sited within SA61, including Barber Wilsons & Co Ltd have supplied bespoke fixtures and fittings for our design projects. This local proximity to industry is vital not only to us but to other creative industries working within London, as well as internationally. We serve both local and overseas clients as do Barber Wilsons & Co Ltd. ENVIRONMENTAL Townscape and Cultural Heritage (SA Report10.14) - Preserve or enhance buildings and areas of architectural and historic interest Industry has existed and flourished within this site since the late 18th century. Although this site is not within a conservation area many of these buildings are an asset to Haringey and express architecturally our great industrial heritage. Whilst a provision has been added to the site requirements to preserve the frontage of Barber Wilsons & Co Ltd many of the other buildings on this site deserve and should be preserved too. We should be protecting and enhancing our natural, built and historic environment with care. ECONOMY Economic Growth (SA Report 10.9) - Retain	Not stated	This site has been allocated on the basis of enabling a new pedestrian and cycling link between Wood Green and Tottenham via Lordship Rec.  There are policies in the Local Plan which protect employment land, and

					<p>existing local employment and create local employment opportunities. There appears to be conflicting demands within the local plan; create more homes but at the cost of viable employment land? <b>We shouldn't be obliterating credible (and in the case of Barber Wilsons &amp; Co Ltd, world famous and Royal Warranted) businesses</b> employing many local people who in turn supply many other local businesses in favour of creating more housing. We should be promoting mixed use sites not wholly residential sites that become densely populated without adequate employment or long-term contribution to the economy. Employment land should be protected. Progress should be made but not at the cost of employment, heritage and community. The aim of this policy (point 2.168) to allow residential use to enable creation of a new pedestrian and cycle route seems rather weak; as residents and business owners we are in favour of this green link but feel that residential development is not needed to enable this.</p>	<p>that aim to ensure that new sites deliver employment outcomes through redevelopment. It is considered that these policies strike an appropriate balance regarding meeting the <b>borough's</b> identified employment needs.</p> <p>This allows sites such as this to come forward to create other beneficial outcomes, such as the new link.</p> <p>The Council notes that this</p>
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							allocation is not a requirement for comprehensive redevelopment. It is considered that a number of proposals could come forward in a co-ordinated manner, to meet the requirements of the policy.  No change
227	RSA357	SA56-65	No	Not Stated	Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <i>Our Tottenham network brings together 50 key local community groups, projects and campaigns</i> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a> ). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.  <i>Organisations affiliated to the Our Tottenham network include</i>	Not specifically stated	Noted.

				<p>(as of 1.03.2016):</p> <p>Bull Lane Playing Fields Campaign / Weir Hall Action Group  Chestnuts Community Centre  Clyde Area Residents Association  Day-Mer  Defend Haringey Health Services  Dissident Sound Industry Studios  Find Your Voice  Friends of Downhills Park  Friends of Lordship Rec  Growing-In-Haringey Network  Haringey Alliance for Public Services  Haringey Defend Council Housing  Haringey Federation of Residents Associations  Haringey Friends of Parks Forum  Haringey Green Party  Haringey Housing Action Group  Haringey Independent Cinema  Haringey Justice for Palestinians  Haringey Left Unity  Haringey Living Streets  <b>Haringey Needs St Ann's Hospital</b>  Haringey Private Tenants Action Group  Haringey Solidarity Group  Haringey Trades Union Council  Living Under One Sun  Lord Morrison Hall / Afro International  N.London Community House  Peoples World Carnival Band  Selby Centre  The Banc  Tottenham and Wood Green Friends of the Earth  Tottenham Chances  Tottenham Civic Society  Tottenham Community Choir</p>		
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				<p>Tottenham Community Sports Centre  Tottenham Concerned Residents Committee  Tottenham Rights  Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b></p> <p>See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a>.</p> <p>This response, formulated by the <i>Our Tottenham</i> Planning <b>Policy Working Group</b> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham</i> Local Economy <b>Working Group</b>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham</i> network at our first Community Conference on 6 April 2013 (available here: <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>). This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham</i> network are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p>[Attached as an appendix to the representation]</p>		
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					<p>This response builds upon the previous responses we submitted:</p> <p>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>;</p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here:  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf</a>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (thereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.</p> <p><b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>		
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**SA 62: Broadwater Farm**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
48	RSA 141	SA62	Not stated	Not stated	<p>Further to our email dated 20th March 2015, Sport England is pleased to note the removal of playing field land as part of the Broad Water Farm area allocation (SA 62).</p> <p>Please note that Sport England along with</p>	Sport England believes that being active should be an intrinsic part	Noted.

					Public Health England has recently launched its revised guidance 'Active Design'. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a> for allocations involving leisure uses.	of everyone's life pattern. As such, Sport England would expect to see the principles on Active Design embedded in development guidelines.	
74	RSA 186	SA62	Not stated	Not stated	<p><b>NO TO THREAT OF DEMOLITIONS OF LOCAL ESTATES, AND THE BLIGHTING OF OUR COMMUNITIES.</b></p> <p><b>PROTECT ALL THE LOCAL FACILITIES AND IMPROVEMENTS, INCLUDING THE BROADWATER FARM COMMUNITY CENTRE</b></p> <p>1. The Friends of Lordship Rec are the constituted organisation for all Lordship Rec park users, formed in 2001. Over the last 11 years we have been instrumental in the successful community-led regeneration of Tottenham's largest public park, in partnership with Haringey Council Parks Service and other key stakeholders. We have a current membership of 1,344 park users, most living within a few minutes walk of the Rec, <u>including many on the 4 housing estates within the area identified in proposal SA 62.</u></p>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including

				<p>We and other park user groups, in partnership with the Parks Service, currently manage or help manage various of the park's features and facilities, and the park as a whole.</p> <p>For more details, see Appendix at end: <a href="#"><u>The Community-led Transformation of Lordship Rec</u></a></p> <p>2. We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, some houses along Lordship Lane, and the Broadwater Farm Community Centre.</p> <p>The proposal would increase powers for property developers throughout that zone in the future. It would cause massive stress to all concerned, blight, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>Local residents have worked long and hard to make Broadwater Farm one of the most attractive and well-served estates in the UK.</p> <p>The proposal is unacceptable and should be withdrawn immediately. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>3. We support the objection of Broadwater</p>		<p>the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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				<p>Farm Residents Association and do not repeat most of their excellent points.</p> <p>4. The proposal is unsound as it contradicts and undermines a range of Haringey, London and National policies which should protect the area:</p> <ul style="list-style-type: none"> <li>- respect for the existing character of an area</li> <li>- need for genuine consultation with stakeholders before proposals are made</li> <li>- need to preserve, enhance and expand rather than destroy genuinely affordable housing</li> <li>- respect for, and promotion of, strong communities rather than breaking them up</li> <li>- need for mixed and balanced communities (like we have in Tottenham) rather than gentrification excluding lower income people (the majority of current local residents, and indeed of London residents generally)</li> <li>- the need for Lifetime Neighbourhoods</li> <li>- the need to protect and expand social infrastructure serving local communities</li> <li>- the need for all development to be sustainable, in particular socially and environmentally sustainable (both of which necessitate refurbishment rather than demolition of structurally-sound housing)</li> </ul> <p>5. The proposal is unsound and invalid as the description of the proposal: <i>'Improvements of the housing estate to improve stock, design of the site and routes through the area'</i> is grossly misleading. It is also misleading to characterise the area such: <i>'Broadwater Farm is a collection</i></p>		
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				<p><i>of Homes for Haringey and Housing Association estates...</i> ‘ Those who know the area do not refer to the whole area as ‘Broadwater Farm’, and hence may assume that only the Broadwater Farm estate itself is affected by the proposal (maybe apart from some ‘through routes’ implications for the low rise estates). For some reason the key designation in the Urban Characterisation Study of the 3 Housing Association estates as ‘suitable for tall buildings’ of 6-11 storeys is not mentioned. Maybe it has been dropped, which is to be welcomed – indeed, if so, the current red-zone proposal should therefore not incorporate these estates and the homes along Lordship Lane. That bizarre and unacceptable designation is causing extreme concern and stress in these areas. They must be withdrawn from the red-zone immediately.</p> <p>The threat of demolition and redevelopment is not implied or mentioned let alone made explicit as it should have been if it is the case. No reasonable or fair-minded person would think <i>‘Improvements of the housing estate to improve stock, design of the site and routes through the area’</i> meant or even could mean a threat of mass demolitions and redevelopment. It is only by reps of local community groups seeking discussions and clarification from planning officers that the true import of the proposal has been revealed to us (see quotes below).</p> <p>It is therefore also unlawful as it contradicts the general principles of public consultation as set</p>		
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				<p>out by the Supreme Court (in an October 2014 ruling against Haringey Council).</p> <p><b>6.</b> It is worth noting that Haringey Council has confusingly promoted a specialist form for respondents to the Local Plan to fill in, sometimes implying that it is compulsory to use the form (which would be unacceptable as it would put off many local residents from responding), and other times not saying this. For example, in early 2016 the Council put up <b>some posters in the 'red-zone' SA62 area, which doesn't mention any form and states at the bottom:</b></p> <p><i>“ You can submit comments: By email: <a href="mailto:ldf@haringey.gov.uk">ldf@haringey.gov.uk</a> By Post: Planning Policy, Level 6, River Park House, Wood Green N22 8HQ “</i></p> <p><b>It also doesn't state that respondents at this stage are encouraged, should, or have to request the right to give verbal evidence. In the light of this we seek assurance that, as the Our Tottenham network have formally called for, '<i>all respondents to the current Local Plan consultation will be written to after the closure of the consultation to explain the Inquiry plans, procedures and issues and to ask if they wish to contribute 'in person' during the Inquiry.'</i></b></p> <p><b>7.</b> The proposal is unsound and unattainable now that Lordship Rec has been withdrawn from the 'red-zone'.</p>	
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				<p>As pointed out in <b>Note 1</b> of our original 2015 objection (see below),</p> <p><i>“ Steve Kelly from the Council’s Planning Department</i> spoke at the Tangmere Steering Committee on Broadwater Farm in February [2015] and when challenged admitted that the land on Lordship Recreation Ground would be needed for housing for people displaced by any demolitions on Broadwater Farm.</p> <p><i>Matthew Patterson, the Councils Interim Head of Policy, Strategic Transport and Infrastructure,</i> also confirmed to a rep from the Friends of Lordship Rec on 20 February [2015] that the inclusion of the northern part of Lordship Rec in the development zone is for the power to build housing to decant the residents of Broadwater Farm (or many of them) into that area of the park <i>otherwise the demolitions on the estate could not go ahead</i> due to the impracticalities of re-homing those affected during the demolition and redevelopment works.</p> <p><i>Gavin Ball from the Councils Planning Department</i> told a rep from the Friends of Lordship Rec that <i>a deliberately large zone</i> was chosen <i>for maximum flexibility</i>. It included <i>additional powers</i> to achieve redevelopment. He said there would be <i>no net loss of open space, but that could include a realignment or a land swap</i>. [He didnt say where]. Most of the land in the zone is owned by the Council, but additional powers <i>could include increased powers of compulsory purchase of private land</i></p>		
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				<p>such as the homes on Lordship Lane. When challenged about the proposed re-designation of the 3 low-rise estates in the northern part of the zone as <i>suitable for tall buildings</i>, he said that this is because <i>they are close to transport routes</i>. We note, however, that this directly contradicts policies which protect the existing character of each neighbourhood, in this case the low-rise nature of all the existing buildings on and around those 3 estates. “</p> <p><b>8. The ‘suitable for tall buildings’ designation</b> for the 3 Housing Association estates seems to have no justification and is therefore arbitrary and unlawful and/or unsound.</p> <p><b>9.</b> In March 2015 we, the Friends of Lordship Rec, made the objection to the previous version of the proposal, SA63 (as it was then numbered). This is enclosed in full below. That red-zone proposal was the same as the current SA62 version, except it also included the northern third of Lordship Rec.</p> <p><b>10.</b> In fact a third of all the objections made in February/March 2015 regarding the whole Draft Local Plan were objections to the SA63 ‘Broad Water Area’ red-zone proposal. Almost all of these objections specified that they were objecting to the entire ‘red-zone’ as then proposed.</p> <p><b>11.</b> The Council have since stated that Lordship Rec was withdrawn due to the volume and passion of the objections in early 2015 - but</p>		
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				<p>despite the volume and passion of the objections clearly and explicitly relating to the <u>whole</u> zone at that stage, the Council have so far failed to withdraw the entire proposal.</p> <p><b>12. The Council's senior planning officer</b> Matthew Patterson wrote to the Friends of Lordship Rec on 03/10/2015, stating:  <i>“ I can confirm that the MOL extent, as shown on the UDP Policies Map, is to be excluded from the red line boundary.”</i></p> <p>Indeed, Cllr Alan Strickland, Haringey Cabinet Member for Regeneration and Housing, repeated the above claim to Baroness Jenny Jones, an AM at City Hall (and former Deputy Mayor of London) on 25<sup>th</sup> November 2015.</p> <p>However, for some reason the MOL-designated land upon which sits the bulk of the Broadwater Farm Community Centre and its Harmony Gardens has not yet been excluded, and in fact the red-zone boundary has been specifically re-drawn to include the said building and gardens. <b>These are part of the park, and the park's</b> lottery-funded improvements explicitly included the Centre grounds. Indeed, the functioning of the Broadwater United sport pitches, being part of the park and removed by the Council from the red-zone proposal SA62, are managed from and reliant on the Community Centre. Hence the Community Centre not only straddles MOL, but also is a fully integrated and essential part of that MOL.</p>		
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					<p>With the most senior planning officer and the relevant Cabinet member stating publicly that no MOL land should be under threat, the Community Centre must be withdrawn from the red-zone immediately.</p> <p><b>13.</b> It should be noted that the original red-zone proposal only covered Tangmere block on Broadwater Farm (total 115 dwellings) as it was said to have some specific repairs issues. Red-zoning it may not have been the appropriate course of action but at least there was some attempt at justification. We now know, from a recent Fol request [LBH4703815], that neither Tangmere nor any other block on Broadwater Farm has been found to be structurally unsound. Hence the landlord should perform its duty to properly manage and maintain Tangmere and all other Broadwater Farm homes.</p> <p>However, the current red zone covers a staggering 1,473 homes (1,012 Council tenancies, 68 Council resident leaseholders, 63 Council non-resident leaseholders, 267 Housing Association tenancies, and 55 private sector dwellings) – a threat, in particular such an arbitrary threat, to such a huge area can only be described as unacceptable social engineering.</p>		
75	RSA 187	SA 62	No	No response given	<p>I strongly endorse the sentiments of the objection worded below. I believe this plan is a gross waste of money (since it demolishes buildings which are relatively recently built) , and hugely destructive of residents' stability as well as the massive community cohesion and</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve</p>

				<p>wellbeing painstaking created over years.</p> <p><b>TO HARINGEY COUNCIL PLANNING POLICY TEAM</b>  <a href="mailto:ldf@haringey.gov.uk">ldf@haringey.gov.uk</a></p> <p>I/We the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site</b></p>	<p>permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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					allocation / red-zone' in the Haringey Plan.		
76	RSA 188	SA62	No	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed</p>

							masterplan. No change
77	RSA 189	SA62	No	Not stated	<p>I/We the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local</p>

					The local area has a strong community feel which would benefit from investment and maintenance, to replace the current homes with new builds and displace the current residents in order to 'redevelop' and create profit for the council and private companies is unthinkable. Please do rethink this strategy and protect the local community.		residents, and requires that these be set out in a detailed masterplan.  No change.
78	RSA 190	SA62	No	Not stated	Please abandon such a proposal in favour of improvements to the estate. <b>It has taken many years to 'turn round'</b> Broadwater Farm and its immediate surroundings from the bad image created by the 1980s riots. But it most certainly has been turned round. Many residents we speak to are proud to live on the estate and also to enjoy the park, especially since the lottery grant enabled a lot of socially useful work to take place. The relatively new ' <b>Hub</b> ' <b>community centre is also</b> providing a useful service to the community, attracting people from different cultures, ages, etc.  It would be tragic if this estate were to go the route that so much of London is going – redevelopment for the sake of profit and not for the sake of local people.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate

							<p>further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
79	RSA 191	SA62	No	Not stated	I strongly object to the draft local plan proposal SA62. It is unacceptable & should be withdrawn immediately.		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not</p>

							<p>been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
80	RSA 192	SA62	No	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this</p>

							point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan. No change.
81	RSA 193	SA62	No	Not stated	I think that the proposal to demolish bwf and lido close is a very bad idea. One of the best things about tottenham is the green spaces and normal housing. My family lived on Broadwater farm for 16 years and it was horrible but tolerable because we could walk out into normal housing or parkland. Erect ing a mega estate over a much wider area would be replacing bad with worse than bad. People need proper homes not warehousing. Please don't go ahead with the proposed project.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not

							<p>been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
82	RSA 194	SA62	No	Not stated	<p>I object to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including</p>

					<p>communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>		<p>the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
83	RSA 195	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and</p>

					<p>community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>		<p>decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
84	RSA 196	SA62	No	Not stated	<p>To whom it may concern, I strongly object to your draft proposal to redevelop Broadater farm and demolish people's homes in parts of Lordship lane and nearby areas. There should be a agreement with residents concerning improvements to be made. We do not want our community disrupted and ruined. You are breaching planning rules. People in the community have worked hard and devoted their lives to improving the park and improving the area. Your proposals would mean a big disruption to our lives, especially to those who would lose their homes.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is</p>

							<p>considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
84	RSA 197	SA62	No	Not stated	<p>I am writing to you to voice my objection to your plan to demolish and redevelop in the Broadwater farm area. I feel it is wrong to demolish houses in Lordship lane and the closes as this would ruin peopl's lives. I have lived in the area for many years and it is only fairly recently that lordship park has been improved and it is wrong to use it as a redevelopment zone. You should be thinking of other ways of refurbishing Broadwater farm, ways that won't ruin a whole community.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve</p>

							<p>conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
85	RSA 198	SA62	Not stated	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and</p>

					<p>withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</p>		<p>the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
86	RSA 199	SA62	Not stated	Not stated	<p><i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to</i></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the</p>

					<p><i>improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i></p>		<p>estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
87	RSA 200	SA62	Not stated	Not stated	<p>I/We the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that</p>

					<p>which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>		<p>improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
88	RSA 201	SA62	Not stated	Not stated	<p><i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight, and would undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</i></p> <p><i>It breaches a whole range of planning policies which should protect our community.</i></p> <p><i>It is unacceptable &amp; should be withdrawn immediately.</i></p> <p><i>Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area.</i></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not</p>

					<i>The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</i>		been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
89	RSA 202	SA62	Not stated	Not stated	<i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.  The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i>	As set out	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be

							improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.
							No change
90	RSA 203	SA62	Not stated	Not stated	<p>I want to register that I strongly object to the draft Local Plan Proposal SA62 for the demolition and redevelopment of the area covering the Broadwater Farm estate, Somerset Close, Lido Square, Moira Close and a number of houses along Lordship Lane.</p> <p>This would cause displacement, disruption and massive stress to all the current residents and users of Lordship Rec. Residents would lose their homes and be very unlikely to afford the rents or to buy in any new development.</p> <p>It would undermine all the efforts to build a strong and stable community in the area and to improve local facilities.</p> <p>It is totally unacceptable. The Council should continue the work of improving the homes , facilities and communities in the area. Otherwise the resources already poured into improvements are completely wasted.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>

							No change
91	RSA 204	SA62	No	Not stated	<p>I the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>
92	RSA 205	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some</p>		<p>No change</p> <p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve</p>

					houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
93	RSA 206	SA62	Not stated	Not stated	<i>We are Landlords (among other houses in the area) of 263 Lordship Lane N17 6AA and we understand that our property falls within the proposal SA62 plan. We have worked very hard in the past few years to bring good &amp; quality tenants to the Tottenham area and worked very hard to promote the area as a growing and vibrant community and we see how hard working families are moving to the area and</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary

					<p><i>establishing healthy and prospers roots in Lordship Lane and other areas in Tottenham, therefore We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan."</i></p>		<p>due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
94	RSA 207	SA62	Not stated	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the</p>

					<p>which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p>		<p>opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
95	RSA 208	SA62	No	Not stated	<p>We object to any kind of development in lordship lane and around the areas of Broadwater farm, lido, local plan SA63 for demolition and redevelopment zone covering lordship lane, lido square, Somerset close, moira close, lordship recreation. And some houses along lordship lane.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and</p>

							decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.
							No change
96	RSA 209	SA62	Not stated	Not stated	I have deep concerns about the draft Local Plan proposal SA62 for a redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. I appreciate that 'improvements of the housing estate to improve stock' could be a positive action, if done considering the needs of the residents of the estate as best as possible. However I am concerned that these 'improvements' will not actually benefit the local residents and will be more favourable and affordable for new higher earning buyers moving into the area. The rights of the current residents must be protected. This means re-housing residents on the same site (and not elsewhere outside of the site) and maintaining a similar organisation and order so that local neighbours/networks are maintained. Rent prices should similarly be maintained and not unfairly raised to be unaffordable. Local organised groups and facilities need to be preserved, maintained and improved.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further

							engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.
							No change
97	RSA 210	SA62	No	Not stated	<p>We the singes of the attached petition object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed</p>

					compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b>		masterplan. No change
98	RSA 211	SA62	Not stated	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years, as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable and should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p> <p>Look forward to hearing how you will work with the community to improve the area, rather than displacing hundreds of families.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>
99	RSA	SA62	No	Not stated	I object strongly to the draft Local Plan proposal		Objection is noted. The

	212				SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable and should be withdrawn immediately. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.
100	RSA 213	SA62	No	Not stated	I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned,		No change Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of

					displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan		this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.
101	RSA 214	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect		No change Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist

					our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
102	RSA 215	SA62	No	Not stated	<i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</i>  <i>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect,</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and

					<p><i>support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i></p>		<p>decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
103	RSA 216	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to</p>

					require a site allocation in this plan.		indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
104	RSA 217	SA62	No	Not stated	<p>I the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate</p>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be

					compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan.</b>		set out in a detailed masterplan.  No change
104	RSA 218	SA62	No	Not stated	<i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment ‘red-zone’ covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change.
105	RSA	SA62	No	Not stated	I would like to register an objection to the above		Objection is noted. The

	219				<p>plan for Broawater Farm and surrounding areas.  It would cause disruption to everyone local for years.  Planning policies which should protect our communities are being ignored.  The homes and estates in the area should be improved and restored, not knocked down.  Good maintenance is better [and cheaper] than demolition</p>		<p>Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
106	RSA 220	SA62	No	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Fram, Somerset Close, Moira Close and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of</p>

					and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community. It is unacceptable and should be withdrawn immediately. Instead the council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan		this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.
107	RSA 221	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect		No change Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist

					our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan		to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
108	RSA 222	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these

					The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
109	RSA 223	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding

							<p>how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
110	RSA 224	SA62	No	Not stated	<p>I the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>

					of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan</b>		No change
111	RSA 225	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and houses along Lordship Lane.</p> <p>The proposal would cause massive stress, displacement and disruption for years to all those affected, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable to the existing local community and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is totally unnecessary compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
112	RSA 226	SA62	No	Not stated	I, the undersigned, object strongly to the draft Local Plan proposal SA62 for a demolition and		Objection is noted. The Council has proposed in

					<p>redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p> <p>I am afraid that new developments will drive out or exclude members of the community who have built so much more than bricks and mortar in their local area, namely their reputation, friendships and aspirations.</p>		<p>Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
113	RSA	SA62	No	Not stated	I, the undersigned object strongly to the draft		Objection is noted. The

	227				<p>Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>		<p>Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>
114	RSA 228	SA62	No	Not stated	<p>I, the undersigned object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of</p>

					<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>		<p>this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>
115	RSA 229	SA62	No	Not stated	<p><b>I'm writing in strong objection to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</b> The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the</p>

					range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
116	RSA 230	SA62	No	Not stated	<i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. I would like to see the Council work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and

							decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.
							No change
117	RSA 231	SA62	No	Not stated	I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It ignores <b>all the renovation work done by the Council's</b> BWF Architects in conjunction with tenants. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further

					than demolition which would not require a site allocation in this plan.		engagement regarding how this site can be improved for the benefit of local residents.
118	RSA 232	SA62	No	Not stated	<p>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>

					There a plenty of brownfield sites nearby you could use. Why destroy communities and a beautiful park?		
119	RSA 233	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
120	RSA	SA62	No	Not stated	I the undersigned object strongly to the draft		Objection is noted. The

	234				<p>Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan</b></p>		<p>Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
121	RSA 235	SA62	No	Not stated	<p>I, the undersigned, object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of</p>

					<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation / red-zone’ in the Haringey Plan.</b></p>		<p>this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
122	RSA 236	SA62	No	Not stated	<p>Object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight - and undermine all the successful efforts over decades to build a</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the</p>

				<p>strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation / red-zone' in the Haringey Plan.</b></p>		<p>estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
123	RSA 237			<p>I would like to make an objection to the draft Local Plan proposal SA62 for the demolition and redevelopment of Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some privately owned houses along Lordship Lane. I think this would cause a lot of disruption in the area for many years and be very stressful to a lot of tenants and residents who would be moved, probably out of their community. It would cause blight in my area and undermine a lot of effort that has been put into regenerating it by a passionate local community, especially in Lordship Rec and Harmony Gardens and on Broadwater Farm over many years. Just as we have begun to regenerate our area together,</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could</p>

					some of the residents who now enjoy the fruits of that success will be displaced. It is in breach of a range of planning policies which are there to protect communities not destroy them. I feel the Council should be working with the community to protect and improve all the existing homes, estates and facilities. It is totally unacceptable and should be withdrawn immediately. The draft proposal SA62 does not make sound planning sense and I believe repair and refurbishment of the estate, as was previously planned and promised for Broadwater Farm, rather than demolition, would be a better alternative and would not require a site allocation in this plan.		take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
124	RSA 238	SA62	No	Not stated	<i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point.

					<i>estate rather than demolition which would not require a site allocation in this plan</i>		This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
125	RSA 239	SA62	No	Not stated	<i>I object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan</i>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and

							requires that these be set out in a detailed masterplan.
							No change
126	RSA 240	SA62	No	Not stated	<p>I strongly object to the proposed redevelopment. This area have been built-up over the years and has a very strong community.</p> <p>It is common knowledge that a lot of money has been invested into all these areas over the years. Last year alone saw a considerable amount of money invested into Lordship Lane. I personally was on the receiving end of some of those improvements after a long waited 20 years. I love my home and the community alike. Broadwater Farm is no longer the notorious estate once branded. Why destroy people's community? Is this what things have come to ! This plan needs to be revised and better solution put in its place.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
127	RSA	SA62	No	Not stated	<i>We object strongly to the draft Local Plan</i>		Objection is noted. The

	241				<p><i>proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i></p>		<p>Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>
128	RSA 242	SA62	No	Not stated	<p><i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all</i></p>		<p>No change</p> <p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of</p>

					<p><i>concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i></p>		<p>this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
129	RSA 243	SA62	No	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist</p>

					our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
130	RSA 244	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these

					The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
131	RSA 245	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding

							how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
132	RSA 246	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.

							No change
133	RSA 247	SA62	No	Not stated	We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
134	RS2 48	SA62	No	Not stated	Re: Local Plan Proposal SA63 for the demolition and redevelopment zone covering Broadwater	The proposal is	Objection is noted. The Council has proposed in Policy SA62 to consider

					<p>Farm, Somerset Close, Lido Square, Moira Close, some houses along Lordship Lane, and the northern part of Lordship Recreation Ground, including the enclosed sports field.</p> <p>We, the undersigned, write further to the above matter and to inform the Council and/or the Planning Department that we strongly object to the proposal which would see the demolition of our existing homes and facilities, including Lordship Lane Recreation Grounds.</p>	<p>unacceptable and should be withdrawn immediately.</p>	<p>how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
135	RSA 249	SA62	No	Not stated	<p>We strongly object to the draft Local Plan Proposal SA63 for the demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, some houses along Lordship Lane, and the northern part of Lordship Recreation Ground, including the enclosed sports field.</p>	<p>It is unacceptable and should be withdrawn immediately. Instead the Council must work with the</p>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is</p>

					<p>The proposal would cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community.</p>	<p>community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>	<p>considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>
136	RSA 250	SA62	No	Not stated	<p>We the undersigned, urge Haringey Council to reconsider and reverse their decision that we strongly object to the draft Local Plan Proposal SA63 for the demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, some houses along Lordship Lane, and the northern part of Lordship Recreation Ground, including the enclosed sports field.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts</p>	<p>It is unacceptable and should be withdrawn immediately. Instead the Council must work with the community to protect, support and improve all the existing</p>	<p>No change</p> <p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is</p>

					over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community.	homes, estates, facilities and communities in the area.	considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
137	RSA 251	SA62	No	Not stated	<b>Stop “redevelopment” threats to the Broadwater/ Lordship Rec Area.</b> Protect our estates and park. No to any demolitions of local homes! No to building on the park and the sports field! Protect all the facilities and improvements in the area.		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not

							<p>been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
138	RSA 252	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit</p>

					<p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>People Matter. Talk to them and you will find out we need more love in this world.</p>		<p>of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
139	RSA 253	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit</p>

					The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a <b>'site allocation/ red zone'</b> in the Haringey Plan.		of local residents, and requires that these be set out in a detailed masterplan.  No change
140	RSA 254	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site</b></p>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this

					allocation/ red zone' in the Haringey Plan.		site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
141	RSA 255	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate</p>

					<p>maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>Wellbeing of local residents over money grabbing developers. Council should work with local residents to protect existing houses and ALL Green Areas. Quality of life more important than money !!</p>		<p>further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
142	RSA 256	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not</p>

					<p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>Please understand our community is alive and well. <b>Don't destroy it!</b></p>		<p>been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
143	RSA 257	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including</p>

					<p>communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>Established viable communities must not be sacrificed for speculative schemes which do not benefit local residents.</p>		<p>the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
144	RSA 258	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and</p>

					<p>community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>This is disgraceful and must not be happening. People before money – a government grabbing <b>money making b*\$+@d's</b> PEOPLE FIRST</p>		<p>decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
145	RSA 259	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>'People first' Community &amp; family staying together.</p>		<p>improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
146	RSA 260	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for</p>

					<p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
147	RSA 261	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that</p>

					<p>which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
152	RSA 266	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
153	RSA 267	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is</p>

					<p>immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
154	RSA 268	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve</p>

					<p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
155	RSA 169	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and</p>

					<p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>Moira Close is as important today as it was when opened in 1973. Integrated housing for able and disabled people to live in harmony and to combine integration and independence for all.</p>		<p>the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
156	RSA 270	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a trong</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document</p>

					<p>and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>Regardless of your opinions becoming an absentee landlord helps no-one.</p>		<p>is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
157	RSA 271	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of</p>

					<p>years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>I do agree with everything discussed in the meeting today.</p>		<p>this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
158	RSA 272	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve</p>

					<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
159	RSA 273	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and		Objection is noted. The Council has proposed in Policy SA62 to consider how

					<p>some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
160	RSA 274	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and		Objection is noted. The Council has

				<p>redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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161	RSA 275	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>
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							No change
162	RSA 276	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be</p>

							set out in a detailed masterplan.  No change
163	RSA 277	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local</p>

					<p><b>Additional Comments</b></p> <p>We have been involved in the regeneration of this area for 10 years and although there is a lot to be done it is happening and it is good. This <b>proposal's bad in that it is high handed, arrogant and undemocratic.</b></p>		<p>residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
164	RSA 278	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement</p>

					of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
165	RSA 279	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation</p>

					compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b>		<p>serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
166	RSA 280	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not</p>

					The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – none of which require a <b>'site allocation/ red zone'</b> in the Haringey Plan.		been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
167	RSA 281	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and</p>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including

					<p>communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone'</b> in the Haringey Plan.</p>		<p>the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
168	RSA 282	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and</p>

					<p>community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
169	RSA 283	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>
170	RSA 284	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for</p>

					<p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>When this proposal proposed certainly did not <b>take into consideration local people's need.</b> Where there are group of people who survive be receiving community support from each other like Turkish speaking communities who are in need of language barrier.</p>		<p>residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
171	RSA 285	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the</p>

					<p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p><b>Demolition isn't the way forward please don't rip up a community.</b></p>		<p>size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
172	RSA 286	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document</p>

					<p>and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
173	RSA 287	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of</p>

					<p>years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
174	RSA 288	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve</p>

					<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
175	RSA 289	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and		Objection is noted. The Council has proposed in Policy SA62 to consider how

					<p>some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
176	RSA 290	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and		Objection is noted. The Council has

				<p>redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change.</p>
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177	RSA 291	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>
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							No change
178	RSA 292	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be</p>

							set out in a detailed masterplan.  No change
179	RSA 293	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local</p>

							residents, and requires that these be set out in a detailed masterplan.
							No change
180	RSA 294	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this</p>

					<p>allocation/ red zone' in the Haringey Plan.</p> <p><b>Additional Comments</b></p> <p><b>This is a community, please don't destroy this and ruin lives!</b></p>		<p>site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
181	RSA 295	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate</p>

					<p>maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’</b> in the Haringey Plan.</p>		<p>further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
182	RSA 296	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this</p>

					the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b>		point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
183	RSA 297	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for

					<p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
184	RSA 298	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what</p>

					<p>the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
185	RSA 299	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could</p>

					<p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
186	RSA 300	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is</p>

					<p>immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
187	RSA 301	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve</p>

					<p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
188	RSA 302	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and</p>

					<p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
189	RSA 303	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered</p>

					<p>local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
190	RSA 304	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site</p>

					<p>successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
191	RSA 305	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the</p>

					<p>concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>I am against the demolishing of the estate.</p>		<p>area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
192	RSA 306	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing</p>

					<p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
193	RSA 307	SA62	No	Not stated	I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm,		Objection is noted. The Council has proposed in Policy

					<p>Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
194	RSA	SA62	No	Not stated	I/We the undersigned object strongly to draft		Objection is noted.

	308			<p>Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p>		<p>The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p>
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							No change
195	RSA 309	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed</p>

							masterplan.  No change
196	RSA 310	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and</p>

					Redecorate the estate		requires that these be set out in a detailed masterplan.
							No change
197	RSA 311	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved</p>

							for the benefit of local residents, and requires that these be set out in a detailed masterplan.
							No change
198	RSA 312	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement</p>

					of the estates – none of which require a ‘site allocation/ red zone’ in the Haringey Plan.		regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
199	RSA 313	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p> <p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate</p>		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation

					<p>compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a ‘site allocation/ red zone’ in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p>I prefer to live on my estate. Displacement is awful, now that the estate is so peaceful why is all this fuss about. No red zone in my estate.</p>		<p>serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
200	RSA 314	SA62	No	Not stated	<p>I/We the undersigned object strongly to draft Local Plan proposal SA62 for a demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight – and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.</p> <p>It breaches a whole range of planning policies which should protect our community.</p> <p>It is unacceptable and should be withdrawn immediately.</p> <p>Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not</p>

					<p>The proposal is unsound in planning terms as the threat of demolition is very inappropriate compared to the alternative of good maintenance, timely repairs and refurbishment of the estates – <b>none of which require a 'site allocation/ red zone' in the Haringey Plan.</b></p> <p><b>Additional Comments</b></p> <p><b>My concern is I love Broadwater Farm. I don't want to live anywhere else. I am against the Council proposals. Remove the red zone please.</b></p>		<p>been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
201	RSA 315	SA62	No	Yes	<p>The proposal would cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities &amp; communities in the area</p>	No response given	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including</p>

							the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.  No change
202	RSA 316	SA62	Yes	Yes	I feel that improvements are based around the public funding provided especially for that area and a halt is placed on improvements when over expenditure becomes a problem.	Even though improvements are planned in a fair manner, occasionally, several properties may be neglected through an admin malfunction.	Noted.
203	RSA 317	SA62	No	Not stated	Is the document justified? No evidence that stress and public health issues resulting from a proposed demolition have been realistically assessed.	Remove Broadwater Farm estate from the site allocation plan SA62.	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve

							<p>permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
203	RSA 318	SA62			Is the document sound? No difference has been made between “affordable” housing rent and “social housing rent”. See enclosed chart which shows affordable rent double social rent.	Any proposal should guarantee social	SP2 of the Local Plan sets out the differentiated target for affordable rent and

						housing rent for any tenants choosing or forced to move.	intermediate products. No change
204	RSA 319				<p><b>We write our reply to Haringey Council's Local Plan Consultation</b> mainly in reference to the <i>Sites Allocation DPD Pre-Submission Version dated January 2016</i>. <b>Haringey Council's Site Allocation 62</b> is the Broadwater Farm Area. This area includes Broadwater Farm estate with all its marvellous community facilities, and also Somerset Close, Lido Square, Moira Close and the houses along Lordship Lane to the north.</p> <p>The proposed zone is indicated by a red line on a map (see right) taken from the above document. This proposal, if adopted, would mean that developers could draw up plans to demolish housing on the site and provide new housing, whether this housing was provided by a Housing Association or was fully private sector housing.</p> <p><b>The residents and the Residents' Association</b> have worked with the Council to dramatically improve the estate over the last 30 years. It now has great facilities, including concierges, play areas, a health centre, landscaping and schools. In the last 6 years a range of refurbishments and repairs have been made - yet bizarrely it has now been put on a list of <b>Council estates facing 'redevelopment'</b>. <b>We say it is the Council's duty as the landlord to finish</b></p>	<p><u>The Alternative We Want</u></p> <p>Broadwater Farm <b>Residents' Association</b> wants improvement of the existing housing on Broadwater Farm as an alternative to demolition and rebuilding.</p> <p>Throughout 2015 representatives of Broadwater Farm <b>Residents' Association</b>, Broadwater</p>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this</p>

				<p>off all the works started.</p> <p>This proposal which facilitates demolition and re-building will cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition. Repair and refurbishment would not require a site allocation in this plan.</p> <p>Broadwater Farm</p> <p>Broadwater Farm Estate was commenced in 1967 on the site of the allotments by Lordship Recreation Ground. It was a massive development of high density Council housing of initially 1063 flats for housing 3000-4000 people. Due to some early problems with the estate, such as leaking roofs, residents banded together and convinced the Council to carry out works on the buildings. By 1981 a process of refurbishment had started, but progress was slow. Residents created a very active <b>Youth Association and a Residents' Association.</b></p>	<p>United Sports and Football Academy, Broadwater Farm Enterprise Centre, Back 2 Earth@Broadwater Community Centre and Friends of Lordship Rec. have been meeting together.</p> <p>We came up with the following principles for improving the Broadwater Farm:</p> <p>Complete the planned Decent Homes Works program Do the</p>	<p>site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
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				<p>From the mid-1980s the Council consulted the residents about a new program of needed works and residents identified the improvements they wanted with the Council agreeing to implement them and finding the funds to do so. The community-led regeneration of the estate attracted over £40m of resources and has been a huge success. All of the <b>tenants' recommended solutions were carried</b> out by the Council. Improvements included concierges for all blocks, play areas, landscaping, workshops for rent, a health centre, a community centre, a new school campus, bus route through the estate, and more.</p> <p>It is now one of the most well-served Council housing estates in the UK and regularly attracts visitors from around the world who wish to see this great example of successful community-led regeneration. All these facilities are at risk of demolition if SA62 is approved as a site allocation. So is all the housing, not just on Broadwater Farm but also the excellent housing on Somerset Close, Lido Square and Moira Close. This includes special provision of housing for people with disabilities. Residents of these areas have expressed great concern about the possible demolition of their homes.</p> <p><b>Broadwater Farm Residents' Association</b></p> <p><b>The current Broadwater Farm Residents' Association</b> was established in 1987, originating</p>	<p>repairs needed in the flats and blocks (including fixing leaking pipes) Install effective entry/security systems to all blocks Redecorate the estate Protect and improve the existing facilities and services, and <b>the estate's</b> environment Rehouse overcrowded families entitled to a bigger home if they wish</p> <p>Decent Homes work should include new front doors, kitchens and bathrooms</p>	
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				<p>from the Broadwater Farm Youth Association. It was established to look at the issues of lack of representation and deprivation on the estate as well as to raise community spirit. It has held regular meetings with councillors and council officials over the years to achieve these goals.</p> <p>The current committee was elected at an Annual General Meeting in September 2015. We hold regular committee meetings. We continue to organise events for local residents. In 2015, for example, we organised two Open Days where residents could come and meet each other, enjoy refreshments and discuss any problems or suggestions they had about their estate. We have also taken up various issues, including issues with repairs, estate facilities, general maintenance and estate improvements with Homes for Haringey and Haringey Council.</p> <p><b>SA62: Proposal to 'Improve Stock'-What Demolition Would Mean</b></p> <p>As the Site Allocations document notes:</p> <p><b>'This site is listed as part of the Council's initial</b> estate renewal programme in Policy SP2. This policy also seeks to ensure no net loss of existing affordable housing floorspace in development; and ensure that affordable</p>	<p>for the existing blocks. (Tangmere in addition requires new roofs, windows and other works to the exterior of the block). It should also include work to ensure good insulation and other work to the existing blocks as necessary. This modernisation of facilities will make give our flats a far more modern feel and make</p>	
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				<p>housing units are designed to a high quality and <b>are fully integrated within schemes.</b><sup>135</sup></p> <p>The possibility of the demolition of council housing on the Broadwater Farm site has been broached in meetings between members of the Broadwater Farm Residents Association Committee and Steve Kelly of the Planning Department on 18/02/2015 and 16/03/2015 and by members of our Association and Matthew Pattison of the Planning Department on 09/03/2015 at the West Green and Bruce Grove Area Forum. At both meetings Mr Kelly rather reluctantly agreed that demolition and rebuilding of blocks in addition to Tangmere (see below for issues related to Tangmere) could be a possibility on the site but stressed that his department was not responsible for this decision and that no concrete plan for this had yet been drawn up. Mr Kelly stated in both meetings that the allocation of land on Lordship Recreation Ground was necessary for building new homes for decanted residents from Tangmere. Mr Pattison went further at the Area Forum on 09/03/2015 and said the land might be needed if blocks at Broadwater Farm need to be decanted, i.e. the land would house residents from more than one demolished block. While the Lordship Rec plan has now been dropped we believe that the continued inclusion of the other areas in SA62 indicates</p>	<p>residents value their homes even more. Our homes will be warmer and more comfortable and our heating bills will be reduced.</p> <p>New door entry systems are planned for Northolt, Stapleford, Lympne, Manston, Kenley, Hornchurch, Martlesham and Rochford this year. Tangmere, Croydon, Debden and Hawkinge</p>	
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<sup>135</sup> *Site Allocations DPD Pre-Submission Version*, January 2016. Page 151

				<p>that demolition is still being seriously considered. It is obvious that the inclusion of Broadwater Farm on the Site Allocations plan does make demolitions of council blocks on Broadwater Farm a possibility and not only Tangmere, in the absence of any statement in the plan to the contrary.</p> <p>The type of 'regeneration' Broadwater Farm may well face is set out under proposals for Broadwater Farm to be included in a 'Joint Venture' arrangement. On 10/11/2015 Haringey's Cabinet approved a proposal to set up a Joint Venture to 'deliver regeneration' in various areas, including potentially the Broadwater Farm. As the report states:</p> <p>'The Haringey development vehicle would be a 50:50 joint venture between the Council and its private partner or partners.'<sup>136</sup></p> <p>Broadwater Farm is listed as one of the 'Sites and assets that may be transferred to the vehicle...'</p> <p>We are very concerned that the proposal in SA62 to 'Improve Stock' in fact bears no relation to our aspirations but could actually facilitate wholesale demolition and rebuilding. We find evidence of this in the proposed</p>	<p>have been left out however. Adding the remaining blocks to the program will bring about an improvement to our security on the estate.</p> <p>We also believe that our blocks require redecoration: painting of communal areas and new, more attractive flooring. Relative to capital works such as the new doors this is</p>	
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<sup>136</sup> Haringey Development Vehicle Report to Cabinet 10/11/2015 in Agenda Packs:

<http://www.minutes.haringey.gov.uk/documents/g7301/Public%20reports%20pack%2010th-Nov-2015%2018.30%20Cabinet.pdf?T=10> page 141

				<p><i>Alterations to Haringey's Adopted Strategic Policies 2011-2026.</i> Alteration 53 sets out an <b>initial list of housing estates to be 'regenerated'</b>. Broadwater Farm is one of the estates set out here. The reason box for Alteration 53 states that the alteration:</p> <p><b>'Recognises the Council's commitment to improving its existing housing stock and the limitations of the Decent Homes Programme for a significant number of Council-owned homes.'</b><sup>137</sup></p> <p>Now according to Haringey Council's September 2015 <i>Future of Housing Review</i> the Development Vehicle the Council wishes to set up:</p> <p><b>'is unlikely to be a refurbishment vehicle, and transfer would most likely be on the basis of decanting tenants and potentially offering them the opportunity to return.'</b> <sup>138</sup></p> <p>The clear implication here is that estates on the regeneration list, including Broadwater Farm may well be knocked down. The idea of right to return is only stated as a possibility not a guarantee.</p> <p>Given reductions in government grants for new</p>	<p>relatively inexpensive and would make a huge difference to the perceptions of residents and visitors about the estate.</p> <p>We wish our existing facilities to be defended and improved. Broadwater Farm Community Centre is a very valued local resource that provides a café, a gym and a football club</p>	
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<sup>137</sup> *Alterations to Haringey's Adopted Strategic Policies 2011-2026. Pre-Submission Version.* January 2016.

[http://www.haringey.gov.uk/sites/haringeygovuk/files/06\\_haringey\\_strategic\\_policies\\_dtp\\_221215.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/06_haringey_strategic_policies_dtp_221215.pdf) Page 17.

<sup>138</sup> *The Future of Housing Review-Conclusions and Recommendations* Report to Cabinet 4.9.15 in *Agenda Packs*

<http://www.minutes.haringey.gov.uk/documents/g7299/Public%20reports%20pack%2015th-Sep-2015%2018.30%20Cabinet.pdf?T=10> page 80

				<p>social housing build, it is very unlikely that Haringey Council could demolish an estate the size of Broadwater Farm and re-provision anything but a small proportion of the homes at social rent. So-called <b>'Affordable Rented'</b> housing and Shared Ownership are outside the income ranges of most Broadwater Farm residents and most Tottenham residents.</p> <p>Moreover, there are clear indications that all new housing built by Joint Ventures will be private not social in any case.</p> <p>In this connection we must note the report of Julian Wain, the Independent Adviser to the London Borough of Haringey Future of Housing Review. In his report of September 2015 he writes that:</p> <p><b>'At present local authority controlled companies</b> can hold property exempt from the right to buy, but the government has signalled its intention to remove this exemption. This will leave joint venture vehicles, part owned by the the private sector as the only mechanism whereby properties can be protected for social use. These will however, not be secure tenancies; but rather private rented properties let at secure <b>or affordable rents.</b>' <sup>139</sup></p>	<p>among other services and events. We are very surprised that this facility is still being included on the Site Allocation for potential demolition. We also note that it stands on Metropolitan Open Land and we wonder how it can be imagined that it would be legally possible to demolish it in any case.</p> <p>We regard improvement</p>	
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<sup>139</sup> *Final Report of Independent Advisor to the Future of Housing Review*. September 2015.

<http://www.minutes.haringey.gov.uk/documents/g7299/Public%20reports%20pack%2015th-Sep-2015%2018.30%20Cabinet.pdf?T=10> Page 160

				<p>Therefore if there is new development on the estates, the tenants will only be given the option of return if they want to swap a secure, council tenancy for an insecure private tenancy. Given that virtually no tenants will want to do that, our only real option will be to accept a move onto another housing estate in Haringey. We will lose all the facilities we enjoy on this estate and gain nothing.</p> <p>The Haringey Council Cabinet approved the <b>establishment of a 'Development Vehicle'</b> on 10/11/2015 on a Joint Venture model and tendering is now taking place. <sup>140</sup></p> <p>In this connection we must also mention the <b>Council's proposed <i>Estate Renewal and Rehousing and Payments Policy</i></b>. This policy which is intended to determine how council tenants will be rehoused when their homes are demolished states:</p> <p><b>'The Council will aim to offer secure tenants the option of returning to a new permanent home on their estate where possible, on a scheme by scheme basis.'</b><sup>141</sup></p> <p>There is absolutely no guarantee that council tenants will be rehoused in the new homes on</p>	<p>of housing as an alternative to inclusion on the site allocation plan as none of the improvements that are necessary would require inclusion of our estate on the Site Allocation. We believe the only reason for the inclusion of our estate as a Site Allocation is to facilitate demolitions in the future and we reject this option as unnecessary and</p>	
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<sup>140</sup> See for example: <http://www.gva.co.uk/news/HaringeyseeksJVpartnerfor2bnestatesregeneration/>

<sup>141</sup> *Estate Renewal and Rehousing and Payments Policy* [http://www.haringey.gov.uk/sites/haringeygovuk/files/estate\\_renewal\\_rehousing\\_and\\_payments\\_policy\\_-\\_final\\_draft.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/estate_renewal_rehousing_and_payments_policy_-_final_draft.pdf) Page 7

					<p>Broadwater Farm. It is therefore clear that most of the council tenants in Broadwater Farm have no real interest in the demolition of their homes and refurbishment not demolition should occur.</p>	<p>damaging.</p> <p>Broadwater Farm <b>Residents'</b> Association does not agree that the potential demolition of the blocks we live in should be described as a way to <b>'improve stock'</b>. No report exists that indicates that the buildings on the Broadwater Farm are in any way structurally unsound. Stock should be improved by the type of Decent Homes work detailed above. In</p>	
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						addition all the facilities and features serving and enhancing the estate should be treasured and protected. Further reasons for our opposition to demolitions will be detailed below.	
	RSA 320				<p>The Issue of Tangmere in Relation to the Potential Demolition of Other Council Blocks on the Broadwater Farm Estate</p> <p>Tangmere has a different design to the other blocks. Tangmere residents were consulted in a Homes for Haringey Steering Group in 2014 and 2015 where demolition was openly discussed. The principal reasons given for the <b>concerns about Tangmere's future</b> appear to be a fairly large number of leaks in the block and anti-social behaviour . At the Steering Group meeting on 18/02/2015 the Repairs Department attended and stated they were doing extensive work on unblocking pipes, as pressure from water in blocked pipes on joints was deemed to</p>		<p>The engagement with the community on Tangmere prompted consideration by the Council to further improvements across the estate. The intention is that the masterplan for the estate will be subject to the same level of engagement as has taken place on the Tangmere housing block to date. The allocation is not about</p>

				<p>be a major cause of leaks. It was also agreed to restore lighting to unlit parts of the car park due to resident complaints about car break-ins. The restoration of lighting was done. Balcony gully drains are being unblocked from 29/2/2016 which should help stop the problem with leaks. Given we have been given no evidence of any actual structural problem at Tangmere, it must be suggested that the problems at Tangmere could probably be addressed through better management and maintenance and it does not seem likely that demolition is necessary. The meetings of the Steering Group have already brought about <b>improvements in the block and it is rather 'lazy thinking' for Haringey Council to suggest</b> when there are maintenance or anti-social behaviour problems in a block that demolition must be put on the agenda rather than helping residents explore other alternatives.</p> <p>One point we wish to make, however, is that any problems in Tangmere that might exist should not be used as a <b>'Trojan Horse'</b> for facilitating demolitions of any other blocks on Broadwater Farm. The current site allocation would enable developers to come forward with plans for demolitions of all blocks on Broadwater Farm, not just Tangmere.</p> <p>If it really is the case, that only Tangmere is being considered for demolition, which seems unlikely for reasons laid out above, then it must be asked why the Site Allocations plan does not indicate that all the other blocks will definitely</p>		<p>demolitions, but rather further improvements on the estate.</p> <p>No change</p>
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				<p>not be demolished. This point does not in any way indicate that Broadwater Farm Residents' Association supports the demolition of Tangmere. We do not, and insist the necessary repairs be completed.</p> <p>Conclusion</p> <p>Broadwater Farm provides decent quality housing for thousands of people. It is a strong, vibrant community. Huge amounts have been spent on providing concierge suites, new roofs and windows, providing a Community Centre and many other facilities. All residents want to look to the future on our estate, rather than having our lives needlessly disrupted by demolitions and decants.</p> <p>On 09/03/2015 at the Area Forum, Matthew Pattison of the Planning Department indicated that Haringey Council has no evidence of any structural problems with the blocks at Broadwater Farm. The Planning Department is also clear that any redevelopment of the Broadwater Farm would not lead to a net increase in the number of houses on the site and would therefore have no impact on the <b>Mayor of London's target for 1,502 new homes</b> a year for Haringey. These two facts must clearly beg the question, what is the point of demolition and rebuilding?</p> <p>Demolition of housing on Broadwater Farm and in Somerset Close, Moira Close and Lido Square would lead to a huge loss of socially</p>		
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				<p>rented, genuinely affordable housing. Residents in these Somerset Close, Moira Close and Lido Square are very angry about the proposals. They have attended meetings and lobbies against these proposals and have handed in petitions against them. Representatives of these areas spoke against the proposals <b>alongside Broadwater Farm Residents' Association</b> Representatives and a representative of the affected houses on Lordship Lane at a protest meeting on <b>24/2/2016. Current options for 'Affordable Rent' housing or Shared Ownership housing</b> on the site would not be genuinely affordable for the majority of households in Tottenham. Demolition and rebuilding would contravene <b>Haringey's commitment to equal opportunities.</b> In addition there would potentially be a huge loss of very valued community facilities such</p> <p>Refurbishment and improvements as set out above are a clear alternative to the woefully inappropriate policy of demolition. As refurbishment and improvement does not necessitate inclusion on the Site Allocations plan, we believe that SA62 should be removed.</p>		
204	RSA 321	SA62		<p>From April 2015 around the end of 2015 <b>Broadwater Farm Residents' Association</b> carried out petitioning against the demolition of Broadwater Farm and surrounding areas and the building of houses on Lordship Recreation Ground. 684 people signed the paper petition. As of 29/12/2016 956 have signed the online petition (see screengrab attached.) We would note that other petitions against demolition</p>		Noted

				<p>were also carried out independently by residents of the affected areas and handed in as part of the first round of consultation.</p> <p>We attach copies of the petition. Please note: some of the petitions have different wording as Lordship Rec. was taken out of the Council plans in September 2015. The petitions were carried out by different people in different places so a small number of people may have signed it twice.</p>		
205	RSA 322	SA62		<p>I write to object in the strongest possible terms to the proposed destruction of Broadwater Farm Estate and other council estates. . Ignoring the decision of the supreme court in Mosely v Haringey the Council has clearly decided to demolish the Broadwater Farm and other council estates before you consult the tenants about it and in the face of the united opposition of the tenants associations.</p> <p>May I remind you what the supreme court decided.</p> <p>"First, that consultation must be at a time when proposals are still at a formative stage. Second, that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response. <b>Third,... that adequate time must</b> be given for consideration and response and, finally, fourth, that the product of consultation must be conscientiously taken into account in finalising <b>any statutory proposals."</b></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not</p>

				<p>May I also remind you that your recent consultation about council's statement of community involvement is subject to a High Court challenge and calls into question the validity of the 2011 SCI you are currently using.</p> <p>My objection is also concerned with the</p> <ul style="list-style-type: none"> <li>• lack of planning by the council for the housing of tenants at affordable rents during regeneration and after it;</li> <li>• the failure to take into account your public health responsibilities in the context of the current and increasingly unaffordable of rents, which creates rent arrears and takes an ever increasing proportion of the income needed for food, fuel, clothes, transport and other necessities.</li> <li>• the impact of inevitable household debts on the health and wellbeing of men, women and children and of the insecurity of tenure on the education of children</li> </ul> <p>You will be aware that since 2009 housing benefit paid to tenants has been cut three different ways with the benefit cap, the bedroom tax and the local housing allowance; that creates damaging rent arrears. Since 2011 benefit increases have been frozen at 1%. Since 2013 the incomes provided by the taxpayer, through central government, for the survival people with the lowest incomes in the</p>		<p>been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
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				<p>borough have been taxed by the council who follow up inevitable arrears with draconian enforcement</p> <p>against around 20,000 residents a year . The one or three month jobcenter benefit sanctions render all debts unpayable and impacts mental and physical health</p> <p><a href="#">But Chapter 7</a> " HEALTHIER PEOPLE WITH A BETTER QUALITY OF LIFE" of the local plan has no mention of the impact on health and wellbeing of inevitable rent or council tax arrears. As you know rent and council tax arrears are enforced against the lowest incomes or sometimes no incomes at all due to a sanction</p> <p>There is no comment in Chapter 7 of the damage to health of unaffordable rents, council tax or of council induced insecurity of tenure.</p> <p>The persistent reduction of single adult unemployment benefits of £59.70 a week for under 25s and £73.10 thereafter has consequences in poor maternal nutrition and low birthweight of which there is all ready to much in the London Borough of Haringey.</p> <p>You will also be aware that life expectancy on some wards in Haringey is an average of 17</p>		
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					<p>years shorter than life expectancy in Kensington and Chelsea.</p> <p>There are volumes of robust research which confirm the damage to health and wellbeing of hunger, debts, insecurity of tenure and poor maternal nutrition</p> <p>I am, in other words, concerned about council's failure to have proper regard to its public health responsibilities in the local plan and to take into account of the impact on the health and well being of local men, women and children in the local plan in general, and at Broadwater Farm in particular, of high rents, low incomes, inevitable debts, insecurity of tenure and the destruction of homes and communities.</p> <p>For these reasons the council should drop its regeneration plans, put in place a public health programme that meets the human needs of residents for an adequate income and affordable rents and refurbish the council estates as requested by the residents.</p>		
206	RSA 323	SA62	No	Not stated	<p>I wish to object strongly to the proposals in the draft Local Plan, Site Allocation 62, for a demolition and redevelopment 'red zone' in the Broadwater Farm area. This proposal will severely damage community cohesion, displacing residents, disrupting their lives and causing massive and unnecessary stress to all who live locally. Broadwater Farm is noted for the achievements of its residents in building a strong community, with good facilities, and</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document</p>

					<p>overcoming disadvantages - it should be celebrated as a positive example for Tottenham, rather than as something to be swept away. The proposals are unsound in terms of planning policies, and make no sense economically compared to the alternative of repair and refurbishment of existing buildings. In a time of housing crisis for Haringey families, it is bizarre that Haringey Council is proposing to increase their hardship by further reducing the supply of genuinely affordable, secure homes.</p>		<p>is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.</p> <p>No change</p>
207	RSA 324	SA62	No	Not stated	<p>In respect of the above site allocation. I am pleased that the plans to build on Lordship Recreation Ground have been shelved. As in my previous correspondence I do not object to the demolishing of the Broadwater Farm estate but I feel that any replacement should be low rise development not the proposed 6-11 storeys proposed.</p>		<p>Noted.</p>

208	RSA 325	SA62	No	Not stated	<p><i>I object to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. Redevelopment now means high density, high rise and unaffordable. If Tottenham Hale's new development is a benchmark for current planning, then that kind of density is inhumane; it is unsightly; will look even worse in 20 years time and some parts must be awful to live in. People need light and space and Broadwater farm has that currently. Please do not take that away from the communities that desperately need it.</i></p> <p><i>As a designer, I think that the Modernist design is beautiful and significant for Tottenham and London and should be preserved as an example to future generations.</i></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
209	RSA	SA62	No	Not stated	If you price working class people out of		Objection is noted.

	326			<p>boroughs like Haringey, soon the capital will be suffering a huge labour shortage for essential low-paid work. If you fill London up with rich people, those rich people will need people to do low-paid work for them (cooks, cleaners, kitchen porters, launderers, labourers, taxi drivers etc etc etc etc), and the people who do that work will need somewhere to live. So maybe you don't care about communities, you don't care about the poor, but the fact is that the affluent city you are creating needs us, and it'll collapse if we have nowhere to live. Eventually we'll just move to affordable cities, especially once you've fully destroyed our communities. I know you think this is what you want (in more euphemistic terms), but your plan to push out the poor and create a rich-only stronghold won't hold up without our labour. So if you want the rich to come, you better not destroy our communities and our homes. As someone on the housing list bidding for places on Broadwater Farm I put my name to the following statement:</p> <p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect</p>		<p>The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
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					our community. It is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.		
210	RSA 327	SA62	No	Not stated	<p><i>We object strongly to the draft Local Plan proposal SA62 (and any other proposal you have in mind for Lordship Lane conservation area and surrounding areas) for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community.</i></p> <p><i>WHERE WILL THESE PEOPLE BE HOUSED WHILST THIS IS GOING ON</i></p> <p><i>It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is</i></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this</p>

					<p><i>unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.”</i></p> <p><i>Further more, how many homes will be affordable, Tottenham Hotspur redevelopment is not going to provide affordable homes after all from what has been written, how do residents know if contractors will back down from obligations to provide homes for renting at reasonable costs.</i></p> <p><i>How many other areas and homes in Tottenham do you plan to demolish? people do not want to re housed when they already have homes that are suitable.</i></p> <p><i>FIND EMPTY LAND SITE OR BROWN SITES AND BUILD ON THESE. HOW MANY OF YOU IN THE PLANNING DEPARTMENT WILL BE DISRUPTED IN YOUR HOMES, LOSE YOUR HOME AND COMMUNITY AS A RESULT OF THIS DEMOLISION AND COMPULSORY PURCHASE ORDER OF PRIVATE HOMES? HOW WOULD YOU FEEL. ARE ANY OF US SAFE?</i></p>		<p>point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
211	RSA 328	SA62	No	Not stated	<p><i>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment ‘red-zone’ covering Broadwater Farm, Somerset Close, Lido Square, Moira</i></p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how</p>

				<p><i>Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</i></p> <p>I am sending you the above objection, as outlined by community groups campaigning against this 'redevelopment' because in my experience as a resident it is not what the area needs. I moved here two years ago, and had my first child here, attending antenatal appointments at Broadwater Farm health Centre, and postnatal appointments at it's Children's Centre. My son and I walked round the streets of Broadwater and the Lordship Rec every day this summer. It is clear to me this is a vibrant, established community, with a strong active, civic element.</p> <p>To wipe all this away in order to build high-density, overwhelmingly private housing would be shameful. The Broadwater estate needs</p>		<p>to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
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					<p>building up, not tearing down, and it's community needs to be supported and recognised for it's positive and enterprising spirit, not disenfranchised and scattered by short term, neo liberal housing policies.</p> <p>Find a more positive and sustainable way to develop this area, and work with local residents.</p>		
212	RSA 329	SA62	No	Not stated	<p>We object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan. Work with the community, NOT against the community!!!</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate</p>

							<p>further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
213	RSA 330	SA62	No	Not stated	<p>I am writing to object to the planned demolition and displacement of all the families in the SA62 which includes Broadwater farm and all the community facilities. Much time and effort and money has gone into developing this community over the years and more should be done to continue this positive action. It is totally unnecessary to destroy and disperse the families who live there, uprooting them from their social networks, their jobs and livelihoods when an alternative programme of maintenance and upgrading of the site would suffice. I strongly object to selling off more council housing to private developers whose only interest is money. The council has a responsibility to these families and any threat to their livelihoods is surely more likely to be damaging and cause local unrest again. Please review the plans and instead work to improve existing housing stock without attempting this blatant plan of social cleansing.</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement</p>

							regarding how this site can be improved for the benefit of local residents.  No change
214	RSA 331	SA 62	No response given	No response given	<p>Demolition and redevelopment zone covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane.</p> <p>The demolition and redevelopment would cause huge stress to all current residents as well as undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. The Council should support one of the success stories in Haringey in which local initiatives brought the community together after the riots of 30 years ago and that it is now an important asset in Tottenham. Tottenham is already in the process of gentrification whereby local residents are being priced out of living in the area and this can only further damage the chances of them being able to stay within the community</p>		<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this</p>

							site can be improved for the benefit of local residents.
							No change
215	RSA 332	SA62	No response given	No response given	As a resident of Haringey (Tottenham Green Ward) I am writing to object strongly to the draft Local Plan proposal SA62 for a demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause not only displacement and disruption for years but also extreme stress to all who live in this zone. What's more, the plan will blight and undermine all the successful efforts over decades to build a strong and stable local community and improve local facilities. The plan goes against all received wisdom in relation to community and social housing and the area as a whole by creating unnecessary upheaval to tenants, home owners and nearby residents alike. The plan is deeply flawed and should be withdrawn. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area. Working with the community rather than against it will make everything move more smoothly as residents would be involved and engaged, hence supportive, rather than anxious and demoralised through the uncertain future they face.	No response given	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved

							for the benefit of local residents.  No change
216	RSA 333	SA62	Not stated	Not stated	Hi my name is Khiry pascal - Joseph I'm 23 years old live opposite the estate have wonderful views across the estate what I've heard is absolutely disgusting knocking down an estate that has an wonderful community sprit I oppose this completely if this goes ahead we are gonna be blight by years of noise anxiety the red zone needs to be completely removed		Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local

							residents. No change
217	RSA 334	SA62	No	Yes	I would like the demolition to take place. I agree with the proposal to take place in the Rochford Area.	The floors are very dirty, and the lifts are dirt and needs cleaning on a day to day basis.	Noted.
221	RSA 350	SA62	Not stated	Not stated	We have received a number of comments from local residents in relation to SA62, Broadwater Farm. Whilst we are pleased that original plans that included parts of Lordship Recreation Ground have been removed, estate regeneration must take into account the needs of local residents.	The estate regeneration must take into account the needs of local residents.	It is considered that the Plan makes this clear both in this site allocation and also in the alterations to the Strategic Policies DPD.  No change
223	RSA 353	SA62	Not stated	Not Stated	As local Tottenham residents who have instigated and run successful community regeneration projects in this local area we strongly object to this draft Local Plan proposal SA62 proposing a possible demolition and redevelopment zone for the area that includes Broadwater Farm Community Centre, Broadwater Farm Estate, Somerset Close, Lido Square, Moira Close and some of the houses along Lordship Lane.  To our knowledge nobody living or working here was consulted first about these planning proposals that would so greatly affect their homes and lives.  We are told that there is some consultation now	Withdrawal of the site allocation	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is

				<p>on the Broadwater Farm estate, asking individuals what they want. ( Unfortunately this is the old high handed tory tactic of divide and rule, as if the council are scared of dealing with people working together in a properly organised democratic group).</p> <p>If these proposals were to go ahead they would cause displacement and disruption for years and also massive stress to many as well as planning blight. Carried out in this way it would also undermine and destroy all the successful efforts made by people like ourselves over the decades, to help build a strong and stable local community and to improve local facilities - not destroy them. It is very peaceful and pleasant around Broadwater Farm nowadays and nothing like the myth always trumpeted in the media every time Broadwater Farm is mentioned.</p> <p>Who is this proposed development for ? Who will gain the most out of it? Not the people living here we suspect. At a cursory glance these proposals are not about the people and communities here really at all, but are a high-handed planning exercise aimed at satisfying the government and GLA's <b>need for more</b> housing in Haringey - and the property developers and landlords who will make themselves even richer from all this redeveloped land.</p> <p><b>This not "Regeneration" but "Redevelopment"</b> and the way this whole process has been</p>		<p>considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this <b>point. Home's for</b> Haringey have commenced early engagement with residents in the area to understand what <b>residents like or don't</b> like about the estate, but as yet no formal engagement has taken place on developing a masterplan to set out the improvement needed or desired. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
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					<p>carried out so far is not democratic. The local people who live and work here should have been involved in the process right from the outset. There should be a committee or forum of local neighbourhood stakeholders who can best represent the interests of the people from this area - who should have been consulted first before any plans or red zones were even drawn up.</p> <p>This present red zone and all the plans and rumours that have gone with it is frightening people and making their future security uncertain. This is unacceptable and the red zone should be withdrawn immediately so that these initial discussions can take place properly, democratically - and without fear and anger.</p>		
224	RSA 354	SA62	Not stated	Not stated	<p>As a local Tottenham resident who also runs a successful community gardening project at Broadwater Farm Community Centre, I object strongly to the way this draft Local Plan proposal SA62 proposing a possible demolition and redevelopment zone for the area including Broadwater Farm Community Centre, Broadwater Farm Estate, Somerset Close, Lido Square, Moira Close, and some of the houses along Lordship Lane.</p> <p>Nobody living or working here has been consulted from the outset about these proposals that would affect their homes and lives. If were to go ahead would cause displacement and disruption for years and so massive stress to many as well as planning</p>	Withdrawal of the site allocation	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is</p>

				<p>blight. Carried out in this way it would also undermine and destroy all the successful efforts made by people like ourselves over the decades, to build a strong and stable local community and to improve local facilities. It is very peaceful and pleasant around here nowadays and nothing like the myth always trumpeted in the media everytime Broadwater Farm is mentioned.</p> <p>Who is this proposed development for ? Who will gain the most out of it? Not the people here we suspect. At a cursory glance these proposals are not about the people and communities here but are a high-handed planning exercise aimed at satisfying the <b>government and GLA's need for more housing</b> in Haringey and the property developers and landlords who will make themselves even richer from this redeveloped land.</p> <p><b>This not "Regeneration" but "Redevelopment"</b> and the way this whole process has been carried out so far is not democratic. The local people who live and work here should have been involved in the process right from the outset There should be a committee or forum of local neighbourhood stakeholders who can best represent the interests of the people from this area, who should have been consulted before any plans or red zones were even drawn up.</p> <p>This present red zone and all the plans and rumours that have gone with it is frightening</p>		<p>considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this <b>point. Home's for Haringey</b> have commenced early engagement with residents in the area to understand what <b>residents like or don't like</b> about the estate, but as yet no formal engagement has taken place on developing a masterplan to set out the improvement needed or desired. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
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					people. This is unacceptable and the red zone should be withdrawn immediately so that these initial discussions can take place properly, democratically and without fear and anger.		
225	RSA 355	SA62			<p>My family have lived in Lido Square since Lido Square was built, we were one of the first families to move in. We are not just neighbours but a small family. We share good and bad events and have helped each other throughout the decades.</p> <p>We object strongly to the draft Local Plan proposal SA62 for demolition and redevelopment 'red-zone' covering Broadwater Farm, Somerset Close, Lido Square, Moira Close, and some houses along Lordship Lane. The proposal would cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. It is unacceptable &amp; should be withdrawn immediately. Instead the Council must work with the community to protect, support &amp; improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition which would not require a site allocation in this plan.</p>	Withdrawal of the site allocation	Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this <b>point</b> . Home's for Haringey have commenced early engagement with residents in the area

					Please reconsider this proposal.		to understand what <b>residents like or don't</b> like about the estate, but as yet no formal engagement has taken place on developing a masterplan to set out the improvement needed or desired. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents.  No change
227	RSA 357	SA56-65	No	Not Stated	Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <i><b>Our Tottenham network brings together 50 key local community groups, projects and campaigns</b></i> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a> ). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.  <i>Organisations affiliated to the Our Tottenham network include</i>	Not specifically stated	Noted.

				<p>(as of 1.03.2016):</p> <ul style="list-style-type: none"> <li>Bull Lane Playing Fields Campaign / Weir Hall Action Group</li> <li>Chestnuts Community Centre</li> <li>Clyde Area Residents Association</li> <li>Day-Mer</li> <li>Defend Haringey Health Services</li> <li>Dissident Sound Industry Studios</li> <li>Find Your Voice</li> <li>Friends of Downhills Park</li> <li>Friends of Lordship Rec</li> <li>Growing-In-Haringey Network</li> <li>Haringey Alliance for Public Services</li> <li>Haringey Defend Council Housing</li> <li>Haringey Federation of Residents Associations</li> <li>Haringey Friends of Parks Forum</li> <li>Haringey Green Party</li> <li>Haringey Housing Action Group</li> <li>Haringey Independent Cinema</li> <li>Haringey Justice for Palestinians</li> <li>Haringey Left Unity</li> <li>Haringey Living Streets</li> <li><b>Haringey Needs St Ann's Hospital</b></li> <li>Haringey Private Tenants Action Group</li> <li>Haringey Solidarity Group</li> <li>Haringey Trades Union Council</li> <li>Living Under One Sun</li> <li>Lord Morrison Hall / Afro International</li> <li>N.London Community House</li> <li>Peoples World Carnival Band</li> <li>Selby Centre</li> <li>The Banc</li> <li>Tottenham and Wood Green Friends of the Earth</li> <li>Tottenham Chances</li> </ul>		
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				<p>Tottenham Civic Society  Tottenham Community Choir  Tottenham Community Sports Centre  Tottenham Concerned Residents Committee  Tottenham Rights  Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b></p> <p>See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a>.</p> <p>This response, formulated by the <i>Our Tottenham Planning Policy Working Group</i> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham Local Economy Working Group</i>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham network</i> at our first Community Conference on 6 April 2013 (available here:</p>	
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				<p><a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>. This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham</i> network are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p>[Attached as an appendix to the representation]</p> <p>This response builds upon the previous responses we submitted:</p> <p>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>;</p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here:</p> <p><a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf</a></p> <p><a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in conjunction with the separate responses we</p>		
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					<p>have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (hereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.  <b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>		
227	RSA 361	<b>SA62: Broadwater Farm Area:</b>	Not stated	Not stated	<p>Our Tottenham fully endorses the response of the Broadwater Farm Residents’ Association regarding this matter. See our detailed comments about the <b>soundness of the Housing Estate ‘renewal and improvement’ approach</b> taken by the Council in our separate responses on the <i>Alterations to Strategic Policies</i> and on the <i>Tottenham AAP</i>. <b>We contest the ‘red lining’ of housing estates for future redevelopment into ‘mixed communities’ on the grounds explained in our comments.</b></p>	<p>We demand the following principles to be explicitly included in the Site Requirement s and Development Guidelines in the Site Allocation DPD:          No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the</p>	<p>Objection is noted. The Council has proposed in Policy SA62 to consider how to improve housing estates, and improve permeability within the area. The inclusion of this site within the Site Allocations document is considered necessary due to the size of the estate, and the opportunities that exist to improve conditions for residents. It is considered that improvements could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate</p>

						<p>existing resident tenants as the drivers of all the decision-making related to their homes. Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants. There should be absolutely NO NET</p>	<p>further engagement regarding how this site can be improved for the benefit of local residents.</p> <p>No change</p>
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						LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. Social housing in this context is housing at rents equivalent to existing council housing levels with permanent, secure tenancies.	
230	RSA 369	SA62: Broadwater Farm area	Not Stated	Not Stated	(London Plan Reference: Various, especially policies 3.9, 3.14 and 7.17) Further to GLA representations at preferred option stage, the removal of Lordship Lane recreation ground (an area of Metropolitan Open Land) from this allocation is supported.	None	Noted.

**SA 63: The Selby Centre**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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4	RSA26	SA63	Not stated	Not stated	Existing community uses should be re-provided, including the wood recycling facility. And development should provide a green link to the Weir Hall Open Space.	Not specifically stated	Noted. Policy DM49 provide protection against the loss of community facilities and any proposal would need to meet the requirements therein.  No change
49	RSA143	SA 63	Not stated	Not stated	<p>The Selby Centre is a unique and high performing community hub run by the Selby Trust. Sometimes the actual quality of the Selby's work is underestimated and undervalued because the project is judged by its environment and not its achievements. The Selby Centre is a colocation of 100+ social action organisations who between them deliver health, education, employment, social enterprise, voter engagement, democracy, recycling, sports, youth, safe cycling, refugee support, food bank, advice, community debate and cultural events and projects all from this site. The net worth of these projects is cautiously estimated at £3.5 million per annum and all those benefiting are people living in the surrounding deprived communities. There are 217 FTE staff on site and projects support further jobs in the community. Appendix 1 sets out the current annual estimate of value created by the Selby Trust in a year.</p> <p><u>SITE DESCRIPTION AND CONTEXT</u> The site is an old school site located in a cul-de-sac at</p>	<p>SUMMARY OF REQUESTED CHANGES FOR SA63:</p> <p>Page Site requirements, p153, - First bullet point to be amended as follows: The future consolidated re-provision of all the existing community uses should be secured as part of</p>	<p>It is considered that the policy, along with policies SP16, and DM49 seek to ensure that appropriate community uses are protected, and provided on all sites.</p> <p>It is not considered that the engagement of the Selby</p>

				<p>the end of Selby Road on the northernmost boundary of the borough. The land is owned by the Council but transferred on a long lease to The Selby Centre in 1997. To the north is a playing field located in Enfield but also owned by the London Borough of Haringey called Bull Lane and this may provide some further development opportunity to the site as mentioned in the SSAD.</p> <p>The site is 10 minute walk from Tottenham High Road and equidistant from Great Cambridge Road and is rated PTAL level 2. It is also a 6 minute walk from White Hart Lane Station. The Site is registered as an Asset of Community Value.</p> <p><u>RESPONSE TO SITE ALLOCATION</u> We have made comments on previous drafts of the SSAD and we acknowledge that some changes have been made in response to those comments (corrected description of current use; inclusion of the need to consolidate community use; inclusion of status as asset of community value, concur that site capacity is still to be determined). While we acknowledge the principle of development that inclusion of a site in the SSAD confers we do not consider the draft SSAD goes far enough to ensure the long term sustainability of the community asset and the value it delivers for the community.</p> <p>There are four main issues we will raise that We consider will improve the site proposals and we will provide evidence to support our points, this being one of the key tests for further changes at this stage of the process. The points we will address are: - Importance of replacing community asset in a manner that secures flexible, sustainable space to deliver a growing range of community services to the people of</p>	<p>redevelopment providing a replacement community asset in a manner that secures flexible, sustainable space ideally within the existing site - And to also include a third bullet point as follows: Employment levels currently on site to be retained at existing levels and potentially maximised</p> <p>Page Development Guidelines, p153, to also include - The Community should be a key partner to the development</p>	<p>Trust as a delivery partner is an issue that the Local Plan has control over.</p> <p>Regarding employment, the site is currently considered to be in community use. While it is noted that this use is a creator of employment locally, it is the community use that is to be protected, not an employment one. As such, it is hoped that the reprovision of the community use will ensure that</p>
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				<p>Tottenham in order to improve Social Value</p> <ul style="list-style-type: none"> <li>- Approach to development needs to engage the Selby Trust as a community partner</li> <li>-Additional mention to be added in relation to maintaining and increasing job numbers on the site</li> <li>- Retaining a proportion of community greenspace as open space</li> </ul> <p><u>Importance of replacing community asset in a manner that secures flexible, sustainable space to deliver a growing range of community services to the people of Tottenham in order to improve Social Value</u></p> <p>The current Selby Centre delivers a lot of social value into the very deprived communities in east Haringey. However, the current buildings, while offering varied space for a range of projects also cause problems as they are old and inefficient to run. The heating, insulation and repair bills alone cost the organisation in excess of circa £100,000 a year. Monies which could otherwise be put to good use supporting community development. New, flexible, sustainable space would enable improved and increased service delivery in the area.</p> <p>Haringey Local Plan Policy SP16:</p> <p>COM M U N I T Y FACILITIES states that <i>'the Council will work with its partners to ensure that appropriate improvement and enhancements, and where possible, protection of community facilities and services are provided for Haringey's communities. This will be based on the programming, delivery, monitoring and updating of the Infrastructure Delivery Plan and Schedule which cover projects for: • Health (see also SP14); • Education; • Social care; • Libraries and Museums (see also SP15);</i></p>	<p>process to ensure that community development activities remain at the heart of the site</p> <ul style="list-style-type: none"> <li>- There is potential for all or part of the development to be brought forward under the Community Right to Build</li> <li>- Retention of a significant amount of open space should be included in the new development to support the community use</li> </ul> <p>The Selby Trust understand the need for development and in fact see</p>	<p>employment numbers are replaced in the consolidated facility.</p> <p>It is considered, in the context of the site being surrounded by open space, that the non-designated open space on this site does not require specific protection in the Plan, and that doing so may compromise a potential development of the site.</p> <p>No change</p>
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				<p>• <b>Open Spaces and environmental improvements</b> (see also SP13); " <i>Community and youth facilities; " Play facilities (see also SP13); Leisure (see also SP 15); • Emergency Services; • Transport (see also SP7); • Waste (see also SP5); • Water Supply and Sewerage (see also SP5); • Towards a low carbon borough (SP4); and • Energy and Telecommunication Services. The Council will: • Expect development that increases the demand for community facilities and services to make appropriate contributions towards providing new facilities or improving existing facilities; and • Promote the efficient use of community facilities and the provision of multi-purpose community facilities.</i> ' </p> <p>As the description of services provided by the Selby has shown the Trust deliver not just a single community function but multiple functions covering many of the above services. Therefore we consider the SSAD needs to be explicit in stating what form of community provision needs to be protected in any redevelopment.</p> <p>In addition Local Plan Policies SP14: HEALTH AND WELL-BEING states that <i>'the Council will seek to improve health and wellbeing in Haringey. The Council will: • Work with NHS Haringey in its goal to reduce health inequalities in the areas with poorest health; .....; • Prioritise interventions and resources to those areas of the borough where health inequalities are greatest; and • Support the integration of community facilities and services, i.e. health, education, cultural and leisure in multi-purpose buildings.'</i></p> <p>And SP15: CULTURE AND LEISURE <i>'The Council will safeguard and foster the borough's cultural heritage and promote cultural industries and activities through: ....3.</i></p>	<p>it as part of the solution for them to move from old, inefficient space to modern, flexible, energy efficient facilities fit for the future. However, as it remains important to ensure that this unique and valuable community asset continues serving the population of Tottenham, we consider that the SSAD needs to highlight the community role in planning and delivering redevelopment with the Council and any future</p>	
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				<p><i>Protecting and enhancing, where feasible, existing cultural facilities and access to cultural heritage throughout the borough. The Council will safeguard and foster the borough's existing recreational and sporting facilities through:</i></p> <ul style="list-style-type: none"> <li>• <i>The protection and enhancement of sporting and leisure facilities in areas of deficiency; and</i></li> <li>• <b><i>The dual use of the borough's cultural assets, such as land and buildings to meet the needs of local communities, for example meeting space, arts and leisure activities, opportunities for recreation and sport.'</i></b></li> </ul> <p>The Social Value of community activity is highlighted in numerous policy papers but two examples are provided here as evidence to support the Selby Trust's position. The NIACE [National institute of Adult Continuing Education - now part of the Learning and Work Institute] briefing paper on the social value of adult learning 2010 concludes that adult learning can impact on health, well-being and building stronger communities in a very specific and measurable way. The benefits include residents gaining new skills, feeling less isolated, being involved in the community, taking up volunteering, neighbourhoods feeling safer and improved partnership working. The Selby Centre projects deliver many of these outcomes and more.</p> <p>The full briefing paper can be found at the link below: (Council note: web link has been excluded for formatting reasons - see original response for link).</p> <p>The Arts Council have also assessed the benefit of Arts and Culture on people's lives and claim key benefits for the economy, health and wellbeing, society and education. The Selby Centre is an arts and cultural organisation for that most disadvantaged sector of the</p>	<p>development partner and that further protection is afforded to employment levels on site.</p>	
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				<p>community for whom traditional arts centres seem inaccessible and inappropriate. To that extent we make the case that the same benefits are achieved by the Selby for a very impoverished sector of the community. The full 2014 paper can be found here: (Council note: web link has been excluded for formatting reasons - see original response for link).</p> <p><u>Approach to development needs to engage the Selby Centre as a community partner</u></p> <p>The Selby Trust are concerned that new proposals by the Council as to how community groups shall be granted leases mean that after the end of their current long lease in six and a half years they will only be granted a short term lease. Further that as the Council owns the freehold the Selby Trust will not have enough 'interest' in the site in commercial terms to be an equal development partner. We realise landlord and tenant law are not the proviso of Planning so we will not go into details and are not expecting this process to comment on that, however, for information the report is attached as Appendix 2. What we are seeking is that the SSAD is clear that the community benefits on this site are a function of the community itself and not just that land and that to ensure the ongoing services are still delivered the community should be a key partner to the development process.</p> <p>The evidence we provide to support this case is even contained within Town Planning legislation - the principle that communities and neighbourhoods are better designed if the community is engaged. This case is made strongly by Locality in their documentation. (Council note: web link has been excluded for formatting reasons - see original response for link).</p>		
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				<p>While the Trust is not seeking to develop a neighbourhood plan for the area many of the principles of neighbourhood planning apply to the Selby Centre site and with appropriate wording in the SSAD to strengthen the role for community engagement in the redevelopment of the site we consider a much improved outcome will be achieved.</p> <p>The Selby Trust is applying to Big Potential Advanced to secure funding to help it become investment ready. As a partner in the development process the Selby Trust can ensure the needs of the community are correctly specified; ensure the further development will be appropriate; secure funding and resources not available to the private and public sectors.</p> <p>The Selby Centre was conceived in 1986, making 2016 its 30th year as a community space. The Trust has retained a focus on its mission of providing affordable community space, successfully and consistently generating over 75% of its income from these activities. The Selby Trust itself has been delivering services from the site for 23 years and aim to continue as long as the community has need of the Centre.</p> <p>Furthermore the site is registered as an Asset of Community Value and this gives at least five years of protection to the role of the community in future land transactions.</p> <p>The Selby Trust would like to call on provisions in the Localism Act which provide for a route to development known as the Community Right to Build and which are vested by way of an order. We would like the SSAD to highlight this as a potential route to development for the</p>		
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				<p>Selby Centre. We understand that a Community Right to Build Order is a form of Neighbourhood Development Order and would require a referendum to take place but that if successful it could offer an alternative to traditional planning processes. The Selby Trust are at an early stage in establishing their own understanding of the site, the future community use needs, investment mechanisms etc and at this stage we are ambitious but not unrealistic. We simply wish to formally acknowledge this as a potential route for the future transformation of all or part of the site.</p> <p><u>Additional mention to be added in relation to maintaining and increasing job numbers on the site</u></p> <p>The site is currently host to 217 FTE jobs on site and we do not wish to see employment levels fall either on this site or in the wider deprived community of White Hart Lane ward. Therefore we are seeking that the SSAD mention the need to retain and, ideally, enhance the jobs levels on site. White Hart Lane ward is the second most deprived ward in Haringey and amongst the 5% most deprived wards in the country. The employment level in White Hart Lane ward is 54.8% compared to 67.5% in Haringey and 69.2% in London [2011 Census data]. More ward level data compared to the borough can be found here (Council note: web link has been excluded for formatting reasons - see original response for link) and the figures highlight the deprivation levels locally and the need for a project such as the Selby Centre.</p> <p>The site currently is host to 100+ organisations who are regular users and on licenses from the Selby Trust (the head lessee) and who all provide valuable services within the local economy and a number of jobs to the local community. There is a continued need for a mixed</p>		
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				<p>range affordable workspace on this site and the variety of jobs these sites offer. The Haringey Core Strategy Policy SP9: IMPROVING SKILLS AND TRAINING TO SUPPORT ACCESS TO JOBS AND COMMUNITY COHESION AND INCLUSION states that 'The Council will seek to address unemployment by facilitating training opportunities for the local population, increasing the employment offered in the borough and allocating land for employment purposes. The Council will encourage the provision and growth of education and training facilities within the borough in areas such as Haringey Heartlands and Tottenham Hale and areas of high unemployment. The Council will promote the diversification of the borough's economy and support new and expanding employment sectors such as green industries, small and medium sized enterprises. The Council will secure financial contributions from development that results in a net loss of employment floorspace to invest in training and other initiatives that seek to promote employment and adult education in the borough.'</p> <p>The Federation of Small Businesses and the New Economics Foundation both regularly make the case for retention and improvement of workspace for small businesses through the JustSpace Campaign <a href="http://www.justspacc.org">http://www.justspacc.org</a> . This site identifies an ongoing campaign by small businesses and other stakeholders not to see the continual erosion of industrial and employment land in London and in particular looks at ways the planning system currently contributes to the issue and how it can be used as a solution not a cause.</p>		
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				<p>London's Industrial Land: Cause for Concern is a working paper produced by Jessica Ferm and Edward Jones of the Bartlett School of Planning UCL in February 2015 (Council note: web link has been excluded for formatting reasons - see original response for link). The authors of this study conclude on pages 37-39 that development pressure and planning policy have played a role in the loss of employment land as well as deindustrialisation, exacerbated by the Government's permitted development rights facilitating the conversion of industrial land to residential. Ferm Jones go on to say that 'in contrast to what downward spiralling projections suggest evidence on the ground indicates that manufacturing is changing but not dead'. The articulate that 'hidden industrial sites house businesses that are part of the local economic ecosystem and that relocation of these businesses is more problematic than often appreciated' a point we would reiterate. The allocation of this site for a mix of residential and employment uses will likely result in a further loss of employment land above the planned level of release intended for London and Haringey.</p> <p>Haringey's own Employment Land Study (February 2015) provides an analysis of the local property market. Due to its size this site is not classified as a Defined Employment Area within the borough but it is an employment area nonetheless. At 3.7 on page 13 the report notes ' there is a perceived lack of supply of build developments catering for industrial and warehousing uses, local commercial agents noted there was high occupancy in the existing protected areas. The stakeholder consultees identified the Borough was suffering from limited Industrial stock and competing pressure from other uses e.g. residential'.</p>		
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				<p>At 3.18 the report notes there is 'a lack of suitable B1c/B2 stock across the borough. There is an insufficient supply of employment locations with enough capacity to accommodate additional B1c/ B2 industrial (Uses across the Borough. Local commercial agents consider that additional sites need to be brought forward ...in order to accommodate SMEs.' Figure 5.1 in the report shows there has been a steady decline in industrial floorspace since 2004.</p> <p>If employment numbers were lost on the Selby Centre site those community organisations would be seeking land in industrial and other lower value sites but as these sites are already in demand it is likely that the community would struggle to find alternative suitable accommodation. For this reason we would like the SSAD to protect and potentially enhance employment numbers on this site. Protecting the levels of employment also works to protect the volunteering, learning and training opportunities available on the site.</p> <p>With the opening of four Crossrail 2 stations in Haringey in the coming years employment land will be in even greater demand. This is supported by recent research from Bilfinger GVA on Economic Growth Forecasts over the next 20 years. They predict that by 2036t jobs growth in zones one and two will reach an average of 16%, compared to 13% in zone one with Haringey forecast to see a 23% increase in jobs.</p> <p><u>Retaining a proportion of community greenspace</u> The SSAD makes no particular mention of the importance of open space; neither to the existing community activities nor to the future redevelopment.</p>		
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					<p>The Council's Local Plan Policy SP13: Open Space and Biodiversity states that 'New development shall protect and improve Haringey's parks and open spaces. All new development shall:</p> <ul style="list-style-type: none"> <li>• <b>Protect and enhance, and when and where possible,</b> extend the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development;</li> <li>• <b>Provide amenity space in</b> accordance with the Council's Open Space and Recreational Standards Supplementary Planning Document (SPD);</li> <li>• <b>Manage the impact of such new developments in</b> areas adjacent to designated open space;</li> <li>• <b>Secure Improvements, enhancement and management</b> in both quality and access to existing green spaces;</li> <li>• <b>Seek on-site or financial contributions</b> towards open space from new developments as set out in the Open Space and Recreational Standards SPD;</li> <li>• <b>Seek to secure opportunities for additional publicly accessible open space</b> especially in those identified areas of Open Space deficiency .....</li> </ul> <p>Haringey's Open Space and Recreation Standards SPD (March 2008) highlights areas where there is an open space deficiency. The SPD sets out areas of open space deficiency in Map B.1 and this identifies parts of White Hart Lane ward as deficient, albeit not the area of the site. Despite this maintaining an open space on the site available to the wider community will be an important contribution to standards as future intensification takes place. It will also be important to support future housing</p>	
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					<p>and affordable housing that may be developed on site.</p> <p>The Selby Trust has recently developed a Global Garden project financed through a crowdfunding scheme which raised £11,000 and which creates a garden for the community, providing local amenity, supporting small wildlife and delivering positive community led outcomes in terms of food growing, mental health, exercise and training.</p> <p>The project is run by volunteers, both local and corporate. The positive outcomes delivered by this scheme are dependent on an amount of open space being available to the community. We are therefore seeking that the SSAD safeguard an amount of open space on site for community use.</p> <p>(Council note: See original response for <u>Annexes</u> referred above)</p>		
22 7	RSA357	SA56-65	No	Not Stated	<p>Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <b><i>Our Tottenham</i></b> network brings together <b>50 key local community groups, projects and campaigns</b> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.</p> <p><b>Organisations affiliated to the <i>Our Tottenham</i> network include</b> (as of 1.03.2016): Bull Lane Playing Fields Campaign / Weir Hall Action</p>	Not specifically stated	Noted.

					Group Chestnuts Community Centre Clyde Area Residents Association Day-Mer Defend Haringey Health Services Dissident Sound Industry Studios Find Your Voice Friends of Downhills Park Friends of Lordship Rec Growing-In-Haringey Network Haringey Alliance for Public Services Haringey Defend Council Housing Haringey Federation of Residents Associations Haringey Friends of Parks Forum Haringey Green Party Haringey Housing Action Group Haringey Independent Cinema Haringey Justice for Palestinians Haringey Left Unity Haringey Living Streets <b>Haringey Needs St Ann's Hospital</b> Haringey Private Tenants Action Group Haringey Solidarity Group Haringey Trades Union Council Living Under One Sun Lord Morrison Hall / Afro International N.London Community House Peoples World Carnival Band Selby Centre The Banc Tottenham and Wood Green Friends of the Earth Tottenham Chances Tottenham Civic Society Tottenham Community Choir Tottenham Community Sports Centre		
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				<p>Tottenham Concerned Residents Committee  Tottenham Rights  Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b>  See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a>.</p> <p>This response, formulated by the <i>Our Tottenham Planning Policy Working Group</i> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham Local Economy Working Group</i>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham network</i> at our first Community Conference on 6 April 2013 (available here:  <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>.  This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham network</i> are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p>[Attached as an appendix to the representation]</p>		
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					<p><b>This response builds upon the previous responses we submitted:</b></p> <p>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>;</p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here:  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf</a>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (hereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.</p> <p><b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>		
227	RSA362	<b>SA63: The Selby Centre</b>	Not stated	Not stated	Our Tottenham absolutely supports the retention of the Selby Centre as a multi-use community centre. We seek reassurance that inclusion in the Site Allocations will lead to no loss of community meeting space.	Not specifically stated	Noted, it is considered that the Allocation provides for this, if it is necessary as does Policy DM49  No change

SA 64: The Roundway

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
50	RSA144	SA64	Not stated	Not stated	<p>I am writing on behalf of Tottenham Civic Society regarding this site, 315 Roundway, which is included in your plans as a potential redevelopment site, with flats of several storeys. Picture attached with view from the west.</p> <p>The view of our Society has always been that this site is not at all suitable for tall buildings.</p> <p>It is bounded on all sides by low rise, two storey buildings, including cottage garden estates, and the slightly higher buildings of Bruce Castle, All Hallows Church, the Emhurst pub, and Risley Avenue School. All of these buildings are in conservation areas and some are nationally listed, and together they form the centre of medieval Tottenham and one of its cultural hearts.</p> <p>To impose a large new residential structure in the middle of this situation would be to compromise all of the other heritage buildings and be to the detriment of the surrounding conservation areas. Church Lane, which bounds the site to the east, is a road of great character and seclusion in this part of the borough.</p> <p>We understand that it is proposed to include the petrol station in the development area, and the acquisition costs of this would therefore mandate an intensive use of the site. We would argue that it would be simpler to exclude the petrol station from the development area, and to therefore make a less intensive land use more achievable, realistic and</p>	As set out in the representation	<p>Policy DM6 of the DMDPD sets out areas in which tall buildings will be acceptable, with this not being one. The potential intensity of development on this site will be required to have reference to its surrounding context in accordance with Policy DM1.</p> <p>Regarding the petrol station site, it is considered that the approach proposed allows flexibility within the scheme, and if the sites are in separate</p>

					<p>affordable.</p> <p>We have previously argued against a large block of flats on this site and the matter has been taken to the Planning Inspectorate, which agreed with us. The developer subsequently produced a new plan for two storey houses, which unfortunately never came to fruition but which we believe is the best possible solution to this site. We would consider three storeys the absolute maximum justified in this sensitive location.</p> <p>We would also argue that there are many other areas within Haringey that have the potential for more intensive but less intrusive development and we will be writing further on this in due course.</p>		<p>ownership, this would not transfer the financial burden of acquiring one part of it onto the design of another in the manner inferred. Instead, if one section of the site comes forward, the applicant will be required to show how the proposal can be compatible with the remainder of the site.</p> <p>The Council agree that other areas should be, and are the focus for regeneration within the borough, but believe this is a suitable site for redevelopment.</p> <p>No change</p>
22	RSA35	SA56-65	No	Not	Tottenham is a great place with a rich social and architectural	Not	Noted.

7	7			Stated	<p>history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <i>Our Tottenham network brings together 50 key local community groups, projects and campaigns</i> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.</p> <p><b>Organisations affiliated to the <i>Our Tottenham</i> network include</b> (as of 1.03.2016):</p> <ul style="list-style-type: none"> <li>Bull Lane Playing Fields Campaign / Weir Hall Action Group</li> <li>Chestnuts Community Centre</li> <li>Clyde Area Residents Association</li> <li>Day-Mer</li> <li>Defend Haringey Health Services</li> <li>Dissident Sound Industry Studios</li> <li>Find Your Voice</li> <li>Friends of Downhills Park</li> <li>Friends of Lordship Rec</li> <li>Growing-In-Haringey Network</li> <li>Haringey Alliance for Public Services</li> <li>Haringey Defend Council Housing</li> <li>Haringey Federation of Residents Associations</li> <li>Haringey Friends of Parks Forum</li> <li>Haringey Green Party</li> <li>Haringey Housing Action Group</li> <li>Haringey Independent Cinema</li> <li>Haringey Justice for Palestinians</li> <li>Haringey Left Unity</li> <li>Haringey Living Streets</li> <li><b>Haringey Needs St Ann's Hospital</b></li> </ul>	specifically stated	
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				<p>Haringey Private Tenants Action Group  Haringey Solidarity Group  Haringey Trades Union Council  Living Under One Sun  Lord Morrison Hall / Afro International  N.London Community House  Peoples World Carnival Band  Selby Centre  The Banc  Tottenham and Wood Green Friends of the Earth  Tottenham Chances  Tottenham Civic Society  Tottenham Community Choir  Tottenham Community Sports Centre  Tottenham Concerned Residents Committee  Tottenham Rights  Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b>  See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supportinggroups/">http://ourtottenham.org.uk/about/supportinggroups/</a>  <a href="http://ourtottenham.org.uk/about/supporting-groups/">http://ourtottenham.org.uk/about/supporting-groups/</a>.</p> <p>This response, formulated by the <i>Our Tottenham Planning Policy Working Group</i> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham Local Economy</i></p>	
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				<p><b>Working Group</b>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham</i> network at our first Community Conference on 6 April 2013 (available here: <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>). This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham</i> network are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p><b>[Attached as an appendix to the representation]</b></p> <p><b>This response builds upon the previous responses we submitted:</b></p> <p>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>,</p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here:  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf</a>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (thereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.</p> <p><b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>	
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23 2	RSA38 7	SA 64 The Roundw ay	Not state d	Not state d	it is noted that the site allocation is located opposite Bruce Castle Museum and within the historic medieval core We therefore would suggest that the site requirements are amended to include a reference to the potential for significant archaeology.		<b>Amend the site requirements to include a reference to the potential for significant archaeology.</b>
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#### SA 65: Leabank & Lemsford Close

ID	Rep ID	Allocatio n / Policy / Figure / Para	Soun d	Legally Complia nt	Reason	Change Sought	<b>Council's Comments / Response</b>
4	RSA27	SA65	Not state d	Not state d	Any development should provide a green frontage to the river, helping link Markfield Park to the Springfield Park site to the south.	Not specifically stated	It is considered that the safeguarding of the riverside foot/cycle path is appropriate on this site to enable this link.  No change
51	RSA14 5	SA 65	Not state d	Not state d	This site has a significant boundary with the River Lee Navigation and its towpath, which is owned and managed by the Trust. The site currently has a very poor relationship with the waterspace.	We would like the allocation detail to be amended to require more emphasis on improving the openness of the site to the towpath, and enhancing the waterside environment. This would be through the site layout, and also	<b>Agreed in part – propose a minor modification to the first site requirement to include the Canal and River Trust and to the 4<sup>th</sup> bullet point to refer to the towpath. Within</b>

						appropriate landscaping. We would also request that any future developer be encouraged to consult at a very early stage of their site design with the Canal & River Trust. We would also request they contribute to improvements to the towpath and accesses.	<b>the Development Guidelines, at the 6<sup>th</sup> bullet point, add a reference to London Plan policies 7.28: Restoration of the Blue Ribbon Network and 7.30: London's Canal's and other River and Waterspaces.</b>
52	RSA14 6	SA65/ 2.176	No	No	I am a leaseholder of a flat in Leabank View and Lemsford Close (SA65). There is no reason given in the Site Allocations DPD for the destruction of the estate aside from the potential for more housing stock, however there is also a recognition that this potential is limited due to height restrictions. Adding a small number of properties does not justify the considerable distress and disruption of destroying people's homes (not to mention the disruption to the neighbourhood). Furthermore there is no suggestion that any new homes would benefit local residents in housing need. The estate is very quiet and has no social problems. The neighbours are friendly and on good terms. There are areas where children play and the park is next door. It feels safe. The buildings are in good condition and have recently undergone a number of improvements. I live in a block of six flats and it is sturdy, functional and secure. Many of the residents have lived	Remove SA65 from the site allocation DPD. The DPD does not provide sound reasons for such a wholesale destruction of people's homes.	The potential public benefit that the redevelopment will serve is through the creation of additional affordable homes in the borough.  The allocation identifies an indicative net capacity for the site of 65 units, which it is considered can make a significant contribution to meeting housing need locally.  No change

					here for extended periods (I know at least two of my neighbours in my block alone have lived here for more than 15 years each). To destroy people's homes for little overt benefit is wholly unsound.		
53	RSA148	SA65	Not stated	Not stated	I think it is very unfair to ask normal citizens about topics/situations like this, who would know about whether a local plan is legally compliant, all I know is that I love living here and would not want to move to make way for future development.	Not specifically stated	Noted.
54	RSA149	SA65	Not stated	Not stated	In reply to your letter regarding estate renewal program, I would like to remind you that Leabank View and Lemsford Close was improved under Decent Homes Programme few years ago, and the Council spent millions of pounds on the works, so to demolish the estate is a waste of money and the sheer lunacy. I'm totally against your plans to demolish perfectly adequate flats and houses, and replace them with some high rise building that will be at odds with the area. Haringey needs to build more council properties, but to get rid of good accommodation is totally wrong. Stop destroying good housing, and start building somewhere else.	Not specifically stated	Objection is noted.  The potential public benefit the redevelopment will serve is through the creation of additional affordable homes in the borough.  The allocation identifies an indicative net capacity for the site of 65 units, which it is considered can make a significant contribution to meeting housing need locally.  No change
22	RSA35	SA56-65	No	Not	Tottenham is a great place with a rich social	Not specifically stated	Noted.

7	7			<p>Stated</p> <p>and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The <i>Our Tottenham</i> network brings together <b>50 key local community groups, projects and campaigns</b> standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <a href="http://ourtottenham.org.uk/">http://ourtottenham.org.uk/</a>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.</p> <p><b>Organisations affiliated to the <i>Our Tottenham</i> network</b> include (as of 1.03.2016):</p> <ul style="list-style-type: none"> <li>Bull Lane Playing Fields Campaign / Weir Hall Action Group</li> <li>Chestnuts Community Centre</li> <li>Clyde Area Residents Association</li> <li>Day-Mer</li> <li>Defend Haringey Health Services</li> <li>Dissident Sound Industry Studios</li> <li>Find Your Voice</li> <li>Friends of Downhills Park</li> <li>Friends of Lordship Rec</li> <li>Growing-In-Haringey Network</li> <li>Haringey Alliance for Public Services</li> <li>Haringey Defend Council Housing</li> <li>Haringey Federation of Residents Associations</li> <li>Haringey Friends of Parks Forum</li> <li>Haringey Green Party</li> <li>Haringey Housing Action Group</li> </ul>		
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				<p>Haringey Independent Cinema  Haringey Justice for Palestinians  Haringey Left Unity  Haringey Living Streets  <b>Haringey Needs St Ann's Hospital</b>  Haringey Private Tenants Action Group  Haringey Solidarity Group  Haringey Trades Union Council  Living Under One Sun  Lord Morrison Hall / Afro International  N.London Community House  Peoples World Carnival Band  Selby Centre  The Banc  Tottenham and Wood Green Friends of the Earth  Tottenham Chances  Tottenham Civic Society  Tottenham Community Choir  Tottenham Community Sports Centre  Tottenham Concerned Residents Committee  Tottenham Rights  Tottenham Theatre  Tottenham Traders Partnership  Tower Gardens Residents Group  Tynemouth Area Residents Association  Ubele  University and College Union at CONEL  Urban Tattoo  Wards Corner Community Coalition  <b>1000 Mothers' March Organising Group</b>  <b>20's Plenty for Haringey</b>  See a description of our member at:  <a href="http://ourtottenham.org.uk/about/supporting">http://ourtottenham.org.uk/about/supporting</a></p>		
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				<p><a href="http://ourtottenham.org.uk/about/supporting-groups/">groups/ http://ourtottenham.org.uk/about/supporting-groups/</a>.</p> <p>This response, formulated by the <i>Our Tottenham Planning Policy Working Group</i> (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the <i>Our Tottenham Local Economy Working Group</i>, is based on the principles embedded in the <i>Community Charter for Tottenham</i> agreed by the <i>Our Tottenham network</i> at our first Community Conference on 6 April 2013 (available here: <a href="http://ourtottenham.wordpress.com/community-charter/">http://ourtottenham.wordpress.com/community-charter/</a>). This was followed up by two more Community conferences in February and October 2014. All the materials produced by the <i>Our Tottenham</i> network are available on our website. The <i>Our Tottenham Community Charter</i> and subsequent revisions are enclosed in <b>Appendix 1</b> of the present submission.</p> <p>[Attached as an appendix to the representation]</p> <p>This response builds upon the previous responses we submitted:</p>		
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					<p>i. in March 2014, in response to the public consultation on <i>the draft Tottenham APP Regulation 18 Consultation Document</i>;</p> <p>ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the <i>Site Allocations DPD, February 2015 version</i>. Our response (in two parts) is available here:  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_overall_response.pdf</a>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sa_detailed_response.pdf</a></p> <p>The present response needs to be read in conjunction with the separate responses we have submitted about the <i>Alterations to Strategic Policies 2011-2026</i> (thereafter referred to as <i>Alterations</i>) and about the <i>Tottenham AAP</i>.  <b>In this response we ONLY comment on the sites located East of the Borough, i.e. SA56 – SA65.</b></p>		
227	RSA363	<b>SA65: Leabank and Lemsford</b>	Not stated	Not stated	<p>See our detailed comments about the <b>soundness of the Housing Estate ‘renewal and improvement’ approach taken by the Council</b> in our separate responses on the <i>Alterations to Strategic Policies</i> and on the <i>Tottenham AAP</i>. We contest the ‘red lining’ of housing estates for future redevelopment into ‘mixed communities’ on the grounds explained in our comments.</p>	<p>We demand the following principles to be explicitly included in the Site Requirements and Development Guidelines for SA56 in the Site Allocation DPD:  No estate regeneration programme should go</p>	<p>The Council has, and will continue to engage with residents affected, or potentially affected by estate renewal programmes. The Council is</p>

				<p>We demand to see structural reports that would indicate that the homes here are uneconomic to improve. The presumption in favour of demolition is opposed. We find the case for inclusion on the site allocation not made to any extent. We demand improvement not demolition as an alternative to the unsound and unsubstantiated inclusion of this site on the list of site allocations. Leabank and Lemsford is a prime site for property developers to make profits by demolishing social housing and building private housing. We think it is very unlikely that existing council tenants will be rehoused here if the council properties are demolished. The proposal is unsound and inappropriate. The clear alternative is retention of existing housing.</p>	<p>ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing resident tenants as the drivers of all the decision-making related to their homes.</p> <p>Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.</p> <p>There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. Social housing in this context is housing at rents equivalent to existing council housing levels with permanent, secure tenancies.</p>	<p>undertaking a programme of estate renewal in order to increase <b>the borough's</b> stock of affordable housing, and feel it is essential to help meet the full range of housing need within the borough.</p> <p>No change</p>
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## Schedule of Proposals and Designations

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA28	Table 5	Not stated	Not stated	We ask for an added view, Lee Valley to Alexandra Palace. This view links two important areas of open space, it links the east and west of the borough, and provides a link from	Not specifically stated	<p>It is not clear where this view would be, and additionally how it would affect deliverability of the plan, as it potentially stands to be quite wide at the Lee Valley park end, which is <b>close to a number of the Plan's</b> growth areas.</p> <p>It is noted that there is one protected view from Watermead Way railway bridge, which is Lee Valley adjacent.</p> <p>No change</p>
221	RSA351	Schedule 6	Not stated	Not stated	We support the inclusion of Table 10 in Schedule 6. This provides an important resource to measure any loss or gain of Green Belt and Metropolitan Open Land in the future. We similarly support the inclusion of Table 11 on Significant Local Open Land and 12 on Ecologically Valuable Sites. We would urge the Council to ensure such data is shared with the Greater London Authority and Greenspace Information for Greater London (GiGL).	Not stated	<p><b>Noted. It should be noted that a minor modification is proposed to the Proposals Map to ensure each of these areas is labelled with its reference number on the Map.</b></p> <p>The data on Ecological Valuable Sites comes from GiGL.</p> <p>No change</p>

## No Policy Specified

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RSA6	Decentralised energy	Not stated	Not stated	We welcome the inclusion of this in the guidelines for most large sites. Our concern is whether this is strong enough –	Should it be in the requirements rather than guidelines to give it better purchase?	The policy requiring connection to an existing or emerging network is DM22, this only represents a cross-reference.  No change
48	RSA142	Whole Document	Not stated	Not stated	Sport England has no specific comments to make on the Alterations to the Strategic Policies (DPD) January 2016. It is not obvious that the proposed changes relate directly to any sporting matters.	No comment	Noted.
55	RSA150	N/A	Not stated	Not stated	These representations are made on behalf of Kennet Properties Ltd in relation to land at Hornsey Water Treatment Works. They are in <b>response to London Borough of Haringey's</b> consultation on their Site Allocations Development Plan Document (DPD) Preferred Options consultation.  1.2 Kennet Properties is a subsidiary development company within the Thames Water Group. Its remit is to identify land that is surplus, or could become surplus, to the operational requirements of Thames Water Utilities Limited and to promote it for alternative use. 1.3 The London Borough of Haringey commenced preparation of their Site Allocations DPD in 2013 by carrying out a Call for Sites	Include the Hornsey Filter Beds site in the Site Allocations DPD	The Council have identified sufficient sites to meet the <b>Borough's</b> objectively identified housing need, and London Plan housing target. This has been achieved without needing to develop MOL within the borough.  It is noted that this site was included in earlier versions of

				<p>consultation. At this time Kennet Properties Ltd promoted the Hornsey Filter Beds site which comprises of an area of 0.7 Ha in size.</p> <p>1.4 In January 2014 Haringey published their Site Allocations DPD Regulation 18 consultation within which the Hornsey Filter Beds site was identified as site HO2. Kennet Properties Ltd responded to this consultation supporting the allocation.</p> <p>1.5 The current Site Allocations DPD identifies the site as site SA48, Hornsey Water Treatment Works (WTW). The proposed site allocation does not include the whole WTW site but only the southern two filter beds, as identified by the location plan in Appendix 1. For clarity the site is therefore referred to within this consultation response as Hornsey Filter Beds.</p> <p>1.6 Kennet Properties Ltd continue to maintain that the Hornsey Filter Beds are suitable for residential use. In response to the current consultation stage for the Site and Allocations DPD these representations:  review housing need in Greater London and specifically the London Borough of Haringey  review the proposed site and its surroundings;  present a case for the need to redefine the Metropolitan Open Land boundary; and address some additional considerations including a new proposed footpath through Hornsey WTW and concerns with Odour.  Housing need in Greater London</p>	<p>the document, but was removed after consultation responses, including from the GLA, who formally designated for Metropolitan Open Land, raised objection to its inclusion.</p> <p>It is considered that in order for a reallocation of MOL at any point in the future, that in addition to the case being made that the land itself does not provide a MOL-appropriate use, there would need to be significant strategic benefit gained through the rezoning (above and beyond simply housing need, which has demonstrably been met on non-MOL sites), and will make a positive</p>
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				<p>2.1 In 2013 The Department for Communities and Local Government (DCLG) and Greater London Authority (GLA) released official housing statistics through the London Strategic Housing Market Assessment (SHMA) which <b>revealed that London’s housing need was greater</b> than was thought.</p> <p>2.2 It showed that London’s population has grown more over the last ten years than at any time in the capitals history and that housing supply has not kept up with this growing demand.</p> <p>2.3 With the capitals population expected to reach nine million by 2020, current housing supply levels suggest that there will be a deficit of 559,000 homes by 2021.</p> <p>2.4 In order to be able to keep up with this demand, and to address the current deficit, 809,000 homes need to be built in London by 2021.</p> <p>Housing Need in the London Borough of Haringey</p> <p>2.5 The GLA’s 2013 mid-year population estimates, which remain the most up-to-date projections available, estimates that the London <b>Borough of Haringey’s population stood at</b> 262,797 in 2013 and it is expected to grow to 293,748 people by 2026.</p>		<p>benefit to the surrounding MOL, Conservation Area, and other surrounding uses.</p> <p>No change</p>
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				<p>2.6 In order to meet this additional need the GLA in their Further Alteration to the London Plan (FALP) (2015) document set a challenging housing target for the Borough. Over the Plan period 2011 – 2026 they are required to deliver 19,802 new additional homes. This equates to 1,502 new homes per annum.</p> <p>2.7 The Council has prepared the Tottenham Area Action Plan and the Site Allocations DPD which had identified sites for only 18,656 net additional dwellings. The Council is there not yet able to demonstrate that it can meet its full housing requirement and as a consequence it is imperative that those site suggested for allocation are carried forward to adoption.</p> <p>How can Hornsey Filter Beds contribute to <b>Haringey's Housing Target</b></p> <p>2.8 The Hornsey Filter Beds site will help to address the housing need in Haringey by delivering approximately 40 units, on a site which has been previously developed, is in a sustainable location and is well related to the existing residential neighborhood.</p> <p>The Site and its Surroundings</p> <p>3.1. Hornsey Water Treatment Works (WTW) is located immediately west of the East Coast Main Line Railway, south and east of Alexandra Park, north of Newlands Road, the Campsbourne Estate and the New River Village.</p>		
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				<p>3.2 The water works contain 4 concrete lined filter beds, a new water treatment facility and a open storage reservoir to the north of the site. The site proposed for allocation consists of the two most southern filter beds which sit adjacent to Newlands Road.</p> <p>3.3 Alexandra Park, just to the north-west of the site, is a public recreation space. It is designated a Site of Borough Grade I Importance for Nature Conservation, and a Historic Park. Both the park and the water works, including the filter bed site, are designated Metropolitan Open Land (MOL).</p> <p>3.4 To the south of the site beyond Newlands Road and to the east of the site beyond the East Coast Main Line Railway are existing built up areas consisting of both residential houses and apartments and other industrial and commercial uses.</p> <p>3.5 The Penstock footpath is a pedestrian and cycle link connecting Wood Green and Haringey Heartlands with Hornsey and Alexandra Park. It turns off Newlands Road at the southern edge of the site, runs east along the edge of the New River, then turns north beside the New River, before passing under the railway in a short underpass. At no point does the footpath cross through the WTW site.</p> <p>Due to the challenging housing targets set by the GLA and the capacity constraints experienced by the London Borough of Haringey, it is considered</p>		
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				<p>necessary for the London Borough of Haringey and the GLA review the Metropolitan Open Land (MOL) designation at the Hornsey Filter Beds.</p> <p>4.2 The Hornsey Filter Beds site is currently designated as MOL. This designation was included as part of the previous statutory plan for the Borough – the Unitary Development Plan – which was adopted on 1 November 2006.</p> <p>In November 2006 permission was granted for the erection of a new water treatment works comprising of four new buildings. Prior to this development the WTW site was considerably more open. The development of the buildings in the center of the site separates the large MOL designation which extends through Alexandra Park and Palace and the proposed allocation of the filter beds.</p> <p>4.4 The decision notice for the new works stated that: <i><b>“The proposals are inappropriate development within the Metropolitan Open and (Policies OS2 Metropolitan Open Land, OS4 Alexandra Palace and Park) and some harm would be caused to the open character of the land...”</b></i></p> <p>4.5 Due to the introduction of the new WTW at the site and the consequential notable change to the open character of the site, it is considered that a review of the MOL designation at this location is warranted. The London Plan in Policy 7.17 states that any alterations to the boundary</p>		
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				<p>of the MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities. In the context of the pressing need to increase the supply of housing in Haringey it is considered an appropriate time for this review.</p> <p>4.6 Policy 7.17 of the London Plan goes on to state that land designated as MOL should satisfy one or more of the following criteria:</p> <ul style="list-style-type: none"> <li>Land that contributes to the physical structure of London by being clearly distinguishable from the built-up area;</li> <li>Land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London;</li> <li>Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level;</li> <li>Land that forms part of a Green Chain and meets one of the above criteria.</li> </ul> <p>4.7 Therefore in order to establish whether or not the Hornsey Filter Bed site should be removed from the MOL the site needs to be assessed against the above.</p> <p><b>Case for the removal of Hornsey Filter Beds from the MOL</b></p> <p>Land that contributes to the physical structure of London by being clearly distinguishable from the built-up area</p>		
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				<p>4.8 Hornsey WTW is split into two key areas. To the north of the site there is an open storage reservoir and located to the southern end of the site is the operational works. The area covered by the operational works is wholly made up of hard standing with 4 large operational buildings standing 44.70 meters high.</p> <p>4.9 The wider MOL designation includes Alexander Palace and Park. The proposed Filter Beds site is separated from the Palace and Park by these large operational buildings resulting in there being a disconnection between the proposed site and the wider MOL designation.</p> <p>4.10 The proposed filter beds site sits adjacent to the residential estate of Campsbourne to the south. Due to the site having an existing urbanised character and its location next to an existing built up area the site is considered to be further disconnected from the wider MOL, and better related to the surrounding residential neighborhood.</p> <p>4.11 The proposed allocated site cannot therefore be clearly distinguished from the built up area and therefore does not contribute towards the physical structure of London.</p> <p>Land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London</p>		
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				<p>4.12 The proposed filter bed site as described above is wholly made up hard standing. The site does not currently provide open air facilities of any description as it is an operational works. For health and safety reasons it is not (and has never been) accessible by the general public. Its operational use also makes it unsuitable as a site for leisure, recreation, sport, arts or cultural activities use.</p> <p>4.13 Should the site be removed from the MOL there will be no net loss of open land as the site does not currently provide open public space.</p> <p>Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level.</p> <p>4.14 The filter beds and other structures on the site are locally listed. A request was made to English Heritage to list the whole site including the filter beds. English heritage have produced their factual report which assesses the site historical significance. Thames Water instructed Montagu Evans to review this report and respond on their behalf.</p> <p>4.15 Their response to the report, which is submitted in full in support of these representations, concludes that the site and associated Sluice House do not have the requisite special interest  <b>to warrant inclusion on the Secretary of State's list of buildings as per s.1(1) of the Planning</b></p>		
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				<p>(Listed Buildings and Conservation Areas) Act 1990. As such it is considered that the site does not contain features of historical value.</p> <p>4.16 The site is located within a conservation area. Any future development on the site, will need to respect and enhance the character of the conservation area, and mitigate against any potential impacts. Given the distance to Alexandra Palace and the presence of the water treatment works in between it is not considered that redevelopment of the filter beds will ultimately be harmful to the Conservation Area.</p> <p>Land that forms part of a Green Chain and meets one of the above criteria</p> <p>4.17 The London Plan 2013 defines Green Chains as: <i>'areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian cycle routes.'</i></p> <p>4.18 The site at present would not be considered to form part of a Green Chain as the site is not assessable by the public. It also has a developed character and does not represent an area of open space.</p> <p>4.19 Should the site come forward by way of an allocation any proposed development will improve the current accessibility and Green Chain by providing access through the site to the Alexander Park and Palace.</p>		
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				<p>Summary of the case for removal from the MOL</p> <p>4.20 As demonstrated it is considered that the proposed Hornsey Filter Bed site no longer <b>satisfy's</b> the London Plan criteria as land which should be designated MOL. As such the proposed alteration of the MOL boundary is therefore acceptable at this location.</p> <p>Footpaths</p> <p>5.1 The Council have expressed a desire for Thames Water to provide access across their site in order to create a more direct route from the New River Path Subway to the Alexander Park. Unfortunately Thames Water are unable to grant access across an operational site due to health and safety issues.</p> <p>5.2 As mentioned above any proposed development at the site could provide a better link between the Newlands Road the Alexander Park and Palace by way of a public footpath through the development.</p> <p>Odour</p> <p>5.3 The proposed allocation will result in residential dwellings being located in close proximity to an operational works. As the works are a Water Treatment Works there is no concerns with regards to Odour.</p> <p>Reinvestment into infrastructure</p>		
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					5.4 Thames Water regularly identifies surplus land which can be sold for other uses. Thames Water Utilities Regulator OFWAT monitors and reviews all non regulatory business to ensure that all profits are invested back into the regulatory business. As such any profit made from development and subsequent sale of the site will be re invested into Thames Waters existing infrastructure.		
218	RSA3 36	SA52/general al	Yes	Yes	We are pleased that site SA52 (Pinkham Way) has now been included in the sequential test. As outlined in the response form, the Site Allocations documents should reflect the wording in the sequential test and be clear that no more vulnerable development will be permitted in areas of Flood Zone 3.	-change of wording to reflect the wording in the sequential test and clarify that no more vulnerable development will be permitted in areas of Flood Zone 3.	<b>Noted, this amendment will be made.</b>
220	RSA3 43	General	Not stated	Not stated	National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.	None	Noted.
230	RSA3 67	General	Not Stated	Not Stated	The Mayor notes that the Council has responded positively to the comments issued at preferred option stage, and the proposed refinements to	None	Noted.

					designation boundaries and opportunity site allocations are broadly supported in strategic planning terms. A number of further detail comments are set out within Appendix 1 and 3		
230	RSA3 68	Sites in the west of the borough	Not Stated	Not Stated	(London Plan Reference: Policy 7.17) The removal of the allocation (including residential use) for Hornsey Water Treatment Works (an area of Metropolitan Open Land) is supported. GLA officers nevertheless remain open to discussion on opportunities to improve east-west connections between Wood Green town centre and Alexandra Palace and Park.	None	Noted.
231	RSA3 70	BG2, BG3, BG4	Not Stated	Not Stated	BG2, BG3 and BG4 - TfL strongly supports the identification of these sites for development as this will assist with the regeneration of the Bruce Grove area and provide the impetus for transport improvements such as works to the A10 and the upgrade of Bruce Grove rail station	None	Noted.
232	RSA3 75	Wood Green Tall building clusters	Not stated	Not stated	<b>It is noted that throughout the document ‘<i>tall building clusters</i>’ are identified. We would suggest that the title of these sections should be amended to ‘<i>potential tall building clusters</i>’ as the supporting policy DM6 and the supporting text in the site allocations clearly outline that these locations may be appropriate for tall buildings subject to further considerations. Further clarification could be provided through site allocations that <b>fall within the ‘cluster’ areas</b>, as the details provided do not specify limitations on height levels or bulk.</b>	<b>–‘tall building clusters’ amended to ‘Potential tall building clusters’</b>	<b>Agreed for consistency</b>