

# Tottenham Area Action Plan (AAP)

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

### 1. Introduction

- 1.1 Pre-Submission consultation on the Tottenham AAP Map 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 Tottenham AAP 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 Tottenham AAP

- 2.1 On 23rd November 2015, Haringey's Full Council endorsed the Pre-Submission Tottenham AAP 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 Tottenham AAP 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 Tottenham AAP 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 Tottenham AAP, 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 Tottenham AAP, 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 Tottenham AAP 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:

Library	Drop In Date and Time
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 Tottenham AAP, 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> <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>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 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	<p>Letters inviting representations on the Local Plan documents and Sustainability Appraisal and responses received. (See Consultation Statements for each DPD)</p> <p>Meetings at Council offices:</p> <ul style="list-style-type: none"> <li>• 1 April 2014, 7 July 2014</li> </ul>	<p>Details of representations received and the Council’s actions as a result are detailed in the Consultation Statements.</p> <p>Key area of discussion was regarding sequential testing of proposed development sites in Tottenham.</p> <p>EA provide flood mapping for the Borough.</p> <p>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>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</p>

	Meetings at Council offices	ensuring heritage conservation and the regeneration proposals are better integrated. Further HE funding for completion of the Noel Park CAAM, which is part in and adjoins the Wood Green AAP area. Comments received and taken on board on the Sustainability Appraisal scoping and, in later iterations of the appraisal.
Natural England	Letters inviting representations on all Development Plan Documents and responses received. Engagement on SA	Details of representations received and the Council's actions as a result are detailed in the Consultation Statements. 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.
Greater London Authority	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Meetings with Haringey assigned Officer from the GLA to discuss strategic fit of emerging policies GLA Housing Study meetings and work Liaison with specialist officers for policy development regarding affordable housing and sustainability in light of changes to Lifetime Homes etc and London Plan alterations GLA represented on governance boards for the Tottenham housing zone's and the Wood Green AAP. Current engagement on Crossrail 2 spur serving Wood Green. Submitted responses to the Further Alterations to the London Plan consultation.	Details of representations received and the Council's actions as a result are detailed in the Consultation Statements. 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. Participation in the London wide SHLAA and SHMA evidence base studies – most recently the call for sites. Agreement to methodology for surveys on Town Centre Health Checks to take place mid-2016. 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. 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.
Civil Aviation Authority	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)	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.
Haringey Clinical Commissioning Group (CCG)	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Infrastructure Delivery meetings and correspondence.	Details of representations received and the Council's actions as a result are detailed above. 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. Continued engagement on healthcare requirements/priorities being reflected in local plan policies, including those that address obesity and mental health.
Homes and Communities Agency	Letters inviting representations on all Development Plan Documents	Details of representations received are provided in the Consultation Statement. No major issues raised
Highways Agency/ Highways England	Letters inviting representations on all Development Plan Documents and responses received.	Details of representations received are provided in the Consultation Statement. No major issues raised
Transport for London	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Quarterly 1:1 meetings to discuss all transport related matters. Liaison with TfL regarding transport study modelling and findings Infrastructure Delivery. Meetings and correspondence on specific transport projects. Meetings on Crossrail 2 proposals	Details of representations received and the Council's actions as a result are detailed in the Consultation Statement. Agreed the methodology for transport modelling of broad growth assumptions, and the results of the findings of the study, using TFL data. 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

	Engagement on DCF for the Upper Lee Valley OAPF.	superhighway, White Hart Lane station improvements, and Crossrail2. 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. Confirmation of population projections and sites informing infrastructure provision across the Lee Valley OAPF area, in recognition of refresh.
Office of Rail Regulation	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)	Details of representations received are provided in the Consultation Statement. No major issues raised.

## 4. Who responded and number of representations received

- 4.1 There were 44 representations received to the Pre-Submission consultation on the Tottenham AAP. **Appendix H** provides a full list of the respondents. In total, 164 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**.
- 4.2 10 representations to the Tottenham AAP were received after the deadline for the close of the publication period. These respondents are listed at **Appendix K** and were subsequently notified of the fact that their representation was not duly made, and that it would be for the appointed Planning Inspector to determine whether the matters raised therein would be considered. In the event that the appointed Planning Inspector wished to take these late representations into account in their examination of the Tottenham AAP, the individual late comments are provided at **Appendix L** along with Council's response to each. These are provided in Respondent order only.

## 5. Summary of the main issues/comments raised to the Tottenham AAP 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 Tottenham AAP. 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 Tottenham AAP.

### AAP1: Regeneration/Masterplanning

There were several representations seeking clarity on the requirements for site masterplanning. Taking these into account the Council has amended the supporting text, in particular to clarify that the policy does not preclude development from coming forward in phases.

### AAP2: Supporting site assembly

There were no representations received on this policy.

### AAP 3: Housing

Some respondents considered that the housing proposals would adversely affect the existing community. They felt that the 10,000 new homes target falls unfairly to Tottenham when there is insufficient infrastructure in place to support this, and other parts of the borough could contribute to growth. It was also suggested that the plan does not seek to deliver better housing for existing residents. The Council considers that the Local Plan seeks to enable the delivery of housing to meet objectively assessed need and the Borough's strategic housing target, having regard to the spatial strategy for Tottenham and the Borough. Parts of Tottenham have been identified as Growth Areas and Areas of Change, recognising their potential to facilitate growth through the availability of developable sites and existing / planned significant infrastructure investment to support this growth in a sustainable way.

There were several objections received to the wholesale demolition of estates. To this end it was argued that the Council should be seeking to improve existing homes and there should be no loss of structurally sound homes or social housing units. Further it was felt that if estate renewal was planned, that proposals should not go ahead without consultation with the local community. The Council notes that the Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy, the AAP gives effect to the Alterations to Policy SP 2, which provides a strategic and selective approach for housing estate regeneration, renewal and improvement. The approach is set recognising the Council's commitment to improving housing stock and the limitations of the Decent Homes programme. The inclusion of estate regeneration in the Local Plan is considered necessary in policy

terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan. Where the Council does undertake estate regeneration and renewal, it will seek to re-provide the same amount of social housing on an equivalent floorspace basis. This approach is considered necessary to ensure flexibility for re-provision to better meet changing housing needs of existing residents. Alterations to SP 2 clearly set out that the Council will consult with residents on estate regeneration schemes.

There were further objections to the definition of affordable housing included in the plan, and some respondents considered that affordability should be established in view of the London Living Wage. The Council definition of affordable housing is set having regard to the NPPF and London Plan.

Some respondents suggested that the policy should be amended to clearly state that affordable housing requirements are subject to viability. The Council considers that this point is appropriately addressed elsewhere in the Local Plan and need not be repeated here.

#### AAP4: Employment

Following consultation feedback, a few minor amendments have been proposed to ensure accuracy in the mapping of Designated Employment Areas, the indicative site development capacities set out in Table 6 and terminology for replacement employment floorspace. These changes will ensure consistency with proposals set out elsewhere in the Local Plan.

One respondent suggested that the timescales for the re-classification of DEAs should be provided within the plan. The Council notes that designations will be reflected in the Policies Map, and will take effect once this and other Local Plan documents are adopted.

#### AAP5: Conservation and heritage

There were several representations suggesting that the policy should be amended to clarify that the Council, rather than applicants/proposals, will prepare Conservation Area Management Plans. The Council agrees and a minor modification has been proposed to this effect.

#### AAP6: Urban design and character including tall buildings

There were several representations objecting to the development of tall buildings, particularly at Hale Wharf. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, having regard to the delivery of the spatial strategy, which is both informed and justified by technical evidence.

#### AAP7: Transport

There were no significant issues raised. In response to consultation feedback the Council has proposed a minor modification to clarify the plan objectives of “managing” the capacity of the road network, rather than “improving” the capacity as currently worded in this policy.

#### AAP8: Development along Tottenham High Road

Respondents to this policy broadly supported the principle of car-free development however they felt that appropriate parking controls/enforcement would need to be in place to ensure effective implementation, along with parking provision for disabled people. The Council notes that AAP7 signposts, and will need to be considered alongside Policy DM32, which it considers addresses the matters raised. Parking enforcement is outside the scope of the Local Plan.

#### AAP9: Tottenham green grid

A few respondents sought amendments to the supporting text to ensure the AAP better reflects opportunities for new open space provision, in line with other Local Plan policies. The Council has proposed minor modifications in line with the representations received.

#### AAP10: Meanwhile uses

There were no representations received on this policy.

#### AAP11: Infrastructure

There were no significant issues raised.

#### SS1: Seven Sisters and West Green Road District Centre

The respondent to this policy suggested that further details should be set out in respect of the relationship with Clyde Circus and Tottenham High Road/Page Green conservation areas. The Council considers that the policy appropriately addresses this matter, with further details on management of heritage assets set out elsewhere in the Local Plan.

Further comments were made in respect of the existing market, with the respondent suggesting that the policy should require its retention in the area and further specify that all market traders can remain. The Council notes that the plan makes provision for retention of the market in the area, with further details set out in this policy SS5. It also seeks to ensure that the size and costs of stalls are controlled so as to enable access to local traders.

#### SS2: Lawrence Road

One respondent made a number of representations on the site requirements and development guidelines, in particular seeking that the plan clarify responsibilities in respect of the site-wide masterplan and provide more flexibility on the requirements, such as for landscaping and decentralised energy. The Council considers that the plan provides sufficient guidance to assist applicants with implementation and that the requirements are necessary to support delivery of the spatial strategy.

#### SS3: Brunel Walk and Turner Avenue

There was one respondent objecting to the “red-lining” of housing estates for future demolition and redevelopment and sought further details in respect of the principles for housing estate renewal. The Council notes that the approach to housing estate regeneration, renewal and improvement is set out in Alterations to SP2, which this site allocation will help give effect to. The respondent also made representations on Policy AAP3 which capture some of the comments made on this policy, which the Council has responded to accordingly.

#### SS4: Gourley Triangle

There were a few representations made in respect of the existing and potential future use of this site for employment generating uses. One respondent suggested that the site requirements be amended to state there should be no loss of existing businesses. Another respondent sought clarity on the indicative site development capacities for both residential and commercial uses. The Council notes that Policy SS4 seeks redevelopment to deliver new employment floorspace to help meet objectively assessed need and deliver the spatial strategy for Tottenham. Whilst the policy provides for the continuation of employment uses at this site, the Local Plan cannot require that there to be no loss of existing businesses. The site development capacities have been set using a standardised methodology and the optimum capacity of development on any individual site will be determined through a robust design-led approach in accordance with DM1 and other Local Plan policies.

One respondent suggested several alternatives for improving open space and habitat provision on the site allocation, including by extending the SINC and ecological corridor. Whilst the Local Plan seeks to protect and enhance open space and biodiversity, the Council does not consider enhancements as suggested to be deliverable at this particular site, in particular owing to the fractured ownership arrangements.

#### SS5: Wards Corner

There were several representations made in respect of the existing market, with the respondents suggesting that the policy should require its retention in the area and further specify that all existing and independent market traders can remain. The Council notes that the plan makes provision for retention of

the market in the area. It also seeks to ensure that the size and costs of stalls are controlled so as to enable access to local and independent traders however the Local Plan cannot require that all existing traders remain.

#### SS6: Apex House and Seacole Court

One respondent made a number of representations to this policy and broadly considered that it did not appropriately reflect the site's key strategic location and opportunities in that regard. The respondent also considered a tall building to be inappropriate at this location. The Council generally disagrees with the thrust of the comments and considers the Local Plan aims to optimise opportunities for the site's future redevelopment, contributing to delivery of the spatial strategy for Tottenham and the Borough. Many of the respondents concerns (including for housing tenure, design and workspace) are considered to be addressed appropriately elsewhere in the Local Plan.

#### TG1: Tottenham Green's civic heart

There was one respondent to this policy, who noted that the site allocation for the Leisure Centre Car Park included in previous AAP drafts had been removed and suggested that it should be reintroduced with the site allocated for open space, as it is currently used. The Council notes the allocation in question was removed from the plan owing to issues identified in respect of deliverability. While the site is not currently open space as suggested, provision of outdoor facilities would likely result in the same concerns over deliverability – more so if the outdoor use increased demand for parking.

#### TG2: Tottenham Changes and Nicholson Court

A representation was received suggesting that the policy should make explicit the protection of the existing community use (Tottenham Changes). The policy makes provision for community uses however the Council does not consider it appropriate to identify specific users of the facility within the policy.

There were concerns raised that heritage assets would be threatened by future development proposals in line with the site allocations. The Council considers that the policy clearly sets out considerations in this regard, and alongside other Local Plan policies on managing the historic environment, would ensure appropriate consideration of these assets in delivery of the spatial strategy.

#### TG3: Tottenham Police Station and Reynardson Court

One respondent raised concerns with the loss of the police station. The Council notes that the policy provides that re-provision of this facility within Tottenham must be provided prior to any redevelopment taking place.

Another respondent suggested that Reyndardson Court should be removed from the site allocation. The Council notes that the approach to housing estate regeneration, renewal and improvement is set out in Alterations to SP2, which this site allocation will help give effect to. In addition, redevelopment of the site offers opportunities to enable improvements to open space provision, which is an important part of the spatial strategy.

There was one representation suggesting that the policy did not appropriately reflect an extant planning permission, which includes an element of student accommodation. The respondent therefore sought amendments to the policy to make provision for this use, and further for hotel and visitor accommodation. The Council considers the allocation is correct as applying to the majority of the site and it would be incorrect to include student housing as a primary land use expectation of the allocation. However, a minor modification is proposed to ensure the extant permission is appropriately recognised. Visitor accommodation will be considered against other Local Plan policies.

#### BG1: Bruce Grove and Tottenham High Rd District Centre

The owner of the Banqueting Suite requested consideration of the demolition of the existing building to facilitate a comprehensive redevelopment, involving the demolition of the existing building. The Council does not want to volunteer the demolition of a building that has conservation value, but will consider the merits of schemes proposed on the site.

#### BG2: Bruce Grove Station

The existing occupant of the site, and a local community group object to the allocating of a currently viable builders merchant on this site. The Council believe that as the site is located directly adjacent to Bruce Grove Station, it at present does not make the best use of this piece of land, and that establishing precedent for a more intensive use is sound.

#### BG3: Bruce Grove Snooker Hall and Banqueting Suite

A local community group object to the redevelopment of the site as it is currently viable. The owner of the Banqueting Suite requested consideration of the demolition of the existing building to facilitate a comprehensive redevelopment, involving the demolition of the existing building. The Council does not want to volunteer the demolition of a building that has conservation value, but will consider the merits of schemes proposed on the site.

#### BG4: Tottenham Delivery Office

Our Tottenham do not want to see any loss of employment on this site. The Council's policy supports the creation of new employment activity on the site.

#### NT1: Northumberland Park Station

Our Tottenham perceive that the allocating of this area puts significant quantum of social housing at risk from development by private developers. The Council believes that the creation of new houses, including affordable houses, in this area is needed to meet objectively identified housing need.

#### NT2: Strategic Industrial Land in North East Tottenham

No responses on this policy.

#### NT3: Northumberland Park North

Our Tottenham perceive that the allocating of this area puts significant quantum of social housing at risk from development by private developers. The Council believes that the creation of new houses, including affordable houses, in this area is needed to meet objectively identified housing need.

#### NT4: Northumberland Park

Our Tottenham perceive that the allocating of this area puts significant quantum of social housing at risk from development by private developers. The Council believes that the creation of new houses, including affordable houses, in this area is needed to meet objectively identified housing need. There was some local support for the redevelopment being able to establish new east-west routes through the area. Spurs have requested that the site requirements support a fanzone to service the adjoining stadium. This is considered overly restrictive.

#### NT5: High Rd West

Our Tottenham perceive that the allocating of this area puts significant quantum of social housing at risk from development by private developers. The Council believes that the creation of new houses, including affordable houses, in this area is needed to meet objectively identified housing need. There was some local support for the deculverting of the Moselle in this area. There was also concern at the proposed loss of industrial land at this location. The Council consider that the loss here supports the spatial objectives of the Plan in terms of building new housing and mixed use typologies supporting the provision of a leisure-based local centre. Spurs consider that the licensed waste capacity on this site to already have been rehoused. The Council will retain the requirement to ensure it is completed.

#### NT6: North of White Hart Lane

The landowner objects to the allocation of their land for redevelopment. Our Tottenham are seeking no development of community assets unless they have been reprovided on site. The Council's policy requires appropriate re-provision, but not necessarily on site if a better alternative can be found. Spurs want the recently consented stadium application to be referenced in the Policy.

#### NT7: Tottenham Hotspur Stadium

Local community groups object to the loss of business space on this site, and do not consider the regenerative effects of a new stadium to be sufficient to justify this loss. The Council is confident that the Policies in the plan seek to optimise conditions locally, and ensure that the regeneration benefits are spread through the document.

#### TH1: District Centre in Tottenham Hale

Some local groups are concerned about Tottenham Hale being allocated as a District Centre, specifically with regard to the impact that the creation of a night time economy could have on the quality of life of local residents. The Council considers that the Plan protects amenity generally, and that an improved nighttime offer will be beneficial overall to local residents.

#### TH2: Tottenham Hale Station

Local interest groups consider the proposal to be an over development. The Council's capacities are in line with the London Plan's density matrix.

#### TH3: Tottenham Hale Retail Park

Local interest groups suggest that the creation of a new district centre at Tottenham Hale will compromise the plans to support the continuing revitalisation of Bruce Grove and Seven Sisters centres. A Retail Impact Assessment for this allocation has been carried out into the designation of this centre.

#### TH4: Station Square West

Local interest groups support the retention of the existing petrol station, and oppose tall buildings at this site. The Councils' evidence suggests this is a suitable location for higher density, public-transport oriented development.

#### TH5: Station Square North

There was support for restricting parking on this site.

#### TH6: Ashley Rd South Employment Area

There was concern about heights produced in a model as part of an earlier consultation showing tower blocks along Watermead Way. The allocation does not have this level of detail, and any tall buildings proposed would need to conform with the tall buildings policy in the DMDPD.

#### TH7: Ashley Rd North

There was concern regarding where the replacement waste capacity would be. The policy only seeks to ensure that it is planned for.

#### TH8: Hale Village

There is concern that the building of a tower at this site is overdevelopment by local interest groups, while the developer is seeking greater flexibility in the design of a potential tower. As the tower is consented, and a tall buildings policy proposed, it is considered that the Plan provides sufficient flexibility in this matter.

#### TH9: Hale Wharf

The prospective developers consider the requirement for replacement employment floorspace to be overly onerous, and that clarity should be provided regarding only the garage site being subject to green belt policy.

There was a great deal of opposition to the development of the site as proposed in the scheme presented for public consultation as part of the pre-application process around the same time as the publication consultation. Many local residents and interest groups have objected to the proposed tall buildings. The allocation of course does not specifically propose tall buildings on this site, and any proposals will be required to meet the Council's Tall Buildings Policy in the DMDPD. Additionally it is considered that the policy takes an appropriate line with regards managing the potential effects of the site on neighbouring residents, open spaces, and biodiversity.

#### TH10: Welbourne Centre & Monument Way

There is support for the building of additional public housing and a health centre on this site, but concern over the loss of local green space. The Council considers that as the open space is not designated, limited development could be acceptable here.

TH11: Fountayne Rd

There was some concern about the impact of development on the warehouse community. There were calls for the O'Donovan's site to be included for redevelopment due to the impact it has on local amenity. It however, also has a licensed waste capacity.

TH12: Herbert Rd

A local landowner is seeking to increase the red line designation to enable further development at the expense of a local employment designation. The Council do not believe this accords with the evidence set out in the Employment Land Study.

TH13: Constable Crescent

A prospective local developer is seeking to strengthen the wording on this policy to support redevelopment. The Council feel that the policy is sufficient to support an appropriate redevelopment.

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

thetottenhamindependent.co.uk

January 15, 2016 25



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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 2013) 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@sharingey.gov.uk](mailto:ld@sharingey.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@sharingey.gov.uk](mailto:ld@sharingey.gov.uk) or contact the Planning Policy Team on 020 8489 1475 or at the above address.  
Dated 8th January 2016

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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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- 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 January 2015- 4<sup>th</sup> March 2016**

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

Individual First Name	Individual Family Name	Councillor/MP Name
Lynne	Zilkha	Cllr Adamou Gina
Jasper	Woodcock	Cllr Adje Charles
Heather	Wood	Cllr Ahmet Peray
Kitty	Wong	Cllr Akwasi-Ayisi Eugene
John	Wise	Cllr Amin Kaushika
Teresa	Wing	Cllr Arthur Jason
Carolyn	Whitehead	Cllr Basu Dhiren
Edward	Webb	Cllr Beacham David
Julia	Warburton	Cllr Berryman Patrick
Jonathan	Vellaph	Cllr Bevan John
Nick	Trivialis	Cllr Blake Barbara

Max	Tomlinson
Joey	Toller
Jane	Thompson
Rachel	Tedesco
Alison	Taylor-Smith
Elizabeth	Sutton-Klein
Henriette	Stuchtey
Celeste	Menich
Margaret	Stoves
Kevin	Stanfield
Michael	Edwards
Evelyn	Ryan
Tara	Ryan

Cllr Blake Mark
Cllr Bull Clare
Cllr Bull Gideon
Cllr Carroll Vincent
Cllr Carter Clive
Cllr Christophides Joanna
Cllr Connor Pippa
Cllr Demirci Ali
Cllr Diakides Isidoros
Cllr Doron Natan
Cllr Ejiofor Joseph
Cllr Elliott Sarah
Cllr Engert Gail

Nicholas	Rusz
Joyce	Rosser
Jeff	Rollings
Chris	Roberts
Lorna	Reith
Barry	Rawlings
Kimberley	Pyper
Annabruna	Poli
Karl-Dirk	Plutz
Richard	Perry
Andrew	Papadopoulos
Pavel	Pachovský
Christopher	Owen
Stephen	Overell
Gerrit	Ormel
Christian	Ogilvie-

Cllr Gallagher Tim
Cllr Goldberg Joe
Cllr Griffith Eddie
Cllr Gunes Makbule
Cllr Hare Bob
Cllr Hearn Kirsten
Cllr Ibrahim Emine
Cllr Jogee Adam
Cllr Kober Claire
Cllr Mallett Antonia
Cllr Mann Jennifer
Cllr Marshall Denise
Cllr McNamara Stuart
Cllr McShane Liz
Cllr Meehan George
Cllr Morris Liz

	Browne
Juliet	Oerton
Carol	Norton
Joseph	Nichola s
Ollie.	Natelson
Jill	Naeem
Eleni	Murphy
Dave	Morris
Said	Moridi
Faye	Morgan
Mary	Mitchel l
Simon	Miller
Chris	McNam ara
Chris	McNam ara
Louise	McNam

Cllr Morton Peter
Cllr Newton Martin
Cllr Opoku Felicia
Cllr Ozbek Ali Gul
Cllr Patterson James
Cllr Peacock Sheila
Cllr Reith Lorna
Cllr Rice Reg
Cllr Ross Viv
Cllr Ryan James
Cllr Sahota Raj
Cllr Stennett Anne
Cllr Strickland Alan
Cllr Vanier Bernice

	ara
Peter	McNamara
Richard	Max
Kim	Mason
Colin	Marr
Jason	MacKay
Stephen	Lubell
John	Long
Alison	Lister
Barry and Louise	Lewis
Rebecca	Lellis Ferreira
Ethan	Lazell
Charlie	Kronick
Heather	Kinnersley
Angie	Kikkides
Gabrielle	Kagan

Cllr Waters Ann
Cllr Weston Elin
David Lammy MP
Lynne Featherstone MP

<b>Company/Organisation</b>
A Anva Ltd
A P T Consulting
A S Z Partners Ltd
A. E. Butler & Partners
A.C.H. Turkish Speaking Pensioners Club
Abbeyfield (North London) Society
Abbeyfield Society
ACHE (Action for Crouch End & Hornsey Environment)
Adult Literature Group

Petal	Caddu
Francois	Joubert
Nick	Jenkins
Tony	Hopkins
Marian	Hone
Elaine & Ben	Holgado
Susie	Holden
Michael	Herbert
Frances	Heigham
Claudia	Hawkins
Lauritz	Hansen-Bay
Paul	Hancock
Laura and Marcus	Graham
Marcos	Godinho

Adult Literature Group
Adult Literature Group
African Caribbean Association
African Cultural Voluntary Organisation
African Women's Welfare Group
Africans & Descendants Counselling Services Ltd
Age UK
Agudas Israel
AH Architects
Air Transport Users Council
Aitch Group
AJ Architects
Alan Cox Associates
Albany & Culross Close Residents Association

Joe	Friedman
Hannah	French
Elaine	Graham
Sean	Fewlass
Carla	Ferrarello
Pasco	Fearon
Cindy	Evans
Sue	Ettinger
Chris	Elser
Kieron	Edwards
Johnny	Dixon
Angharad	Davies
Felipe	Da Rocha
Ruth	Cowan
Stephen	Cook

Alexander Elliot Ltd
Alexandra Mansions Tenants Association
Alexandra Palace Action Group
Alexandra Palace Residents Association
Alexandra Park/Grove Lodge Meadow Allotments
Alexandra Primary School
Alexandra Residents Association
Alexandra Tenants Association Group
Allenson House Medical Centre
Ally Pally Allotment Society
Al-Rasheed Dauda Architect
Altaras Architecture
Anatolitis Associates
Ancient Monuments Society

Kenneth	Connolly
Anastasia	Christofis
David	Burrowes MP
Paul	Bumstead
Paul	Brown
Stephen	Brice
Jill	Bowden
Tim	Blake
Anna	Blackburn
Matthias	Bauss
Frances	Basham
Miles	Attenborough
James	Athanasiou

Andrew Kellock Architects
Andrew Mulroy Architects Ltd
Anglo Asian Women's Association
Apcar Smith Planning
Arbours Association
Architectural Heritage Fund
Architectyourhome-Highgate
Archi-Tone Ltd
Archway Road Residents Association
Archway Road Tenants Association
Archway Road Tenants Association
ARHAG Housing Association
Arnold Road Residents Association

Ruth	Antonia des
Paulette	Amadi
Linda	Alliston
Andreas	Adamides
Leila	Sifri
Eliza	Kaczynska-Nay
Cynthia	Jenkins
Robert	Franks
Selina & Dan	Egerton
Tinu	Cornish
Lucia	Brusati
Tim	Brierley
Arthur	Leigh
Beatrice	Hyams

Arnos Grove Medical Centre
Arta Architectural
Ashdown Court Residents Association
Asian Carers Support Group
Asian Community Centre
Asian Community Group
Asian Family Group
Aspire Design & Survey Ltd
ASRA (GLHA)
Avenue Mews Tenants Association
Aztech Architecture Ltd
Bahai Community
Bangladesh Muslim Organisation
Bangladeshi Cultural Society

Valerie Rose	Berry
Bill	Temple - Pediani
Laura	Forrest- Hay
Sarah	Lane
Elizabeth	Gray
Nicola	Vennin g
Panos	Nicolaid es
Poppy	Rose
Christopher	Chadwi ck
Barry	James
Bob	Maltz
Flavio	Poli
Reuben	Payne
Hannah	Redler Hawes

Bangladeshi Women's Association
Baptist Church
Barnet, Enfield and Haringey Health Authority
Bashkal & Associates
Bedford Road Tenants Association
Belcher Hall Associates
Bell Residents Association
Belmont Infant & Junior School
Bethel United Church of Jesus Christ
Bhagwati Sai Culture & Social Centre
Bibles Christian's Assembly
Bicknell Associates Chartered Architects
Blitzgold Ltd
Born Again Evangelistic

John	Murray
Christine	King
Jon	Brooks
Chris	Warbur ton
David	Lichten stein
Nick	Oparva r
Ruth	Ortiz
Ursula	Riniker
David	Baker
Michele	Eastmo nd
Chris	Mayled
Jeremy	Munda y
Nicholas	Embling
Andrew	Tiffney

Bostall Architecture Services
Bounds Green & District Residents Association
Bounds Green Group Practice
Bounds Green Health Centre
Bounds Green Infant & Junior School
Bounds Green Owner/Occupier Ass. & Neighbourhood Watch
Bowes Park Community Association
Bowes Park Community Association
Bracknell Close/Winkfield Road Residents Association
Brendan Woods Architects
Bridge House Health Care Centre
Briffa Phillips Architects
Britannia Hindu Temple Trust
Broadwater Farm Community Centre

Elizabeth	Barnett
Angela	Rossi Carter
Tony	Baker
Gordon	Forbes
Huub	Nieuws tadt
Bill	Nottag e
Frederick	Limbay a
Feolezico	Calboli
Sue	Penny
J N	Douglas
David	Rennie
Steve	Roe
Katy	Andrew s
Sophie	Cattell

Broadwater Farm Community Health Centre
Broadwater Farm Residents Association
Broadwater Residents Association
Brown & Co (Surveyors) Ltd
Bruce Castle Village Residents Association
Brunswick Park Health Centre
Buckingham Lodge Residents Association
Building Design Consultants
CA (UK) Ltd
CAAC Highgate
CABE
Campbell Court Residents Association
Campsbourne Baptist Church
Campsbourne Centre

<b>Statutory Consultee</b>
Greater London Authority
LB Enfield
LB Waltham Forest Spatial Planning
London Borough of Barnet
London Borough of Camden
London Borough of Hackney
London Borough of Islington
Natural England
Environment Agency
English Heritage - London Region
Highways Agency
Departments for Communities and Local Government
Network Rail
Haringey Fire Service
London Ambulance Service

Campsbourne Infant School
Calvary Church of God in Christ
Capital Architecture Ltd
Carolyn Squire
Carr Gomm Society
Carter Surveying Associates
Caryatid Architects
Casa de la Salud Hispano Americana CASAHA
CASCH
CASCH
Casch
CASE
Causeway Irish
CB Architects
Cemex (UK) Operation Ltd
Central & Cecil
Centre for Accessible Environments

NHS London
<b>Company / Organisation</b>
Corporation of London
London Borough of Haringey
London Borough of Sutton Planning and Transportation
London Borough of Redbridge
London Borough of Brent Planning Services
London Borough of Barking & Dagenham
London Borough of Barnet Planning Department
London Borough of Bexley
London Borough of Croydon
London Borough of Enfield
London Borough of Hammersmith and Fulham
London Borough of Harrow
London Borough of Hillingdon
London Borough of Hounslow

Charisma Baptist Church
Charlton House Medical Centre
Cherry Tree House Residents
Chestnut Area Residents Association (CARA)
Chestnut Northside Residents Association
Chestnuts Community Centre
Chinese Community Centre
Chomley & Causton Residents Association
Christ Apostolic Church Kingswell
Christ Church
Christchurch West Green
Christopher Wickham Associates
Church Commissioners
Church Crescent Residents Association
Circle 33 Home Ownership Ltd
Circle 33 Home Ownership Ltd
Circle 33 Housing Group

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London Borough of Lambeth
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Client Design Services Ltd
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Alexandra Palace Residents Association

Corporation of London
Council for British Archaeology
Crammond Browne Architects
Crawford Partnership
Crouch End open Space (CREOS)
CRH Tenants Association
Cromwell Avenue Residents Association
Crouch End Dental Practice
Crouch End Health Centre
Crouch End Health Centre
Crouch End Traders Association
Crouch End URC Church
Crouch Hall Road Surgery
Crowland Primary School
Cube Building Consultancy
CUE
CUFOS Community Centre
Cypriot Centre

Alexandra Park/Grove Lodge Meadow Allotments
Alexandra Residents Association
Alexandra Residents Association
Alexandra Tenants Association Group
Archway Road Residents Association
Archway Road Tenants Association
Archway Road Tenants Association
Arnold Road Residents Association
Ashdown Court Residents Association
Avenue Mews Tenants Association
Bedford Road Tenants Association
Bell Residents Association
Bounds Green Owner/Occupier Ass. & Neighbourhood Watch
Bowes Park Community Association
Bowes Park Community Association
Bracknell Close/Winkfield Road Residents Association
Broadwater Farm Residents Association
Broadwater Residents Association

Cypriot Women's League
Cyprus Turkey Democratic Association
D R M Associates
DASH
David Langan Architects
Dental Health Centre
Dental Practice
Dental Surgery
Department for Culture Media and Sport
Department for Transport
Devonshire Hill Primary School
Direct Planning Ltd
Discount Plans Ltd
Downhills Infant & Junior School
DPA (London) Ltd
DPDS Consulting Group
Duckett Dental Surgery
Earlsmead Primary School

Bruce Castle Village Residents Association
Buckingham Lodge Residents Association
Campbell Court Residents Association
Cherry Tree House Residents
Chestnut Area Residents Association (CARA)
Chestnut Northside Residents Association
Chomley & Causton Residents Association
Church Crescent Residents Association
Clyde Area Residents Association
Commerce Road Tenants Association
Coppetts Residents Association
CRH Tenants Association
Cromwell Avenue Residents Association
Eastbourne Ward Residents Association
Edgcott Grove Residents Association
Ermine House Residents Association
Ermine Road Residents Association
Ferry Lane Estate Residents Association

Eastbourne Ward Residents Association
Ebenezer Foundation Advisory Association
Ecodomus
Edgcott Grove Residents Association
Eldon Road Baptist Church
EMJCC Community Side
ENKI Architectural Design
Eritrean Community in Haringey
Ermine House Residents Association
Ermine Road Residents Association
Evering Pentecostal Church
FA Drawing Service
Faith Baptist Church
Faith Mosque
Faith Restoration Ministry
Family Health Service Authority
Family/Landmark Housing Association
Federation of African Peoples

Fortismere Residents Association
Garden Residents Association
Garden Residents Association
Grosvenor Road Residents Association
Hale Estate Residents Association
Harmony Close Residents Association
Hillcrest Tenants & Residents Association
Hillside Road Residents Group
Hilltop House Residents Association
Hornsey Lane/Colwick Close Residents Association
HTBG Residents Association
Jackson's Lane Residents Association
James Place/Church Road Residents Association
Kingsley Place Residents Association
Lancaster Road Residents Association
Lomond Close & Brunswick Road RA
Lomond Close Residents Association

Organisation
Ferry Lane Estate Residents Association
Finsbury Park Track & Gym
Flower Michelin Ltd
Forestry Commission England
Fortismere Residents Association
Fortismere School
FQW
Frederick Knight Sports Ground
Freight Transport Association
Friends of Albert Road Recreation Ground
Friends of Bowes Park Garden
Friends of Bruce Castle
Friends of Bruce Castle
Friends of Brunswick Road Open Space
Friends of Cherry Tree Wood
Friends of Chestnut Park
Friends of Crouch End Open Space

Love Lane Residents Association
Millicent Fawcett Tenants Association
Moselle Close Residents Association
Muswell Colney Residents Association
Nelson Mandela Residents Association
Noel Park North Area Residents Association
North Grove Residents Association
Northumberland Park Tenants & Community Association
Oakdale Resident Association / South Tottenham RA
Palace Gates Residents Association
Palace View Residents Association
Park Lane Close Residents Association
Partridge Way Residents Association
Plevna Crescent Residents Association
Remington Road Residents Association
Resident Association
Resident Association

Friends of Downhills Park
Friends of Downhills Park
Friends of Hornsey Church Tower
Friends of Ivatt Way
Friends of Lordship Rec
Friends of Markfield Recreation Ground
Friends of Muswell Hill Playing Fields
Friends of Muswell Hill Playing Fields & Coldfall Wood
Friends of Noel Park
Friends of Paignton Road
Friends of Queen's Wood
Friends of Railway Fields
Friends of Railway Fields
Friends of Stationer's Park
Friends of the Earth (London Region)
Friends of Tottenham Cemetery
Friends of Wood Green Common

Robert Burns Residents Association
Seymour Road Residents Association
Sophia House Residents Association
South Hornsey Residents Association
Southwood Lane Residents Association
Springfield Avenue Residents Association
Stokley Court Residents Association
Stroud Green Residents Association
Suffolk Road Residents' Association
Summersby Road Residents Association
The Chine & Cascade Residents Association
The Weymarks Residents Association
Tiverton Tewkesbury Residents Association
Tower Gardens Residents Network
Turner Avenue Residents Association
Veryan Court Residents Association
Wood Green Black Tenants Group
Wood Green Central Area Tenants & Community Assoc.

G T Project Management
Gage Limited
Garden Drive Neighbourhood Watch
Garden Residents Association
Garden Residents Association
Gf Planning Limited
Gladesmore Community School
Gladesmore Girl's & Young Women's Club
Gladesmore Youth Club
Globe Projects Ltd
Goan Community Centre
Grace Baptist Chapel
Greek Community Care
Greek Orthodox Church
Greek Parents Association
Green City Landscapes Ltd
Greig City Academy
Gridline Architecture

Woodridings Court Residents Association
Woodside Residents Association
The Queens Mansions Residents Association
Avenue Gardens Residents Association
Avenue Gardens Residents Association
Beresford Road Residents Association
Burghley Road Residents Association
Chestnuts Northsid Residents Assn
Chitts Hill Residents Association
Glasslyn, Montenotte Tivoli Road Residents Assoc.
HFRA (Haringey Federation of Residents Association)
Morrish Residents Association
Noel Park North Area Residents Assocation/Noel Park Conservation Area Advisory Committee/Friends of Noel Park
Parkside & Malvern Residents Association
Parkside Malvern Residents Association
Rookfield Estate Residents Association
Sandlings Residents Association

Grosvenor Road Residents Association
Groundwork London
Gus Alexander Architects
Guyana People's Congress
Habinteg Housing Association
Haines Philip Architects
Hale Estate Residents Association
Hamilton Bishop Ltd.
Hancock Architects
Haringey African Organisation
Haringey Area Youth Project
Haringey Arts Council
Haringey Asian Women Aid
Haringey Autism
Haringey Breastfeeding Centre
Haringey Community Volunteer
Haringey Deaf Group

The Alexandra Residents Association
Warner Estate Residents Association
West Green Residents' Association
West Green Residents' Association
Woodlands Park Residents Association
Woodstock Road Residents Association
Cranley Gardens Residents' Association
Wood Lane Residents Association
Gardens Residents Association (GRA)
Grovelands, Lemsford & Leabank Residents Assoc.
Torrington Park Residents Association
Tynemouth Area Residents' Association
Friern Village Residents' Association
The Bounds Green and District Residents Association
Dowset Road Residents Association.
Haselmere Residents Association
Haselmere Residents Association

Haringey Faith Forum
Haringey Ghanaian Community
Haringey Group London Wildlife Trust
Haringey Irish Cultural & Community Centre
Haringey Leaseholders Association
Haringey Mencap
Haringey Pakistan Cultural Society
Haringey Phoenix Group
Haringey Police
Haringey Solidarity Group
Haringey Sports Council
Haringey United Church
Haringey Women's Aid
Harmony Close Residents Association
HART Architecture
Hartleys Projects Ltd
Health and Safety Executive

Haringey Federation of Residents Associations
Palace Gates Residents' Association
Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth
Crouch End Forum
Fountayne Residents Association

<b>Company/Organisation</b>
Office of Government Commerce
Cornerstone Trading
Barratt Development PLC
Inland Waterways Association
LB Greenwich
Metropolitan Development Service
London TravelWatch
St. Peter in Chains RC Infant School
Aarogya Medical Centre
London Ambulance Service

High Cross Church
High Cross United Reformed Church
Highgate Group Practice
Highgate Library Action Group
Highgate Newton Community Centre
Highgate Primary School
Highgate United Synagogue
Highgate Wood School
Highpoint Dental Surgery
Highway Youth Club
Hill Homes
Hillcrest Tenants & Residents Association
Hillside Road Residents Group
Hilltop House Residents Association
Hollickwood Park Campaign
Holly Park Clinic
Holmes Design Ltd

3 Valleys
African Caribbean Leadership Council
Alexandra Palace & Park CAAC
Alexandra Palace Charitable Trust
Al-Hijra Somali Community Association
Alliance Planning
Angolan Community Association
Arriva London
Asian Action Group
Asian Women's Association
Avenue Gardens Residents Association
Avenue Gardens Residents Association
Barnard Hill Association
Barton Willmore
Barton Willmore
Bellway Homes
Beresford Road Residents Association

Holmesdale Road & Orchard Road Neighbourhood Watch
Holy Innocents
Holy Trinity Church
Home Craft Consultant
Homebase Ltd
Homebound Social & Luncheon Group
Homes & Community Agency
Hornsey Dental Practice
Hornsey Housing Trust
Hornsey Housing Trust
Hornsey Lane & Colwick Close RA
Hornsey Lane Association
Hornsey Lane/Colwick Close Residents Association
Hornsey Moravian Church
Hornsey Mosque
Hornsey Police Station
Hornsey School for Girls

Black & Ethnic Minority Carers Support Service
BME Community Services - Selby Centre
BPTW
British Waterways
Canal River Trust Head Office
Bruce Grove Primary School
Burghley Road Residents Association
Buying Solutions
CARA Irish Housing Association
CB RE
CGMS Consulting
CGMS Consulting
CGMS Consulting
CgMS Ltd
CGMS Ltd
Chestnuts Northsid Residents Assn
Chettle Court Ranger Youth (FC)

Hornsey YMCA
Housing 21
HPN Ltd
HTBG Residents Association
IBI Design Associates
Industrial Dwellings Society
Innisfree Housing Association
Irish Community Centre
Irish in Britain Representation Group
Islamic Community Centre
Islamic Community Centre Women's Group
JA Architecture
Jack Cruickshank Architects
Jacksons Lane Community Centre
Jackson's Lane Residents Association
James Place/Church Road Residents Association
Jason Read Pugh

Cheverim Youth Organisation
Chitts Hill Residents Association
Alderton Associates
Christian Action (Enfield) Housing Association
Christian Action (Enfield) Housing Association
City Planning Group
Civil Engineers Ltd
Cluttons LLP
College of Haringey, Enfield and North East London
Colney Hatch Management Company Ltd.
Connexions
Council of Asian People (Haringey)
Crossover Group
Cypriot Elderly & Disabled Group
Department for Business, Innovation and Skills
Alexandra Park School
Department of Environment Food and Rural Affairs
Derek Horne & Associates

Jesus for the Word Community Project
Jewish Orthodox Association
John Grooms Housing Association
John L Sims Surveyor
John Perrin & Co
JS Surveying And Design
Julian Cowie Architects
Kings Avenue Dental Practice
Kingsley Place Residents Association
Kurdish Advice Centre
Kurdish Community Centre
Kurdish Housing Association
Kush Housing Association
L & P Consultants
Ladybur Housing Co-operativr
Lancaster Road Residents Association
LB Barking & Dagenham
LB Brent

Dialogue Communicating Planning
DP9 Planning Consultants
Drivers Jonas Deloitte
The Old Surgery
Ethiopian Community Centre
Euroart Studios
Family Mosaic
Fields in Trust
First Plus Planning
FirstPlan
Friends of Priory Park
Friends of Priory Park
Muswell Hill and Hornsey Friends of the Earth
Friends of the Earth Tottenham & Wood Green
Friends, Families and Travellers and Traveller Law Reform Project
Fusion Online Limited
Genesis Housing Group
Glasslyn, Montenotte Tivoli Road Residents Assoc.

LB Croydon
LB Ealing
LB Hammersmith & Fulham
LB Harrow
LB Havering
LB Kensington & Chelsea
LB Lambeth
LB Merton
LB Newham
LB Richmond Upon Thames
LB Sutton
LB Tower Hamlets
LB Wandsworth
Lea Valley Primary School
League of Jewish Women
LETEC
Levvel Ltd
Liberty Church

GLC-RAG
Grace Organisations - Elderly Care Centre
Greek Cypriot Women's Organisation
GreenN8 Community Group
Gt. Lakes Initiative & Support Project
Haringey Chinese Centre
Haringey Cycling Campaign
Haringey Fire Service
Haringey Peace Alliance
Haringey Play Association
Haringey Racial Equality Council
Haringey Somali Community & Cultural Association
Haringey Womens Forum
HAVCO
Her Majesty's Court Service
HFRA (Haringey Federation of Residents Association)
Home Builders Federation - London

Lidl UK
Lipton Plant Architects
Living World Temple
Livingstone Youth & Parent Support Centre
Lomond Close & Brunswick Road RA
Lomond Close Residents Association
London Ambulance Service
London Basement Company Ltd
London Bat Group
London City Airport
London Forum of Amenity & Civic Societies
London Historic Parks & Gardens Trust
London Housing Federation
London Islamic Cultural Society
London Islamic Cultural Society
London Port Health Authority
London Walking Forum

Home Office
Home-Start Haringey
Hornsey CAAC
Hornsey Historical Society
Hornsey Vale Community Association
Hornsey Vale Community Association
Jala - Johnanthan A Law and Associates
Jamait-Al-Nissa
Joint CAAC
Jones Lang LaSalle Planning
King Sturge Llp
Knight Frank
Ladder Community Safety Partnership
Lambert Smith Hampton
LB Bexley
LB Redbridge
Lee Valley Estates
Lee valley Park Authority

London Waste Ltd
London Wildlife Trust
London Windows Direct Ltd
Lord Morrison Community Centre
Lordship Lane Infant School
Lordship Lane Junior School
Loren Design Ltd
Love Lane Residents Association
M C Dentistry
Manor House Dental Practice
Marianne Davys Architects Ltd
Mario Pilla Architects
Markfield Project
MD Designs
Metropolitan Development Consultancy
Metropolitan Home Ownership
Metropolitan Police
Metropolitan Police Service

London Continental Railway
Dron & Wright
London First
Metropolitan Housing Trust
Metropolitan Police
Metropolitan Police
Methodist Church
Ministry of Justice
Morrish Residents Association
Mount Anvil plc
Mulalley and Company Ltd
Nathaniel Lichfields and Partners
National Federation of Gypsy Liaison Groups
AMEC for National Grid
National Market Traders' Federation
New Testament Church of God
NHS London Healthy Urban Development Unit

Middle Lane Methodist Church
Middlesex Area Probation Service
Millennium Neighbourhood Watch & Residents Association
Millicent Fawcett Tenants Association
Millyard 7th day Baptist Church
Ministry of Praise
Missionaries of Africa
MJW
Moravian Church
More Space
Morris House Dental Surgery
Morris House Surgery
Moselle Close Residents Association
Mountview Arts Centre
Mt. Olivet Baptist Church
Murray Graham Architecture Ltd
Murray Mackeson Associates

Noel Park CAAC
Tottenham CAAC
Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park
North London Business
North London Chamber of Commerce
North London Partnership Consortium
North London Waste Authority
North London Waste Authority
North Middlesex Hospital
Caldotec Ltd
Campsbourne School
Parkside & Malvern Residents Association
Parkside Malvern Residents Association
Peacock & Smith for WM Morrison Supermarkets plc
Peacock and Smith
PEEC Family Centre

Muswell Colney Residents Association
Muswell Hill & Fortis Green Association
Muswell Hill & Highgate Handicapped Pensioners Club
Muswell Hill & Highgate Pensioners Action Group
Muswell Hill & Highgate Pensioners Action Group
Muswell Hill Police Station
Muswell Hill Synagogue
Muswell Hill Youth Project
N London Cultural Diversity Group
N.A.G.
National Romany Rights Association
Neelkamal Asian Cultural Centre
Neil Wilson Architects
Nelson Mandela Residents Association
New Deal for Communities
New Image Design

Planning Perspectives
Pollard Thomas & Edwards Architects
PTEA
Rapleys
Rapleys
Redrow Homes (Eastern) Ltd
Restoration Community Project
Rookfield Estate Residents Association
RPS Planning
Sandlings Residents Association
Savills
Savills
Savills
Savills
Savills Planning
Savills

New River Action Group
New River Sports Centre
New Space
New Stroud Green Health Centre
Newton Architecture
NHS London
Nightingale Primary School
Noel Park Infant & Junior School
Noel Park North Area Residents Association
Noel Park Over 55's Club
North Grove Residents Association
North Harringay Infant & Junior School
North London West Indian Association
Northumberland Park Community School
Northumberland Park Tenants & Community Association
Northumberland Park Women's & Childrens Centre

Selby Trust
Shian Housing Association Ltd
St. James Church
St. Mary's Church
Stapleton Hall Ltd
Stewart Ross Association/Dev Plan
Stock Woolstencroft
Stonewall
Sustrans
Tan Dental Practice
Tetlow King Planning
Thames Water Utilities Ltd
Thames Water Wastewater Services
The Alexandra Residents Association
Haringey Council
The Mulberry Primary School
The Planning Inspectorate

npower
Oakdale Resident Association / South Tottenham RA
Okpanam Women's Association
Oromo Community in Haringey
Osel Architecture
Outline Building Limited
P R P Architects
P. E. Ottery
P.D. Associates
Palace Gardens Association
Palace Gates Residents Association
Palace View Residents Association
Park Lane Close Residents Association
Park Road Dental Practice
Park Road Pool
Park View Academy
My Dental Care

The Ramblers
The Theatres Trust
<u>Sustrans</u>
Tiverton Primary School
Tottenham CAAC
Tottenham Civic Society + Tottenham CAAC
Transport For London
Tree Trust for Haringey
Triangle Community Centre
Turley Associates
Campaign to Protect Rural England (CPRE)
Turnaround Publisher Services
Turnaround Publisher Services
Unite Group PLC
Veolia Environmental Services (UK) Plc
Wards Corner Community Coalition
Wards Corner Community Development Group
Warner Estate Residents Association

Park Vue Dental Practice
Parsons Brinckerhoff Ltd
Partridge Way Residents Association
Pathmeads
Patrick Hickey Design
Paul Archer Design
Paul Buxton Associates
Peabody Design Group
Peabody Trust
Peabody Trust
People's Christian Fellowship
Perfect Fit Kitchen & Interiors Ltd
Peter Brades Architects
Phoenix Group
Plevna Crescent Residents Association
Police & Community Working Group
Port of London Authority
Post Office

Haringey Citizen's Advice Bureau
West Green Residents' Association
West Green Residents' Association
Woodlands Park Residents Association
Haringey Trades Council
Woodstock Road Residents Association
Workspace Group
YMCA
Cabinda Community Association
Veolia Water Partnership
London Parks and Gardens Trust
Pinkham Way Alliance
Thames Water
Freehold Community Association
Natural England Consultation Service
Office of the Green MEPs,
Member of Parliament for Chipping Barnet

Post Office Counters Ltd
Powergen plc
Pride of Ferry Lane
Propel Projects
Protect Bruce Castle Area (PBCA)
Pyramid Counselling Services
Quorum Associates
Randall Shaw Billingham
Redemption Church of God
Remington Road Residents Association
Rennie & Partners
Resident Association
Resident Association
Rhodes Avenue Primary School
Richard S McCarthy Architect
Rie Nijo Architecture
Risley Avenue Infant & Junior School

Planner
One Housing Group
One Housing Group
Hyde Housing
Viridian Housing
Viridian Housing
Tamil Community Housing Association Ltd
London & Quadrant
London & Quadrant
London & Quadrant
London and Quadrant
British Waterways Board (London Office)
Friends of Parkland Walk
Friends of Woodside Park
The Highgate Society
LB Southwark
Lee Valley Regional Park Authority

Robert Burns Residents Association
Robert Harrison Property
Rolfe Judd Planning Ltd
Royal Mail Property Holdings
Royal Society for the Protection of Birds
Rutland House Surgery
Saheli Asian Girls & Young Womens Group
Sakumoh Dance Group
Sanctuary Housing Association
Sanctuary Youth Club
Save Britain's Heritage
Save the Environment of Park & Palace (STEPP)
Savills Plc
Scenario Architecture
Schamroth + Harriss Architects
Servite Houses
Seven Sisters Infant & Junior School

Martineau
Milmead Industrial Management Ltd.
Mobile Operators Association
Muswell Hill CAAC
Planning Potential
Shire Consulting
Sunlight Lofts Ltd
Haringey Allotments Forum
Montagu Evans
Newlon Housing Trust
Newlon Housing Trust
CG Architects
Tottenham Police Station
Methodist Homes
Network Housing
Network Housing

Seventh Day Adventist Church
Seymour Road Residents Association
SGI Sokagakkia
Sierra Leone Community Empowerment Project
Sierra Leone Family Welfare Association
Sigma Design Build UK
Simon Bocking Building Services
Simon Levy Associates
Society for the Protection of Ancient Buildings (SPAB)
Solon Housing Co-operative Housing Services
Somali Community Group
Somali Welfare Association
Somerset Gardens Family Health Care
Sophia House Residents Association
South Harringay Infant School
South Harringay Junior School

Arhag HA
Lee Valley Estates
Lee Valley Estates
Innisfree HA
Karin Housing Association
Karin Housing Association
Circle Houing Group
Circle Houing Group
Highgate CAAC
Highgate CAAC
Highgate CAAC
Apna Ghar Housing Association
Carr-Gomm
Circle 33 Housing Trust
Community HT (One HG)
Grainger PLC
Guinness Trust

South Hornsey Residents Association
Southwood Lane Residents Association
Spenser Associates
Sport England London Region
Sporting & Education Solution
Springfield Avenue Residents Association
St, Paul's and All Hallows CE Junior School
St. Andrews Vicarage
St. Ann's Primary School
St. Anns Church
St. Benet Fink
St. Cuthbert's Church
St. Francis de Sales RC Infant & Junior School
St. Gildas' RC Junior School
St. Ignatuis RC Primary School
St. James CE Primary School
St. James Dental Surgery

Habinteg Housing Association Ltd
Hornsey Housing Trust
Housing 21
Islington and Shoreditch HA
Lien Viet Housing Association
Logic Homes Ltd
North London Business
North London Sub-Region
Notting Hill Housing Association
Nottinghill Housing Group
Origin Housing
Origin Housing
Origin Housing Group
Pocket
Pocket
Pocket Living
Sahil HA
Sahil Housing

St. John the Baptist Greek Church
St. John Vianney Church
St. John's
St. Marks Methodist Church
St. Marks Methodist Church
St. Mary Community Centre
St. Mary's CE Infant School
St. Mary's CE Junior School
St. Mary's Greek Orthodox Cathedral
St. Mary's RC Infant & Junior School
St. Michael's CE Primary School
St. Paul the Apostle
St. Paul's
St. Paul's and All Hallows CE Infant School
St. Paul's Church
St. Peter Le Poer
St. Thomas More School
St. Vincent Social & Economic Association

Sanctuary Group
Sanctuary Housing
Shian Housing Association
Southgate Churches & Wood Green
St Mungo
Teachers Housing Association
The Abbeyfield Society
Pinkham Way Alliance
Muswell Hill Sustainability Group
S. Mary's Vicarage
Networked Neighbourhoods
Cranley Gardens Residents' Association
The Hawthorns RA and Neighbourhood Watch
Haringey Forum for Older People
Woodside High School
LB Lewisham
Barker Parry Town Planning Ltd
Lancasterian Primary School

Stagecoach - SELKENT
Stamford Hill Primary School
Stationers Community Centre
Staunton Group Practice
Stephen Donald Architects
Stokley Court Residents Association
Stroud Green Baptist Church
Stroud Green Housing Co-operative
Stroud Green Residents Association
STS Structural Engineering
Stuart Crescent Health Centre
Stuart Henley & Partners
Studio 11 Design Ltd
Studio 136 Architects
Suffolk Road Residents' Association
Summersby Road Residents Association
Sunshine Garden Centre
Sure Youth Foundation Project

Exposure Organisation
Open Door
Open Door
Open Door
Space Design Consultants Ltd
LB Bromley
St. Martin of Porres RC Primary School
Turkish Cypriot Community Association
Iceni Projects Limited
Mind In Haringey
Pellings Llp
Oliver Burston Architects
Highgate URC Church
Earlham Primary School
John Rowe-Parr Architects
The Garden History Society
Westminster City Council

Symon Smith & Partners
T.B.F.H.A
Tasou Associates
Temple of Refuge
Templeton Associates
Tenants Association
Tetherdown Primary School
Thames Gateway London Partnership
The Alexandra Surgery
The Bowes Road Dental Practice
The Chine & Cascade Residents Association
The Christchurch Hall Surgery
The Clock Tower Practice
The Gainsborough Clinic
The Georgian Group
The Green CE Primary School
The Gypsy Council

Wood Lane Residents Association
Gardens Residents Association (GRA)
Royal Borough of Kingston upon Thames
St. John the Baptist Greek Church
Grovelands, Lemsford & Leabank Residents Assoc.
Muswell Hill Primary School
Family Mediation Service
Sovereign Group Ltd
St. Francis de Sales
Leads Design Partnership
St. Aidan's VC Primary School
Keeping it Simple Training (KIS) Ltd
Home Group
The Parish of Wood Green
Ferry Lane Primary School
St. John Vianney School
Action for Kids Charitable Trust

8 Stuart Crescent Health Centre,
The John Loughborough School
The North London Gay & Lesbian Association
The Surgery
The Surgery
The Surgery
The Surgery
Spur Road Surgery
The Surgery
The Surgery
St John's Road Surgery
The Surgery
The Surgery
The Surgery
Myddleton Road Surgery
The Surgery

Muswell Hill Centre
Coleridge Primary School
Stroud Green Primary School
Barnet, Enfield and Haringey Mental Health Trust
Our Lady of Muswell Hill Primary School
Torrington Park Residents Association
The Willow Primary School
Millennium Dental Practice
St. Paul's Catholic Primary School
Rokesly Junior School
Tynemouth Area Residents' Association
Papa Architects Ltd
Friern Village Residents' Association
Enfield, Haringey and Barnet Samaritans
Dixon Searle LLP
Mario Pilla Architects Ltd
LB Merton

The Surgery
The Tree Council
The Tree Trust for Haringey
The United Reformed Church
The Victorian Society
The Weymarks Residents Association
Affinity Water Limited
Tibbalds TM2
Tiverton Tewkesbury Residents Association
Tomlinson Tree Surgeons
Tottenham & Wood Green Pensioners Group
Tottenham Baptist Church

LB Merton
The Bounds Green and District Residents Association
Rapleys LLP
Savills,
Mario Pilla Architects Ltd
Planning Bureau - McCarthy and Stone
Dowset Road Residents Association.
Bridge Renewal Trust
Winbourne Martin French (chartered surveyors).
Muswell Hill & Fortis Green CAAC
Transition Crouch End
Hornsey Historical Society member.
MHFGA
CgMs Consulting
London borough of Enfield
London Borough of Enfield
Collins & Coward
Hornsey Historical Society member

Tottenham Community Sports Centre
Tottenham Green Sports Centre
Tottenham Green Taskforce
Tottenham Irish Women's Group
Tottenham Peoples Initiative
Tottenham Police Station
Tottenham Traders Association
Tottenham Trust
Tottenham Women's Aid
Tower Gardens CAAC
Tower Gardens Residents Network
Town & Country Planning Limited
Trafalgar Christian Centre
Transco
Trinity at Bowes Methodist Church
Turkish Cypriot Counselling Group
Turkish Cypriot Elderly Group
Turkish Cypriot Forum

A2 Dominion Group
The Highgate Society
Greater London Authority
Urban Vision Partnership Limited Regulatory Services
Planware Ltd
Mayor's Office for Policing and Crime
Haringey Young Carers Project
We Love Myddleton Road
Architectural Heritage Fund
Smith Jenkins Town Planning Consultants
Level Ltd
SSA Planning Ltd
London Gypsy and Traveller Unit
Met Police – Safer Transport Team - Haringey
Met Police – Safer Transport Team - Haringey
DSO Edmonton London Ambulance Service
London Ambulance Service

Turkish Cypriot Peace Movement in Britain
Turkish Cypriot Women's Project
Turkish Parents Association
Turkish Youth Association
Turner Avenue Residents Association
Turnpike Lane Citizens Advice Bureau
Twentieth Century Society
TWG FoE/FoE London
Tynemouth Medical Practice
Uganda Welfare Association
Umfreville Road Neighbourhood Watch
Unit One Architects
United Apostolic Faith Church
Universal Church of the Kingdom of God
Urban Futures London Ltd
Urban Homes Ltd
Van Rooyen Design

Arriva
Metroline
First Capital Connect
First Capital Connect
TfL
TfL
TfL
TfL
TfL London Rail
LOROL
Metroline
Abellio
Go Ahead
Greater Anglia
Haselmere Residents Association
Haselmere Residents Association
London Travel Watch - Chair of Consumer Affairs
London Travel Watch

Veryan Court Residents Association
Victim Support Haringey
Visit London
Vivendi Architects LLP
Voluntary Action Haringey
W. A. Shersby
Warham Road Neighbourhood Watch
Charalambous Architectural Consultant
Welbourne Primary School
West Green Neighbourhood Watch
West Green Primary School
West Green Regeneration Group
Westbury Dental Practice
Westbury Medical Centre
Weston Park Primary School
White Young Green Planning
Whitehall Community Centre
Willoughby Road Methodist Church

Haringey Cycling Campaign
Age UK
Mobility Forum/ Age Concern Haringey
Haringey Disability First Consortium (Access & Transport sub-group)
Haringey Disability First Consortium
Haringey Disability First Consortium
Haringey Federation of Residents Associations
Palace Gates Residents' Association
Highgate Neighbourhood Forum
Sustainable Haringey/ Muswell Hill and Fortis Green Association
Sustainable Haringey Transport Group
Barking-Gospel Oak line users group
Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth
HAVCO
London at BT Group and Chair, Haringey Business Board
Hackney Community Transport Group
Living Under One Sun

Wilson & Bell
Winkfield Road Community Centre
Wise thoughts - gaywise
Women & Medical Practice
Wood Green Area Youth Project
Wood Green Black Tenants Group
Wood Green Central Area Tenants & Community Assoc.
Wood Green Community Link
Wood Green Dental Practice
Wood Green Police Station
Wood Green Regeneration
The Archdeacon of Hampstead
Wood Green Youth Club
Woodberry Down Baptist Church
Woodlands Park Infant & Junior School
Woodridings Court Residents Association
Woodside Residents Association

Boyer Planning London
Berkeley Homes (North East London) Ltd
Crouch End Forum
Fairview New Homes
Amec Foster Wheeler on behalf of National Grid
NHS Property Services Ltd
Fairview
Persimmon
Persimmon
Persimmon
DP9 Planning Consultants
Chartered Landscape Architect
Fountayne Residents Association

Xeva Design Concepts
Yabsley Stevens Architects
Young Lesbian Group
Youth One Stop Shop
Youth Theatre Project
Zatkhon Construction Co. Ltd.
The Queens Mansions Residents Association
Ladder Community Safety Partnership
Department for Education
Chris Thomas Ltd
Haringey NHS
Haringey Teaching Primary Care Trust
Whittington Hospital Trust

## 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
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<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> 1 Philip Lane, Tottenham Green N15 4JA	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm	<b>Muswell Hill Library</b> Queens Avenue, Muswell Hill N10 3PE	Mon – Fri 9am – 7pm 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](mailto: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

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	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Address Line 2	
Address Line 3	
Post Code	
Telephone Number	

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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.

Email address

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

Name or Organisation:

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

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the Duty to co-operate

Yes

No

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 Tottenham Area Action Plan DPD Consultation

ID	Respondent	Wishes to Attend Hearings	ID	Respondent	Wishes to Attend Hearings
1	David Smolira	No	23	Montagu Evans on behalf of Hale Village Properties	Not stated
2	Sport England	Not stated	24	Canal and River Trust	Not stated
3	Cllr Lorna Reith	Yes	25	Quod obo Muse Developments and the Canal and River Trust	Yes
4	Tottenham & Wood Green Friends of the Earth	Yes	26	Christine Protz	Not stated
5	Tim Kay	Not stated	27	Marc Roach	Not stated
6	Zena Brabazon	Yes	28	Amar Shazad	Not stated
7	Elizabeth Pearce	No	29	Catherine Collingborn	Not stated
8	Russell Dove	No	30	Peter Corley	Not stated
9	Our Tottenham Network	Yes	31	Cyrus Razavi	Not stated
10	Fiona English and Mark Ellerby	Not stated	32	Lewis Jardine	Not stated
11	Isaac Solinsky	No	33	Yvonne Spyrou	Not stated
12	Savills obo Interfine Properties	No	34	Stanley Knill	Not stated
13	Savills obo Empyrean Developments Ltd	No	35	Neha Garg	Not stated
14	David Sargeant	No	36	Lorenzo Lodi	Not stated
15	Jigsaw Student Living	Not stated	37	Kunal Gupta	Not stated
16	Tezay Mustafa	Yes	38	Fred Clark	Not stated
17	Springfields Planning and Development Limited obo Ali Mentesh	Yes	39	Alex Tennyson	Yes
18	GW & JA Green	? (couldn't find rep)	40	Margaret Burr and Noel Treacy	Not stated
19	Quod obo THFC	no	41	Ben Scanlon	Not stated
20	Commercial Vehicle Sales & Hire	Not stated	42	Empyrean Developments Limited	No
21	Tottenham Business Group	Yes	43	Colliers on behalf of Diamond Build PLC	Not stated
22	North London Waste Authority	No	44	Ruiyon Zhou	No



## Appendix I - Responses to the Pre-Submission Tottenham Area Action Plan DPD Consultation – Respondent Order

### Respondent 1: David Smolira

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	RTAAP1	AAP general	No	Yes	My concern relates to the area covered by the Tottenham Area Action Plan. Although I recognise that the eastern half of SEVEN SISTERS WARD has limited capacity for development, it is nonetheless a very important area of South Tottenham and one that if excluded from the AAP fails to benefit from or be taken account in the development of policy and provision in the south of the borough. Surely it makes more sense to extend the area covered by the AAP to the borough boundary with Hackney. In addition, Hackney is undertaking similar planning in the north of their borough and it seems to me to be important for better coordination and joined-up policy development that the two AAP meet and that the tow	To extend the Tottenham Area Action Plan South to the borough boundary to include the eastern half of Seven Sisters Ward.	Disagree. The AAP boundary is drawn such that it identifies the growth opportunities within Tottenham and its surrounds. The southern part of the borough is not intended to be an area of significant growth as set out in the Haringey Spatial Strategy to which the AAP gives effect. The inclusion of the eastern half of Seven Sisters Ward within the AAP may give rise to expectations regarding intensification, which would not be supported by the strategic investment in social and physical infrastructure programmed for Tottenham Hale and North Tottenham.  There still however remains opportunities to work with Hackney about the appropriate management of the area that lies

					boroughs work together for the benefit of the people of south east Haringey and north Hackney, especially given that the infrastructure housing and service provisions will impact on all the people in these areas		between our two growth areas.  No change
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### Respondent 2: Sport England

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	RTAAP2	Not stated	No response given	No response given	<p>Further to Sport England's email dated 23rd March 2015, we note the Council's intentions to provide adequate social infrastructure to support new development and growth. We welcome the potential of partnerships with schools that could help facilities such as playing fields to meet the sporting needs of the community.</p> <p>However, Sport England remains unclear as to whether existing playing field sites are intended to be protected or whether it is intended that they will be lost to development. Sport England would expect any policy in the APP to be very explicit on the need to retain (in playing field use) and not prejudice the use of the existing playing field land. Working with the provisions of the NPPF, Sport England recognises the role of sport and recreation as a fundamental part of sustainable development, and expects local</p>	Expect any policy in the APP to be very explicit on the need to retain (in playing field use) and not prejudice the use of the existing playing field land.	Haringey's Local Plan recognises the role of sport and recreation in supporting sustainable development, in line with the NPPF. This is made clear in the adopted Strategic Policies Local Plan, including policies SP 13 (Open Space and Biodiversity) and SP 15 (Culture and Leisure), which set out the Council's approach to plan positively for playing fields and related facilities. The DM DPD

				<p>authorities to plan positively for these needs and demands accordingly. The protection and provision of opportunities to participate in sport is seen as fundamental to the health and well-being of communities (NPPF, section 8), meaning that local authorities must plan and provide accordingly through policy and development management. Without a robust and up-to-date assessment of need (as required by paragraph 73 of the NPPF), there is a risk that a local plan document could be considered unsound.</p> <p>Sport England will resist the allocation of any playing field site for development unless there is a robust assessment (Playing Pitch Strategy to Sport England methodology: <a href="https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/">https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/</a>) in place at the point of allocation which has clearly shown the open space, buildings or land to be surplus to requirements. Should any policy seek to allocate any existing playing field land or formal built sports facilities for redevelopment, we would strongly urge the Council to discuss this directly with Sport England.</p>	<p>and site allocations give effect to the Strategic Policies. Accordingly, the Council will seek to enhance and protect against the loss of these open spaces and leisure facilities, unless it can be suitably demonstrated these are surplus to requirements. This policy approach is supported by assessments of open space provision, as included in the technical evidence base; in addition the Council is currently finalising an updated Playing Pitch Strategy, which will inform the Infrastructure Delivery Plan (IDP), and help to ensure an appropriate level of provision to support planned growth in the Borough.</p>
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Respondent 3: Cllr Lorna Reith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RTAAP3	Para 3.9	Not stated	Not stated	I am pleased to see that the <b>vision includes “much needed higher quality council housing”</b> but it isn't clear if this means more such housing or just improving the quality of the existing stock. Clearly, despite the improvements obtained through the Decent Homes programme, more investment in the existing stock is needed. However, given the acute shortage of good quality housing for people on low and moderate incomes it is vital that the plan provides for additional social housing.	Not stated.	The AAP seeks to deliver both improved existing council housing stock, through estate renewal and the current Decent Homes Programme, as well as new affordable housing within new residential developments. New affordable housing will comprise a range of tenures, from Starter Homes, to low cost market housing, intermediate housing products and social/affordable rent.  No change
3	RTAAP4	Para 3.15	Not stated	Not stated	It is not clear what is meant by <b>“affordable”</b> . The current residents of Tottenham Hale need housing that is affordable for their level of <b>income, not just “affordable”</b> by government definition.	Not stated.	At paragraph 3.15 the terms affordable refers to general market housing for sale or rent within the Tottenham Area, recognising the polarity between Tottenham and other parts of the Borough in terms of land values and rent levels.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
							No change
3	RTAAP5	AAP1	Not stated	Not stated	I welcome the reference in D to “ <i>reduce carbon emissions and adapt to climate change</i> ” and I welcome proposals regarding decentralised energy grids. It will be important to ensure that this is given due priority in subsequent negotiations and planning conditions. I would therefore propose that all such mentions in the individual site sections should be in Site Requirements not Site Guidelines.	I would therefore propose that all such mentions in the individual site sections should be in Site Requirements not Site Guidelines.	AAP 1 is an area-wide policy and therefore applicable to all site allocations. Where the Council considers that proposals should investigate opportunities for DE on site allocations, these have been included in the development guidelines to ensure due consideration, having regard to individual site circumstances at the time of an application. The Council disagrees with suggested change, as it may not always be appropriate to require proposals to deliver DE infrastructure.  No change.
3	RTAAP6	AAP3	Not stated	Not stated	Para 4.13 – as referred to above the plan needs to deliver better housing for existing residents of Tottenham Hale, including more genuinely affordable homes as well as bigger homes to ease overcrowding.		The Local Plan seeks to facilitate the delivery of housing to meet objectively assessed need and the <b>Borough's strategic housing</b> target. This includes delivery of a wide range of housing types and tenures, including affordable housing, for both

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
							existing and new residents.  No change
3	RTAAP7	AAP6	Not stated	Not stated	Para F – “ <b>Ferry Lane</b> ” – should differentiate between those bits of Ferry Lane in DCF and those adjacent to the river/Green Belt. In particular the Hale Wharf site is not suitable for tall buildings. These should be concentrated at the transport hub and in already built up urban areas – not at the boundary of the green belt. This approach is in line with the wording elsewhere in 4.26 - DM6 – building heights should “ <i>respond to existing street hierarchy</i> ” and “ <i>decrease into the quieter hinterland areas</i> ”. “ <i>Where elements that are considerably taller than this consistent height such as at Seven Sisters station in the Apex House site allocation or at Northumberland Park station... they should mark something or somewhere and have a reason for being</i> ”	Para F – “ <b>Ferry Lane</b> ” – should differentiate between those bits of Ferry Lane in DCF and those adjacent to the river/Green Belt. In particular the Hale Wharf site is not suitable for tall buildings. These should be concentrated at the transport hub and in already built up urban areas – not at the boundary of the green belt.	AAP 6 (F) makes reference to taller buildings, not tall buildings. The Local Plan sets out a clear distinction between these two development types with details set out in Policy DM 6 of the DM DPD. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey’s</b> technical evidence base. It should be noted that the role and function of Green Belt as set out in the NPPF is to curb urban sprawl, but does not extent to the consideration of impacts of development outside of but adjoining Green Belt on its openness. By inference, it is therefore acceptable to have development adjacent to the Green Belt boundary and for this to be visible from the Green Belt extent.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><i>taller. These by their very nature should be few in number".</i></p> <p>Although Hale Wharf itself is not Green belt land it provides the border to Green Belt land to the west, north and east (and a bit further to the south as well). So tall buildings here would severely impinge on the sense of openness that the plan says it seeks to preserve.</p>		No change.
3	RTAAP8	AAP3	Not stated	Not stated	<p>A further problem with the plan is that it fails to set out how the housing needs of the existing population will be met. The priority appears to be for new developments which will be one and two bedrooms in size and will not meet the needs of families living in over-crowded, poor quality, insecure, private accommodation. While accepting that Tottenham will see new people move into the area I am concerned that existing communities</p>	Not stated.	<p>The Council considers that the Local Plan sets a clear framework to deliver housing to meet objectively assessed need and the <b>Borough's strategic housing</b> target. This includes delivery of a wide range of housing types and tenures, including affordable housing, for both existing and new residents. The Development Management DPD sets out borough-wide policies (applicable to the Tottenham area) to ensure that new housing development is</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					across the ward will not see the benefit of regeneration and may in practice find themselves eased out. One of <b>Tottenham's key</b> strengths is the way in which people from across the globe live together, get on and contribute to the borough and society in general.		designed to a high quality and is of an appropriate standard. It is worth noting that a new Family Housing Protection Zone, including Tottenham, has been proposed to help ensure a supply of larger and family homes in the area.  No change
3	RTAAP9	Para 4.29	Not stated	Not stated	<i>Managing and improving the capacity of the road network</i> ". <b>The accepted</b> wisdom in relation to road capacity and traffic generation is that increasing capacity merely encourages more traffic. The area around Tottenham Hale has undergone a major roadworks scheme with the removal of the gyratory, the aim of which was to reduce capacity along Broad Lane to discourage through-traffic. This approach should be strengthened.	I would suggest changing <b>the text by deleting "and improving the capacity of"</b> .	<b>Agreed. Include a minor modification that recognises the objective of managing the capacity of the road network and improving the street environment.</b>
3	RTAAP10	AAP8	Not stated	Not stated	While I am happy with the principle of car-free	Not stated.	Policy AAP 7.C sets out that parking provision will be

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>development this has to be properly managed, with adequate spaces for disabled people and proper, enforced, parking controls in surrounding streets. My experience as a ward councillor is that people <b>move into a 'car-free'</b> development but think that they will be able to find somewhere locally to park. This has caused considerable resentment and problems on the Ferry Lane estate with residents from Hale Village and the Sian housing development within the Ferry Lane estate parking on the estate. I have also had to deal with difficulties arising from inadequate provision of dedicated parking for disabled people.</p>		<p>expected to be delivered in accordance with Policy DM 32, which the Council considers makes appropriate provision for disabled people. Parking enforcement is outside the scope of this Local Plan consultation.</p> <p>No change</p>
3	RTAAP11	Para 2.65	Not stated	Not stated	<p>I welcome the inclusion of <i>"New public spaces need to be added and existing spaces significantly improved... opportunities to provide open space as part</i></p>	<p>So in terms of wording, I would suggest amending 2.65 (as set out in the response from Tottenham and Wood Green Friends of the Earth) to read</p>	<p>The suggested changes are considered to add an unnecessary level of detail for an introductory section highlighting key challenges and opportunities. Further,</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><i>of major development schemes or master plans developed in Tottenham will be encouraged</i>". This needs to be considerably strengthened. Green open space has already been lost (railway expansion at Tottenham Hale) and more is at risk (proposed housing development along Monument Way), and more is likely to be lost if the level of proposed housing does get built. While accepting that some new open space will be created the plan lacks an overall assessment of the amount of space <b>being lost; so it isn't clear if</b> there will be a net gain or loss. The proposed increases in population require an increase in open green space and the plan should specifically accommodate that.</p> <p>There are actions that can be taken to protect and enhance the green space</p>	<p><i>"Some development will lead to loss of green open space and natural habitat, for example the three-tracking and Crossrail 2 works at Tottenham Hale. New public spaces need to be added and existing spaces significantly improved including access improvements so that each part of Tottenham has a quality network of green and accessible space that supports a diversity of nature. The Council will monitor gains and losses and ensure a net gain. Opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged including opportunities at Ermine Road and Plevna Crescent"</i>.</p>	<p>the Local Plans seeks to protect against the net loss of open space and biodiversity, and the Council therefore disagrees with parts of the suggested wording. Monitoring arrangements are discussed in Chapter 6 and need not be repeated here.</p> <p>Such requirements are also set out in Policy AAP 9: Tottenham Green Grid.</p> <p>No change.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>that exists and in doing so help preserve local wildlife. Actions it would be good to see included are:</p> <ul style="list-style-type: none"> <li>• Ensure that green corridors provide high quality natural habitat.</li> <li>• Making new developments really green – on their roofs (where not suitable for PV panels), walls and open spaces, with bird- and bat boxes integrated into structures and with appropriate mix of native species.</li> <li>• Actively conserve species we do have – for example the small colonies of House Sparrows in South and North Tottenham. Sparrows depend on access to roof space, which means they do best in older streets. Building renovation often blocks such access so it is important to ensure it</li> </ul>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					is replaced when renovation occurs.		
3	RTAAP12	Para 4.35	Not stated	Not stated	<i>Delivering new open spaces of a significant scale is not considered</i> ". I would argue that the proposed growth in population, coupled with existing deficiencies in open space makes the case strongly for considering new (and significant) open spaces. It also possibly contradicts 2.65.	I suggest re-wording 4.35 (in line with the response from Tottenham and Wood Green Friends of the Earth) to say: <i>"Due to the significant projected increase in housing and employment in Haringey and Tottenham, the Council will seek to establish new open space where opportunities arise, and to create linkages between them for people and wildlife. Tottenham does have a range of excellent open spaces within it, but some are being lost and others are under pressure from growing population. Development contributions have the potential to be collected and spent on adding to, improving and improving access to existing open spaces. Together, these will form a green grid of</i>	Agree that wording should be amended to better reflect opportunities for open space provision, in line with other Local Plan policies.  Change paragraph 4.35 to: <b>"Due to the significant need for new housing and employment in Haringey, and Tottenham, delivering new open spaces of a significant scale is not considered realistic. However the Council will seek to facilitate the creation of new open spaces where opportunities arise, and to create linkages between open spaces for people and wildlife.</b> Tottenham does have a range of excellent open spaces within it, and on its doorstep. Additionally development contributions have the potential to be collected and spent on

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
						<i>networked, high quality open spaces</i> ".	improving, and improving access to existing open spaces. Together, these <del>aims</del> will form a green grid of networked, high quality open spaces.
3	RTAAP13	TH7	Not stated	Not stated	The commentary includes the phrase " <i>subject to the reprovision of the licensed waste capacity at the Ashley Road depot site</i> " <b>and last</b> bullet point. However, there is no detail given about where this reprovision would be. This needs to be included. This is an important local amenity and it is unreasonable and unrealistic to expect local residents to cross the borough to reach a waste and recycling site.	There is no detail given about where this reprovision would be. This needs to be included.	There are limited alternatives for the provision of the existing waste facilities within the Tottenham area, noting that such use is currently co-located with Depot uses and for efficiencies needs to continue to do so. There remain other facilities serving other parts of the Borough including the Western Road facility in Wood Green, meaning residents would not need to cross the entire borough..  No change.
3	RTAAP14	TH8	Not stated	Not stated	There is outline planning permission for a tower at Hale Village of 18 storeys. This should be retained at this height. There is no justification for a building	Not stated.	The height limit reflects the extant planning permission, which is referenced in the policy. Hale Village falls within the envelope of an area considered suitable for

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>over 18 storeys. The target for the Mayor's housing zone can be met without going above the existing permission height. There is a real danger that allowing a significant change in height would undermine confidence in the housing market. People moved into Hale Village, buying quality properties, on the basis of the original planning permission. To change their surroundings significantly within a few years of occupation may well impact on the confidence of other potential buyers.</p>		<p>tall buildings, as supported by Haringey's technical evidence base. The policy provides that proposals over 18 stories will need to be justified, and the Council considers this approach is sufficiently flexible to consider proposals having regard to their individual merits.</p> <p>No change.</p>
3	RTAAP15	TH9	Not stated	Not stated	<p><b>Site requirements:</b> I welcome the reassurance about continued access and facilities for the boaters. Similarly I welcome the need for any development "to have regard to the environmental, ecological interests in the locality, particularly relating to the water environment and habitat of the Lee Valley</p>	Not stated.	Noted.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><i>Regional Park</i>".</p> <p>I support the section relating to the garage site and the need for any development to comply with Green Belt objectives.</p>		
3	RTAAP16	TH9	Not stated	Not stated	<p>I support the guideline in relation to the need for a range of unit sizes and types and suitability for family housing. One of the complaints I receive as a councillor is from people who like living at Tottenham Hale but have started a family and need to move to larger accommodation – of which there is a shortage.</p> <p>5<sup>th</sup> bullet – I agree that <b>building heights 'must respond to proximity and openness of the Green Belt'</b> but would stress that the site is <i>within</i> the river corridor and Green Belt, with the river to one side and the Paddock and reservoirs to the other. The sense of openness should be preserved from Ferry Lane northwards, including</p>	Not stated.	Noted.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>around the lock. High buildings at this point would create the reverse of openness, turning the environment into an urban canyon, with Hale Village at 12 storeys on one side and new high buildings on the other. The whole essence of this part of Tottenham Hale is that it is flat and open marshland and has been for hundreds of years. It has a palpable sense of openness and is not urban in character. This must be retained. Tall buildings would undermine that uniqueness and would potentially lead to an increase in heights in the surrounding area – changing the character forever.</p> <p>6<sup>th</sup> bullet – I support the aim that the development must be responsive to the natural environment. This should include green walls/roofs facing river on both sides, and incorporate bird and bat boxes etc.</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RTAAP17	TH10	Not stated	Not stated	I am concerned about the loss of open green space from the proposed housing development. The Plan must ensure that the Green Link at least compensates for this in terms of area, and improves on it in terms of habitat quality. The last bullet point of D Guidelines notes that the wall currently provides a noise barrier. This is something that residents of the Chesnuts estate value. If this is removed then the new development needs to provide at least as good an acoustic barrier from traffic noise.	<p>The Plan must ensure that the Green Link at least compensates for this in terms of area, and improves on it in terms of habitat quality.</p> <p>The new development needs to provide at least as good an acoustic barrier from traffic noise</p>	<p>The open space is non-designated and poorly configured limiting its use to a buffer. The site requirements set out how new development should interface with this open space. New development offers opportunities to improve the quality and function of this space, in addition to green grid improvements and delivery.</p> <p>Measures to be implemented for protection against pollution will be considered having regard to individual proposals. Policy DM 23 sets out criteria to ensure appropriate protection in this regard, and will be considered alongside TH 10.</p> <p>No change</p>
3	RTAAP18	TH11	Not stated	Not stated	Although outside Tottenham Hale ward this area includes <b>part of the O'Donovans site.</b> (The other part of their site will be affected by Crossrail	Not stated.	Noted. Existing authorised uses are outside the scope of this Local Plan consultation.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					2). The operation of this site is a blight on residents of Ferry Lane estate through its noise and, sometimes, dust. The operation is also a blight on Markfield Road – danger, dirt and mud, and an appalling road surface. I receive a lot of complaints from residents about noise and about the condition of Markfield Rd. If the operation will have to move at some time, then the Council should be working to secure the greatest benefit by working with the company to move them earlier rather than later – when land to relocate them in NE Tottenham industrial estates is still available and affordable.		No change

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	RTAAP19	Flood risk	Not	Not stated	Much of the proposed	So there should be a	The Council has

			stated		development will be in the River Lee floodplain, and only 10m above sea level. The floods of 2015/16 have shown previous assessments re <b>“1 in 100 years” etc to be no longer valid.</b> The world is on course for 3.7°C warming. So where will sea level be in 100 or 200 years (when on current trends the buildings we put up now may still be required)?	new point recognising that –a new assessment should be carried out looking at global warming up to 3.7°C.	undertaken a flood risk assessment in line with the NPPF and associated guidance, making an appropriate allowance for climate change.  No change.
4	RTAAP20	Paragraph 2.65 Green Space	Not stated	Not stated	<b>“New public spaces need to be added and existing spaces significantly improved... opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged”.</b> (but 2.66 goes on <b>“increasing the quantity of open space is difficult in an urban borough”.</b> The Plan does not acknowledge that green open space is already at risk (eg due to railway works, potential housing development at Plevna Crescent, and	So in terms of wording, we suggest amending 2.65 to read <i>“Some development will lead to loss of green open space and natural habitat, for example the three-tracking and Crossrail 2 works at Tottenham Hale. New public spaces need to be added and existing spaces significantly improved including access improvements so that each part of Tottenham has a quality network of green and accessible space that supports a diversity of</i>	The suggested changes are considered to add an unnecessary level of detail for an introductory section highlighting key challenges and opportunities. Further, the Local Plans seeks to protect against the net loss of open space and biodiversity, and the Council therefore disagrees with parts of the suggested wording. Monitoring arrangements are discussed in Chapter 6 and need not be repeated here.  Such requirements are

				<p>proposed housing along Monument Way), and that more will be lost if its vision comes to be. Some will be created – we welcome for example the Green Grid across Tottenham Hale and the proposed Bruce Grove Wood SLOL (though we seek clarification on how the latter will be created). But there seems to be no overall assessment of space being lost; so it <b>isn't clear if there will be a net gain or loss</b>; and the rising population means we do need a net increase.</p> <p>At the same time we know that many – and probably most - of our wildlife species are in decline and we need to do much better at providing quality joined-up habitat.</p> <p>So, the Council needs to:</p> <ul style="list-style-type: none"> <li>• work with the local community to look at opportunities, including working with TfL and Network Rail to take Ermine Road</li> </ul>	<p><i>nature. The Council will monitor gains and losses and ensure a net gain. Opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged including opportunities at Ermine Road and Plevna Crescent”.</i></p>	<p>also set out in Policy AAP 9: Tottenham Green Grid.</p> <p>No change.</p>
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					<p>and Plevna Crescent open land back into public ownership, so that the remaining open land can be managed for nature and amenity for when Crossrail 2 is built and Gourley Triangle developed (the developer has not started work at Plevna Crescent despite getting planning permission on appeal last year).</p> <ul style="list-style-type: none"><li>• Ensure that green corridors do provide high quality natural habitat.</li><li>• Make new developments really green – on their roofs (where not suitable for PV panels), walls and open spaces, with bird- and bat boxes integrated into structures and with appropriate mix of native species.</li><li>• Actively conserve species we do have – for example the small</li></ul>		
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					colonies of House Sparrows in South and North Tottenham. Sparrows depend on access to roof space, which means they do best in older streets. Building renovation often blocks such access so we need to ensure it is replaced when renovation occurs.		
4	RTAAP21	Spatial vision	Not stated	Not stated	The plan needs to provide the backing for a big increase in cycling and walking – for health and environmental (air quality and climate change) reasons.	The plan needs to provide the backing for a big increase in cycling and walking.	<p><b>Haringey’s Strategic Policies Local Plan</b> already supports this, including through Policy SP 7, which sets out the <b>Council’s strategic</b> approach to promoting and facilitating modal shift to more sustainable forms of movement, including walking and cycling. The AAP will help give effect to these policies, including through Policy AAP 7, AAP 9 and requirements <b>on the Plan’s site</b> allocations.</p> <p>No change.</p>
4	RTAAP22	Housing Paragraph 3.9	Not stated	Not stated	We welcome the fact that <b>the vision includes “much needed higher quality</b>	Change text to make it clear we need more council housing as well	The vision reflects that housing will be delivered to meet need. The level of

					<b>council housing” but not clear if this means more such housing or just improving quality of existing numbers. We need both.</b>	as better quality	provision of social housing depends on many factors including Government policy to extend the definition of affordable housing to <b>include ‘Starter Homes’</b> and a grant funding regime that prioritises affordable rent tenure at up to 80% market rents.  No change.
4	RTAAP23	Housing Paragraph 3.15	Not stated	Not stated	It is not clear what is <b>meant by “affordable”</b> – we need really affordable housing for low income people, not just <b>“affordable” by government definition.</b>	Set out affordability definition.	A definition of affordable housing is already included in the glossary (Appendix D). NB: this may change as a result of the Planning & Housing Act  No change.
4	RTAAP24	Climate Change AAP 1	Not stated	Not stated	We welcome the <b>reference in D to “reduce carbon emissions and adapt to climate change”</b> . We welcome proposals regarding decentralised energy grids and hope this will be given due priority in subsequent negotiations and planning conditions.	We propose that all such mentions in the individual site sections should be in Site Requirements not Site Guidelines.	AAP 1 is an area-wide policy and therefore applicable to all site allocations. Where the Council considers that proposals should investigate opportunities for DE on site allocations, these have been included in the development guidelines to ensure due consideration, having regard to individual site

							<p>circumstances at the time of an application. The Council disagrees with suggested wording, as it may not always be appropriate to require proposals to deliver DE infrastructure. A more flexible approach is to include the text in the site guidelines.</p> <p>No change.</p>
4	RTAAP25	Housing policy AAP 3	Not stated	Not stated	The plan needs to deliver better housing for existing people, including more, affordable homes as well as bigger homes to ease overcrowding.	Set this out in the text.	<p>Policy AAP 3 and supporting text reflects the approach to meet objectively assessed housing need for the Borough, including within the Tottenham AAP area. The Plan seeks to deliver improvements in housing choice for both existing and future residents. The DM Policies set out borough-wide policies addressing housing quality.</p> <p>No change.</p>
4	RTAAP26	AAP 6	Not stated	Not stated	Tall buildings. We do not consider the Hale Wharf site suitable for tall buildings. This is in line with the	Para F – “ <b>Ferry Lane</b> ” – should differentiate between those bits of Ferry Lane in DCF and those next to river/Green	<p>AAP 6 (F) makes reference to taller buildings, not tall buildings. The Local Plan sets out a clear distinction between these two</p>

					<p>wording elsewhere in 4.26 - DM6 – building heights should “respond to existing street hierarchy” and “decrease into the quieter hinterland areas”. “Where elements that are considerably taller than this consistent height such as at Seven Sisters station in the Apex House site allocation or at Northumberland Park station... they should mark something or somewhere and have a reason for being taller. These by their very nature should be few in number”.</p> <p>Hale Wharf is not itself Green belt land but it has Green Belt land to the west, north and east (and a bit further to the south as well). So tall buildings here will severely impinge on the sense of openness that the plan says it seeks to preserve.</p>	<p>Belt. And make it clear that hale Wharf is not suitable for tall buildings.</p>	<p>development types with details set out in Policy DM 6 of the DM DPD. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by Haringey’s technical evidence base. Policy TH 9 sets out further detailed requirements for Hale Wharf and provides that all proposals will need to respond to the Green Belt, in line with national policy, as well as local character and ecological assets in the area.</p> <p>No change.</p>
4	RTAAP27	Transport Paragraph 4.29	Not stated	Not stated	<p>Managing and improving the capacity of the road network”. But we know that increasing the</p>	<p>We suggested changing the text by deleting “and improving the capacity of”.</p>	<p>Agreed. Include a minor modification that recognises the objective of managing the</p>

					capacity will encourage more traffic, and an aim of the gyratory works was to reduce capacity to discourage through-traffic. So why now do we want to increase it?		capacity of the road network and improving the street environment.
4	RTAAP28	AAP 8	Not stated	Not stated	AAP8 and elsewhere – we welcome proposals for car-free development but stress that car-free policies are nullified unless there is comprehensive CPZs in all surrounding streets – otherwise residents will “cheat” by parking on nearby public highway (or estate roads) There is evidence that this already happens (people from car-free developments parking on Jarrow Road, and people from Hale Village parking here to avoid parking charges).	Set out policy aim to have comprehensive CPZs in development areas where car-free or car-capped housing is proposed.	AAP 7 sets out that proposals will be expected to comply with Policy DM 32 of the DM DPD – this provides that proposals for limited or no on-site parking will only be supporting where a CPZ exists or will be provided prior to the occupation of the development.  No change.
4	RTAAP29	Paragraph 4.35	Not stated	Not stated	<b>4.35 “delivering new open spaces of a significant scale is not considered”</b> . Considering the growth in population and the existing deficiencies this betrays a lack of ambition. It also possibly contradicts 2.65. See our	We suggest re-wording <b>4.35 to say “Due to the significant projected increase in housing and employment in Haringey and Tottenham, the Council will seek to establish new open space where</b>	Agree that wording should be amended to better reflect opportunities for open space provision, in line with other Local Plan policies.  <b>Change paragraph 4.35 to: “Due to the</b>

					<p>comments above on the need for more open space.</p>	<p><i>opportunities arise, and to create linkages between them for people and wildlife. Tottenham does have a range of excellent open spaces within it, but some are being lost and others are under pressure from growing population. Development contributions have the potential to be collected and spent on adding to, improving and improving access to existing open spaces. Together, these will form a green grid of networked, high quality open spaces”.</i></p>	<p>significant need for new housing and employment in Haringey, and Tottenham, delivering new open spaces of a significant scale is not considered realistic. <u>However the Council will seek to facilitate the creation of new open spaces where opportunities arise, and to create linkages between open spaces for people and wildlife.</u> Tottenham does have a range of excellent open spaces within it, and on its doorstep. Additionally development contributions have the potential to be collected and spent on improving, and improving access to existing open spaces. Together, these aims will form a green grid of networked, high quality open spaces.</p>
4	RTAAP30	Paragraph 4.36	Not stated	Not stated	<p>The sentence beginning “<b>The more built up character</b>” is unintelligible. Can we have a translation? Should it be “eradication”</p>	<p>Not stated.</p>	<p>Noted. This is a grammatical error which will be rectified.</p> <p>Change second sentence of paragraph</p>

					not “education”?		4.36 to read: “The <del>more</del> built up character of many of the areas identified as being deficient in access to <u>open space</u> and nature makes the <u>eradication</u> of deficiency all the more <b>challenging</b> ”.
4	RTAAP31	AAP 11 – B	Not stated	Not stated	– should this be “tertiary education operators” not “tertiary employment operators”?	Not stated.	Noted.  Change policy AAP 11 (B) to read: “ <b>The Council will actively seek to introduce tertiary <u>employment education operators</u>...</b> ”
4	RTAAP32	Paragraph 5.23	Not stated	Not stated	This makes reference to new improved SLOL at Lawrence Road but does not explain what they are. We would very much welcome such a step. What are the plans?	Explain proposals for Lawrence Road SLOL	The Council proposes to designate new Significant Local Open Land (SLOL) at the land linking Elizabeth Place and Clyde Circus. Further details are set out in Policy SS 2.
4	RTAAP33	SS 2	Not stated	Not stated	Last bullet point – should this refer to West Green Road not Seven Sisters Road?	Not stated.	Noted. Change last bullet in Development Guidelines to read:  “ <b>The urban realm along, and linking to, <del>Seven Sisters Road</del> <u>West Green Road</u> should be of a high quality so as to provide a pleasant</b> ”

							<b>approach to Seven Sisters station by foot”.</b>
4	RTAAP34	SS 3	Not stated	Not stated	The current estate has a lot of open space but it may be of poor quality both ecologically and amenity-wise.	The policy should require this to be improved in any redevelopment, for example restoring some of the trees.	Noted. Should the site come forward, further details on open space provision can be addressed in a site masterplan. The DM DPD sets out requirements for landscaping and open space provision.  No change.
4	RTAAP35	SS 4 – 4 <sup>th</sup> bullet	Not stated	Not stated	It would be desirable to improve and extend the SINC and ecological corridor, especially if housing development goes ahead on Plevna Crescent site. But much better would be to re-secure Plevna Crescent as public open space and connect it to Gourley Triangle as envisaged in 5 <sup>th</sup> bullet of development guidelines. See comments above on 2.65. We welcome the requirement to deculvert the Stone Bridge Brook on this site.		Extending the SINC is likely to be challenging given the fractured ownership of the site but could be delivered through requirements for on-site landscaping associated with redevelopment if the development comes forward comprehensively as a single development parcel.  No change
4	RTAAP36	TG 2	Not	Not stated	Is it possible to create an	Insert a Guideline	Green corridor is not an

			stated		east-west green corridor connecting to the ecological corridor of the railway track?	accordingly	established designation; however notwithstanding this the Council does not consider that a new ecological corridor or open/green space linking to the existing ecological corridor at the railway track would be deliverable. The development guidelines are specific to the land within the site allocation boundaries.  No change.
4	RTAAP37	Paragraph 5.70	Not stated	Not stated	New improved SLOL at Bruce Grove Wood. We strongly welcome this, what are the plans? A mini-park at the rear of the heritage buildings would give them an improved setting.	Set out the plans for this SLOL.	The Council proposes to designate land at Bruce Grove Wood as Significant Local Open Land (SLOL) giving it appropriate protection as open space. Further details on managing open space provision are set out in Policies SP 13 and DM 20.
4	RTAAP38	Paragraph 5.94	Not stated	Not stated	Creation of high-quality public space network.	This should include good habitat (trees, hedgerows etc) connecting the Lee Valley and Bruce Castle etc.	The bullet is emphasising the objective to deliver a network of high quality open space. This can include habitat improvements, but the Council does not consider it necessary to state here.

							Biodiversity considerations for public realm are covered in Policy SP 13.  No change.
4	RTAAP39	NT 5 last bullet	Not stated	Not stated	The Moselle. Can this be deculverted?	Insert guideline accordingly	Proposals will be required to investigate opportunities for deculverting in line with Policy DM 28.  No change.
4	RTAAP40	NT 4 Northumberland Park	Not stated	Not stated	The large-scale redevelopment opens up the opportunity to create some east-west ecological corridors.	Include requirement for east-west ecological corridors.	The objective here is to reconfigure the existing open spaces and to make these more functional for use by the local community. This may therefore be at odds with a requirement to create an east west ecological corridor.  No change
4	RTAAP41	TH 3, 4, 5, 6 –	Not stated	Not stated	We agree that parking should be minimised. But see comments re need for CPZ above.	Not stated.	Noted.
4	RTAAP42	TH 3	Not stated	Not stated	<b>“Opportunities to green the existing SINC adjoining the railway line”</b> – we agree. This should be partly to recompense	Not stated.	Noted.

					for losses elsewhere.		
4	RTAAP43	TH 7	Not stated	Not stated	<p>“<b>subject to the</b> re-provision of the licensed waste capacity at the Ashley Road depot <b>site” and last bullet point.</b> But has any such re-provision been planned? The TAAP does not name a site, and surely it should.</p>	Designate a site for new civic amenity site in Tottenham Hale	<p>In line with the London Plan, sites with licensed waste capacity must be safeguarded until alternative provision has been made – see Policy SA 4 for further details. Re-provision will be considered on a case by case basis. The North London Waste Plan will designate potential additional sites required to meet the strategic waste apportionment.</p> <p>No change.</p>
4	RTAAP44	TH 8	Not stated	Not stated	<p>The tower at Hale Village – no justification has been produced for a building over 18 storeys <b>and it isn’t needed for</b> housing target,</p>	Set firm limit of 18 storeys	<p>The height limit reflects the extant planning permission, which is referenced in the policy. Hale Village falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey’s technical</b> evidence base. The policy provides that proposals over 18 stories will need to be justified, and the Council considers this approach is sufficiently flexible to consider proposals having regard</p>

							to their individual merits. No change.
4	RTAAP45	TH9 Hale Wharf. Site Requirements – penultimate bullet	Not stated	Not stated	The environmental impacts could include lighting – the water channel between the wharf and the Paddock is unlit	The new development must have suitably adapted street lighting, of a light wavelength, location, angling and timing to ensure that no disturbance is caused to bats, moths and other nocturnal wildlife. But the requirement must also apply to lighting from homes – through a ban on security or other external lighting, and measures to control spillage of light from indoors. And this must be conditioned in such a way as to ensure continuing long-term compliance with enforcement measures.	The matter of light pollution is addressed in Policy DM 9, which provides that proposals will be required to have appropriate regard to the impact on natural habitats, including watercourses. This is a borough-wide policy that will apply to proposals on this site.  No change.
4	RTAAP46	TH9	Not stated	Not stated	Development guidelines – we support second bullet, ie the development must not adversely impact on ecological assets		Noted.
4	RTAAP47	TH9 5 <sup>th</sup> bullet	Not stated	Not stated	We agree it must respond to proximity and openness of Green Belt. The site is not <i>adjacent to</i>	Set limit of 6 storeys for this site.	The site description box sets out the relevant planning designations, which the Council

					<p>but <i>within</i> the river corridor and Green Belt, with the river to one side and the Paddock and reservoirs to the other, The sense of openness should be preserved from Ferry Lane northwards, including around the lock. High buildings at this point would create the reverse of openness, and create a canyon feel, with Hale Village at 12 storeys on one side and new high buildings on the other.</p>		<p>considers are accurate. Parts of the are adjacent to designated Green Belt. Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b> evidence base. Policy TH 9 sets out further detailed requirements for Hale Wharf and provides that all proposals will need to respond to the Green Belt, in line with national policy, as well as local character and ecological assets in the area. The Council does not consider the imposition of a building height restriction is sufficiently flexible to consider proposals having regard to their individual merits and a design-led approach.</p> <p>No change.</p>
4	RTAAP48	TH9 6 <sup>th</sup> bullet	Not stated	Not stated	<p>Support. The development must be responsive to the natural environment. This should include green walls/roofs facing river on both sides, and incorporate bird and</p>		<p>Noted.</p>

					bat boxes etc.		
4	RTAAP49	TH9 Last bullet point	Not stated	Not stated	We agree. See earlier point about need for revised flood risk assessment for the whole area.		Noted.
4	RTAAP50	TH10 Welbourne Centre	Not stated	Not stated	We are concerned about the loss of open green space from the proposed housing development. The Plan must ensure that the Green Link at least compensates for this in terms of area, and improves on it in terms of habitat quality. The last bullet point of D Guidelines notes that the wall currently provides a noise barrier. If this is removed then the new development needs to provide at least as good an acoustic barrier from traffic noise. How will the new homes be protected from noise and air pollution?	Specify how new homes will be protected from noise and air pollution?	The open space is non-designated. The site requirements set out how new development should interface with this open space. New development offers opportunities to improve the quality and function of this space.  Measures to be implemented for protection against pollution will be considered having regard to individual proposals. Policy DM 23 sets out criteria to ensure appropriate protection in this regard, and will be considered alongside TH 10.  No change
4	RTAAP51	TH11	Not stated	Not stated	This area includes part of <b>the O'Donovans site</b> . The other part of their site will be affected by Crossrail		Noted. Existing authorised uses are outside the scope of this local plan consultation.

					2.The operation is a blight on residents of Ferry Lane estate through its noise and, sometimes, dust. The operation is also a blight on Markfield Road – danger, dirt and mud, and an appalling road surface. If the operation will have to move at some time, then the Council should be working to secure the greatest benefit by working with the company to move them earlier rather than later – when land to relocate them in NE Tottenham industrial estates is still available and affordable		
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Respondent 5: Tim Kay

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
5	RTAAP52	AAP Generally	Not stated	Not stated	I have just spent a depressing hour reading the Tottenham area development plan. As a resident of Tottenham Hale I have to say I am opposed to the entirety of the plan which appears to favour a small	I urge you to please reconsider the plan	The Council considers that the AAP provides a positive framework for managing growth, regeneration and investment in the area, having regard to objectively assessed needs. The

					<p>variation on the Hale Village development being parachuted into every small parcel of land available. This would transform Tottenham into a cut price Stratford without the landscaping and sports facilities. As <b>a local resident I value Tottenham's</b> diversity and feel that the plan solely involves setting aside areas to provide developers with land on which to build high-rise dwelling completely out of character with the area and without considering the needs of those who actually live here.</p> <p>I also feel that the presentation of information, low key consultation process and lack of information about means of communicating views to the council on the matter to be at worst calculated to reduce opportunity to raise objections and at best negligent.</p> <p>Tottenham needs regeneration <i>not</i> re-creating as some Bouygues / large developers profit scheme and I urge you to please reconsider the plan.</p>		<p>Local Plan sets out a clear framework for managing tall buildings, supported by local evidence, which identifies a few strategic locations where such proposals will be considered acceptable and having regard to local character. The Local Plan consultations have been carried <b>out in line with the Council's</b> adopted Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>No change</p>
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Respondent 6: Zena Brabazon

ID	Rep ID	Allocation	Sound	Legally	Reason	Change Sought	Council's Comments /
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		/ Policy / Figure / Para		Compliant			Response
6	RTAAP53	Not specified	No response	No response	<p>I am writing to object to the development proposals for Tottenham Hale as set out in the AAP of January 2016. My name is Zena Brabazon. I am chair of our local <b>residents'</b> group, Dowsett Estate <b>Residents' Association</b>.</p> <p><b>General Comments</b></p> <p>One of the implementation considerations set out as an introduction to the plans for Tottenham Hale TH1 – TH13 <i>states</i> that this is an area <b>where 'targeted investment can best accelerate the delivery of substantial volumes of new homes and jobs'</b>. It suggests that for 5000 homes and 4000 jobs to be created, there is a need for <b>'early infrastructure planning'</b> with reference to utility providers. Yet, the infrastructure is more than utilities; scant and superficial mention is made of the need for a health infrastructure for example, which even now, before 5000 people move in,</p>	Not stated.	<p>The Local Plan is accompanied by an Infrastructure Delivery Plan (IDP) setting out the key infrastructure requirements needed to support delivery of the spatial strategy for the Borough and the Tottenham area, including key responsibilities and timeframes for this, recognising the many partners that will assist in delivering the Local Plan over its lifetime. The IDP is subject to regular review and updating over the plan period.</p> <p>The Local Plan seeks to deliver housing to meet objectively assessed need <b>and the Borough's strategic</b> housing target. This includes delivery of a wide range of housing types and tenures, including affordable housing, for both existing and new residents. Policy AAP 3 sets out further details in this regard. The Council has proposed through Policy DM 16 a Family Housing</p>

				<p>is entirely inadequate for the local population. People moving into Hale Village find it difficult to register with a GP for example and things have not yet improved. One GP surgery in some type of temporary building is due to opening April 2016, but this is only after a very long campaign. It does not bode well for future infrastructure developments especially for health services.</p> <p>The housing proposed in the plans is largely high rise tower blocks. These are likely to be one and two bedroom flats. <b>Para 5.143 states that 'higher levels of family housing will be concentrated on sites less proximate to the centre...'</b> Where will these be, and will they be genuinely affordable social housing for the hundreds of families in housing need in Tottenham? Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise.</p>		<p>Protection Zone, including parts of Tottenham, to help ensure provision for larger and family sized homes, in addition to those delivered through new development.</p> <p>The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change</p>
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					<p>The entire thrust of these plans is to create a forest of tower blocks which will impact on our local physical environment; our park; and on local families who need proper affordable homes. Little account is taken of these matters in these proposals which give a green light to developers to build over 15 storeys and with high densities. I oppose this approach since it will change the character of the area, pays no regard to the quality of life of existing residents and has very scant provision for social housing.</p> <p>Tottenham Hale has a very high proportion of families living in private rented and temporary accommodation. The AAP for Tottenham Hale does not mention tenants yet the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments.</p>		
6	RTAAP54	TH 1	No	No	There are serious concerns	This is largely a	The designation of a new

			response given	response given	<p>about Tottenham Hale being designated a district centre. The proposals for development do not mention the impact of a night time economy which can be <b>detrimental to a community's</b> quality of life. This is largely a residential area and consideration should be given as to how the creation of a district centre and potential night time economy will affect residents. This is a serious omission and needs to be rectified and spelt out so local people can make an informed judgement.</p>	<p>residential area and consideration should be given as to how the creation of a district centre and potential night time economy will affect residents.</p>	<p>District Centre at Tottenham Hale is in line with the London Plan (2015), Table A2.2, which provides scope for this change to the town centre hierarchy. The creation of the centre is considered necessary to support future growth in this part of Tottenham, and will complement rather than compete with the existing hierarchy. The designation has been assessed for its impact on other centres, both within and outside the Borough, in accordance with the NPPF (see evidence base -Tottenham Hale Retail Impact Assessment). In addition, the Sustainability Appraisal (SA) for this AAP specifically assessed the approach for designating a new District Centre, and concluded there are likely positive effects across a number of sustainability objectives. The Council provided the public with an opportunity to comment on the approach at the Regulation 18 stage of consultation.</p>
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							No change
6	RTAAP55	TH 2	No response given	No response given	<p>We consider the proposals to be an over-development. The plans here propose up to eleven storeys, yet when the last permission was given for Tottenham Hale the number of storeys proposed was nine. There is an emerging pattern here where developers get agreement for a certain height, and then return for a couple of additional storeys which is then granted. This sets a precedent for higher towers elsewhere irrespective as to whether or not they are appropriate. In this instance eleven storeys above the station is in effect 12 or 13 storeys since the station is already there, and this will be in front of a current wall of blocks at Hale Village which now form the eastern aspect of the site. This will only intensify the concentration of tower blocks in the area. We draw your attention to the CABE report on the initial designs for Hale Village which expressed clear criticism of the wall of blocks proposed. In this AAP new buildings on Watermead Way extends this</p>	Not stated.	<p>The Council has established indicative development capacities for the AAP site allocations using a standardised methodology, which applies the London Plan density matrix. Further, the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. TH 2 falls within the envelope of an area considered suitable for tall buildings, as supported by this technical evidence.</p> <p>Planning decisions on applications made under current adopted policy are outside the scope of this consultation.</p> <p>No change</p>

					<p>'wall' much further.</p> <p>The station has just undergone extensive re-modelling at significant public cost. The new station interchange and new 'urban square' will create further disruption.</p>		
6	RTAAP56	TH 3	No response given	No response given	<p>Haringey Council has plans to revitalise Tottenham High Road and to make Seven Sisters station an anchor site for the High Road. To develop an enlarged retail centre at Tottenham Hale is more than likely to contradict the <b>Council's first aim</b>. The current retail park is busy and successful, and is a day time centre. These proposals would significantly increase the usage, again over developing which will cause even greater traffic problems, air contamination and noise pollution. These plans are silent on Ferry Lane which is the direct route into Tottenham Hale from Walthamstow. How will developing a new town centre and extending the retail park impact on Ferry Lane and the people who live along it?</p>	Not stated.	<p>The designation of a new District Centre at Tottenham Hale is in line with the London Plan (2015), Table A2.2, which provides scope for this change to the town centre hierarchy. The creation of the centre is considered necessary to support future growth in this part of Tottenham, and will complement rather than compete with the existing hierarchy. The designation has been assessed for its impact on other centres, both within and outside the Borough, in accordance with the NPPF (see evidence base -Tottenham Hale Retail Impact Assessment).</p> <p>The proposal is set within the context of positively managing change and delivering the spatial strategy</p>

				<p>People mainly drive to retail centres, yet no mention is made in this proposal of traffic issues and management.</p> <p>No mention is made of potential night time activities which remains a serious omission. This is a residential area and even with the developments you propose will remain so. Anyone living locally will know that despite the improvements from the new gyratory, traffic problems are still very frequent and significant. For people living along Broad Lane, and indeed for children attending Earlsmead School, air pollution is a real day-to-day issue.</p> <p>Finally, these proposals seek to create a town centre for an area which is not a town and is essentially a transport interchange. It is not like Stratford which always was a shopping and town centre, nor is it like Walthamstow which has always had a main shopping urban street. This is an artificial development which runs the risk of</p>		<p>for the area, recognising the levels of planned growth and high levels of public transport accessibility will support interventions aimed at delivering transition of a retail park to a more traditional town centre format.</p> <p>No change</p>
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					destroying a perfectly good and popular retail park, imposing even more very tall buildings with over intensification, whilst also undermining the development of Tottenham High Road.		
6	RTAAP57	TH 4	No response given	No response given	The petrol station is a very useful local service which is located at the confluence of many roads. We wish it to be retained. Building a 15 storey tower on the adjacent site at the corner of Ashley Road is entirely unnecessary and out of keeping with this side of Tottenham Hale. This proposal from the planning service seems more aligned to the financial interests of developers to have highest densities on every piece of land in our locality.	Not stated.	The proposals seek to address objectively assessed needs whilst seeking to deliver the spatial strategy for the Tottenham AAP area and the Borough. The Local Plan approach for determining the appropriate density for individual sites is set out in the DM Policies DPD, which the Council considers to be in general conformity with the London Plan. Comments on petrol station are noted however in delivering the spatial strategy, the Council will seek to introduce appropriate town centre uses and to promote more sustainable modes of transport, recognising the high PTAL rating of the site.  No change
6	RTAAP58	TH 6	No response given	No response given	The model of the new Tottenham Hale which was used in earlier consultation	Not stated.	The model referred was not used as part of the Local Plan consultation; rather this was

					<p>sessions included tower blocks along Watermead Way. It is not clear from the map in the AAP if these are still proposed. The accompanying text is unclear stating only <b>that 'the proximity of the new Harris Academy to the north and Down Lane Park to the north and west make the area particularly suitable for larger units along those edges'</b>. What does this actually mean? If it means 22 storey tower blocks (as indicated in the model) then it is likely that they will impact on the view people have from the Park View Road side of Tottenham Hale. We wish to retain that view as that enhances our quality of life and enjoyment of the park. No regard is given in these proposals to the impact on existing residents in this part of Tottenham Hale.</p>		<p>used for the public consultation on the non-statutory District Centre Framework. Any future planning proposals will need <b>to comply with the Council's</b> statutory development plan, which the AAP will form part of, once adopted. The site requirements / development guidelines for TH 6 provide a basis for considering the scale and massing of buildings, having regard to local character, and these will be considered alongside other policies in the DM DPD (including policies on character, building heights and local views). The Local Plan does not prescribe building heights and these will be considered on a case basis, having regard to individual site circumstances.</p> <p>The AAP has been subject to an integrated impact assessment, which has considered the likely impact of proposals across a range of sustainability objectives, along with equalities and health considerations.</p>
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							No change
6	RTAAP59	TH 8	No response given	No response given	Permission for this was already granted for 18 storeys and for a hotel. It now appears that this site is to be developed as residential flats at even greater heights. This would constitute glaring over development in this already congested site full of tower blocks.	Not stated.	TH 8 reflects the extant planning permission, which includes a tall building. The policy does not prescribe building heights for future proposals, but requires that any future applications for tall buildings above the current permitted height (18 storeys) will require justification and also need to comply with Policy DM 6.  No change
6	RTAAP60	TH 9	No response given	No response given	The plans for Hale Wharf are now being made public, including a tower up to 21 storeys and other very tall buildings. This is totally inappropriate for an area fringing the Tottenham Marshes/green belt. High buildings at this point would create the reverse of openness, and create a canyon feel, with Hale Village at 12 storeys on one side and new high buildings on the other. How can such a development do anything other than damage and spoil a beautiful natural environment? There are also implications for the Paddock, for the residents	Not stated.	The AAP proposals for Hale Wharf were included in the <b>Regulation 18 'Preferred Approach' document</b> , which the public was consulted on. The plan proposals seek to address objectively assessed needs whilst seeking to deliver the spatial strategy for the Tottenham AAP area and the Borough. The Local Plan does not prescribe building heights, however it sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings

					<p>of Ferry Lane and those of Hale Village. Para 5.170 states <b>'there is an exciting opportunity to create distinctive riverside development on this site...'</b></p> <p>This seems to be code for allowing tower blocks which will do nothing to enhance the riverside at all.</p>		<p>Locations Validations Study. Part of TH 9 falls within the envelope of an area considered suitable for tall buildings, as supported by this technical evidence. The TH 9 site requirements are clear that proposals will need to have regard to the marshes and other elements of the natural environment, in addition to the Green Belt.</p> <p>No change</p>
6	RTAAP61	TH 10	No response given	No response given	<p>Given the shortage of public housing, the proximity of this site to Chestnuts estate, and the fact that Haringey owns the land, it would make good sense to build council housing on this site. Having a health centre underneath, and access to some community meeting space would be welcome given the shortage of primary health and community facilities in the area. We would oppose yet another tower since this is a residential area with low rise blocks. The highest block is Warren Court, which is set back from the road and is eight or nine storeys.</p>	Not stated.	<p>The site allocation provides for comprehensive redevelopment of the site, including a mix of appropriate town centre and residential uses. All proposals for residential development will need to make appropriate provision for affordable housing in line with other Local Plan policies.</p> <p>The Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. Part of TH 10 falls within the</p>

				<p>The Welbourne site is surrounded by a four and one five storey block, A tower would be entirely out of keeping with the estate and with Park View Road. Would this be allowed or even considered in other parts of Haringey? The Welbourne centre site is not in the proposed Tottenham Hale District Centre, it is in a quiet residential neighbourhood comprising residential streets of terraced housing and a low rise estate. Building a tower block on this site, which in these plans would stand almost opposite another tower block would destroy the character of our neighbourhood and be entirely out of keeping with the rest of <b>the area's layout.</b></p> <p>Monument Way is a main road which is greened, provides protection for the nearby houses from air and noise pollution through high walls and through an earth bund and high willow fencing. It is preferable for the area to remain as it is. If there is further housing on this road</p>		<p>envelope of an area considered suitable for tall buildings, as supported by this technical evidence. The TH 10 development guidelines are clear that proposals along Monument Way site of the allocation should respond to the established heights within the Chesnut Estate.</p> <p>Measures to be implemented for protection against pollution will be considered having regard to individual proposals. Policy DM 23 sets out criteria to ensure appropriate protection in this regard, and will be considered alongside TH 10.</p> <p>No change</p>
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					there must be very strong measures to prevent air contamination and pollution which could seriously harm peoples' health.		
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Respondent 7: Elizabeth Pearce

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
7	RTAAP62	ALL	No	No	I do not consider the plan to be legally compliant on the grounds that I have not had any actual consultation regarding the future of the property where I have lived for 40 years. This form alone is full of jargon and for the average tenant impossible to understand let alone complete. At no point has any representative from the council personally contacted me to advise or reassure me of what it going to happen to my home. I would expect, at the very least, to have someone come and speak to residents to reassure them that they are not	I believe that represenatives from the council should be coming and speaking to residents in each building or estate which is earmarked for 'improvement' or demolition. The lack of information is simply unacceptable. Jargon free, easy to understand information should be made readily available.	The Local Plan consultations have been carried out in line <b>with the Council's adopted</b> Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.  While the Local Plan allocate sites for estate renewal or improvement, the Council is committed to, and statutorily required to, engage with residents of each estate prior to commencing any proposals for renewal or improvement in accordance with s105 of the Housing Act. It is at this stage, or through the Haringey Housing Strategy, that

				<p>simply going to be 'rehoused' elsewhere in unsuitable areas or left to find their own alternative accommodation. There have not been enough public meetings to offer information to tenants on these issues. I contacted the council and was told that no final decisions have been made regarding my home at Reynardson Court however it would seem that it has been earmarked for demolition rather than improvement. I am retired and simply cannot afford to move to privately rented accommodation or even so called 'affordable housing'. I do not want to move from my home. Paragraph <b>3.2.2 of Haringey's Local Plan: Strategic Policies 2013 - 2026</b> states that: <b>'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community they want to live.'</b> For the above reasons, I believe that the possible demolition of</p>	<p>tenants and leaseholders will be advised of the range of options available to them leading up to and prior to commencement of any proposal on their estate.</p> <p>No change</p>
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					Reynardson Court and other council states in Tottenham contravenes the <b>Council's own policies.</b>		
7	RTAAP63	TG3	Not stated	Not stated	With regard to the proposed demolition of Tottenham Police Station I simply cannot see how this will benefit the community. Having a visible police presence on the High Road is one of the most important aspects of community safety, particularly in light of the riots which occurred a few years ago.	Not stated	The policy sets out that re-provision of the police facility within Tottenham must be identified prior to the redevelopment taking place. This will ensure appropriate provision is maintained whilst enabling consideration of alternative uses on the site which can assist in delivering the spatial strategy for Tottenham.

#### Respondent 8: Russell Dove

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
8	RTAAP64	All Tottenham Area Action Plan	No	No	There is a legal obligation to consult with residents. This documents under consultation here, and their previous versions, are complex, poorly designed, consist of multiple documents with appendices and are effectively	To make the consultation as a whole legally compliant and sound it should be rerun with a longer consultation period, supported by effective engagement with residents in public, online and in the streets/ shopping centres	The Local Plan consultations have been carried out in line with the <b>Council's adopted</b> Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012. In

				<p>impossible for any ordinary resident to address. This form for making representations and the structure is itself couched in language that is very difficult to understand even for an educated resident. If the consultation is to have any validity it must address residents in clear comprehensible language, or at the very least a summary should be provided outlining the key principles and concrete proposals contained in the plan to which residents could then respond. The requirement to address each document separately is further offputting and adds to the complexity. In addition, the two open events were also poorly publicised and not sufficiently accessible to residents. I learned of them only after they had taken place.</p>	<p>and other places where large numbers of people travel or congregate. Of the 10 sites where there was a public presentation only 3 out of 10 were located in Tottenham. This is not appropriate where a key part of the total plan and some of the most wide-ranging proposals relate to Tottenham. The initial consultation referred to, quoted in the text here (page 11, point 1.24) only 80 people were contacted out of a total population of over 100,000 in Tottenham. This consultation is unlikely to have achieved a much greater reach. In terms of specific content, the Action Plan is both vague in its overall aim and principles and over-specific in detail in relation to particular sites, and does not sufficiently draw these two elements together. For example, there are references to a landmark tall building at the Seven Sisters Apex House site (page 63, point 5.38) where it is argued that the location</p>	<p>recognition that the Council was consulting on a number of Local Plan documents at the same time, the consultation periods were extended beyond the statutory minimum of all occasions.</p> <p>The Council considers that the Local Plan is sound with the proposals justified by a robust technical evidence base, and positively prepared, having regard to meeting objectively assessed needs, including for housing.</p> <p>No change</p>
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						<p>is “a suitable location for a high quality tall building” without no evidence or argument why this should be the case. What features of the surroundings justify this? This has evidently been predetermined since no evidence for this assertion is given here. Where does this meet the needs of Haringey or Tottenham in particular? I have selected just one example since it is simply not possible to go into all the elements for reasons of time. Not all sites and elements of the plan are objectionable, but evidence is lacking. I would need to see greater evidence provided throughout both for the specific proposals and the business case that underlies them. I would like to see a much closer, evidence-based arguments how this plan addresses <b>the needs of Tottenham’s</b> existing residents and the new ones who are likely to move in. How do these <b>plans relate to the council’s</b> existing social housing</p>	
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						<p>waiting lists? What research has been carried out to identify what kind of people can afford to buy the new housing provided under this plan, other than landlords. Does this plan provide a long-term future for <b>Tottenham's new</b> residents under existing tenancy laws? Much of this is speculative and any growth is focused on public sector development. Any social housing referred to is <b>based on 'renewal'</b> – in itself possibly/ probably a good thing in certain individual cases - but there is no parallel expansion of genuinely affordable, low-rent social housing to match the large number of new properties to buy or address existing demand. The plan as a whole therefore does not address <b>London's housing crisis</b> or the immediate needs of Tottenham.</p>	
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Respondent 9: Our Tottenham Network

I	Rep	Alloc	Sound	Legally	Reason	Change	Council's Comments /
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D	ID	ation / Policy / Figure / Para		Compliance		Sought	Response
9	RTAA P65	APP 3	No	No response	<p>We argue that several policies and proposals made in the <i>Tottenham AAP</i> <b>do not meet the existing local communities' requirements</b> (from both residents and businesses). On the contrary, they represent an unacceptable <b>attempt to enforce a 'top-down' social and physical re-engineering of large parts of Tottenham to the detriment of current communities and of Tottenham's character.</b> This particular affects Tottenham, as a significant amount of foreseen of development is concentrated in this part of the Borough. Additionally, they fail to demonstrate how the revised Strategic Policies will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on). The <i>Alterations</i> fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of Tottenham in particular. The Planning <b>Inspector for the Plan's predecessor</b>, the Local Development Framework, made it crystal clear after extensive evidence and debate at the</p>	<p>Lower the 10,000 target, whose burden unfairly falls on Tottenham, and justify how the extra needed social infrastructure, in addition to the existing backlog, would be provided.</p> <p>We strongly oppose the reduction in the affordable housing requirement for development above 10 units from 50% to 40%. It should be increased to the maximum</p>	<p>The Local Plan seeks to enable the delivery of housing to meet objectively assessed need and the <b>Borough's strategic housing target</b>, having regard to the the spatial strategy for Tottenham and the Borough. Parts of Tottenham have been identified as Growth Areas and Areas of Change, recognising their potential to facilitate growth through the availability of developable sites and existing and planned significant infrastructure investment, including transport infrastructure, to support this growth in a sustainable way; <b>and in line with the Council's regeneration objectives.</b> The capacity to deliver 10,000 new homes has been identified in the AAP site allocations and is therefore considered deliverable over the plan period.</p>

				<p><b>LDF Inquiry that Haringey's character is generally suburban.</b></p> <p>a) In several ways the AAP do not fulfill, or contradict, some of the objectives laid out in para. 3.2.2, Policy SP2 HOUSING of the <b>Strategic Policies, in particular: 'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of'.</b></p> <p>b) The objectively assessed requirements are for building as much genuinely affordable housing as possible, as well as meeting a deficit of green space in the densely populated wards of Tottenham. The Strategic Housing Market Assessment (<a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf</a>, p. 8) shows that 58% of currently resident households could not afford to pay even 80% of market rents in 2010. Since then, there has been rapid growth of both house prices and rents, making that assessment seriously out of date with its assumptions of very low inflation of housing costs in 2010-16. The <i>Alterations</i> (Para 3.2.18) state that the <b>Council 'aims to ensure an adequate mix of dwellings is provided' but there is no detail as to how this will be achieved, especially with regard to social housing for families.</b> The proposals for new developments are primarily for high density flats including many very tall buildings. These are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs</p>	<p>possible.</p> <p>We disagree with the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). Based on the evidence we exposed in the previous section, it is not acceptable to meet affordable accommodation targets only with shared ownership or intermediate rent housing, both of which are out of the price range of low income families in Haringey. A truly affordable</p>	<p>The definition of affordable housing is set in line with national and regional policy, so as to ensure the Local Plan is consistent with the NPPF and in general conformity with the London Plan.</p> <p>The borough-wide affordable housing target is included in the Strategic Policies Local Plan, reflected in the AAP, and is set having regard to the <b>Council's</b> latest viability evidence which suggests that the existing target is not deliverable across the majority of site scenarios tested, and that a reduction to 40% is appropriate to ensure provision of affordable housing does not harm the delivery of housing overall.</p> <p>The affordable housing tenure split proposed for Tottenham (Policy AAP 3) is considered necessary to rebalance the high levels of social rented accommodation in Tottenham, which equates to more than 60% of the <b>Borough's total social rented</b></p>
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				<p>covered. Given the extensive need in Haringey for social housing for families, how can this <b>approach be described as a ‘strategy which seeks to meet objectively assessed requirements?’</b> <b>The Council says responding to family housing need is ‘a priority for the Council’, so the question is, will this plan address this in making provision of family housing for people living here?</b></p> <p><b>The proposals for the “renewal and improvement” (including demolitions) of the council housing estates listed in the Strategic Policies, SP2 point 10, p. 42, do not include comprehensive detailed options for rehousing families living in, at minimum, like for like accommodation. Neither are there alternative options for improving the estates so people can remain there. This is not objective in any sense. Yet this is the priority group in housing need. A large consultation exercise carried out by the Council to gauge people’s priorities showed that the main issue of concern to local people in Tottenham was provision of social housing, and the need to tackle rogue landlords.<sup>2</sup></b></p> <p>There are serious questions which need to be <b>answered regarding the concept of ‘rent’.</b> <b>‘Affordable’ levels (defined as 80% of market rent in the plan and the London Plan) may not be affordable, especially if we add the substantial service charges which both social and private landlords charge in addition to rent in many buildings.</b></p> <p><b>c) The Council’s Sustainable Community Strategy (2010-2016)<sup>3</sup> states ‘We will continue</b></p>	<p>home is one that is affordable to any tenant earning the London Living Wage. This means that the only truly affordable form of housing for many low income Haringey residents is social rented. <b>‘Affordable’</b> should not be defined as 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. We therefore demand that a separate and clear percentage for social rented housing be set</p>	<p>stock. This policy helps give effect to London Plan policy 3.9 in supporting mixed and balanced communities, including a mix of tenure types.</p> <p>The Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy, Alterations to Policy SP 2 set <b>out the Council’s strategic</b> and selective approach for housing estate regeneration, renewal and improvement. The approach is set <b>recognising the Council’s</b> commitment to improving housing stock and the limitations of the Decent Homes programme. The inclusion of estate regeneration in the Local Plan is considered necessary in policy terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan. Where the Council does undertake estate regeneration and renewal, it will seek to re-</p>
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				<p>to increase the availability of affordable housing through the optimum use of existing dwellings and by building more affordable homes'. <b>With Government cuts and caps to benefits</b> affecting thousands of local residents, and almost no private tenancies available at LHA rates or below, the desperate need for genuinely affordable housing and social housing generally is of even greater urgency. For people in housing need in Haringey this means social rented housing. Yet, the Council has not produced any alternative option which demonstrates how this might be achieved, even within the current housing and planning environment. Councils such as Islington and Brighton have used different strategies, but the <i>Alterations</i> rely on simply working with developers and the private rented market. The LB Islington Housing Strategy 2014-20194 challenges the concept of 80% market rent being a suitable ceiling of 'affordability', works to curb bad landlords and secure longer more secure tenancies, and seeks to make council homes cheaper to run. In Brighton, the Estate Regeneration programme<sup>5</sup> focuses on identifying small infill sites within existing council estates and building on them subject to detailed consultation work with local residents.</p> <p>The plan needs to provide enough social housing to meet the needs of Haringey's housing waiting list within a 5 year period, plus enough for population growth. The waiting list had 8,362 people in 2013; since then the lower-priority categories (bands D and E) have</p>	<p>in the affordable housing provision target; 70% of that affordable housing target should be social rented housing. We support Haringey <b>Council's</b> objective as laid out in para. 3.2.2, Policy SP2 HOUSING that <b>'the</b> council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of'. <b>This key priority can only start to be met by</b></p>	<p>provide the same amount of social housing on an equivalent floorspace basis. This approach is considered necessary to ensure flexibility for re-provision to better meet changing housing needs of existing residents.</p> <p>Proposed Alterations to the Strategic Policies (Alteration 64) set out further details in respect of how the Council will engage with existing residents where estate renewal is considered, along with signposting further guidance on options available to existing tenants and leaseholders through this process.</p> <p>The Council disagrees that it has not had sufficient regard to social and community infrastructure. The Local Plan is supported by an Infrastructure Delivery Plan (IDP) which sets out the infrastructure required to support the levels of planned growth and to deliver the spatial strategy for the Borough and Tottenham. The IDP is subject to regular</p>
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				<p>been removed from the list. The ostensible reason was because it was unmanageably large, but removal of these two bands also conceals the extent of housing need, and the numbers of people living in private, temporary and substandard, overcrowded and sub-standard accommodation. In this context, the 2013 figure may give a better idea of concealed housing need than the up-to-date one.</p> <p>In addition, the plan needs to meet the requirements of population growth, assuming that this will follow the trajectory of the last decade minus the portion of that population growth attracted by residential building for sale at Hale Village and the New River development, the major new developments of that period. To accommodate the 2013 waiting list, the absolute minimum number of new social housing units should be around 8,360 plus an additional 1,700 every 3 years to cater for population growth, even before considering any <b>further increase</b> in the proportion of households who cannot afford market rents. In summary, our estimate is that, before considering any change in that proportion, Haringey would need <b>at least 16,300 social rented units over 15 years or 1,066 per year</b>. This is more than 100% of the previous building targets <b>for all types of housing</b> before the London Plan was revised in 2015, showing that without the excessive densification now proposed, Haringey would need to find ways of helping some of its residents to meet their housing</p>	<p><b>embedding the following principles CLEARLY in the wording of Policy AAP3 D (on housing estate renewal in Tottenham):</b></p> <p>No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes. Such programmes should prioritize improvements</p>	<p>review and updating over the plan period. Where appropriate, site allocation policies require specific provision of social infrastructure. The DM DPD (Policy DM 49) sets out borough-wide policies to protect against the loss of social and community infrastructure. It is recognised that delivery of infrastructure will not solely be the responsibility of the Council, and the Local Plan therefore makes clear that the spatial strategy will be delivered through a combination of public and private sector investment, with the Council working with its partners to ensure appropriate provision. To this end the Council has engaged with a wide range of service providers, including in health and education, to feed into the IDP and provide an understanding of requirements needed to meet the levels of planned growth, along with identification of the organisations/agencies that will assist with delivery.</p> <p>In terms of open space and</p>
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				<p>needs in other boroughs which are currently <b>less crowded or in ‘new town’ type</b> developments outside London. Even if the new target of over 20,000 homes could be achieved without excessive densification (which we very much doubt), over 75% would need to be genuinely affordable to achieve the central objective of Housing Policy 3.2. <b>Remarkably, Haringey Council’s own Joint Strategic Needs Assessment states that ‘to address both projected newly arising need and the current backlog, an annual programme of over 4,000 additional affordable homes is estimated to be required’</b> (see <a href="http://www.haringey.gov.uk/social-care-andhealth/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsnahousing#levelofneedofpopulation">http://www.haringey.gov.uk/social-care-andhealth/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsnahousing#levelofneedofpopulation</a>). This simply cannot be achieved without overspill to other areas. But it is clear that the <i>Alterations’ target of only 40% of units to be ‘affordable’</i> is absolutely inadequate and there is little clarity <b>that ‘affordable’ would include social rented</b> housing which families in Tottenham on low incomes could afford.</p> <p>We would like to challenge some key assumptions and evidence base used to justify Policy AAP3 HOUSING of the Tottenham AAP, which itself reflect the Alterations to Policy SP2 HOUSING of the Strategic Policies (see our separate response), under 3 broad themes:</p>	<p>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 units and no displacement of existing tenants as part of any plan for an estate. The proposed wording <b>‘reprovide</b> the same amount of social housing on an equivalent floorspace <b>basis’ does</b></p>	<p>related recreational provision, the Council has set its strategic approach in Policies SP 13 and SP 15, which the AAP will help give effect to. The approach is supported by up-to-date evidence. There is limited scope to create new major open space in Tottenham, given the imperative to optimise available sites to meet strategic growth requirements. Therefore the <b>Council’s strategic approach</b> is to address identified deficiency by improving the quality of existing spaces and enhancing accessibility to and between those spaces. Policy AAP 9 will play a key role in delivering this objective locally.</p> <p>The Council does not agree that the proposals represent an overdevelopment of sites that would compromise deliverability of plan objectives. Indicative capacities for site allocations have been set using a standardised methodology, applying the London Plan density matrix. The</p>
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				<ul style="list-style-type: none"> <li>- Overall scale of housing growth and implications for existing and future social Infrastructure</li> <li>- The question of affordability</li> <li>- The chosen approach to housing provision and to 'housing estate renewal'</li> </ul> <p>1.2.1 Overall scale of housing growth and implications for existing and future social infrastructure in Tottenham:</p> <p>a) The Alterations to the Core Strategy have been prompted by the adoption of the Further Alterations to the London Plan (FALP) which were adopted in March 2015. The Haringey Local Plan has to comply with the FALP and thus the proposed alterations reflect the major changes in housing and employment targets which were included in the FALP. The strategic housing target for Haringey was increased from 820 homes per annum to 1,502 homes per annum on the basis of the GLA SHLAA - an 83% increase. This is the single highest increase of any London Borough (the increases ranging from 3% for Greenwich to 83% for Haringey. The distribution of targets across London Boroughs displays a bias towards poorer (and denser) Boroughs, the ones which suffer from highest levels of deprivation. It is highly questionable whether Haringey land and infrastructure have the capacity to accommodate so many extra homes and the London Plan target needs to be challenged, in</p>	<p>not guarantee those principles, and should be rephrased. There should be no demolition of structurally sound homes.</p>	<p>appropriate density for sites will be established having regard to the nature of individual schemes, and compliance with the suite of Local Plan policies.</p> <p>The Council does not agree that flood risk compromises delivery of the plan. The spatial strategy for the Borough, along with site allocations to deliver this, has been selected having regard to a Strategic Flood Risk Assessment and sequential test, in line with the NPPF. In addition, the Local Plan includes a suite of development management policies to ensure that all proposals avoid and reduce the risk of flooding, and do not increase the risk of flooding in the Borough.</p> <p>It is noted that the Council has committed to a development vehicle that provides a basis for joint venture partnerships to assist with delivery of the <b>Haringey's regeneration</b> objectives. However, the Council does not consider</p>
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				<p>particular compared to the much lower rates of expansion given to West Central and Outer South-eastern boroughs. We strongly contest and oppose this massive increase affecting the Borough of Haringey. We made a submission during the public consultation on the Further Alterations to the London Plan in 2014 (here <a href="https://www.london.gov.uk/sites/default/files/302OurTottenhamPlanningPolicyWorkingGroupResponse.pdf">https://www.london.gov.uk/sites/default/files/302OurTottenhamPlanningPolicyWorkingGroupResponse.pdf</a>) and presented evidence at the EiP at Session 2b (Housing need and supply) on Wednesday 3 September 2014 to make this argument. It was ignored in the subsequent version of the FALP post-EiP. These figures are unsustainable, unrealistic and unfair. The strategic priority given to new, large-scale development in Tottenham in the London Plan and in the Haringey Local Plan consultation documents cannot be realized at the expense of the people already living and working there. In the response by the LB Haringey to the consultation on the Further Alterations to the London Plan (in 2014), Steve Kelly, Assistant Director of Planning, himself <b>noted that this was a 'stretching'</b> target that it would not meet on its own without external GLA funding and support (<a href="https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf">https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf</a>).</p> <p>b) The Tottenham AAP identifies land capable of delivering 10,000 new homes and 5,000 new jobs. We contest the scale of this growth and its concentration in Tottenham. The proposal to concentrate half of the housing</p>	<p>that delivery of the Local Plan is reliant on the development vehicle, and at any rate, this is outside the scope of this Local Plan consultation.</p> <p>The adopted Strategic Policies Local Plan, Appendix 3, sets out the <b>Council's</b> framework for monitoring plan performance across a range of policy topic areas. Delivery of the vision and strategic objectives for the Tottenham area will be monitored against this framework, along with an additional set of bespoke monitoring indicators and targets for the AAP, as included in Chapter 6 of the plan. The Council publishes Authority Monitoring Reports (AMRs) in line with the statutory requirements for plan monitoring, and future AMRs will include information on the effective implementation of the AAP policies and progress on plan delivery. This includes reporting on delivery against the borough-wide affordable housing target, which the Council has reported in</p>
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				<p>delivery target (=10,000 homes) in Tottenham is particularly not realistic and potentially very highly damaging to the existing residents and businesses, environment and character of the area (see our Response to the Alterations to Strategic Policies 2011-2026). We disagree with the fact that Tottenham should host half of this targeted growth. Several wards of Tottenham already have the highest densities in the Borough (see table and map in the overall response to this APP). Bruce Grove, <b>St Ann's, Seven Sisters and Tottenham Green</b> have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate). White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land – which means that the population density in the residential areas of those North Tottenham wards is high, too.</p> <p>Tottenham has the highest level of social deprivation and suffers from a chronic shortage of key facilities such as GPs, open <b>space, schools etc...Tottenham cannot cater</b> for 10,000 extra residents without grave problems for its social infrastructure and existing population. This is an unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough. How and where will social infrastructure be provided to accompany the planned 10,000 new homes is absolutely not demonstrated in</p>		<p>previous AMRs.</p> <p>The Council considers that equalities considerations have been appropriately addressed through the integrated impact assessment of its Local Plan - this incorporates sustainability appraisal, health impact assessment and equalities impact assessment. Further information is set out in the Sustainability Appraisal for the Tottenham AAP (November 2015), including Section 4.3 and Annex IV (Equalities and Health Impacts). Equalities assessments completed for other Council strategies are outside the scope of this Local Plan.</p> <p>No change</p>
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				<p>this AAP. A precise list of the needed social infrastructure, with supporting evidence, to cater for (i) the backlog of need and (ii) anticipated growth is needed in the next draft AAP, with precise proposals for location on particular sites. How these amenities and services would be provided and funded – in particular through Section 106 agreements and the CIL – is not explored convincingly in the <i>AAP</i>.</p> <p>There should be a strict policy of protection of existing community centres - some of which are under threat or seeking renewed or longer leases - of pubs, post offices, and corner shops from change of use. An expansion of youth services and facilities and nurseries is absolutely vital across Tottenham.</p> <p>We consequently demand that any new development encouraged by the AAPs should not lead to any net loss of social infrastructure, and should include additional social infrastructure to serve the existing and future residents in and near Tottenham, in particular:</p> <p><b><i>1. Adequate levels of GP and health services provision:</i></b></p> <p>In London the average is 1639 patients per GP, according to a Kings Fund report on ‘General Practice in London’. However, by going through the information for each practice provided for patients on <a href="https://www.myhealth.london.nhs.uk/">https://www.myhealth.london.nhs.uk/</a>, we can show that the average for Tottenham GPs is 2002 patients each, as outlined in the table below<sup>8</sup>. Thus Tottenham GPs have 22.2 per cent more patients on their list, on average,</p>		
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				<p>than London GPs in general. So in effect Tottenham is short of over one fifth of the GPs it needs even before we have an extra 10,000 or so homes as envisaged in the Tottenham regeneration plans. The existing situation may even be worse than that for at least three reasons:</p> <p>The number of GPs in this calculation assumes that they are all working full-time, except for one who says on the practice web site she is part-time and was counted as half. If other GPs are in fact working only part-time, the number of patients per <i>full time equivalent</i> GP would be higher.</p> <p>As a deprived area with therefore a relatively high incidence of various illnesses, and moreover many people for whom English is not their first language, Tottenham probably imposes on GPs a heavier workload per patient than the London or national average.</p> <p>Since Tottenham is characterised by a highly transient population with many migrants and students, the proportion of the resident population actually <i>registered</i> with a GP may be unusually low. If all who are entitled to be registered did register (regarded by the NHS as a desirable goal to keep people out of A and E departments) the number of patients per doctor might rise considerably.</p> <p>This raises the question of what specific plans are being made for extra health infrastructure in the Area Action Plan and Site Allocation documents. This is simply not clear. If an extra 10,000 homes bring in an extra 25,000 people (the exact number obviously depends on the</p>		
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				<p>size of dwellings and the vacancy rate), this population would need an extra 15 GPs to provide for their needs at the London average ratio of patients to doctors. A further 16 GPs are needed to reduce the patient/doctor ratio for the <i>existing</i> registered patients to the London average. This makes a total of 31 doctors needed for the N15/N17 areas. It is unrealistic to think these can be accommodated within the premises of the 25 existing practices listed in the attached spreadsheet, even if all the partners working there wanted to take on new colleagues. So a <b>number of new doctors' surgeries will be</b> needed and provision for them needs to be made within the land allocations for social infrastructure.</p> <p>This has important implications for the future <b>of the St Ann's Hospital site. It is</b> a large area of land currently devoted to health service use and capable of housing one or more GP practices, possibly also an urgent care centre, which would serve the N15 area as a whole. This would be the obvious and probably the most economical way to <b>address the 'doctor deficit' in South Tottenham. However it is too</b> far from the new housing developments planned around High Road West and the northern part of N17, for which additional health use land will be needed.</p> <p><i>ii. Adequate levels of quality, public open space (including major new spaces to address areas of deficiency), play areas and sports facilities:</i></p> <p>Based on the London Plan's public open</p>		
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				<p>space hierarchy, around 50% of Haringey is deficient in public open green space. In addition, using the Mayor's <i>Guide to Preparing Open Space Strategies - best practice guidance of the London Plan</i>, there are also huge areas of deficiency in allotment <b>provision, children's play areas, sports pitches</b> and nature conservation areas. These officially recognised criteria for assessing deficiency are minimums. The London Borough of Haringey Open Space Strategy - Action Plan (<b>November 2005</b>), <b>Objective 1.2, reads: 'To adopt the GLA Guidelines for provision of the different types of open space as the standard to which Haringey will work towards.'</b> <b>'Priority: High' 'Timescale: Immediate' That Action Plan</b> still applies. To achieve minimum standards requires a massive expansion of provision. So the AAP and Site Allocation DPD need to make very significant provisions to deliver not only the missing open spaces but also any additional open space needed to cater for any future growth in the resident population of Tottenham.</p> <p><b>In terms of sports facilities</b>, The Haringey Open Space and Sports Assessment (2003) provides excellent information on the need to address deficiencies of a whole range of much needed facilities. Since then the population of Tottenham has increased greatly, and is projected to increase even further. The Council has produced a number of useful sports-related plans including: LB Haringey Sport and Physical Activity Action Plan 2005; LB Haringey Tennis Development Plan - 2010-</p>		
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				<p>2013; LB Haringey Football Development Plan - 2009-2012; LB Haringey Football Development Plan - 2009-2012. As an example, the Football Development Plan (Section 4 - Key Issues and Recommendations) contains detailed and useful recommendations about facilities, education, club development, health, Voluntary Sector development, girls and women's development, disability development, celebrating cultural diversity, coach education, and disaffected young people. Key recommendations regarding facilities include:</p> <p><i>'develop additional pitches and ancillary facilities in the east of Haringey where quality facilities and provision are most needed'</i></p> <p><i>'develop Service Level Agreements with a number of schools to extend community access to school facilities and to implement dual use'</i></p> <p><i>'develop the use of s. 106 agreements ..... to create or improve local sports and leisure facilities. The population in Haringey is set to rise.... Haringey Council is responsible for providing the growing community with sport and recreation facilities that are accessible and inclusive to meet the demand of an increasing population'.</i></p> <p>Here are some extracts from the Summary of the <b>Football Development Plan</b> regarding Facility development:</p> <p>Accessibility: <i>The Haringey Open Space and Sports Assessment identified a 400m walk as the appropriate catchment for football pitches.</i></p>		
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				<p><i>At present, around half of the population of the borough is outside such a catchment.</i></p> <p><i>Localised facilities: To seek to provide at least one multi-use games area in each of the 19 wards in the borough, to support local efforts to expand the small-sided game. Reviewing the size and quality of the hard play areas at all 62 primary school sites in the borough and making improvements as appropriate, to facilitate skills training for the 5 - 11 year old age group.</i></p> <p><i>Overall sports participation rates: The overall rates of sports participation in Haringey are below the regional and national averages, according to the 2008 Active People survey.</i></p> <p><i>Participation by under-represented groups: The Active People survey found participation amongst underrepresented groups such as women, BME groups and disabled people is disproportionately low in Haringey.</i></p> <p><i>Football conversion rates: FA data shows the proportion of footballers as a percentage of the overall population is significantly lower in Haringey than for London or England as a whole. The mini-soccer figures are lowest of all, with conversion rates only 20% of the national average.</i></p> <p><i>Small-sided football: Small-sided football is poorly developed at junior level, with no teams at all in the borough. Eight of the 19 wards in Haringey do not have a kickabout area at present.</i></p> <p><i>Pitch provision: There are currently enough football pitches to meet existing demand in Haringey, but the number of pitches per capita</i></p>		
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				<p><i>is well below regional and national averages. This suggests current provision is only adequate because local demand levels are suppressed, possibly as a result of the lack of pitch supply. Quality of pitches and ancillary facilities: 17% of all football pitches are in poor condition, 22% do not have access to changing facilities and 60% do not have any on-site social facilities.</i></p> <p><b>iii. Adequate levels of school provision (and other educational facilities):</b></p> <p>According to a report compiled by Haringey Council in 2013<sup>10</sup> there is already a shortage of school places in various part of the Borough, in particular Tottenham. This report provides an extensive and detailed picture of the existing situation. Surplus capacity at school reception level is already incredibly tight. The Published Admissions Number are projected by the Council to be in deficit against the GLA's projections by 143 needed reception places by 2023 for Tottenham Green, Tottenham Hale, Northumberland Park, White Hart Lane and Bruce Grove wards (p. 41).</p> <p>Secondary school places will be in deficit by 10% by 2021/22. Appendix 12 of the report analyses the implications of the proposed new housing developments in identified growth areas (most of which are located in Tottenham) for school place planning, and states that to support the inevitable demand that will arise from the provision of more than 6,000 units across the area, planning for further capacity within local primary and</p>		
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				<p>secondary schools as well as any special <i>school provision will be an important component in ensuring that additional school place provision is joined up and sustainable</i>' (p. 67). The report goes on to recognize the huge challenge posed by the need for further school provision, for example in Northumberland Park: <i>'Schools in the local area are at or close to capacity at primary reception level and even before the grant of planning permission for additional units at Spurs and at Canon Rubber we were aware of the need to increase local capacity. The provision of a two form entry primary school by EACT Free School, Hartsbrook Primary, which opened in September 2012, went some way to relieving local pressure for places, but, with the roll out of the development outlined above, we are aware that we will need additional provision... There are physical constraints at almost all of the existing local school in the area meaning expansion of existing schools will be challenging at best'</i> (pp. 69-70).</p> <p><b>2.2.2 The question of affordability</b></p> <p>a) The assumptions in the <i>Housing Market Assessment</i> about growth rate of house prices and rents are far too low. Values applied to the viability calculations (i.e. how many <b>'affordable'</b> units developers can reasonably be asked to build whilst leaving them an <b>'acceptable' profit</b>) may be out of date given that many sites are public land whilst sales values for homes to be built in the next few years will be affected by the</p>		
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				<p>unexpectedly rapid growth of house prices in 2014-15. For example Table 1, p. 10 states that <b>'medium value' areas like Wood Green</b> (N22) had a price at the base date (Dec 2010) for a 3 bed, 4 person flat of £280k but even 2 bed flats are now over £400k and even in N17 they are typically over £350k. Appendix B 1.2 table 5 has the assumption that house prices (HPI) will hardly rise between 2010 and now. But they have risen enormously! Average sales prices of residential property rose 10.71% over the last 12 months in N17 (compared to 10.28% in N15 and 9.6% in London as a whole) and 46.59% over the last five years (compared to 49.17% in N15 and 40.17% in London as a whole – data from Zoopla web site on Jan. 19th 2016). The rise in house prices and rental values in Tottenham is especially out of line with local incomes, since <b>as noted in Haringey's Homelessness Strategy</b>, there is a gap of £16,000 between average incomes in the east and west of the borough, and according to the Housing Market Assessment a gap of over £12,000 in the median income. The London Poverty Profile data shows Haringey lower quartile rents are £1,257 monthly and lower quartile GROSS earnings are 74% of lower quartile rents.<sup>11</sup> This means that the conclusion of the <b><i>Housing Market Assessment</i></b> that most of the new housing will be <b>'unaffordable' for existing</b> Haringey residents is truer now more than ever. This also means that genuinely affordable housing is needed at rents that can be afforded by households on those incomes.</p>		
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				<p>b) There is also considerable ambiguity about what the affordability of 'rent' means in the context of the 'affordable rent' concept. 'Affordability' is defined to mean 80% of market rent but the rise in market rents of recent years has been much faster than incomes. Moreover a rent which is 'affordable' may not be so if we add service charges, which could be considerable, especially in high rise buildings which need lifts, water pumps and cradle-suspended operations for window cleaning and for external painting.</p> <p>c) The recent growth of rents and house prices also means that many of the viability calculations on particular sites are thrown into question – as sales values rise more than was expected, developers will obtain a windfall gain and should be required to build a larger proportion of genuinely affordable units and/or pay larger s.106 contributions. For example, in the case of the redevelopment of St. Ann's Hospital, in South Tottenham, the community group which formed the St Ann's Redevelopment Trust finally got the viability assessments disclosed after planning consent was granted. The independent viability assessment commissioned by Haringey calculated that there could have been more affordable housing on the site than the 14% figure which the Council and developer settled for (i.e. a further £23m worth of affordable housing). Where developers can make an acceptable level of profit with a higher proportion of affordable homes, the argument for densification falls, and with it the case for</p>		
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				<p>the imposition of tall buildings on a suburban landscape, with huge pressure on green space and social infrastructure and attendant risks about the unaffordability of future maintenance charges. This is especially an issue for Northumberland Park.</p> <p>2.2.3 The chosen approach to housing provision and to 'housing estate renewal' Obj. 4 of the AAP (p. 32) <b>proposes a 'different kind of housing market'</b>. <b>We oppose the wording and the approach suggested by this</b> with regard to the social housing estates located in the East of the Borough, and earmarked in the Strategic Policies for '<b>renewal and improvement</b>', namely:</p> <ul style="list-style-type: none"> <li>Northumberland Park</li> <li>Love Lane</li> <li>Reynardson</li> <li>Turner Avenue</li> <li>Leabank View / Lemsford Close</li> <li>Park Grove and Durnsford Road</li> <li>Tunnel Gardens, including Blake Road</li> <li>Noel Park</li> <li>Broad Water Farm</li> </ul> <p>The arguments below underpin the site-specific comments we have made with regard to each of these housing estate sites.</p> <p>a) There is an assumption that bringing in higher-income residents by intensive high-rise <b>development will produce 'mixed communities'</b>. <b>What does this mean?</b> The intended inference is that Tottenham is not a mixed community now. This is a deeply flawed and spurious argument both with regard to</p>	
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				<p>Council estates and Tottenham as a whole. Our estates, and Tottenham as a whole, are very mixed communities indeed. The postcodes N17 and N15 are reputed to be the most diverse in Europe, and these of course are the target Tottenham postcodes for this plan. Council estates are mixed – by race, class, culture, socio-economic status and, since the Right to Buy, by housing tenure, with some leaseholders and some private tenants of leaseholders. These estates are not islands – they are in local communities and have rich and extensive social networks as evidenced by the many groups, associations and community organizations. The membership of Our Tottenham evidences this. This has also been demonstrated by research recently carried out by University College London (the Bartlett School of Planning).<sup>12</sup></p> <p>b) There is no evidence that the development of <b>‘mixed’ communities by densification of existing housing estates and change of use from industrial to residential on council-owned industrial estates</b> will be beneficial to the local community, either in terms of housing or employment. We presented in our earlier response submitted in March 2015 (see text box on pg 16 of response) a mass of academic and policy research evidence to show that drawing in higher-income residents <b>to ‘dilute’ council estate populations leads to disruption of community networks, class-segregated living and social tension, rather than greater cohesion.</b> The history of many</p>		
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				<p>London estates where this ‘solution’ has been applied testifies to this, and there is extensive academic research which confirms it.</p> <p>c) Community stability, adequate green space and community facilities are the key to low crime and tenant satisfaction. Densification is hostile to these objectives. In this connection we would mention a statement by <i>Architects for Social Housing</i> citing a survey that Broadwater Farm has a very low rate of crime, a very high rate of tenant satisfaction with regard to safety<sup>18</sup> and very low rent arrears. The plan asserts that the proportion of social housing in Tottenham, particularly in North Tottenham, is excessive.</p> <p>But no objective criterion or argument is given about what constitutes the ‘ideal’ tenure mix, or over what area it should be measured. According to the Haringey Joint Strategic Needs Assessment (Fig. 1 in <a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/otherfactors-affecting-health/jsna-housing">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/otherfactors-affecting-health/jsna-housing</a>), Haringey as a whole has a proportion of social rented housing very little above the London average. Moreover, given the current crisis about affordability of housing in London, the central objective of the plan as stated in the Strategic Policies - Housing Policy SP2 can only be achieved if a high proportion of social housing is maintained. It should also be noted that estates originally built as council housing are now effectively mixed tenure since a significant proportion of homes have been purchased under the right</p>		
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				<p>to buy, there are leaseholders living on estates, and other properties are now let out by private landlords.</p> <p>d) The plan does not deliver its objective of providing for the housing needs of the Haringey population, as stated in point 1 above. Where and how will those people and families displaced by these plans be housed? The plan has no detail on these critical points.</p> <p>e) Nor will it provide jobs for them, since the jobs associated with construction of new housing will be temporary and most local residents do not have the skills to access them; and moreover the plan involves the loss of many cheap, accessible small business premises of the type that Tottenham needs, both industrial and retail.</p> <p>f) The rise in private sector rents, induced by <b>the expectation of a 'gentrification' of Tottenham</b> and the continued grave shortage of social housing, will force many more residents to have to seek homes in neighbouring outer boroughs, for example Enfield, Waltham Forest and Redbridge, as well as beyond the north and eastern boundaries of London. This will put pressure on housing markets and waiting lists there, and on transport infrastructure as they try to commute to jobs in Haringey or in central London and to continue at local schools in <b>Haringey so as not to disrupt children's</b> education. But there is no guarantee such housing exists. In particular in any site where it is proposed to demolish housing association stock, the price paid by the Council or its</p>		
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				<p>development partner(s) to the housing association may not be enough to finance building or acquisition of equivalent units elsewhere to re-house the tenants, who will be <b>the housing association's responsibility</b>. There will then be a displacement effect on social housing waiting lists elsewhere in London as the housing associations struggle to find homes to re-house people whose homes they have sold for demolition.</p> <p><b>2.3 Is it the most appropriate strategy when considered against the alternatives?</b></p> <p>No. There is no assessment of the comparative economic and social costs of providing a given number of homes by demolition and rebuilding versus the cost of refurbishing, extending and converting many of the existing ones. Even some office blocks could potentially be converted to housing by stripping out the interior and leaving the basic structure standing. Architects for Social Housing (<a href="https://architectsforsocialhousing.wordpress.com/page/2/">https://architectsforsocialhousing.wordpress.com/page/2/</a>) have illustrated in the example of Knights Walk in Kennington how refurbishment and extension of existing buildings, for example by building additional storeys, can be much cheaper than rebuilding, as well as far less disruptive to existing residents and less wasteful of environmental resources. According to a report from the Urban Lab and Engineering Exchange at <b>University College London</b>, <b>'there is a growing</b> body of research suggesting that extending the lifecycle of buildings by refurbishment is</p>		
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				<p>preferable to demolition in terms of improved environmental, social and economic <b>impacts</b>'19. <b>See also the <i>Our Tottenham Housing Factsheet: Demolition vs Refurbishment</i></b> <a href="http://ourtottenham.org.uk/our-tottenham-factsheet-housing-demolition-vrefurbishment/">http://ourtottenham.org.uk/our-tottenham-factsheet-housing-demolition-vrefurbishment/</a>. Historically the decision to refurbish or rebuild has been subjected to NPV analysis, along the line for example of the model used by Sovereign Housing Association (see <a href="https://www.sovereign.org.uk/aboutus/strategic-asset-management/">https://www.sovereign.org.uk/aboutus/strategic-asset-management/</a>). We would expect to see a similar assessment of whether the <b>Haringey Plan's proposals for estates such as Northumberland Park or Broadwater Farm</b> represent best value for public money, taking into account also the intangible <i>social</i> costs and benefits of each alternative such as keeping the community together and <b>continuity of children's schooling</b>. <b>For one specific group of estates, the 'Orlit' homes in Bounds Green</b>, the site DPD argues that refurbishment is technically impractical, but we have spoken to residents who are convinced otherwise and heard of an internal Council report which said refurbishment is technically feasible.</p> <p>See our response to the Alterations of the Strategic Objectives, where we highlight a series of alternative mechanisms/options/policies to creating extra low-cost homes and reducing rent levels. These alternatives have not been fully considered in the Tottenham AAP:</p>	
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				<p>a) bringing into residential use rooms and flats above shops which are currently empty or used for storage, including in particular the many shops owned by the Council.</p> <p>b) control of rents and of the quality of private sector lettings by registration of landlords and by creating competition from a non-profit best-practice lettings agency, which could be run as a municipal enterprise with minimal tenancy setup charges and low commissions to landlords who offer a fair deal.</p> <p>c) inducing private landlords to let for longer tenancies, thus reducing the vacancy rate due to churning of tenants (approximating to almost 5% if flats remain empty for 1 week every 6 months, but only 2.5% if tenancies last <b>a year with a week's vacant period in between.</b> <b>This factor alone could 'provide' the</b> equivalent of an extra 700 homes just by reducing the vacancy rate). It could be done through a nonprofit lettings agency as proposed above. It should be noted that 17% of the households becoming homeless in Haringey become so because of no-fault evictions at the end of short term tenancies, requiring about 100 social rented vacancies per year.</p> <p>d) buying empty and hard-to-sell homes to let to homeless families through a municipal housing company (along the Enfield model) which would buy empty or under-occupied homes and save the huge cost of temporary accommodation for homeless families, thus freeing up more money for refurbishments/new building.</p> <p>e) facilitating self-build and community non-</p>		
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				<p>profit developments (by community development trusts or coops) on small and large sites. The Plan fails to, for example, adequately promote Community Land Trusts whose average 3% of surplus margins sought are clearly more appropriate when contrasted with the obscenely inflated and unacceptable profit margins being sought by most profit-led property development. Such property development, upon which the current Plan has <b>chosen to rely, is presented as 'the only show in town' and used as justification for failures to</b> implement or enforce social infrastructural, affordable housing and s106 obligations. Low-rise building could be done using prefabricated units which are cheaper and quicker to build than conventional construction methods.</p> <p>f) use of space over car parks, so that housing could be built over them with parking only at ground level, and car parking would rarely be the only land use for spaces currently used as car parks. Several hundred homes could be accommodated in this way at sites such as Stoneleigh Road N17 and Summerland Gardens N10.</p> <p>g) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. This could be encouraged in particular areas in partnership with local small builders and selected banks to provide finance for home extensions/attic conversions, and would provide opportunities for solar panels</p>		
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					<p>and quality insulation to be incorporated into the works, thus increasing the sustainability of the housing stock. There would be substantial spin-off benefits in terms of job creation, development of refurbishment/repair capacity in the local construction sector, improved community cohesion, lower childcare and elder care costs due to families being able to stay together if they wish.</p> <p>h) logistical help for older people who own much larger homes than they need (3-5 bedrooms) to let rooms or find suitable ways to sell up and move to smaller accommodation, possibly outside London, if they want to.</p> <p>i) enhancements and improvements to more single storey retail sites to make use of any available additional space, where appropriate.</p> <p>j) reduction of refurbishment/maintenance costs for social housing by adopting a different way of doing the works; this might mean re-constituting a direct labour force (with attendant important opportunities for training local youth) and/or offering tenants a cash-back on part of their rent for doing minor repairs that they are competent and willing to do, for example painting, some kitchen fitting, and some repairs to windows, doors, locks, taps, light fittings and floors, garden fences and gates. These are all things which owner-occupiers often do for themselves.</p> <p>k) having clear contract and/or planning conditions with developers that sites developed on public land must include social rented council homes which could be funded</p>		
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				<p>via the private sector element of the development.</p> <p><b>If the intention is to have a genuinely ‘mixed community’ which meets the housing needs</b> evidenced in many reports, the Local Plan should include these other options and ideas. <b>Regrettably the phrase ‘mixed community’</b> appears to be used in the context of the Haringey Local Plan in the way critiqued by <b>some academics ‘who question the evidence base for social mix policies and rhetorics that advance processes of gentrification’</b> (<i>Mixed Communities; Gentrification by Stealth?</i> Edited by Gary Bridge, Tim Butler and Loretta Lees, 2012, Bristol: Policy Press).</p> <p>We have several concerns regarding the effectiveness of the proposed <i>AAP</i>.</p> <p>a) Policy AAP3 and the site-specific proposals for sites currently occupied by social housing estates will result in expulsion of many <b>residents who will be ‘priced out’</b> of Tottenham into neighbouring areas or out of London altogether. In the meantime, rising rents brought about by the introduction of higher-value housing and the attendant uplift to the property market for older homes will mean a higher housing benefit bill, increasing arrears and increasing homelessness.</p> <p>b) As we have extensively argued above, there is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new</p>		
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				<p>health centres are envisaged in Tottenham but there is no assessment of overall need, nor any assessment of the need for school places. There is no provision for additional community centres despite the loss of the Welbourne Centre, the ambiguity with regard to the Broadwater Farm Community Centre<sup>20</sup> and even the possibility of losing Tottenham Chances if a developer comes forward with a proposal that appears to justify the loss of a listed building.</p> <p>Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. But if there is no specific provision of additional childcare space in the new buildings, either this policy will be unworkable or it will result in an exacerbated shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use. There is a very serious lack of health provision, especially in Tottenham Hale. With a further 5,000 homes proposed, there should be detail about how services will be provided.</p> <p>c) According to Cabinet papers revealed to the public on 17.11.2015, the Council envisages extensive use of a single private sector partner for development, in a 50/50 jointly owned venture company, but this exposes the Council, our public assets and the community to serious risks. What if the chosen development partner goes bankrupt, or uses its enormous market power to bargain for</p>		
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				<p>higher profits and less affordable units? What if the company gets into financial difficulty and reneges on whatever commitments will be made about s.106 contributions, affordability or guarantees of re-housing to existing tenants? It is important that site development should rely on a variety of actors and development partners in order to spread the risks and to avoid any profit-driven party having undue market power. The joint venture arrangement appears to give no opportunity for community partners such as coops, community land trusts or social enterprises.</p> <p><b>Is it deliverable?</b></p> <p>Many of the <b>site-specific proposals in the AAP</b> are potentially not deliverable.</p> <ul style="list-style-type: none"> <li>a) The plan involves serious over-development of many sites as already stated in point 2(d) above.</li> <li>b) Some of the sites which will have very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will itself increase the flood risk with more land built over and unable to absorb rainwater into gardens and landscaped areas.</li> <li>c) The Council has expressed a preference for a very small number of development partners, which renders the plan vulnerable to being <b>'beaten down' in negotiations</b> on the <b>proportion of 'affordable' units and on infrastructure contributions</b>, as with the Spurs development.</li> <li>d) As we have argued in our response to the <i>Alterations to Strategic Policies</i>, the</li> </ul>		
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				<p><i>Alterations</i>, and their translation into Policy AAP1 and AAP3 of the Tottenham AAP, reinforce the fact that is a one dimensional plan which relies on private developers and a buoyant housing market to achieve its objectives. We believe this is short-sighted and irresponsible. There are already concerns, most recently expressed by the Chancellor of the Exchequer, that the economy is weakening. There is no guarantee that a further recession might not happen, especially given the situation with the EU. In our view the Local Authority has a responsibility to develop alternative strategies for Tottenham. If the economy goes into downturn, what commitment would these developers have to Tottenham and its communities?</p> <p>e) Part of developing alternative approaches would be to examine eventualities which might occur – in other words, to carry out a risk assessment. Relying on this plan, should there be an economic collapse, this would leave, in particular, Tottenham blighted, with many communities caught within red-lined zones.</p> <p><b>f) Haringey's proposal for a joint venture</b> company comprising 50/50 ownership with a private development partner compounds the huge risk of this one-dimensional plan. The plan to transfer two estates to a private company is predicated on this local plan – they go hand in hand. This makes housing and development even more vulnerable to the market and leaves hundreds of tenants and residents exposed. This is discussed further in paragraph 7, section d, below.</p>		
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				<p><b>Is it flexible?</b></p> <p>As we have argued in our response to the <i>Alterations to Strategic Policies</i>, the <i>Alterations</i>, and their translation into Policy AAP1 and AAP3 of the <i>Tottenham AAP</i>, make the plan inflexible since it is one dimensional as described above in paragraph d.</p> <p>a) Estates could be refurbished and alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards from existing buildings, adding extra storeys or wings, are now well-tested strategies for this.</p> <p>b) There is nothing in the plan to say what will happen is the envisaged strategy (overall or for specific sites) cannot be achieved. We know <b>from the Council's latest proposal for a Joint Venture Company</b> approved by Cabinet in December that the Council plans to transfer to a Joint Venture Company much of its property portfolio including many sites in Wood Green and Northumberland Park which are the subject of specific Site Allocation Documents. Much will then depend on how the market affects one particular private sector partner, the one which will be chosen as 50% owner of the Joint Venture Company. If this company should get badly into debt, or if it should decide to pull out of the arrangement because better profits are to be made elsewhere, the strategy for these sites could be in jeopardy.</p> <p>c) The Council is planning to rely too much on a single private sector partner, and too much on large private developers altogether. It</p>		
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				<p>would be less risky and more flexible to envisage for each site a community partner, such as a co-op, community land trust, or community investment fund drawing on the savings of the wealthier west-of-borough residents by selling them bonds. The Council could facilitate the development of several community partners of this kind. It could also engage small local builders for small parcels of building land or for refurbishment work. This would be more flexible than relying on the Joint Venture Company and would have greater prospects of local job creation. We note that in the case of the Hale Village, the collapse of the housing market in the late <b>'noughties'</b> caused financial difficulties for the chosen private sector partner and whilst solutions can be found for a single site, this is rather more difficult where the same company is involved in several sites.</p> <p>d) Moreover, there is no flexibility envisaged in the event that publicizing plans which include demolition as an option should lead to a sharp <b>decline in market values and 'lettability'</b> in particular areas, notably Broadwater Farm and the surrounding area in SA62, and in Northumberland Park. Homes being left empty could lead to dereliction and social problems (such as a <b>'sink estate'</b> reputation, rubbish dumping and drug dealing), affecting the attractiveness and value of nearby private housing as well as the actual estates marked for demolition.</p> <p>e) Our over-riding concern is that</p>		
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				<p>refurbishment should always be considered as an option alternative to demolition.</p> <p><b>Will it be able to be monitored?</b></p> <p>We have concerns that the <i>Tottenham AAP</i> cannot all be properly monitored.</p> <p>a) The site allocation documents do not specify the number of affordable units envisaged for particular sites. Thus as agreements are reached with developers for particular sites, it will be impossible to say whether meeting targets for total units or affordable units are likely to be met taking into account the remaining sites. Table 2 (Broad distribution of new housing) on p. 35 of the <i>Alterations</i> says nothing about how much <b>'affordable' housing will be built on each main site</b>. This is also the case in the Site Allocation DPD and in the Tottenham AAP.</p> <p>We would expect that at the least, targets for <b>'affordable' units should be supplied for the sites in the upper Lee Valley Housing Opportunity Area</b>. We also note that it is not clear whether the <b>'affordable' percentage target of 40% is calculated as 'new build affordable/total new build' or 'new build affordable/(total new build minus the number of social rent properties demolished or amalgamated into larger units)'</b>.</p> <p>b) The <b>'housing trajectory' graph (Appendix 1, p. 58 of the <i>Alterations</i>)</b> which states how many units will be built in each year does not say how many will be affordable at each stage. This means that the <b>'affordable housing' proportion of the total cannot be monitored against the target year by year.</b></p>		
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				<p><b>4. Is the plan consistent with national policy?</b></p> <p>As stated above, the <i>Tottenham AAP</i> fail to demonstrate how they will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on).</p> <p>The <i>Tottenham AAP</i> fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of the Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.</p> <p><b>Equalities legislation:</b></p> <p>The effect of the <i>Alterations to Strategic Policies</i>, the <i>Alterations</i>, and their translation into Policy AAP1 and AAP3 of the <i>Tottenham AAP</i>, would be an unacceptable attempt to <b>enforce a 'top-down' social and physical</b> re-engineering of large parts of Haringey to the detriment of current communities and of <b>Haringey's character. National policy (the Equalities Act)</b> would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, the fact <b>that the plan will 'dilute' and drive out the</b> existing residents of Tottenham means that</p>		
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				<p>negative impacts will disproportionately affect ethnic minority people. Appendix C to the <i>Consultation on Haringey's Draft Housing Strategy 2015-2020</i> also demonstrates how the policy of knocking down council housing in order to increase home ownership through Shared Ownership would be discriminatory. It states:</p> <p><b>'Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period. Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east. Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are overrepresented in comparison with their representation in the general population of Haringey... The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily.'</b></p> <p>We believe that replacing council housing with so-called Affordable Rent properties is also discriminatory, given the concentration of black people in the East of the Borough where household incomes tend to be around £20,000 a year. Such incomes clearly make so-called</p>		
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				<p>Affordable Rents of over £800 a month desperately unaffordable. £800 is over 45% of the gross income of the typical household in Northumberland Park and the East of the borough, let alone their net income (which is <b>the GLA's affordability criteria, see page 53 of Appendix C</b>).</p> <p>We believe that the policy of demolishing council estates therefore breaches the <b>commitment in Haringey Council's Equal Opportunities Policy</b> of April 2012 to the fair provision of services. Paragraph 3.2.2 of <b>Haringey's Local Plan: Strategic Policies 2013-2026 states that: 'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community where they want to live.'</b><sup>23</sup> In the light of the above it is clear that the Council proposal to demolish Northumberland Park is in breach of the Local Plan. It would only be non-discriminatory if there was a plan to re-provide the same quantity of social, rented housing with permanent secure tenancies and low rents similar to the rents currently charged to council tenants in Northumberland Park. Given that no such plan exists, the inclusion of council housing in Northumberland Park in the site allocations is discriminatory and improvements to existing homes rather than demolition should be substituted.</p> <p>We would also note council plans to house more homeless families outside London (see <b>Haringey Council's Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18</b>).</p>		
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					<p>(This was a report made to the Cabinet as part of agenda papers on 16/12/2014)<sup>24</sup>. Clearly demolishing social housing without appropriate replacement in areas like Northumberland Park will lead to increasing <b>numbers of Haringey's homeless families</b> being forced out of London. This <b>'social cleansing' aspect, adds to the discriminatory nature of the proposal to demolish social housing.</b> As Appendix C of the <i>Consultation on Haringey's Draft Housing Strategy 2015-2020</i> states <b>'Black households approach as homeless at a level which is more than twice their representation in Haringey's population compared with White households who present in numbers which are around two thirds of their representation in Haringey's general population. This indicates that Black households are particularly affected by homelessness in the borough.'</b> Therefore reducing the amount of social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. This is additional evidence of the discriminatory <b>nature of the Council's plan</b> for Northumberland Park and Tottenham as a whole.</p>		
9	RTAA P66	AAP Chapter 5	Not stated	Not stated	<p>We would like to see the following principles reflected in the site requirements and development guidelines for all the sites listed in the Tottenham AAP.  <b>GUIDING PRINCIPLES FOR DEVELOPMENT OF SITES IN TOTTENHAM ADVOCATED BY THE OUR TOTTENHAM NETWORK - TO BE APPLIED TO THE SITE REQUIREMENTS AND</b></p>	<p>Guiding principles for development of sites advocated by the Our Tottenham Network to be</p>	<p>The Council does not agree with incorporating the suggested Guiding Principles into the AAP and for these to be applied to all site requirements and development guideline. In addition to the fact that these</p>

				<p>DEVELOPMENT GUIDELINES OF THE AAP</p> <p>These principles were spelled out in Our Tottenham Response to the previous draft of the Tottenham AAP (February 2015 version). They are based on the Our Tottenham Community Charter (Appendix 1 of response) and represent a consensus about how new developments should protect existing residents and businesses and enhances their quality of life and opportunities. THESE PRINCIPLES SHOULD BE APPLIED TO THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES for all the sites in the revised AAP.</p> <p>Under Site Requirements, proposals for each site should:</p> <ol style="list-style-type: none"> <li>1. Relate to sites that are mostly vacant or derelict. Any site consisting of mostly viable buildings and usage should not be subject to a Site Allocation or earmarked for demolition or change of use, except in very exceptional circumstances (such as those buildings and activities not contributing to any of the agreed goals for Tottenham and Haringey, or being predominantly vacant or derelict). No housing that is structurally sound should be demolished. It should be recognised that a Site Allocation for development is likely to create huge uncertainty, stress and blight for the current occupants of the site – this is unnecessary and unacceptable except in the most exceptional circumstances. Local Plan policies already allow for refurbishment and renewal of existing buildings, improvements to social infrastructure and the streetscape etc.</li> </ol>	<p>applied to all site requirements and development guidelines of the AAP (as set out in response).</p>	<p>principles have not been subject to statutory consultation, their application to future development in Tottenham has not been robustly tested for deliverability or effectiveness in achieving the delivery of <b>Haringey’s strategic housing</b> requirement and jobs target. It is highly unlikely that limiting new development to only those sites where buildings are currently vacant or derelict, and therein capping new development at 3-4 storeys, yet requiring it to be of the highest quality, carbon neutral, capable of supporting social rents, new open space and social infrastructure, would render all schemes unviable and therefore the plan undeliverable and unsound.</p> <p>An unsound plan for Tottenham and Haringey would have significant and harmful consequences for the Borough– not least that the promised strategic investment in Tottenham would be at serious risk, while the extant designations</p>
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				<p>2. Conform to Lifetime Neighbourhoods criteria (as set out in the London Plan)</p> <p>3. In Tottenham, conform to the Community Charter for Tottenham</p> <p>4. Conform to best practice for similar sites around the UK and Europe</p> <p>5. All new housing on the site should be high quality and genuinely affordable:</p> <ul style="list-style-type: none"> <li>- An affordable home is one that is affordable to any tenant earning the London Living Wage. 70% of such housing should be social housing.</li> <li>- A quality home means all of the following: Secure; Physically comfortable (with adequate indoor space to at least ‘London Housing Design Guide 2010’ standards ie Parker Morris standards plus 10% more space - and access to adequate outside garden space); It should comply with, and not exceed, the density matrix as set out in the London Plan, and built to 100% lifetimes homes standards. Designs should promote a permeable and convivial street pattern; protect and enhance the conservation and positive character of the local area. There should be easy access to schools, work, healthcare, cultural facilities, public transport, fresh affordable food, and green space. It should allow people to have control over their indoor and outdoor space, and to develop communities and support each other. Residents and communities should be empowered to make decisions and have control over their housing.</li> <li>- As stated in the Haringey Local Plan, Haringey is characterised by predominantly</li> </ul>	<p>and London Plan housing requirement would remain for landowners and developers to fully exploit in the absence of a local statutory framework to manage this level of growth.</p> <p>Conversely, the proposed Local Plan is in general conformity with the London Plan, deliverable and will ensure new development and growth is sustainable for both new and existing communities.</p> <p>The Community Charter for Tottenham has not been subject to statutory consultation and the Council does not therefore consider it appropriate that all proposals conform to this.</p> <p>The Local Plan seeks to ensure that all new development in Haringey is designed and built to a high quality and positively responds to local character. This is reflected in Policy SP 11 and the proposed Haringey Development Charter (Policy DM 1) with</p>
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				<p>low-rise (2-3 storey) residential suburban development across the borough, and 3-4 storey development in its town centres. The pattern of local housing heights in the various neighbourhoods should be respected and all new housing sites should conform to such patterns. In some very exceptional circumstances where the overwhelming pattern of development in an area is greater, heights may be appropriate up to a maximum of 6 storeys as long as there is no overshadowing or blocking of light to nearby residences, or key sightlines.</p> <p>6. Refurbishment and renewal is preferred to demolition and re-build, unless this is impossible</p> <p>7. Development to include additional social infrastructure, including adequate levels of quality, public open space (including major new spaces to address areas of deficiency as set out in the London Plan), play areas/equipment, and a range of other social infrastructure and amenity infrastructure, to serve the residents in and near the site. No net loss of social infrastructure.</p> <p>8. No net loss of employment land and facilities unless the existing site can be demonstrated to have been unviable for a clear 3 year period.</p> <p>9. All new facilities (residential, commercial, social) to be environmentally sustainable, ie conform to highest carbon-neutral criteria</p> <p>10. Preserve the heritage and positive characteristics of the surrounding area and of Tottenham as a whole. Any buildings of merit</p>	<p>further detailed requirements set out across the DM DPD and other Local Plan documents.</p> <p>The Local Plan sets requirements for affordable housing, in line with the definition of affordable housing included in the NPPF and London Plan.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan (IDP) which sets out the infrastructure required to support the levels of planned growth and to deliver the spatial strategy for the Borough and Tottenham. The IDP is subject to regular review and updating over the plan period. Where appropriate, site allocation policies require specific provision of social infrastructure. The DM DPD (Policy DM 49) sets out borough-wide policies to protect against the loss of social and community infrastructure.</p> <p>The Council considers that the Local Plan sets a positive</p>
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				<p>should be added to the official Haringey Locally Listed Buildings list</p> <p>11. For each development, all interfaces with streets, public areas or back gardens should enhance the view and contribute positively to local community experience of the site.</p> <p>12. Change of use of a site will only be allowed in exceptional circumstances (such as the current usage proven to be unviable), subject to the criteria set out here being fully adopted.</p> <p>13. A Social and Community Impact Assessment outlining how it conforms to the above principles is to be produced for each proposed development.</p> <p>Under Development Guidelines, proposals for each site should:</p> <p>a. For Site Allocations, s106 and CIL to be paid towards community benefit to be calculated as all the development profit/surplus expected less 7% for the developer (which we understand is the approx.. European average profit margin). The current CIL to be recalibrated at much higher rate to reflect this figure. At least 20% of the total to be paid shall go to local green space improvements, and at least 20% shall go to youth services and facilities in the area.</p> <p>b. Anyone displaced by the development (whether residential or commercial tenant) must be rehoused by the developer in an equivalent or improved arrangement in the final site or nearby</p> <p>c. Any prospective developer must</p>		<p>framework for managing its employment land stock to meet objectively assessed needs for land and floorspace <b>and the Borough's strategic</b> employment target; it includes criteria to consider proposals involving a reduction or loss of employment land/floorspace. A blanket restriction on loss of employment land and facilities is not considered to provide a positive approach for managing land, and would not be consistent with NPPF paragraph 22.</p> <p>The Local Plan includes a suite of policies to ensure that all development proposals incorporate sustainable design, layout and construction techniques, having regard to climate change adaptation and mitigation, including carbon reduction requirements.</p> <p>The Council considers that the Local Plan sets a positive framework for managing the historic environment, and includes policies to ensure proposals have consideration</p>
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					<p>demonstrate an active and genuine local community partner involved in the decision-making around the design and management of the future site.</p> <p>d. If there is an expression of interest for a Community Plan for the site a minimum period of 12 months shall be set aside to enable such a Plan to be developed before any further action is taken</p> <p>e. All jobs created during and following the development to be quality jobs, above the London Living Wage, with local trade union branch involvement, and earmarked for local people as far as possible, and to include local apprenticeships.</p>		<p>to the significance of heritage assets and their setting in line with the NPPF. This includes borough-wide and Tottenham area policies and additional requirements/guidelines set within site allocations.</p> <p><b>‘Local community experience’</b> is a vague term and the Council is unclear on how it could implement this requirement in policy terms. The Local Plan seeks to ensure that all development responds to local character and makes a positive contribution to places, including public spaces.</p> <p>Some changes of use fall within permitted development, and the Council has limited control in this respect. The Local Plan sets out the range of acceptable uses for the site allocations, which are considered necessary to meet objectively assessed need and deliver the spatial strategy for the Borough; all proposals will need comply with the uses prescribed by these site specific policies.</p>
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						<p>The Local Plan has been subject to an integrated impact assessment, which includes considerations for social, health and equalities impacts. There is no legal scope for the Council to require applicants to prepare social and community impact assessments.</p> <p>With regard to the additional points the respondent suggests should be included within all development guidelines:</p> <p>The suggested changes do not meet the legal tests for the use of S106 planning obligations or the statutory requirements in respect of CIL charging. In terms of CIL receipts, priorities for CIL spend are set out on the Regulation 123 list, which the Council is required to consult the public on. There is no scope within this Local Plan consultation to make modifications to these priorities.</p> <p>There is no scope for the</p>
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						<p>Local Plan to set policies in respect of displacement as a result of development proposals.</p> <p><b>Haringey's Statement of Community Involvement (SCI) sets the Council's approach</b> for involving local residents, businesses and other stakeholders on planning applications. The Local Plan sets further requirements for community consultation, such as with site masterplanning, as provided by AAP 1. However, there is no legal scope for the Local Plan to require developers to secure community partners for design and future management of development sites.</p> <p>There is no legal basis for the Council to prevent development on a site coming forward whilst a Community Plan (Neighbourhood Plan) is being prepared.</p> <p>The Local Plan seeks to increase the number and quality of jobs in the</p>
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							<p>Borough, as well as to facilitate training opportunities, so as to enable residents to access a wide range of employment opportunities. The strategic approach to delivering these objectives is set out in Policies SP 8 and SP 9, which the other Local Plan documents help give effect to; this includes seeking planning obligations to invest in training and other initiatives. It is not considered necessary to repeat borough-wide policies for each site allocation. The Living Wage is outside the scope of the Local Plan.</p> <p>No change.</p>
9	RTAA P67	Policy SS1	Not stated	Not stated	<p>Much of this District Centre is situated in the Clyde Circus and Tottenham High Road/ Page Green Conservation Areas. This should be included in this policy as it is an important factor in planning the positive regeneration of the area.</p> <p>This proposal should be discussed with Tottenham Traders and the Federation of Small Businesses (North East London) before it is adopted.</p> <p>We welcome positive references to the need to protect independent traders by preventing amalgamation of units and reference to the</p>	<p>Much of this District Centre is situated in the Clyde Circus and Tottenham High Road/ Page Green Conservation Areas. This should be included in this policy as it is</p>	<p>Policies AAP 5 and DM 9 provide that all proposals will need to have regard to the heritage assets and their setting, and the Council does not consider it necessary to repeat this here. Policy SS 1 makes reference to the need for proposals respond to the historical streetscape rhythm, along with support for the retention, repair and reinstatement of historic</p>

					<p>retention of the market. However, the wording of sentence F ‘The Council will require the retention of the Seven Sisters Market in the area’, p. 58, is ambiguous, as it implies it may be relocated elsewhere in the area. There is widespread support by local residents and businesses to maintain the market where it is now (Wards Corner) and a viable community-led planning application for the site has been approved.</p> <p><b>Reword sentence F (p. 58): ‘The Council will require the retention of the Seven Sisters Market in the area on-site, preserving the existing building’.</b></p> <p>Residents and market traders are very concerned that the Council’s plan to retain the indoor market will only include some of the current market traders. The plan should specify that all current market traders can remain in the Seven Sisters Market.</p>	<p>an important factor in planning the positive regeneration of the area.</p> <p>Reword sentence F (p. 58): ‘The Council will require the retention of the Seven Sisters Market in the area on-site, preserving the existing building’.</p> <p>The plan should specify that all current market traders can remain in the Seven Sisters Market.</p>	<p>shopfronts and facades. This appropriately reflects consideration of the historic environment for a district centre policy.</p> <p>Policy SS 5 sets out further details in respect of the market. Paragraph 5.34 states that the market should be re-provided on the site and that the size and cost of the stalls should be controlled to ensure they are accessible to local traders. However, the Local Plan cannot require that all current traders can remain in the market.</p> <p>No change.</p>
9	RTAA P68	SS 2	No response given	No response given	<p>Add a bullet point: All development to complement and enhance the surrounding Conservation Area.</p> <p>Address Open Space deficiency by ensuring a major open green space is created at the northern end of the site.</p>	<p>Add a bullet point: All development to complement and enhance the surrounding</p>	<p>The site description box notes that the site is adjacent to a conservation area. Policies AAP 5 and DM 9 provide that all proposals will need to have regard to the heritage assets and their</p>

						<p>Conservation Area. Address Open Space deficiency by ensuring a major open green space is created at the northern end of the site.</p>	<p>setting, and the Council does not consider it necessary to repeat this here.</p> <p>The policy provides that a new SLOL designation will be made at the open space at the northern end of the site.</p> <p>No change.</p>
9	RTAA P69	SS 3	No response given	No response given	<p>We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents. Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.</p> <p>We want a clear rewording on p. 63 to clarify <b>the principles of the 'renewal process'</b>: No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes.</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</p>	<p>We want a clear rewording on p. 63 to clarify the principles <b>of the 'renewal process'</b>:</p>	<p>The Local Plan should be read in its entirety. Alterations to Policy SP 2 set out the <b>Council's strategic approach</b> for housing estate renewal and improvement, and Turner Avenue is included in an initial priority list. The approach is set recognising <b>the Council's commitment to</b> improving the housing stock and the limitations of the Decent Homes programme. The inclusion of estate regeneration in the Local Plan is considered necessary in policy terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan, and will help to address objectively assessed need for</p>

					social housing unit and no displacement of existing tenants as part of any plan for the area.		<p>housing. Further details in this respect are set out in the Alterations to Strategic Policies SP 2, along with paragraph 3.2.29, and Policy AAP 3.D.</p> <p>Paragraph 3.2.29 of the Alterations to Strategic Policies set out the Council's approach to engage with residents on estate renewal projects. It also states that the Council will seek to re-provide social housing on an equivalent floorspace basis.</p> <p>No change.</p>
9	RTAA P70	SS 4	No response given	No response given	p. 65, under 'Site requirements', add a bullet point stating 'there should be no loss of existing businesses'.	Under 'Site requirements', add a bullet point stating 'there should be no loss of existing businesses'.	<p>Policy SS4 seeks redevelopment of the site to deliver new employment floorspace to help meet objectively assessed needs in this regard, and to deliver the spatial strategy for Tottenham and the Borough. Whilst the policy provides for the continuation of employment uses at this site, the Local Plan cannot require that there be no loss of existing businesses.</p> <p>No change.</p>
9	RTAA	SS 5	No	No	We support the position of the Wards Corner	The Seven	Paragraph 5.34 states that

	P71		response given	response given	<p>Coalition with respect to this site. This states that the Seven Sisters Market should be reprovided on this site and cost of stalls should be controlled to ensure they are accessible to local independent traders. Residents and market traders are very <b>concerned that the Council's plan to retain the indoor market</b> will only include some of the current market traders. The plan should specify that all current market traders can remain in the Seven Sisters Market. Wards Corner is a locally listed building in the Conservation Area and the ground floor is registered as an Asset of Community Value. The Seven Sisters/West Green Road Development Trust was granted planning permission for The Wards Corner Community Plan in 2014. This permission to restore and retrofit the historic former department store should take precedence over the subsequent Apex House Site Allocation statement that it is a suitable location for a tall building. Government Guidance sets out a presumption in favour of preserving buildings that make a positive contribution to the character and appearance of Conservation Areas. Development on the Apex House site should therefore be in keeping with the height and appearance of the existing Wards Department Store building.</p> <p>re-integrate what was mentioned in the previous iteration of the draft AAP: The site lies within the Seven Sisters Conservation Area and development should preserve or enhance its appearance as per the</p>	<p>Sisters Market should be reprovided on this site and cost of stalls should be controlled to ensure they are accessible to local independent traders</p> <p>The plan should specify that all current market traders can remain in the Seven Sisters Market</p> <p>Re-integrate what was mentioned in the previous iteration of the draft AAP: The site lies within the Seven Sisters Conservation Area and development should preserve or</p>	<p>the market should be re-provided on the site and that the size and cost of the stalls should be controlled to ensure they are accessible to local traders. However, the Local Plan cannot require that all current traders can remain in the market.</p> <p>The site description box lists the relevant planning designations, including conservation areas and listed buildings. Policy SS 5 will need to be considered alongside other policies relevant to management of the historic environment, including AAP 5 and DM 9, and the Council does not consider it necessary to repeat requirements here.</p> <p>No change.</p>
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					<p>statutory requirements. This should explicitly mention locally listed buildings and refer to the <b>Council's broader policies and approach</b> to securing the refurbishment of heritage assets along the High Road and more generally.</p>	<p>enhance its appearance as per the statutory requirements. This should explicitly mention locally listed buildings and refer to <b>the Council's</b> broader policies and approach to securing the refurbishment of heritage assets along the High Road and more generally.</p>	
9	RTAA P72	SS 6	No response given	No response given	<p>We consider this site allocation does not provide a strong enough vision for such a key strategic site, either in terms of meeting needs of Tottenham's diverse communities; ensuring a high-quality sustainable building; or ensuring a vital and viable town centre as required by the London Plan. This is especially important in relation to the value of the site and its potential to yield benefits for Tottenham. We propose the following aspects should be mentioned and the relevant policies cross-referred to: Need for the highest environmental standards to be achieved</p>	<p>We propose the following aspects should be mentioned and the relevant policies cross-referred to: Need for the highest environmental standards to be achieved Need to</p>	<p>Disagree. The Council considers that AAP acknowledges the key strategic location and opportunities for this site (including in the Seven <b>"Sisters/West Green Road sub-area" vision and</b> objectives and at paragraph 5.38), which has been reflected in the policy approach to optimise its future redevelopment, contributing to delivery of the</p>

				<p>Need to ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable)</p> <p>Need to reflect and support the culture and diversity of the area</p> <p>Need to deliver affordable workspace, space for small shops, space for cultural and creative uses</p> <p>Need to enhance the public realm</p> <p>Need to ensure safety</p> <p>A tower block, let alone a 22-storey building, is inappropriate at this site. Further cross referencing is needed to key council policies relating to tall buildings, given this is the first time such a building has been proposed in this area and given the height Grainger are currently considering. If this goes ahead, this will likely be the first time these new policies allowing taller buildings are tested. There is therefore a need for caution to ensure that a precedent is not set that damages <b>Tottenham's character</b> and strengths. In particular the following policies should be explicitly referred to: Privacy, Light, Need to relate to surrounding buildings and heritage – it should be clarified that the building must not be so tall that it cannot relate to the surrounding area. The density and height allowable on this site should be clarified with reference to an evidence base, policy and other relevant factors (e.g. flood study).</p>	<p>ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable)</p> <p>Need to reflect and support the culture and diversity of the area</p> <p>Need to deliver affordable workspace, space for small shops, space for cultural and creative uses</p> <p>Need to enhance the public realm</p> <p>Need to ensure safety</p>	<p>spatial strategy for Tottenham and the Borough.</p> <p>The Council considers that the suggested changes to the policy are suitably covered by the requirements set out in the AAP area-wide policies and the DM DPD, and are therefore not necessary to repeat here.</p> <p>The site falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings.</p> <p>The indicative site capacity has been established using a standard methodology, as set out in AAP Appendix A.</p> <p>No change.</p>
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						In particular the following policies should be explicitly referred to: Privacy, Light, Need to relate to surrounding buildings and heritage – it should be clarified that the building must not be so tall that it cannot relate to the surrounding area. The density and height allowable on this site should be clarified with reference to an evidence base, policy and other relevant factors (e.g. flood study).	
9	RTAA P73	TG 1	No response given	No response given	In the previous draft of the AAP the Leisure Centre car park was identified as a site for built development, which we opposed. There	We argue that this site should be	The Leisure Centre Car Park was included as proposed Policy TG 1 in the Regulation

					is no reference to the car park here any longer. We argue that this site should be reintegrated into the AAP and designated to be retained as open space -- particularly to provide facilities for outdoor physical activity, which are almost completely lacking in the already densely built up central Tottenham area. There is a lack of other open space large enough to provide this. The site's location -- adjacent to both the Sports Centre and Tottenham Green -- make it a strategic location for this. It is usual for sports centres to be located adjacent to playing fields and outdoor courts, which extend and supplement their important public health role.	reintegrated into the AAP and designated to be retained as open space -- particularly to provide facilities for outdoor physical activity	18 Tottenham AAP (February 2015). The site allocation has been removed in response to the consultation and concerns over deliverability, including reconciliation of replacement parking. While the site is not currently open space as suggested, provision of outdoor facilities would likely result in the same concerns over deliverability – more so if the outdoor use increased demand for parking.  No change.
9	RTAA P74	TG 2	No response given	No response given	Make explicit the protection of community use (T-Chances), a very valuable asset for the area. T-Chances, is a very important community centre providing key services and <b>facilities for Tottenham's youth. The protection of T-Chances needs to be explicitly included in the site requirements.</b> Nicholson Ct is a recently-constructed low rise residential building and should be retained. REMOVE reference to the Option that "A more comprehensive scheme would need to justify the loss of the existing listed building".	Make explicit the protection of community use (T-Chances).  Nicholson Ct is a recently-constructed low rise residential building and should be retained.  REMOVE reference to	The policy provides that a venue for the existing community use should be secured before any redevelopment occurs – this will ensure that provision of social infrastructure is appropriately retained in accordance with Policy DM49. The Council does not consider it appropriate for the Local Plan to specify users of the community facility.  The proposals regarding Nicholson Court and the listed building are necessary to ensure the policy is

						<p>the Option that "A more comprehensive scheme would need to justify the loss of the existing listed building".</p>	<p>sufficiently flexible to enable development to come forward and facilitate delivery of the spatial strategy for the area. To this end, the policy is clear that any future proposal affecting the buildings would need to be considered having regard to a comprehensive approach. Further, TG 2 signposts the heritage assets within and surrounding the site and any proposals will also be considered having regard to AAP 5 and DM 9 on managing the historic environment. Although it is noted that the heritage value of the building is questionable given it has been substantially rebuilt.</p> <p>The Council considers that the suggested changes do not provide a positive and flexible framework to support delivery of the plan.</p> <p>No change.</p>
9	RTAA P75	TG 3	No response given	No response given	Remove Reynaldson Court from the brief for development. We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of	Remove Reynaldson Court from the brief for development.	Alterations to Policy SP 2 set <b>out the Council's strategic</b> approach for housing estate renewal and improvement, and Reynardson Court is

					social housing units and displacement of existing residents.		<p>included in an initial priority list. The approach is set recognising <b>the Council's</b> commitment to improving housing stock and the limitations of the Decent Homes programme. The inclusion of estate regeneration in the Local Plan is considered necessary in policy terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan. The Council considers that the removal of Reynardson Court <b>would compromise the plan's</b> ability to meet objectively assessed housing need and <b>the borough's strategic</b> housing delivery target. In addition, redevelopment of the site offers opportunities to enable improvements to open space provision, which is an important part of the spatial strategy.</p> <p>Alteration 64 to the Strategic Policies sets out the <b>Council's approach</b> to re-provide social housing on an equivalent floorspace basis.</p>
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							No change.
9	RTAA P76	BG 2	No response given	No response given	This site includes what was previously referred to as BG4 (Moorefield Road) in the previous Fe. 2015 draft of the Tottenham AAP. For this part of the site, occupied by a building merchant, we demand NO NET LOSS OF EMPLOYMENT LAND AND FACILITIES. This site is occupied by MEMS, building merchants, a successful local business and therefore should not be subject to site allocation.	For this part of the site, occupied by a building merchant, we demand no net loss of employment land and facilities	Disagree. The policy seeks to facilitate a mixed use redevelopment to support delivery of improvements to the station. The <b>site's</b> location, next to the station, and within a town centre make it suitable for more intensive use than currently provided. The policy seeks provision for an element of employment floorspace however recognising opportunities to support town centre vitality and viability by encouraging a wider range of uses and improving the public realm.  No change
9	RTAA P77	BG 3	No response given	No response given	The site consists of viable buildings and usage and therefore should not be subject to a site allocation. Any future development should conform to the Guiding Principles set out in our overall response to the AAP.	Any future development should conform to the Guiding Principles set out in our overall response to the AAP.	Disagree. The policy seeks to facilitate a mixed use redevelopment to support delivery of the spatial strategy for the area and the Borough, commensurate with <b>the site's location in an area</b> of high public transport accessibility and within a town centre. The policy makes provision for appropriate town centre uses, however recognising

							<p>opportunities to support town centre vitality and viability through comprehensive redevelopment to improve the public realm and townscape. The site allocation sets out where retention of existing buildings is required.</p> <p>Please refer the Council's response above regarding <b>Our Tottenham Network's "Guiding Principles"</b>.</p> <p>No change</p>
9	RTAA P78	BG 4	No response given	No response given	<p>NO NET LOSS OF EMPLOYMENT LAND AND FACILITIES: The site is occupied by the Tottenham Delivery Office which provides a vital public service including retrieval of parcels and special delivery items and therefore should not be subject to a site allocation. Howarth, a timber and building merchant, occupies part of the proposed site allocation. It is a thriving local business which should not be displaced.</p> <p>In the back of this site is the only open space in Bruce Grove. The Impact of any development on BG2 on this adjacent green space needs to be very carefully considered and in Site Requirements the council should aim to ensure the protection of the Ecological Valuable Site.</p>	Not stated	<p>The policy seeks to facilitate a mixed use redevelopment to support delivery of the spatial strategy for the area and the Borough, <b>commensurate with the site's</b> location in an area of high public transport accessibility, within a town centre, and to optimise opportunities for improved access to Bruce Grove Wood, which is currently not accessible and suffers from fly-tipping and invasive pests. The policy seeks provision for an element of employment floorspace and increase in job density. This site was</p>

							<p>nominated by Royal Mail for this Local Plan, as the delivery office is potentially surplus to requirements.</p> <p>With respect to Bruce Grove Wood, the Local Plan includes policies to ensure appropriate consideration for protection of open space and ecological sites, including SP 13 and policies in the DM DPD. The Local Plan should be read in its entirety.</p> <p>No change</p>
9	RTAA P79	North Tott Neighbourhood Area	No	Not stated	<p>Our Tottenham regards the plans set out in NT1 to NT5 in their entirety as plans for wholesale demolition of council housing and its replacement with mainly private housing. See the overall arguments and representations we have made about this issue in our generic response to the Tottenham AAP and in our separate response to the Alterations to Strategic Policies.</p> <p><b>We note in this connection the Council's plans</b> as set out in the Northumberland Park Masterplan of February 2015 which envisages three scenarios for the NT4 Northumberland Park area, all of which involve the demolition of the majority of the council housing in the area. The scenarios 9.2-9.5 all specify only a small number of council homes <b>to be 'retained' with the</b> others in the area clearly on a demolition list. We believe the</p>	Not stated	<p>Disagree. The AAP seeks to give effect to the Strategic Policies Local Plan, which provides that North Tottenham will play a key role in accommodating future growth and delivering the spatial strategy for the Borough. This includes increasing the amount of housing in Tottenham, including affordable housing, to meet objectively assessed need and the Borough's strategic housing requirement.</p> <p>The Local Plan does not propose wholesale</p>

				<p><b>Masterplan reflects the Council's current</b> thinking on the desirability of demolitions. If the Council has changed its mind on this issue it should state so publicly and unequivocally. If the Council has changed its mind about the Masterplan proposals then there is no need for the Site Allocations NT3-5 as it is not necessary to include areas as site allocations if refurbishment not demolition is what is needed.</p> <p>We believe that these plans are inappropriate and unsound as they will reduce the quantity of social housing in Haringey and they are discriminatory as they will have a worse adverse impact on Black and Ethnic Minority (BME) groups when compared to other groups. We propose that improvement to the existing homes rather than demolition is the most appropriate course of action. We believe <b>this can be achieved by removing the 'red zone' site allocations from areas in NT3, NT4 and NT5</b> and improving buildings in these areas, not demolishing them. The material below is the evidence we wish to cite in support of our objections to policies NT1-5 and the site allocations in NT3, NT4 and NT5 as well as evidence for our alternative.</p> <p>If public spaces are not well-looked after, then the Council should improve its custodianship of these areas. The scenarios set out in the Northumberland Park Masterplan for the demolition of over a thousand council properties (tenanted and leasehold) is a grossly disproportionate response to this problem. The demolition is also a grossly</p>	<p>demolition of council housing. In seeking to deliver the spatial strategy, Alterations to Policy SP 2 set <b>out the Council's strategic</b> approach for housing estate regeneration, renewal and improvement, and Northumberland Park is included in an initial priority list. The approach is set <b>recognising the Council's</b> commitment to improving housing stock and the limitations of the Decent Homes programme. The inclusion of estate regeneration in the Local Plan is considered necessary in policy terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan.</p> <p>The Council has commissioned preliminary work to help inform future masterplan considerations for the area (Northumberland Park – Strategic Framework Report, February 2015), which was subject to public consultation. This report</p>
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					<p>disproportionate response to the issue of North-South road links.</p> <p>Mass demolition is a totally disproportionate response to a problem that is not described with any specificity here. High density developments produce much worse spatial problems with narrow pedestrianized areas without sunlight between very closely built blocks as in Hale Village. But NT3-5 envisages a huge increase in housing density in terms of increases in net residential units.</p>		<p>sought to establish key principles for change in the area, along with an understanding of potential broad options for a future masterplan. It is expected that this work will be further developed in the future, including more refined options, in consultation with the local community. Any such detailed options/scenarios, however, are outside the scope of this Local Plan consultation.</p> <p>The above noted masterplanning work has informed the principles of relevant AAP sub-area policies and site allocations, particularly in relation to identified key challenges and opportunities. The Council considers the AAP policies are necessary to give effect to the spatial strategy, establishing principles of land use and key objectives for area/site redevelopment. Any future development proposal will be required to comply with the Local Plan.</p> <p>No change</p>
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9	RTAA P80	NT1	No	Not stated	<p>A large amount of social housing lies within a ten minute walk of Northumberland Park including Kenneth Robbins House and the surrounding small blocks, Robert Burns House, Charles Bradlaugh House, Haynes Close, Waverley Road, Rothbury Walk, Scotswood Walk, Blaydon Close and Trulock Court. It is true that many but certainly not all of the people who live in these blocks have below average incomes. However, putting their homes in Site allocations which will enable developers to demolish their homes will not benefit them at all. It is highly unlikely (see below) that most of them will be re-housed in the area. This means they will not benefit from the advantages of easy access to central London from the new Crossrail link in terms of work opportunities. Allowing these tenants to remain in the area with the Crossrail link will be a much better alternative to including their homes in Site Allocations NT3 and NT4. The only way to make this policy sound is to prevent demolitions and remove the council estates from Site Allocations.</p>	<p>The only way to make this policy sound is to prevent demolitions and remove the council estates from Site Allocations</p>	<p>The Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy for the Borough, Alterations to Policy <b>SP 2 set out the Council's</b> strategic approach for housing estate regeneration, renewal and improvement, and Northumberland Park is included in an initial priority list.</p> <p>Transport improvements at Northumberland Park station will create a significant uplift in accessibility with the area, and provide a basis for increasing density and optimising the development potential of sites, enabling opportunities to increase local housing supply. The Council is seeking to ensure that existing and new residents benefit from these enabling transport improvements.</p> <p>The Council considers the site allocations are necessary to deliver the spatial strategy as well as to meet objectively assessed need and the</p>
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							Borough's strategic housing requirement.
							No change.
9	RTAA P81	NT3-5	Not stated	Not stated	<p>We are very concerned that the proposal to build new housing in Northumberland Park on the site of existing estates in fact bears no <b>relation to local people's aspirations but could</b> actually facilitate wholesale demolition and rebuilding. We find evidence of this in the <b>proposed Alterations to Haringey's Adopted Strategic Policies 2011-2026</b>. Alteration 53 sets out an initial list of housing estates to be <b>'regenerated'</b>. Northumberland Park is one of the estates set out here. The reason box for Alteration 53 states that the <b>alteration: 'Recognises the Council's</b> commitment to improving its existing housing stock and the limitations of the Decent Homes Programme for a significant number of <b>Council-owned homes.'</b></p> <p>The Council has stated clearly their desire for <b>the 'regeneration' of Northumberland Park to take place through a 'Development Vehicle'</b>. <b>Now according to Haringey Council's</b> September 2015 Future of Housing Review the Development Vehicle the Council wishes <b>to set up: 'is unlikely to be a refurbishment</b> vehicle, and transfer would most likely be on the basis of decanting tenants and potentially <b>offering them the opportunity to return.'</b></p> <p>The clear implication here is that estates on the regeneration list, including Northumberland Park may well be knocked down. The idea of right to return is only stated</p>	All council estates should be removed from the site allocations included in the Tottenham Area Plan.	<p>The AAP seeks to give effect to the Strategic Policies Local Plan, which provides that North Tottenham will play a key role in accommodating future growth and delivering the spatial strategy for the Borough. This includes increasing the amount of housing in Tottenham, including affordable housing, to meet objectively assessed <b>need and the Borough's</b> strategic housing requirement.</p> <p>In seeking to deliver the spatial strategy for the Borough, Alterations to Policy <b>SP 2 set out the Council's</b> strategic approach for housing estate regeneration, renewal and improvement, and Northumberland Park is included in an initial priority list.</p> <p>The site allocations referred by the consultee are clear that any future development will be required to be in</p>

				<p>as a possibility not a guarantee. Given reductions in government grants for new social housing build, it is very unlikely that Haringey Council could demolish the total number of council homes it is considering for demolition in Northumberland Park and re-provision anything but a small proportion of the homes at social rent. <b>So-called 'Affordable Rented' housing and Shared Ownership are</b> outside the income ranges of most Broadwater Farm residents and most Tottenham residents. 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: <b>'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 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.'</b></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. Therefore if there is new development on the estates, the</p>	<p>accordance with a masterplan, prepared with resident involvement.</p> <p>Proposed Alteration 64 of the Strategic Policies Local Plan sets out that where the Council undertakes estate renewal, it will seek to re-provide the same amount of social housing on an equivalent floorspace basis, ensuring sufficient flexibility to re-provide housing to better meet changing needs of existing residents.</p> <p>The site allocations set out principles for potential future site redevelopment, which any future proposal would need to comply with. The <b>"Development Vehicle" and "Estate Renewal and Rehousing and Payments Policy" are outside the scope</b> of this Local Plan consultation.</p>
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				<p>tenants will only be given the option of return if they want to swap a secure, council tenancy for an insecure private tenancy.</p> <p>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. The existing residents of Northumberland Park will gain nothing from such a policy.</p> <p>In this connection we must also mention the <b>Council's proposed Estate Renewal and Rehousing and Payments Policy</b>. This policy which is intended to determine how council tenants will be rehoused when their homes are <b>demolished states: '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></p> <p>There is absolutely no guarantee that council tenants will be rehoused in the new homes on Northumberland Park. It is likely that they will just be put on the list to be transferred to other council estates in Haringey as seems to be happening to most of the Love Lane tenants (see below.) It is therefore clear that most of the council tenants in Northumberland Park have no real interest in the demolition of their homes and refurbishment not demolition should occur.</p> <p>The only way to retain affordable housing in the area is not to knock down council estates in the first place. As the Our Tottenham Guiding Principles state, sites consisting of mostly viable buildings should not be earmarked for demolition. The council estates in Northumberland Park are viable and the</p>		
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					provision of new high density estates with much less social housing will be disastrous, not an improvement. Refurbishment does not require inclusion of areas NT3-5 on a site allocation therefore all council estates should be removed from the site allocations included in the Tottenham Area Plan.		
9	RTAA P82	NT3	Not stated	Not stated	<p>In the context of the Northumberland Park Masterplan's scenarios for mass demolitions of council housing it is obvious that the large <b>amount of social housing or 'unbalanced housing stock with an overbalance of small, socially rented stock' is seen as a problem by the Council rather than a reasonable response to the level of housing need in the area.</b></p> <p><b>The Council's response to this alleged problem is: 'Redevelopment will create more, new, and better housing with greater diversity of scale, size, tenure and type.'</b></p> <p><b>The Council's uniquely targeted approach to social housing estates as needing the insertion of private housing to create 'diversity of...tenure' is blatant discrimination against local people on the basis of their economic status. This approach is quite rightly not being used to criticise streets of predominantly owner occupiers by claiming they are in need of social housing to make a 'mixed and balanced community'. All such references and bias against social and council housing should be removed from all Council documents as untrue, biased and discriminatory. This approach is clearly a cover to try to justify the sell-off or use of some Council land cheaply to property developers, and to justify the</b></p>	All such references and bias against social and council housing should be removed from all Council documents as untrue, biased and discriminatory.	<p>The AAP seeks to give effect to the Strategic Policies Local Plan, which provides that North Tottenham will play a key role in accommodating future growth and delivering the spatial strategy for the Borough. This includes increasing the amount of housing in Tottenham, including affordable housing, to meet objectively assessed <b>need and the Borough's</b> strategic housing requirement. The Local Plan also seeks to deliver a mix of housing in terms of size, tenure and type to facilitate sustainable development, in line with the NPPF.</p> <p>The Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy, Alterations to Policy SP 2 set <b>out the Council's strategic</b></p>

					<p>increasing abandonment of the need to address the needs of local people for more (not less) social housing as the only genuinely affordable and secure housing for thousands of residents.</p>		<p>approach for housing estate regeneration, renewal and improvement. The approach is set recognising the <b>Council's commitment</b> to improving housing stock and the limitations of the Decent Homes programme. The inclusion of estate regeneration in the Local Plan is considered necessary in policy terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan.</p> <p>The Council has commissioned preliminary work to help inform future masterplan considerations for the area (Northumberland Park – Strategic Framework Report, February 2015), which was subject to public consultation. This report sought to establish key principles for change in the area, along with an understanding of potential broad options for a future masterplan. It is expected that this work will be further developed in the future,</p>
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							including more refined options, in consultation with the local community. Any such detailed options/scenarios, however, are outside the scope of this Local Plan consultation.
							No change
9	RTAA P83	NT4	No	Not stated	<p>We believe that the Council will not be able to reprovide genuinely affordable housing in the Northumberland Park area if its plans for mass demolitions go ahead. The Northumberland Park Strategic Framework Report (i.e. the <b>'Masterplan'</b>) <b>only provides for the</b> preservation of a very small percentage of the existing council homes in any of the scenarios. <b>Even in the 'Minimal Intervention' scenario</b> only 183 council homes are preserved with 1154 council homes (909 tenanted and 245 leasehold) being demolished. It is therefore dishonest to argue that good quality homes will be preserved when actually the emphasis is on mass demolition and new provision of mainly high density non-social housing. Nowhere in the Northumberland Park Strategic Framework Consultation Report does it indicate that the residents of Northumberland Park were told by any representative of the Council that the <b>Council's plans would mean the mass</b> demolition of council housing. It is grossly unacceptable to consult about a regeneration plan without informing residents of the scale of demolitions contemplated. Our Tottenham</p>	No stated	<p>The Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy, Alterations to Policy SP 2 set <b>out the Council's strategic</b> approach for housing estate regeneration, renewal and improvement.</p> <p>Proposed Alteration 64 of the Strategic Policies Local Plan sets out that where the Council undertakes estate renewal, it will seek to re-provide the same amount of social housing on an equivalent floorspace basis, ensuring sufficient flexibility to re-provide housing to better meet changing needs of existing residents.</p> <p>The Council has commissioned preliminary</p>

				<p>therefore believes that a lawful consultation into the demolition of such a large quantity of council housing has not taken place. The Site Allocations NT3-5 are therefore unsound and all council housing should be removed from them. Instead the refurbishment of council estates should be carried out which does not require inclusion in Site Allocations in the Local Plan.</p> <p>The Northumberland Park Masterplan- the Northumberland Park Strategic Framework Report states that new homes in the area will be between 3-10 stories. Our Tottenham <b>believes that Tottenham's existing pattern of low-rise housing (2-3 stories) in residential suburban development should be respected.</b> The high-density plans for Northumberland Park sound nightmarish. It is clear that the whole process of developing the plan for Northumberland Park has used very misleading language. The Northumberland Park Strategic Framework Consultation Report suggests that respondents wanted homes <b>with gardens to be built . The 'traditional street pattern principle here seems to relate to such aspirations. The high-density plans, however, are clearly about housing most residents in blocks not houses (see the plan for the new blocks on page 97 of the Strategic Framework Report.) The gardens referred to are therefore communal which is not what most residents imagined when they agreed with an aspiration for homes with gardens. Existing council estates have communal gardens. The 'home with a garden' promise appears to have been</b></p>	<p>work to help inform future masterplan considerations for the area (Northumberland Park – Strategic Framework Report, February 2015), which was subject to public consultation. This report sought to establish key principles for change in the area, along with an understanding of potential broad options for a future masterplan. It is expected that this work will be further developed in the future, including more refined options, in consultation with the local community. Any such detailed options/scenarios, however, are outside the scope of this Local Plan consultation.</p> <p>The site allocations set out principles for land use that any future development proposal would need to be compliant with, and will be considered alongside other Local Plan policies, including those setting out affordable housing requirements. These requirements have been subject to viability testing and the Council therefore</p>
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					used to deceive residents into supporting Council demolition plans. Again it is clear that the alleged consent of local residents to the <b>Council's regeneration</b> plans is not informed consent.		considers the proposals to be deliverable.  The Local Plan consultations have been carried out in line <b>with the Council's adopted</b> Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.  No change
9	RTAA P84	NT5	No	Not stated	<p>We support the representation separately made by the Tottenham Business Group with regard to NT5.</p> <p>A sound plan should be positively prepared. The statutory examination of the Allocations DPD and Area Action Plans for Tottenham <b>must consider that this scheme is the "most appropriate when considered against more reasonable alternatives based on proportionate evidence"</b>. The evidence now out for consultation does not support a strategy based on a stadium scheme. The scheme was found by the Inspectors Report on the Archway Metal Company to deliver little or no benefit against tremendous adverse effects for established local business. The documents out for consultation are flawed in many ways. The Scoping Reports for both the Allocations DPD and The Area Action Plan <b>provided no information as 'to reasonable alternatives' to the present proposed plan.</b></p>	Not stated	The spatial vision and strategy for Tottenham address opportunities in respect of the redevelopment of THFC stadium, to act as a catalyst and anchor for comprehensive regeneration of the area, following the original planning consent for the scheme. Giving effect to this vision and strategy, Policy NT 7 reflects the existing consent, and the AAP has through other site allocations, including NT 5, set out requirements to ensure a coordinated approach to area regeneration. Collectively the site allocations seek to ensure that the local benefits of stadium redevelopment

				<p>The proposal for NT5 was prepared on the back of the existing Tottenham Hotspurs FC scheme for a sports and leisure destination. The concept that the area should be a major sport and leisure area was adopted as set in stone. It was not tested through consultation. The Master plan for NT5 was presented ahead of the AAP and DPD documentation. The Council has commented that it was able to set objective strategies but this does not hold true in the evidence. Six plans were drawn up by ARUP, one of which would have retained the existing local businesses. This or a variation of this was not presented as a reasonable alternative to the community. Strong representations by the Tottenham Business Group representing the threatened local sites to redress this by incorporating some of its features to the Council selected Option. At the initial Consultation each version of the plan presented had no alternative to the demolition of local shops and businesses. These demolitions can only be directly attributable to the needs of the Stadium Development NT7. The needs of the Stadium Development were allowed to prejudice the NT5 plans. No reasonable alternatives were given. NT5 is inherently linked to the Stadium. It is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. To that end discussion of local proposals for modest changes to retain the local business base was not tolerated. NT5 is unsound because the question remains whether in accordance with paragraph 182 of</p>	<p>are optimised, enabling delivery of housing and jobs to meet strategic growth requirements, along with social and community infrastructure to support planned growth.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of <b>the Borough's strategic</b> growth requirements.</p> <p>The Council has consulted the public in preparation of the High Road West Masterplan Framework. Whilst this document will help to inform delivery of the development principles set out in the AAP, it is a non-statutory document and as</p>
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				<p>the NPPF it is ‘justified’ in the sense that is the most appropriate when considered against the more reasonable alternatives, based on proportionate evidence. The Stadium Scheme has been acknowledged publicly as delivering <b>paltry benefits” against the tremendous</b> adverse effects for established businesses. This has been intensified by the new plans for a more intensively developed site. There is no evidence and no information in any of the documents, which have been out for consultation during this process as to <b>“reasonable alternatives’ to the present</b> proposed scheme. This is inconsistent with the EAPP regulations and the advice in <b>paragraph 165 of the NPPF that ‘sustainability</b> which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment.</p> <p>The exclusion of the community from the initial stages of the formulation of the Plan, their continued pressure for an alternative to save established local business and the failure of Haringey to address this issue is a huge omission. The plan cannot be claimed to be robust unless there is a resolution. Haringey Council has an obligation to understand and provide support for its existing economy. The Locally significant employment sites in High Road West NT5 have been removed despite their strengths and against evidence in the Employment Land</p>		<p>such is not subject to the same requirements as the Local Plan, including in terms of its production process. The Local Plan consultations have been carried out in line <b>with the Council’s adopted</b> Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>In preparing its Local Plan documents, the Council has undertaken an updated review of its industrial land stock, as set out in the Employment Land Study (ELS) 2015. Following this review, the Council has proposed a reconfiguration of its designated employment land, informed by recommendations of the ELS, which it considers is necessary to meet objectively assessed need for employment floorspace and <b>the Borough’s strategic jobs</b> target, as well as to deliver the spatial strategy. As set out in Alterations to Policy SP 2, the Council proposes to re-designate High Road West</p>
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				<p>Study 2015 where paragraph 2,26 pledges to safeguard the best sites. They fulfill all the economic and land use criteria in particular with regard to the provision of SMEs and are part of a larger cluster of existing industrial activity. Their removal would inhibit the operations of the nearby industrial uses with which they interconnect. In the Employment Land Study March 2015 Consultation High Road West was described as “a locally significant site providing a range of B2 uses. It was viewed as important to safeguard B2/B8 uses and recommended as vital that any B class jobs affected are either relocated to suitable premises or to existing employment sites.</p> <p>The plans for the new housing in the High Road West area completely contradict the <b>results of the Council’s own survey and, we believe they are therefore unlawful.</b> The High Road West Consultation Feedback Report of August 2013 clearly states that respondents <b>on the Love Lane estate want ‘traditional homes with gardens, built to low density’.</b> Love Lane residents are clear they do not want high rise blocks being built .The Consultation Feedback Report is quite clear that residents in the wider High Road West area did not want high-rise residential blocks, preferring low rise blocks of 3-5 stories. The Tottenham High Road West Masterplan Framework indicates clearly, however, that there is an intention to build a large number of urban blocks at 5-6 levels and towers at 12-14 levels . 12-14 levels is higher than any of the</p>		<p>from a LSIS to LEA – Regeneration Area, and this has been reflected in the AAP. The approach has been subject to sustainability appraisal, including assessment of <b>‘reasonable alternatives’</b>. The LEA – RA designation does not preclude employment uses from operating in the area, however the Council will seek an intensification of employment uses and jobs where sites are redeveloped.</p> <p>The responses to the High Road West masterplan consultation borne no regard to the existing nature of development on the site, which already has several tower blocks poorly laid out and of variable quality. The plan seeks to replace these existing council homes and adding more housing. Neither could be achieved through low-rise redevelopment.</p> <p>No change</p>
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				<p>council blocks currently in the High Road West area (the highest currently being 3 towers which are ten levels.) It is quite clear that the High Road West plans completely contradict the wishes of the residents as expressed in the consultation documents.</p> <p>The High Road West Consultation Feedback states clearly that Love Lane residents wanted to remain as Council tenants. No scheme has ever been identified by the council that might have allowed all Love Lane residents to come back into new properties on the existing site as council tenants. Indeed policy towards rehousing Council tenants has always been the opposite. After the Love Lane consultation the Council made the following policy statement:</p> <p>‘...re-provision of low quality existing council housing with an equal quantum (on a habitable rooms basis) of higher quality modern social housing is not a financially viable option. The building of higher density mixed tenure developments, which increase the quality and range of the affordable housing options for local people is likely to be the only realistic options [sic], and even then, will require significant public subsidy may require flexible application of normal planning policy <b>expectations for affordable housing provision.</b>’</p> <p>We accept that this statement is missing from the new version of this document. However, the new proposal for Northumberland Park is for the building of new housing by a Joint <b>Venture. As noted in our response to the ‘Key Objectives for Northumberland Park section</b></p>		
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				<p>(above) the Joint Venture scheme being proposed for Northumberland Park will provide private tenancies not Council tenancies.</p> <p>In addition we must note that still in 2016, 4 years after consultation with the residents of Love Lane began, no concrete plans are in place to re-house Love Lane residents in newly built homes on the Love Lane site. We cite in evidence for this the result of a Freedom of Information request made by Jacob Secker regarding this issue (see Appendix for a copy of the full correspondence.) As of 23/02/2016 the Council does not have a list of those who want to be re-housed on the site of the existing Love Lane estate. This indicates that there is no clear plan for rehousing tenants in the new housing. We believe that without such a plan demolition should not go ahead. This is because the alleged agreement of Love Lane residents to demolition was predicated on promises that they would be re-housed in the new housing.</p> <p>The Council should never have let the residents of Love Lane believe that new council homes would be built on the Love Lane site if they went along with the demolition of existing homes. Consulting on something that the Council was never going to let happen without making this clear to residents was dishonest and invalidates the results of the consultation. We believe this was unlawful. It is clearly inappropriate and was a fairly underhand way of convincing the</p>		
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					<p>residents that the alternative of refurbishment not demoliton for the Council homes on this site was not something that needed to be considered as they would all be getting new, homes with better facilities anyway. Given that the latter is not true the whole basis for demolition and including the Love Lane estate as a site allocation is fatally undermined and the Love Lane should therefore not be included in this site allocation. Plans for refurbishment should be advanced rather than demolition. The Council should be honest about the chances of Love Lane residents being re-housed in proposed new buildings on the site and be honest about whether they wil have Council, permanent secure tenancies and their rent levels if they do move to the new housing. Once honest information has been given residents of the estate could have be balloted on whether they want refurbishment or demoliton.</p>		
9	RTAA P85	NT6	No response given	No response given	<p>We strongly oppose the loss or displacement of a community facility and employment land. The continuous existence of the Irish Centre needs to be guaranteed in the site <b>requirements, not ‘the potential to accommodate community uses’</b>. <b>Specify that</b> the existing community use should be re-provided ONSITE before any redevelopment occurs.</p>	<p>Specify that the existing community use should be re-provided ONSITE before any redevelopment occurs.</p>	<p>The policy provides that the existing community use should be re-provided before any redevelopment occurs – this will ensure that provision of social infrastructure is appropriately retained (whether on this site or elsewhere in the local area). The Council considers that the suggested change, to require re-provision on site, does not provide a sufficiently flexible approach</p>

							to enable development to come forward.
							No change
9	RTAA P86	NT 7	No response given	No response given	<p>The Tottenham AAP DPD does not consider research on stadium led development and regeneration, which finds very little contribution to the local economy – jobs provided are generally small scale and part time and arguments about local multiplier effects do not take place in practice. Therefore, the new Spurs stadium should not be presented as a driver of economic development in Tottenham. See response submitted in the March 2015 Local Plan consultation by Mark Panton, Birkbeck University, on this point for more information, and the recent London Assembly Regeneration Committee report on this topic.</p> <p>We support the representation separately made by the Tottenham Business Group with regard to NT7.</p> <p>The Draft site NT7 was based on the NDP scheme promoted by THFC. Original permissions were granted on the basis of planning policies contained in the UDP, which were withdrawn. The developments were perpetuated based on a former planning regime when new sustainable policies had been prepared that could have secured more sustainable planning outcomes. There were a number of schemes/alternatives that were better than the NDP scheme but the site</p>	Not stated	<p>The spatial vision and strategy for Tottenham address opportunities in respect of the redevelopment of THFC stadium, to act as a catalyst and anchor for comprehensive regeneration of the area, following the original planning consent for the scheme. Giving effect to this vision and strategy, Policy NT 7 helped shape the existing consented scheme, ensuring changes were made to address key issues such as ensuring the frontage of the new building reinstated a consistent and active frontage to the High Street, and that provision was made for new health facilities to serve the wider area. The uses on the site also reflect the desire to see the stadium provide for activity, and thereby, jobs throughout the week. Provision is also made to ensure a coordinated approach to area regeneration. Collectively the site allocations seek to</p>

				<p>application was not flexible enough to have captured these benefits from different options. The proposed scheme does not significantly improve the economic and social wellbeing of the area, which was confirmed by the Inspectors report on the CPO inquiry into Archway Metals company. It was made clear that converting the NDP scheme to a site allocation would depend on public sector funding which could be more effectively invested in a more appropriate regeneration and environmental purposes.</p> <p>This position has been exacerbated by the new Stadium application, which allows a massively increased stadium size and huge elevations for additional development on the South side.</p> <p>The site was originally allocated to reflect approved planning application when it was in fact the subject of a prolonged CPO inquiry, it should have been selected on the basis of a legally compliant SEA and Sustainability Appraisal. This is surely unsound unlawful practice.</p> <p>The Draft Site Allocation did not consider the merits of alternative schemes and is solely based on a scheme promoted by THFC. It shows a profoundly flawed methodology which is not a sound basis for established land use allocations within a Site Allocation DPD under Part 2 of the Planning and Compulsory Purchase Act 2004(as amended) the</p>	<p>ensure that the local benefits of stadium redevelopment are optimised, enabling delivery of housing and jobs to meet strategic growth requirements, along with social and community infrastructure to support planned growth.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of <b>the Borough's strategic</b> growth requirements.</p> <p>Planning obligations negotiated/agreed on previous planning permissions are outside the scope of this Local Plan consultation.</p>
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					<p>regulations and the NPPF.</p> <p>Heritage buildings should be retained. All housing development at this site should be genuinely affordable social housing and matching the scale of the nearby terraced housing. S.106 obligations should be restored.</p>		No change
9	RTAA P87	Tott Hale NA	No response given	No response given	<p>One of the implementation considerations set out as an introduction to the plans for Tottenham Hale TH1 – TH13 states that this is <b>an area where ‘targeted investment can best accelerate the delivery of substantial volumes of new homes and jobs’</b>. It suggests that for 5000 homes and 4000 jobs to be created, <b>there is a need for ‘early infrastructure planning’ with reference to utility providers</b>. Yet, the infrastructure is more than utilities; scant and superficial mention is made of the need for a health infrastructure for example, which even now, before 5000 people move in, is entirely inadequate for the local population. People moving into Hale Village find it difficult to register with a GP for example and things have not yet improved. One GP surgery in some type of temporary building is due to opening April 2016, but this is only after a very long campaign. It does not bode well for future infrastructure developments especially for health services.</p> <p>The housing proposed in the plans is largely high rise tower blocks. These are likely to be one and two bedroom flats. Para 5.143 states that <b>‘higher levels of family housing will be concentrated on sites less proximate to the</b></p>	Not stated	<p>New permanent healthcare facilities are to be provided on the Welbourne Centre site (TH10) with assessed capacity to meet the existing shortfall and planned growth.</p> <p>The Local Plan seeks to deliver housing to meet objectively assessed need <b>and the Borough’s strategic</b> housing target. This includes delivery of a wide range of housing types and tenures, including affordable housing, for both existing and new residents. Policy AAP 3 sets out further details in this regard. The Council has proposed through Policy DM 16 a Family Housing Protection Zone, including parts of Tottenham, to help ensure provision for larger and family sized homes, in addition to those delivered through new development.</p>

				<p><b>centre...’ Where will these be, and will they be genuinely affordable social housing for the hundreds of families in housing need in Tottenham? Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise.</b></p> <p>The entire thrust of these plans is to create a forest of tower blocks which will impact on our local physical environment; our park; and on local families who need proper affordable homes. Little account is taken of these matters in these proposals which give a green light to developers to build over 15 storeys and with high densities. We oppose this approach since it will change the character of the area, pays no regard to the quality of life of existing residents and has very scant provision for social housing.</p> <p>Tottenham Hale has a very high proportion of families living in private rented and temporary accommodation. The AAP for Tottenham Hale does not mention tenants yet the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments</p>		<p>The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The Housing Zone bid put forward for Tottenham Hale includes significant affordable housing. Although it is noted that this will be predominantly affordable rent, provision has been made for a wide range of tenures, including low cost market housing. However, <b>Council’s plans to see more affordable housing</b> are likely to be significantly</p>
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							compromised by the Housing & Planning Act and the requirement, therein, to <b>prioritise 'Starter Homes'</b> as an affordable housing product.
							No change
9	RTAA P88	TH 1	No response given	No response given	There are serious concerns about Tottenham Hale being designated a district centre. The proposals for development do not mention the impact of a night time economy which can be <b>detrimental to a community's quality of life.</b> This is largely a residential area and consideration should be given as to how the creation of a district centre and potential night time economy will affect residents. This is a serious omission and needs to be rectified and spelt out so local people can make an informed judgement.	Not stated	The designation of a new District Centre at Tottenham Hale is in line with the London Plan (2015), Table A2.2, which provides scope for this change to the town centre hierarchy. The creation of the centre is considered necessary to support future growth in this part of Tottenham, and will complement rather than compete with the existing hierarchy. It is considered that the new district centre will provide for the full range of town centre uses including evening economy uses. The design of the new district centre will take this into account in its layout, ensuring such use is compatible with neighbouring uses. Further controls can be put in place to manage the effects of any evening economy uses either through

							the planning application process or through licensing.
							No change
9	RTAA P89	TH 2	No response given	No response given	<p>We consider the proposals to be an over-development. The plans here propose up to eleven storeys, yet when the last permission was given for Tottenham Hale the number of storeys proposed was nine. There is an emerging pattern here where developers get agreement for a certain height, and then return for a couple of additional storeys which is then granted. This sets a precedent for higher towers elsewhere irrespective as to whether or not they are appropriate. In this instance eleven storeys above the station is in effect 12 or 13 storeys since the station is already there, and this will be in front of a current wall of blocks at Hale Village which now form the eastern aspect of the site. This will only intensify the concentration of tower blocks in the area. We draw your attention to the CABE report on the initial designs for Hale Village which expressed clear criticism of the wall of blocks proposed. In this AAP new buildings on Watermead Way extends this <b>'wall' much further.</b></p> <p>The station has just undergone extensive re-modelling at significant public cost. The new <b>station interchange and new 'urban square'</b> will create further disruption.</p>	Not stated	<p>The Council has established indicative development capacities for the AAP site allocations using a standardised methodology, which applies the London Plan density matrix. Further, the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. TH 2 falls within the envelope of an area considered suitable for tall buildings, as supported by this technical evidence.</p> <p>Planning decisions on applications made under current adopted policy are outside the scope of this consultation.</p> <p>No change</p>
9	RTAA P90	TH 3	No response given	No response given	Haringey Council has plans to revitalise Tottenham High Road and to make Seven Sisters station an anchor site for the High	Not stated	The designation of a new District Centre at Tottenham Hale is in line with the

				<p>Road. To develop an enlarged retail centre at Tottenham Hale is more than likely to <b>contradict the Council's first aim. The current</b> retail park is busy and successful, and is a day time centre. These proposals would significantly increase the usage, again over developing which will cause even greater traffic problems, air contamination and noise pollution. These plans are silent on Ferry Lane which is the direct route into Tottenham Hale from Walthamstow. How will developing a new town centre and extending the retail park impact on Ferry Lane and the people who live along it? People mainly drive to retail centres, yet no mention is made in this proposal of traffic issues and management.</p> <p>No mention is made of potential night time activities which remains a serious omission. This is a residential area and even with the developments you propose will remain so. Anyone living locally will know that despite the improvements from the new gyratory, traffic problems are still very frequent and significant. For people living along Broad Lane, and indeed for children attending Earlsmead School, air pollution is a real day-to-day issue. Finally, these proposals seek to create a town centre for an area which is not a town and is essentially a transport interchange. It is not like Stratford which always was a shopping and town centre, nor is it like Walthamstow which has always had a main shopping urban street. This is an artificial development which runs the risk of destroying a perfectly good and popular retail park, imposing even more</p>		<p>London Plan (2015), Table A2.2, which provides scope for this change to the town centre hierarchy. The creation of the centre is considered necessary to support future growth in this part of Tottenham, and will complement rather than compete with the existing hierarchy. The designation has been assessed for its impact on other centres, both within and outside the Borough, in accordance with the NPPF (see evidence base -Tottenham Hale Retail Impact Assessment).</p> <p>The proposal is set within the context of positively managing change and delivering the spatial strategy for the area, recognising the levels of planned growth and high levels of public transport accessibility will support interventions aimed at delivering transition of a retail park to a more traditional town centre format.</p> <p>No change</p>
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					very tall buildings with over intensification, whilst also undermining the development of Tottenham High Road.		
9	RTAA P91	TH 4	No response given	No response given	The petrol station is a very useful local service which is located at the confluence of many roads. We wish it to be retained. Building a 15 storey tower on the adjacent site at the corner of Ashley Road is entirely unnecessary and out of keeping with this side of Tottenham Hale. This proposal from the planning service seems more aligned to the financial interests of developers to have highest densities on every piece of land in our locality.	Not stated	The proposals address objectively assessed needs whilst seeking to deliver the spatial strategy for the Tottenham AAP area and the Borough. The Local Plan approach for determining the appropriate density for individual sites is set out in the DM Policies DPD, which the Council considers to be in general conformity with the London Plan. Comments on petrol station are noted however in delivering the spatial strategy the Council will seek to introduce appropriate town centre uses and to promote more sustainable modes of transport, recognising the high PTAL rating of the site.  No change
9	RTAA P92	TH 6	No response given	No response given	The model of the new Tottenham Hale which was used in earlier consultation sessions included tower blocks along Watermead Way. It is not clear from the map in the AAP if these are still proposed. The accompanying text is <b>unclear stating only that 'the proximity of the new Harris Academy to the north and Down Lane Park to the north and west make the</b>	Not stated	The model referred was not used as part of the Local Plan consultation; rather this was used for the public consultation on the non-statutory District Centre Framework. Any future planning proposals will need

					<p>area particularly suitable for larger units along <b>those edges</b>'. <b>What does this actually mean?</b> If it means 22 storey tower blocks (as indicated in the model) then it is likely that they will impact on the view people have from the Park View Road side of Tottenham Hale. We wish to retain that view as that enhances our quality of life and enjoyment of the park. No regard is given in these proposals to the impact on existing residents in this part of Tottenham Hale.</p>		<p><b>to comply with the Council's</b> statutory development plan, which the AAP will form part of, once adopted. The site requirements / development guidelines for TH 6 provide a basis for considering the scale and massing of buildings, having regard to local character, and these will be considered alongside other policies in the DM DPD (including policies on character, building heights and local views). The Local Plan does not prescribe building heights and these will be considered on a case basis, having regard to individual site circumstances.</p> <p>The AAP has been subject to an integrated impact assessment (sustainability appraisal), which has considered the likely impact of proposals across a range of sustainability objectives, along with equalities and health considerations.</p> <p>No change</p>
9	RTAA P93	TH 8	No response given	No response given	Permission for this was already granted for 18 storeys and for a hotel. It now appears that this site is to be developed as residential flats	Not stated	The height limit reflects the extant planning permission, which is referenced in the

					at even greater heights. This would constitute glaring over-development in this already congested site full of tower blocks.		policy. Hale Village falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b> evidence base. The policy provides that proposals over 18 stories will need to be justified, and the Council considers this approach is sufficiently flexible to consider proposals having regard to their individual merits.  No change
9	RTAA P94	TH 9	No response given	No response given	Permission for this was already granted for 18 storeys and for a hotel. It now appears that this site is to be developed as residential flats at even greater heights. This would constitute glaring over-development in this already congested site full of tower blocks.	Not stated	The Council assumes this comment refers to planning permission granted at the adjacent site (TH 8). The height limit reflects the extant planning permission, which is referenced in the policy. Part of Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b> evidence base. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings.  No change

9	RTAA P95	TH 10	No response given	No response given	<p>Given the shortage of public housing, the proximity of this site to Chestnuts estate, and the fact that Haringey owns the land, it would make good sense to build social housing on this site. Having a health centre underneath, and access to some community meeting space would be welcome given the shortage of primary health and community facilities in the area. We would oppose yet another tower since this is a residential area with low rise blocks. The highest block is Warren Court, which is set back from the road and is eight or nine storeys.</p> <p>The Welbourne site is surrounded by a four and one five storey block. A tower would be entirely out of keeping with the estate and with Park View Road. Would this be allowed or even considered in other parts of Haringey? The Welbourne centre site is not in the proposed Tottenham Hale District Centre, it is in a quiet residential neighbourhood comprising residential streets of terraced housing and a low rise estate. Building a tower block on this site, which in these plans would stand almost opposite another tower block would destroy the character of our neighbourhood and be entirely out of keeping <b>with the rest of the area's layout.</b></p> <p>Monument Way is a main road which is greened, provides protection for the nearby houses from air and noise pollution through high walls and through an earth bund and high willow fencing. It is preferable for the area to</p>	Not stated	<p>The site allocation provides for comprehensive redevelopment of the site, including a mix of appropriate town centre and residential uses. All proposals for residential development will need to make appropriate provision for affordable housing in line with other Local Plan policies.</p> <p>The Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. Part of TH 10 falls within the envelope of an area considered suitable for tall buildings, as supported by this technical evidence. The TH 10 development guidelines are clear that proposals along Monument Way site of the allocation should respond to the established heights within the Chesnut Estate.</p> <p>Measures to be implemented for protection against</p>
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					remain as it is. If there is further housing on this road there must be very strong measures to prevent air contamination and pollution which could seriously harm peoples' health.		pollution will be considered having regard to individual proposals. Policy DM 23 sets out criteria to ensure appropriate protection in this regard, and will be considered alongside TH 10.  No change
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Respondent 10: Fiona English and Mark Ellerby

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RTAAP96	Design in Tottenham	No response given	No response given	In the Evening Standard Comment section, Tuesday 29th February, they argue that <b>'Housing needs a more imaginative approach' to high-rise.</b> "[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular with residents; the same is true of	Further to our email of 2nd March, we would like to draw your attention to the alternative approach to adopted by Brighton & Hove City Council which we feel offers a sensible and useful answer to many of the objections we raised.	The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Council considers it appropriate to make provision for tall and

					<p>the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but <b>[high rise is] not the best answer.</b> The same argument could be made for Tottenham.</p> <p>Further to our email of 2nd March, we would like to draw your attention to the alternative approach to adopted by Brighton &amp; Hove City Council which we feel offers a sensible and useful answer to many of the objections we raised. <a href="http://www.brighton-hove.gov.uk/content/housing/council-housing/new-homes-neighbourhoods">http://www.brighton-hove.gov.uk/content/housing/council-housing/new-homes-neighbourhoods</a></p>		<p>taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
10	RTAAP97	Tall buildings figure 4.2	No response given	No response given	<p>In the Evening Standard Comment section, Tuesday 29th February, they argue that <b>'Housing needs a more imaginative approach' to high-rise.</b> "[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular with residents; the same is true of the Peabody and Guinness estates, which</p>	Not stated.	<p>The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Council considers it appropriate to make provision for tall and taller buildings on</p>

					are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] not the best answer.” The same argument could be made for Tottenham.		specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.  No change
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#### Respondent 11: Isaac Solinsky

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
11	RTAAP98	SS 2	No response given	No response given	We would like to carry on business	Not stated.	Noted.

#### Respondent 12: Savills on behalf of Interfine Properties

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
12	RTAAP99	AAP 1, SS 2: Lawrence	No	Yes	1) This policy is unsound as it is not effective:	<b>Changes Required</b> The policy should make it clear in what form the	Disagree. The Policy is clear that the masterplan must show how the

		<p>Road Site Allocation , ( Paragraph A of AAP1 and the 1st bullet point under the Site Requirements heading of SS2:Lawrence Road )</p>			<p>These policies are unclear. It does not give a clear indication to the Potential Developer if the requirement for a masterplan is a separate document or if this would be covered in for example the Design and Access Statement as part of any submission. It is also unclear to what extent (area) does the masterplan need to cover.</p>	<p>masterplan is required and should set out the parameters of the required masterplan.</p>	<p>proposed development will successfully integrate with existing and proposed neighbouring development. The extent of the masterplan will therefore depend on the nature of the development site in the context of the extent of the site allocation and neighbouring uses. Primarily it seeks to ensure that what is proposed on part of a site allocation will not compromise the development potential of the remaining site, ensuring phased development secures an optimum site-wide outcome. It is anticipated that the masterplan will need to be prepared and consulted upon prior to any detailed planning application being worked up, but can and should still form part of the application pack. It is not appropriate for validation requirements to be set out in the Local Plan.</p>
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							No change
12	RTAAP100	AAP 3 Paragraph B	No	Yes	<p><b>1) The Policy is unsound as it is not effective.</b>  Policy AAP 3 should be consistence with the other local plan documents. The adopted Policy SP2- Housing and the emerging Policy SP2 (Alterations to the Strategic Policies Pre-submission version January 2016) both indicate how affordable housing shall be achieved subject to viability.</p>	<p><b>Changes Required</b>  Amend the wording as follows (as underlined in bold).  <i>B The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation <b>subject to viability.</b></i></p>	<p>Policy SP 2 &amp; DM13 are clear that the affordable housing requirement is subject to viability and the Council does not consider it necessary to repeat such details here. AAP 3 sets out the affordable housing tenure split that will apply to the Tottenham AAP area, which is the only variation from SP 2 &amp; DM13.</p> <p>No change.</p>
12	RTAAP101	AAP 3 and SS 2 site allocation, paragraph C	No	Yes	<p><b>1) This policy is unsound as it is not effective.</b>  Policy AAP3 Paragraph C is unclear. The minimum housing capacities for SS2 Lawrence Road indicates 178 net residential units (under Phase 2). It does not give a clear indication to the Potential Developer or</p>	<p><b>Changes Required</b>  Policy SS 2 needs to illustrate the Phase 2 area to make it clear to the Potential Developer and Decision Maker that the proposed residential units be referred to as minimum requirements.</p>	<p>The Council does not consider it practical, nor is it required, to map extant planning permissions as part of the Local Plan site allocations. Policy AAP 3.C sets out that the site capacities are minimum capacities. Site capacities have been established using a</p>

					Decision Maker where Phase 2 covers as indicated on the SS2 Site plan. There appears to be no clear evidence base as to where this capacity figure is derived from.		standardised methodology, as set out in AAP Annex 7.  No change.
12	RTAAP102	AAP 5 paragraphs A and E	No	Yes	<b>1)This policy is unsound as it is not effective</b> This policy is unclear. It does not give a clear indication if Policy AAP5 (A) is applicable to the Potential Developer or the Decision Maker. It is <b>the LPA's responsibility</b> to review the Conservation Area Management plans and their boundaries.	<b>Changes Required</b> Policy AAP5 (A) needs to provide clear indication who this is applicable to. This policy should be the responsibility of the LPA and not the Developer/ Applicant. Amend the wording as follows (as underlined in bold) <i><b>the Council/LPA should review</b> Reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries</i>	Agreed. To clarify the approach in this regard, the policy will be amended to read:  <b>A. "The Council will seek to strengthen... and the wider historic environment. <u>This includes reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries.</u> Proposals for new development will be required to..."</b>  In addition to the above modification, delete bullet point A.e.
12	RTAAP103	SS2: Lawrence Rd site allocation, 4th bullet point under site	No	Yes	<b>1)This policy is unsound as it is not effective</b> This policy is not clear and not precise. It does not provide a clear indication if the junction	<b>Changes Required</b> Policy SS2 needs to make it clear to a Potential Developer and the Decision Maker the location and area of the	Disagree. It is a site requirement of any development, and the potential developer will need to consider this.

		requirements			falls within SS2 site area and the precise location and area.	junction, and who's responsibility it is for this reconfiguration.	No change
12	RTAAP104	SS2, Lawrence road site allocation, 3 <sup>rd</sup> bullet point under development criteria	No	Yes	<p>1) <b>This policy is unsound as it is not effective:</b>  A flexible approach to existing trees is required in line with the adopted Local Plan Policy SP13 which states:  <i>'All development shall protect and improve sites of biodiversity and nature conservation, including private gardens through its:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Protection, management and maintenance of existing trees and the planting of new trees where appropriate; and'</i>.</li> </ul>	<p><b>Changes Required</b>  This paragraph should be consistent with adopted Policy.  Amend the wording as follows (as underlined in bold)  <i>The existing street trees are a strong asset to the streetscape and should be preserved, where appropriate</i></p>	<p>Disagree. This comment pertains to the <b>"development guidelines"</b> which offer guidance on the most appropriate development considerations for the site, in line with paragraph 5.6 of the AAP. Policy SS 2 will be considered in conjunction with Policy SP 13.</p> <p>No change.</p>
12	RTAAP105	SS 2 Lawrence Road Site Allocation, 7 <sup>th</sup> bullet point under development criteria	No	Yes	<p>1) This policy is unsound as it is not effective  This policy should be flexible and aligned to adopted Local Policy SP4, where:  <i>'The Council will promote low- and zero-carbon energy generation through the following measures:</i></p> <p><i>a. Requiring all developments to assess,</i></p>	<p><b>Changes Required</b>  This paragraph should be consistent with adopted Policy.  Amend wording as follows (as underlined in bold).  <i>This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub,</i></p>	<p>The development guidelines offer guidance on the most appropriate development considerations for the site, including where other policies may be relevant. In this case, requirements for DE are covered by the borough-wide policies SP 4 and DM 22, which reflect that requirements are subject</p>

					<p><i>identify and implement, where viable, site-wide and area-wide decentralised energy facilities including the potential to link into a wider network;</i></p> <p><i>b. Establishing local networks of decentralised heat and energy facilities by requiring developers to prioritise connection to existing or planned networks where feasible;'</i></p>	<p><i>as a customer, or requiring part of the site to provide an easement for the network, where feasible.</i></p>	<p>to technical feasibility and financial viability. The Council does not consider it necessary to repeat this here.</p> <p>No change.</p>
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**Respondent 13: Savills on behalf of Empyrean and Paul Simon Magic Group**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RTAAP106	SS 4	No	Yes	<p><b>1)The policy is unsound as it is not justified</b></p> <p>The Site was identified for redevelopment in <b>Haringey's Site Allocations</b> DPD January 2014 Consultation Document as THR9- Gourley Place &amp; Wickes Site. This outlined a potential development capacity for 54,000m2 of</p>	<p>The indicative development capacity figures as outlined in SS4 need to be changed to reflect the reasons as outlined above. The indicative capacity figure needs to be flexible and non prescriptive, setting out a minimum figure for both residential and commercial development.</p>	<p>Policy AAP 3.C sets out that the site capacities are minimum capacities. These are indicative capacities (as signposted by the table in Policy SS 4) that have been established using a standardised methodology, summarised in AAP</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>residential and 22,000m2 of commercial development.</p> <p>In February 2015 an evidence base study was undertaken by GVA on behalf of Haringey Council to support their Local Plan preparation titled; <i>London Borough of Haringey Site Allocation Viability Assessment - February 2015</i>. This outlined that the Gourley Triangle Site has the potential to provide 213 residential units (based on an average unit size of 70sqm GIA) and 4,976sqm of business space.</p> <p>The indicative figures for this site are significantly different between the DPD January 2014 Consultation Document and the Allocation Viability Assessment - February 2015. Viability is a subjective matter and it may not always be possible to rely on the conclusions of the third</p>		<p>Annex 7. The purpose of the indicative figures is to demonstrate that across the Plan the Council can meet and exceed its strategic housing requirement and job growth target. The optimum capacity of development on any individual site will be determined through a robust design-led approach in accordance with Policy DM1.</p> <p>No change.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>party. The two key issues here are firstly that the Policy SS4 indicative development capacity figures do not reflect the evidence base study undertaken, where the figures for Policy SS4 do not correspond to the Allocation Viability Assessment - February 2015.</p> <p>Secondly, the evidence base does not provide a clear reason for the significant difference between the two indicative capacity figures for the DPD January 2014 Consultation Document and the Allocation Viability Assessment - February 2015.</p> <p><b>2)The Policy is unsound as it is not justified</b>  The London Plan 2015 density matrix indicates that in urban locations a density of 200-700 habitable room per hectare</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>or between 70- 260 units per hectare is acceptable. Given the site area at approximately 2.0ha the figure of 191 net residential units is low. Based on this figure this assumes an equivalent figure of 1ha = 95.5 units. This is within the density range, however is considerably low and does not fully satisfy London Plan objectives, where:</p> <p>Paragraph 3.19 of the <b>London Plan states:</b> <i>'In addition, the process of managing the release of surplus industrial land should focus on bringing forward areas with good public transport accessibility which will be particularly appropriate for high density development'</i>.</p> <p>It is considered that the indicative development capacity figures for both residential and commercial are too low and do not reflect the London Plan</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>objective to deliver 'high density development' in areas with good public transport, where the Gourley site has PTAL rating of 5.</p> <p><b>3) The Policy is unsound as it is not effective</b></p> <p>The indicative development capacity figures are not consistent with emerging policy objectives, where: The commentary provided in SS4 Policy specifically <b>highlights that:</b> <i>'the Council is seeking to encourage redevelopment of the area to introduce a range higher density employment uses'</i>. Furthermore Policy AAP3 of the emerging Tottenham Area Action Plan outlines that: <i>'Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies</i></p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><i>of this AAP and Haringey's Local Plan are not compromised'.</i></p> <p>The current indicative development capacity figures as outlined in Policy SS4 do not reflect the objective of higher density employment uses. It is considered that the Gourley site has the potential to deliver a mixed use proposal:</p> <p>The site has the potential to deliver approximately 9,000 – 12,000sqm of commercial floorspace.</p> <p>The site has the potential to deliver approximately 600 – 700 residential units.</p>		
13	RTAAP107	AAP1	No	Yes	<p>Policy AAP1 is unclear. It does not give a clear indication to the Potential Developer if the requirement for a masterplan is a separate document or if this would be covered in for example the Design and Access Statement as part of any submission. It is also</p>	<p>The policy should make it clear in what form the masterplan is required and should set out the parameters of the required masterplan.</p>	<p>Disagree. The Policy is clear that the masterplan must show how the proposed development will successfully integrate with existing and proposed neighbouring development. The extent of the masterplan will therefore depend on the nature of the development</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					unclear to what extent (area) does the masterplan need to cover.		<p>site in the context of the extent of the site allocation and neighbouring uses. Primarily it seeks to ensure that what is proposed on part of a site allocation will not compromise the development potential of the remaining site, ensuring phased development secures an optimum site-wide outcome. It is anticipated that the masterplan will need to be prepared and consulted upon prior to any detailed planning application being worked up, but can and should still form part of the application pack. It is not appropriate for validation requirements to be set out in the Local Plan.</p> <p>No change</p>
13	RTAAP108	AAP3	No	Yes	<b>1)The Policy is unsound as it is not effective.</b> Policy AAP 3 should be	Amend the wording as follows (as underlined in bold)	Policy SP 2 is clear that the affordable housing requirement is subject to

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					consistence with the other local plan documents. The adopted Policy SP2- Housing and the emerging Policy SP2 (Alterations to the Strategic Policies Pre-submission version January 2016) both indicate how affordable housing shall be achieved subject to viability.	<i>B The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation <b>subject to viability.</b></i>	viability and the Council does not consider it necessary to repeat such details here. AAP 3 sets out the affordable housing tenure split that will apply to the Tottenham AAP area, which is the only variation from SP 2.  No change.
13	RTAAP109	AAP5	No	Yes	<b>1)This policy is unsound as it is not effective.</b> This policy is unclear. It does not give a clear indication if Policy AAP5 (A) is applicable to the Potential Developer or the Decision Maker. It is the <b>LPA's responsibility to</b> review the Conservation Area Management plans and their boundaries.	Policy AAP5 (A) needs to provide clear indication who this is applicable to. This policy should be the responsibility of the LPA and not the Developer/ Applicant. Amend the wording as follows (as underlined in bold): <i><b>e The Council/LPA should review</b> Reviewing Conservation Area Management Plans where appropriate, including</i>	Agreed. To clarify the approach in this regard, the policy will be amended to read:  <b>A. "The Council will seek to strengthen... and the wider historic environment. <u>This includes reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries.</u></b>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
						<i>reviewing existing boundaries</i>	Proposals for new development will be <b>required to...</b> .  In addition to the above modification, delete bullet point A.e.

Respondent 14: David Sargeant

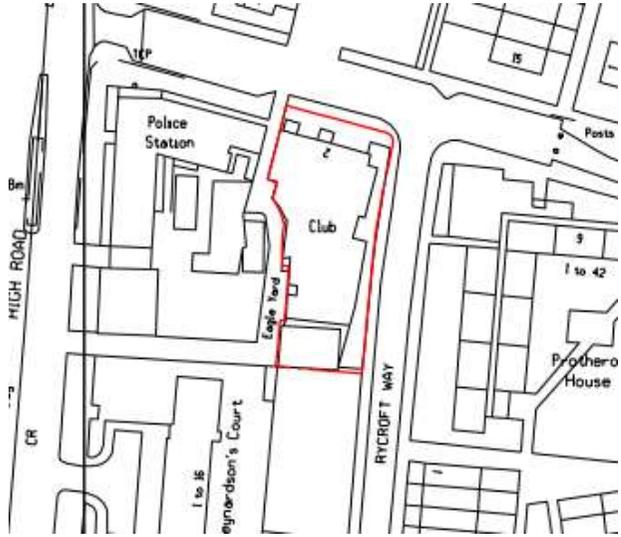
ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
14	RTAAP110	SS6: Apex House & Seacole Court	No	No	What's the matter with Haringey Council these days? Why is the council going astray these day? If this Liberty taking plan was submitted to me as a Planner I will tear it up and ask the producer to return to the drawing board class. We cannot have a plan that destructs quality of life in an area containing normal quiet households. We need a better plan that is not obstructive, intrusive, pokey, constantly erecting, where perverts would love to live so that they zoom their nosey perverse eyes into	Not stated	The Council considers that this response does not address the focus of the consultation.  The Council considers the AAP provides a sound basis for meeting objectively assessed need and delivering the spatial strategy for the Tottenham Area and the Borough. Within this context is sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The

					neighbours gardens, where the locals should be entitled to real daylight and where the council staff and its allies should exercise respect and dignity for the natural long term setting. Seven Sisters patch close to the amenities and rail stations is definitely not New York or Canary Whatf with huge skyscrapers. Indeed skyscrapers case to major pedestrian or public area where it is also the location for transport transit poses a number of potential safety and personal risk. Therefore it is proper to note that Skyscrapers were never meant to be built for human living and any attempt to build the Towel of Babel in Seven Sisters - or even any attempt to build any building more than seven stories tall in seven sisters is corrupting the community.		Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.  No change
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**Respondent 15: SF Planning on behalf of Jigsaw Student Living**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
15	RTAAP111	TG 3	Not stated	Not stated	By way of background, our Client, Jigsaw Student Living Ltd owns 2 Chesnut Road, to the west of High Road and to the northwest of Tottenham Hale station as outlined on the site	Our Client would therefore request the policy is	It should be noted that 2 Chestnut Road forms only a very

				<p>plan overleaf. This is part of a wider site allocation within the draft document (site allocation - TG3), which is discussed later within the representation.</p> <p><b>Our Client’s site comprises of the remains of a mid-19th century villa with a frontage onto Chesnut Road which has a lawful nightclub use (sui generis). The Rycroft Way frontage comprises of various unattractive single storey additions to the original building over recent years. To the west of the site is Tottenham Police Station the western boundary fronts Eagle Yard and its eastern boundary fronts onto Rycroft Way. To the south of the site is open green space lined by semi mature trees followed by a car park between Rycroft Way and Reynardson Court fronting the High Road.</b></p> <p><i>Site Location Plan – 2 Chesnut Road</i></p> <p><b><i>Planning Designations</i></b>  In terms of its planning designations, the site is located within the Tottenham Green Conservation Area, Tottenham High Road “Corridor”, within an archaeological priority area and is adjacent to locally listed buildings. The site is also within the Upper Lee Valley Opportunity Area Planning Framework (2013).</p> <p>The site is within walking distance of the Tottenham High Road bus corridor, Bruce Grove Rail station and Tottenham Hale underground station. There is also the presence of several local and strategic cycle routes including LCN+ Link 79 which connects the site with Enfield and Waltham Forest.</p>	<p>updated to acknowledge the previous planning history of the site since this has been demonstrated to compromise an acceptable reuse of this sustainably and underutilized site.</p> <p>As it has been demonstrated above, the site is within close proximity to good public transport links and there is a need for visitor accommodation and / or specialist housing. These uses should therefore be integrated into the site allocation Policy TG.3</p>	<p>small portion of the overall site allocation. The Council considers the allocation is correct as applying to the majority of the site and it would be incorrect to include student housing as a primary land use expectation of the allocation. Nevertheless, it is appropriate to include reference to the extant planning permission for 2 Chestnut Road. <b>Include extant planning Permission HGY/2013/0155 applying to 2 Chestnut Road and the fact that this provides for student accommodation.</b></p> <p>Visitor accommodation,</p>
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				<p>Chestnut Road</p>  <p><i>Planning Designations</i></p> <p>In terms of its planning designations, the site is located within the Tottenham Green Conservation Area, Tottenham High Road “Corridor”, within an archaeological priority area and is adjacent to locally listed buildings. The site is also within the Upper Lee Valley Opportunity Area Planning Framework (2013). The site is within walking distance of the Tottenham High Road bus corridor, Bruce Grove Rail station and Tottenham Hale underground station. There is also the presence of several local and strategic cycle routes including LCN+ Link 79 which connects the site with Enfield and Waltham Forest.</p> <p>Chestnut Road is a key corridor within the Tottenham area providing an important link</p>		<p>including Hotel and Apart hotel uses are directed to locate in town centres in the first instance to support the vitality of the centres and to make effective use of local amenities. Any future proposals for the site should be in line with the requirements and guidance set out in this allocation and will be assessed against all other relevant policies.</p>
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between Tottenham Hale and Lea Valley Regional Park in the east and the High Road in the west. The area does therefore have very good public transport accessibility with a PTAL rating of 6a.

***Planning History***

The site has some significant planning history in recent years within the table set out below.

These applications have failed to have been referenced within the draft Tottenham AAP.

**Planning Reference**

	Description	Decision
HGY/2009/1665	<i>Demolition of existing structures and erection of 3 storey building comprising of 1 x 3 bed flat, 2 x two bed flat with balconies, bin and cycle store</i>	Granted 27-07-10
HGY/2009/1667	<i>Demolition of existing structures and</i>	Granted 27-07-10

					<p><i>erection of four storey building comprising of 1 x 3 bed flat and 2 x 2 bed flats with balconies, erection of bin and cycle store (amended scheme).</i></p> <p>HGY/2013/0155 <i>Partial</i>                      Granted</p> <p><i>demolition of existing buildings, retaining existing historical facade, construction of student accommodation over 3 and 4 floors to provide 64 student rooms and amenity areas.</i></p> <p><i>26-03-13</i></p> <p><b><i>Policy TG3 - Tottenham Area Action Plan Development Plan Document</i></b>  Our Client's site is located within the wider proposed site allocation (TG3) as set out on the site plan below. Paragraph 5.56 sets out the site allocation;  <b><i>"Subject to re-provision of the Police Station</i></b></p>		
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				<p><i>locally, conversion of the existing police station to include commercial space for SME and startup businesses. Redevelopment of Reynardson Court, and the car park to the rear, for improved housing stock and <b>improved/enhanced open space.</b></i></p> <p>The allocation, as previously set out, fails to mention no.2 Chesnut Road and its relevant planning history as highlighted within the table above. This is a significant material consideration, since the principle of student accommodation has already been found to be acceptable via planning application HGY/2013/0155 which is in the process of being implemented.</p> <p>Our Client would therefore request the policy is updated to acknowledge the previous planning history of the site since this has been demonstrated to compromise an acceptable reuse of this sustainably and underutilized site.</p> <p><b><i>Potential other suitable uses for no.2 Chesnut Road</i></b></p> <p>Our Client is exploring the possibility of other suitable uses for the site which would help achieve the aims and aspirations of the draft Tottenham AAP and would replace the student accommodation within the redevelopment scheme.</p> <p>In this regard, our Client has engaged with key stakeholders and Harrinegy Council regarding the potential need for other uses within this area. Alongside this, a full review of national, London Plan and emerging local policy has been undertaken to determine the suitability of</p>		
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				<p>potential uses for the site. This additional work has determined there is an identified need within the London Plan for short term hotel / visitor accommodation and at a local level a pressing need for specialist housing.</p> <p>- <i>Visitor Accommodation</i></p> <p>In relation to relevant planning policy which concerns visitor accommodation, the National Planning Policy Framework (NPPF - Part 2) recognises that other economic development can play an important role in ensuring the vitality of centres and encourages the development of visitor accommodation on appropriate sites. At a London level, the London Plan is a Spatial Development Strategy which covers the social, economic and environmental strategies for London up to 2036. London Plan Policy 2.7 is relevant given the sites sustainable location within the outer London Borough of Harringey <b>and relates to ‘Outer London: Economy’</b> requiring outer London Boroughs to identify and bringing forward capacity in areas with good public transport accessibility to accommodate leisure, retail and civic needs.</p> <p><b>London Plan Policy 4.5 relates to ‘London’s Visitor Infrastructure’</b> with Boroughs required to; <i>“support London’s visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London.” [Our Emphasis]</i></p> <p>Policy 4.5 goes on to note beyond the Central</p>		
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				<p>Activities Zone (CAZ), visitor accommodation should be focused in town centres and opportunity and intensification areas, where there is good public transport access to central London. As previously set out the site is highly accessible and therefore an appropriate location for much needed visitor accommodation.</p> <p>Part (C) of London Plan Policy 4.5 notes Local Authorities LDFs should promote and facilitate development of a range of visitor accommodation, such as hotels, bed and breakfast accommodation, self-catering facilities, youth hostels and camping and caravan sites as well as supporting and encouraging development of good quality budget category hotels, especially in outer London.</p> <p>A Hotel / Apart-Hotel scheme would include a reception and concierge area at ground floor level to provide a checking in and out facility for guests as well as luggage storage and back of office facilities for staff of the Apart-Hotel. The upper floors would provide a total rooms for guests including separate en-suite and basic cooking facilities if required for longer stay guests.</p> <p>The proposed Apart-Hotel by its nature would provide visitor accommodation which would reduce the likely pressure on residential housing within the Borough to be used as visitor accommodation, whilst retaining an employment element on site.</p> <p>A proposed Hotel / Apart-Hotel on the site to provide self-contained hotel accommodation (C1 use class) that provides for short-term</p>		
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				<p>occupancy for visitors (in line with former ODPM Circular 03/2005) in accordance with the London Plan definition of an Apart-Hotel (Ref: London Plan Glossary – P386), is therefore fully supported at national, regional and local level.</p> <p><i>Conclusion</i></p> <p>The regeneration and improvement of this site will bring back into use a key site along Chestnut Road. As it has been demonstrated above, the site is within close proximity to good public transport links and there is a need for visitor accommodation and / or specialist housing. These uses should therefore be integrated into the site allocation Policy TG.3.</p> <p>Chestnut Road is a key corridor within the Tottenham area providing an important link between Tottenham Hale and Lea Valley Regional Park in the east and the High Road in the west. One of the key objectives for the regeneration of Tottenham is to see high quality development along this route that helps to define it is a safe and secure route between the High Road, Tottenham Green and Tottenham Hale. Furthermore, the site falls within an area with high public transport accessibility level PTAL (6a).</p> <p>We would appreciate an acknowledgement of this representation letter in due course and hope these matters will inform the final drafting of the Tottenham AAP.</p>		
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Respondent 16: Tezay Mustafa

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
16	RTAAP112	BG 1	No	No	<p>In response to the proposed development of the former Bruce Grove Snooker Club and rear of the Banqueting Suite, we completely object to this scheme. As owners of the Banqueting Suite, the proposal to develop to the rear of our building is completely unacceptable as car parking is non-existent along Bruce Gove as it is a Red Route. This would have a huge detrimental effect on our business as all of our clients comment on how important the car park is as there is no parking along Bruce Grove. As a business that has been part of Bruce Grove for 32 years, we are in favour of redevelopment however, strongly object to the single story extension on our existing site. If any sort of development is to take place, then we would argue that the existing banqueting suite is demolished to allow for a comprehensive landmark development with the adjoining former Snooker Club. We do not see our building of having any heritage or cultural value to the area what so ever and it is only due to the fact that we have enhanced and improved it generally that it has any</p>	<p>If any sort of development is to take place, then we would argue that the existing banqueting suite is demolished to allow for a comprehensive landmark development with the adjoining former Snooker Club. We do not see our building of having any heritage or cultural value to the area what so ever and it is only due to the fact that we have enhanced and improved it generally that it has any value. We ask the council to take into consideration the fact that the banqueting suite provides income</p>	<p>The allocation requires a masterplan be prepared for the entire site and that the existing Banqueting Suite Building be retained but not necessarily its current use. Through the masterplan it could be demonstrated that redevelopment of the site requires the Banqueting Suite to be demolished and only its facade retained. However, this would need to be demonstrated through the detailed consideration of alternative site layout proposals, including those that would see the Banqueting Suite retained. This level of analysis and detail is beyond the scope of the allocation to</p>

					value. We ask the council to take into consideration the fact that the banqueting suite provides income and supports four families and once again stress that any redevelopment of the adjoining site and are own is significant enough to continually support all families involved.	and supports four families and once again stress that any redevelopment of the adjoining site and are own is significant enough to continually support all families involved.	provide and is appropriately left to masterplanning and any subsequent planning application.  No change
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Respondent 17: Springfields Planning and Development Limited obo Ali Mentesh

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
17	RTAAP113	BG 2 Para 5.74	No	Yes	<p>The National Planning Policy Framework (NPPF) at Paragraph 182 clarifies that a local planning authority should submit a plan for examination which it considers is “<b>sound</b>” – namely that it is:</p> <p><i>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</i></p> <p><i>Justified – the plan should be the <u>most appropriate strategy, when considered</u></i></p>	The area of Site Allocation BG2 should be amended so that it deletes that part of the site area currently occupied by MEMS DIY Ltd. The area in question that should be deleted was previously identified as <i>Site Allocation BG4: Moorefield Road</i> in the Tottenham AAP Preferred	Disagree. BG 2 seeks to facilitate a mixed use redevelopment of the site to support delivery of the spatial strategy for the area and the Borough, commensurate with <b>the site's location</b> in an area of high public transport accessibility and partly within a town centre, with opportunities to improve the design and functionality of

				<p><i>against the reasonable alternatives, based on proportionate evidence;</i></p> <p><i>Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</i></p> <p><i>Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>(NB The underlining is the objector’s emphasis)</p> <p>In this case, the Site Allocation referenced as <b>‘BG2 Bruce Grove Stationcourt’</b> in the Tottenham AAP fails three of the four tests set out at paragraph 182 of the NPPF and is therefore considered unsound. The reasons for this are as follows:</p> <p><u>Site Allocation BG2 is not justified</u></p> <p>The Site Allocation BG2 is not the most appropriate strategy when considered against the alternatives.</p> <p>It will be noted that the red line area of Site Allocation BG2 includes, amongst other uses, <b>a builder’s merchants including a</b> retail shop and retail/storage yard area, which is currently operated by MEMS DIY Ltd at 22-24 Moorefield Road.</p>	<p>Options Consultation.</p> <p>The text to Site Allocation BG2: Bruce Grove Stationcourt should be amended as follows:</p> <ul style="list-style-type: none"> <li>- to delete the words <b>‘and 22-24 Moorefield Road,’</b> (under <b>‘Address’</b>)</li> <li>- to delete the words <b>‘Builders’ Yard’</b> (under <b>‘Current/Previous Use’</b>).</li> </ul> <p>Should the adjustment to the site area also affect the indicative capacity figures, then these should be amended accordingly. It is assumed that the 11 net residential units will be deleted and most if not all of the 100sqm</p>	<p>the station and forecourt. The policy seeks provision for an element of replacement employment and town centre floorspace, so as to ensure the site continues to deliver local jobs but this can be achieved anywhere across the entire site – and as suggested this may be more deliverable if entirely located on the High Street frontage of the allocation.</p> <p>The Council considers the Local Plan sets a positive framework delivering sustainable economic development, meeting objectively assessed need for employment land/ floorspace and the <b>Borough’s strategic</b> jobs target, consistent with the</p>
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				<p>The area operated by MEMS DIY Ltd lies to the west side of Site Allocation BG2 and forms part of the overall site allocation. This element corresponds with the land of the previous Site Allocation <i>BG4: Moorefield Road</i> that was shown in the Tottenham AAP Preferred Options Consultation (Feb 2015). However, the council has now conjoined such previous site allocation with previous Site Allocation <i>BG3: Bruce Grove Station</i>, complete with the central station area to create one large Site Allocation (BG2).</p> <p>MEMS DIY Ltd is a long standing and successful business, providing building and DIY supplies for the local population. It has been operating at this site for over 30 years and is well utilised by the community for their building materials and DIY needs. The business also employs 10 people from the community providing job opportunities in the local market.</p> <p>Site Allocation BG2 proposes that the <b>existing builder's merchants is replaced</b> with mixed use residential and employment development.</p> <p>In the event of Site Allocation BG2 being supported in an adopted AAP and the site being redeveloped (which will not be easily if at all realised) then there would be a gross loss of 10 jobs. This important</p>	<p>floorspace will be deleted. The text <b>under 'Ownership'</b> should be reviewed to confirm whether <b>'private' freeholds</b> exist.</p> <p>Under paragraph <b>5.74 ('Site Allocation')</b> the words <i>'and mixed use employment and residential on Moorefield Road'</i> should be deleted.</p> <p>Under paragraph <b>5.74 ('Site Requirements')</b> the 8th and final bullet point and its words <i>('Mixed-use residential and employment development replacing the existing Builder's Merchants will be permitted')</i> should be deleted</p>	<p>NPPF. In preparing the AAP and other Local Plan documents concurrently, the Council has undertaken an Employment Land Study (2015) and recommendations from this study have informed the designation of employment land needed to meet identified need for a range of employment uses. This evidence supports that 22-24 Moorefield Road does not need to be retained exclusively for employment uses.</p> <p>Whilst the Council notes that there is an existing business at 22-24 Moorefield Road, it considers that this should not preclude any future proposal from incorporating uses that could better optimise use of the</p>
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				<p><b>matter is not referred to at all in the AAP's</b> documentation. It is not clear whether this is an oversight or a convenient omission. However, to both the business and its employees the potential redevelopment of the site and loss of associated jobs is a serious matter. The allocation represents a <b>real and direct threat to people's</b> livelihoods and has not been properly addressed by the LPA. The Site Allocations DPD might make employment allocations elsewhere in the borough. However, it is not known if there if will be a suitable relocation opportunity nearby for the type of shop and yard use needed, Even if this were the case, it is unlikely to be on the favourable lease terms currently enjoyed by the operators.</p> <p>The LPA may argue that the redevelopment of this part of the site for a mixed use residential/employment land use – if ever realised - will generate new jobs. However, this is somewhat speculative and fails to take account that Moorefield is a back street which does not have the prominence or footfall of High Road, this being a main artery through the Bruce Grove area. Passing trade will therefore be limited. There are also open yard uses to the west side of the site along Moorefield Road which perhaps further defines the character of the road at this location, noting that the Site Allocation does not also incorporate these other</p>	<p>site in delivering the spatial strategy. The policy therefore sets out that replacement <b>of the Builder's</b> Merchants will be permitted.</p> <p>The Council notes the situation in respect of the MEMS DIY Ltd lease. It considers that delivery of the allocation is possible, even if site redevelopment was undertaken in phases (i.e. 22-24 Moorefield Road brought forward after other parts of the allocation). Policy AAP 1 (Regeneration and Masterplanning) provides assurance that proposals are considered comprehensively.</p> <p>The policy does not specify in detail what the appropriate replacement employment</p>
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				<p>yards to deliver a comprehensive redevelopment of the area. It is not clear why open yard uses are acceptable on one side of Moorefield Road but seemingly not on the opposite side.</p> <p>Against the background of the locational characteristics described above, the council has not evidenced what type of non-residential use would be achievable at the site. A1 shops would struggle to survive. Fast food restaurants will not <b>seemingly reflect the LPA's redevelopment</b> objectives. Cafes and Restaurants are more likely to survive if located along High Road to take advantage of passing trade and footfall. B1 or A2 offices are not best suited to the noisy environment adjacent a railway station and its line, or where dedicated parking is limited (noting the parking restrictions on Moorefield Road). There are therefore likely to be significant difficulties in attracting new employment uses or users to the land currently occupied by MEMS DIY.</p> <p>Notwithstanding this, even if the LPA or Local Plan Inspector disagrees with such assertion (such that a viable alternative employment use/user could be found) it is reasonably likely that there would be no increase in jobs at this part of the Site Allocation and in reality a potential net loss of jobs. This is because only 100sqm employment floorspace is made for the</p>		<p>generating use(s) should be. This is in order to provide sufficient flexibility for proposals which positively contribute to plan objectives to come forward, with acceptability of use considered on a case by case basis.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of the</p>
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				<p>whole of the BG2 site allocation, yet MEMS DIY by itself covers a similar site area. Also, the Site Allocations DPD at paragraph 1.30 confirms that the average <b>job density across Haringey's</b> employment areas is currently 44m<sup>2</sup>/worker. Office uses are more efficient which is occupied at 12-16m<sup>2</sup>/job, but would generate only 6 to 8 jobs based on the cited 100sqm employment allocation, whereas 10 jobs currently exist. The employment efficiency of the site (jobs per sqm floorspace) as exists appears to be better than the current borough average and even the cited ratio for an office based scheme. The benefits to the economy and local employment of changing the employment base of the site are dubious.</p> <p>The above comments therefore seriously bring in to question the justification for <b>promoting the replacement of the site's</b> current and viable employment base. This part of the Site Allocation BG2 is not <i>the most appropriate strategy, when considered against the reasonable alternatives</i>. In this case an alternative may be to encourage visual improvements to the fabric of the site, whilst retaining the existing use and the local/community employment it provides.</p> <p>The Site Allocation is therefore not justified.</p>		<p><b>Borough's strategic</b> growth requirements. The Sustainability Appraisal concludes that the AAP is likely to have positive effects across a range of social, economic and environmental sustainability objectives.</p> <p>With respect to business relocation, this is a matter for the landowner to discuss with the lease, regarding termination of the lease arrangements. If a CPO was advanced, this would only be as a last resort, but would likely look at options for relocation on acceptable terms. In this regard, both network rail and the Council have significant landholding across the borough that may provide for a more</p>
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				<p><u>Site Allocation BG2 is not Effective</u></p> <p>To be effective one of the tests is that the plan should be deliverable over its period. The timeframe for delivery indicated in Site Allocation BG2 is 2020 onwards.</p> <p>The land at MEMS DIY is owned by Network Rail (formerly Railtrack), which in turn has granted a lease to the current user of the premises. This lease operates <b>on an 'indefinite' period. This means that</b> as long as the current user wishes to remain at the site, then they can, subject to complying with the other terms of the lease. MEMS DIY Ltd has no intention of vacating the premises. The lease of the land has provided the company - and continues to provide them - with a sound platform on which to operate a viable business.</p> <p>The business is well established and in the absence of any agreement to relocate (of which there is no intention) then the policy could only be implemented via Compulsory Purchase Actions and the indefinite lease being determined through the legal processes. It will also be noted that there is unlikely that any replacement area for this use will be available in the borough on such favourable terms as exist.</p> <p>It seems reasonably likely that the Site</p>		<p>suitable location for the operation of the existing builders merchants.</p> <p>No change</p>
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				<p>Allocation cannot be realised or cannot be realised without significant legal and other obstacles, the outcome of which cannot be determined at this stage. The policy is therefore not effective.</p> <p><u>Site Allocation BG2 is not Consistent with National Policy</u></p> <p>The NPPF at Paragraph 7 states that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles. The economic role includes contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. In this case, for Site Allocation BG2 to be effective it would require the closure of a successful business which currently contributes to the local economy. The Site Allocation does not support this enterprise. Furthermore, there is no policy or site allocation in place to provide replacement premises for this user in the locality. The economic role is therefore not performed by Site Allocation BG2.</p> <p>The social role includes supporting strong, vibrant and healthy communities, with accessible local services that reflect the <b>community's needs. The services provided</b></p>		
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				<p>by the current business on the site are needed by the community, this being evidenced by the longevity of the business operation at this site for many years. The social role is therefore not performed by Site Allocation BG2.</p> <p>Paragraph 9 of the NPPF advises that pursuing sustainable development involves <b>seeking positive improvements in people's</b> quality of life, including (but not limited to) making it easier for jobs to be created in cities, towns and villages. In this case, the proposed Site Allocation BG2 implies the loss of current jobs in this city location, without certainty of replacement employment for the current users of the site or certainty of new employment uses being created (particularly given the constraints referred to in the earlier part of this representation). This approach is therefore contrary to the tenets of policy.</p> <p>Paragraph 10 of the NPPF states that Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. At a micro scale there is a distinction to be made between the local characteristics of High Road (main artery through the area) and Moorefield Road (a back road) and their respective ability to foster new retail or employment uses. For reasons stated earlier, particular</p>		
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				<p>commercial uses may be less easy to attain viability along the Moorefield Road part of Site Allocation BG2. The local circumstances are not accounted for, contrary to the NPPF.</p> <p>Paragraph 17 (Core Planning Principles) of the NPPF states, inter alia, that Plans should: set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the business communities; and promote the vitality of our main urban areas. In this case the needs of MEMS DIY Ltd, who are part of the business community, have not been catered for. Their business need to be stay at the premises. The business, complete with its employment and services to the community, adds to the vitality of this urban area. Core Planning Principles of the NPPF are disregarded in these respects.</p> <p>Paragraph 19 of the NPPF states that The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. 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. In this case the impact of implementing Site Allocation BG2 would be to decimate a longstanding and viable</p>		
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				<p>business, as opposed to supporting its growth as required by national planning policy.</p> <p>Paragraph 21 of the NPPF states that investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment. In drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth and support existing business sectors, taking account of whether they are expanding or contracting. However, in this case, Site Allocation BG2 might bring uncertainty for the current business owners and affect their business decisions with the uncertainty of site redevelopment being threatened (potential via compulsory purchase powers). This would have the opposite effect of encouraging economic growth and does little to support the business of MEMS DIY Ltd. Therefore, Site Allocation BG2 does not accord with national policy.</p> <p>Paragraph 70 of the NPPF states that to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: plan positively for the provision</p>		
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				<p>and use of community facilities (such as local shops) and other local services to enhance the sustainability of communities; guard against the unnecessary loss of valued facilities and services; and ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community. In this case the established premises at MEMS DIY provides both a local shop and a form of social facility Both members of the local community and local trades people use this important facility and have done for many years, which demonstrates its value to them. It is unnecessary to lose such valued facility and Site Allocation BG2 fails to guard against this, contrary to paragraph 19 of the NPPF.</p> <p>Paragraph 151 of the NPPF states that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in the Framework, including the presumption in favour of sustainable development. Paragraph 152 of the NPPF explains that local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these</p>		
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				<p>dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.</p> <p>As explained earlier, the economic and social dimensions of sustainable development (pursuant to Paragraph 7 of the NPPF) are not observed by Site Allocation BG2 and therefore the tenets of paragraphs 151 and 152 of the NPPF are not complied with.</p> <p>Furthermore, paragraph 152 details that where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. In the case of Site Allocation BG2, it effect is to create an adverse impacts upon a viable business and local facility and these adverse impacts could be avoided. If Site Allocation BG2 is implemented there are no compensatory measures set out for dealing with the adverse impacts created ie loss of a business, loss of a local facility, loss of viable employment in this particular business sector. Paragraph 152 of the NPPF is therefore ignored.</p> <p>Paragraph 154 of the NPPF states that Local Plans should be aspirational but '<b>realistic</b>'. They should address the spatial</p>		
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				<p>implications of economic, social and environmental change. In this case, Site Allocation BG2 is aspirational but not realistic given the circumstances set out in this representation. Issues include the indefinite lease arrangements with the freeholder, the current business not wishing to relocate and (in the event it is legally forced to leave the site) the practical and financial difficulties in finding a new and viable alternative site in the locality.</p> <p>Paragraph 155 of the NPPF states that early and meaningful engagement and collaboration with businesses is essential. LB Haringey is aware of the business operation at MEMS DIY Ltd but has not collaborated with the business. Paragraph 157 states that, crucially, Local Plans should be based on co-operation with private sector organisations. In this case the LPA has not co-operated with MEMS DIY Ltd.</p> <p>Paragraph 160 of the NPPF states that local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should work closely with the business community. However, the LPA has not worked closely with MEMS DIY Ltd (as part of the local business community), does not appear to have any clear</p>		
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				<p>understanding of its commercial operation and has therefore failed to recognise its business needs, contrary to the requirements of national planning policy.</p> <p>Paragraph 173 (Ensuring viability and deliverability) of the NPPF states that 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. In the case of Site Allocation BG2, it is dubious whether there is a willing landowner as the freeholder has a lease with an operator. In the event that there was willing landowner, there are also the potential issues of compensation and compulsory purchase, with related costs, in order to remove the current business from the site. These problems throw significant doubt on the financial viability</p>		
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					and deliverability of implementing Site Allocation BG2 on the western part of the site where MEMS DIY Ltd is located.		
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Respondent 18: GW & JA Green

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
18	RTAAP114	NT4	No response given	No response given	Support comprehensive planning of policy area to create new residential neighbourhoods. Generally mid-rise development of 3 – 10 storeys would be appropriate, with increasing density and height near to NT7 redevelopment.	Not stated.	Noted.

Respondent 19: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RTAAP115	Table 1 & Figure 2.4	Not stated	Not stated	Table 1 lists and Figure 2.4 shows High Road West as 'Locally Significant Industrial Land'.	High Road West should be removed from this designation in the Table to reflect its removal as an LSIS in the Pre-submission version of	Noted.  For accuracy and clarity, Table 1 pg 21 and Figure 2.4 pg 22 will be updated to show that

						<p>Strategic Policy SP8. The Haringey Local Plan Strategic Policies 2016 – 2028 Policies Map (January 2016) should also be updated to reflect this change.</p> <p><b>32. Similarly, the ‘High Road East Local Employment Area’ should be removed from Figure 2.4 to reflect its de-allocation, as shown on the Haringey Local Plan Strategic Policies 2016 – 2028 Policies Map (January 2016).</b></p>	<p><b>High Road West is a Local Employment Area – Regeneration Area as set out in Alteration 110 to the pre-submission version of the Strategic Policies DPD.</b></p> <p>Please note that High Road East is a Designated Employment Area and it was N17 Studios that was de-allocated. The map incorrectly shows the boundary of the former N17 Studios DEA. <b>The map will be amended and updated to reflect recommendations of the Employment Land Study.</b></p>
19	RTAAP116	Town centres Paras 2.32-2.37	Not stated	Not stated	<p><b>Under the ‘Town Centres’ section of the AAP, paragraph 2.32 describes how the High Road in this part of North Tottenham provides a local centre which could benefit from sensitive improvements and investment. Paragraph 2.33 recognises the proposed new THFC</b></p>	<p>However to aid this, the local centre boundary should as a minimum be expanded to include the Sainsburys retail store.</p> <p>This links to the Vision for the North Tottenham Neighbourhood Area set out in paragraph 5.81 of the Tottenham AAP which <b>describes a “substantially improved local centre”</b></p>	<p>Disagree. The current town centre boundary implies a historic designation not representative of the current picture or future proposals as set out in the AAP. The redevelopment of High Road West, including the relocation of the station entrance for White Hart Lane station and the</p>

				<p>stadium development which involves comprehensive redevelopment with a new hotel, significant retail and leisure offer, museum, offices and housing. The first phase of the development is complete and includes a large retail store (Sainsburys).</p> <p>34. Paragraph 2.35 states that there is a need to improve the town centre offer across the whole of the Tottenham area, particularly to increase visitation to the centres and ensure their viability. Paragraph 2.37 states that in North Tottenham, there is a need to realise the investment being made by THFC on their stadium as a catalyst for wider change, ensuring this area becomes a hub of activity through the week and not just on match days. This can be achieved by establishing</p>	<p>and Site Allocation NT5: <b>'High Road West'</b> which describes an expanded local shopping centre as well as a new local centre opposite the stadium. There needs to be much more clarity within the suite of emerging Local Plan documents as to how the Tottenham High Road North Local Shopping Centre will expand. For example, policy SA3 of the Site Allocations DPD sets out amendments to town centre boundaries. To deliver its vision and objectives and support the effectiveness of the plan, a similar area-wide policy should form part of the Tottenham AAP.</p>	<p>creation of a new public square, will necessitate a redrawing of the town centre boundary to capture the active frontages proposed and to form a more coherent centre. It is unlikely that the Sainsbury store, which is located off the high street some distance down Northumberland Park Road would necessarily fit with this proposals. More appropriate however would be to see the town centre boundary extend to the Spurs Stadium side including the podium space, which along with the new Moselle Square need to work as one (ideally managed as one) with active town centre uses fronting them/it – this would seem to <b>'effectively' provide the</b> boundary of the new local centre.</p> <p>It is appropriate this this boundary is only drawn and confirmed once the</p>
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					the location as a “premier leisure destination” in London, whilst also retaining a local retail function to support the community. THFC strongly support the objective that the area becomes a hub of activity through the week and not just on match days. However to aid this, the local centre boundary should as a minimum be expanded to include the Sainsburys retail store.		developments on High Road West and the Spurs stadium are delivered and the town centre uses provided for.  No change
19	RTAAP117	Vision & Objectives	Not stated	Not stated	THFC support the ‘Vision’ for Tottenham to become the next great area of London (paragraph 3.1) and consider that the new stadium and associated and supporting development will be an integral part of this. THFC also support the objective in paragraph 3.9 that North Tottenham will become the “premier leisure destination” in London as well as the Spatial Strategy for North	As such, to be more effective, THFC consider that this important vision, objective and strategy needs to be supported more strongly in planning policy (as per the comments on Policy SP1 in Section c) above) and that to help delivery it should become an additional Strategic Objective. Proposed wording for Objective 9 is set out below:  <b>“Objective 9: The premier leisure</b>	The Council see the proposals for North Tottenham delivering upon all eight existing objectives rather than being an objective in its own right. In this respect, the Council considers that paragraph 3.23 sufficiently expresses the Council’s vision for north Tottenham.  No change.

				<p>Tottenham set out in paragraph 3.23:</p> <p><b><i>“In the North Tottenham neighbourhood, the new Tottenham Hotspur FC stadium development will provide the catalyst for comprehensive regeneration of both High Road West and Northumberland Park. The priority is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further cement the area’s reputation as a premier leisure destination within North London.”</i></b></p>	<p><i>destination in London</i></p> <p><i>Alongside the successful redevelopment of the THFC stadium the priority in North Tottenham is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements. We will support developments which further cement the area’s reputation as the premier leisure destination within London.”</i></p>	
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					The Tottenham Physical Development Framework and Tottenham Strategic Regeneration Framework, which are cited in paragraph 3.11 of the Tottenham AAP as helping inform the eight Strategic Objectives, both describe in their Vision creating a new leisure destination at High Road West.		
19	RTAAP118	AAP3	Not stated	Not stated	Cross references to the policy need to be updated in supporting paragraphs 4.12, 4.13 and 4.15. They currently refer to AAP2.	Cross references to the policy need to be updated in supporting paragraphs 4.12, 4.13 and 4.15. They currently refer to AAP2.	Noted.  <b>Referencing will be updated.</b>
19	RTAAP119	AAP4	Not stated	Not stated	Figure 4.1 should be updated to remove the High Road West and High Road East Employment Areas for the reasons set out above.	Figure 4.1 should be updated to remove the High Road West and High Road East Employment Areas for the reasons set out above.	Noted.  <b>For accuracy and clarity, Table 3 and Figure 4.1 will be updated.</b>  Please note that both High Road West and High Road East are Designated Employment Area and it was N17 Studios that was de-allocated. The map incorrectly shows the

							boundary of the former N17 Studios DEA. <b>The map will be amended and updated to reflect the recommendations of the Employment Land Study.</b>
19	RTAAP120	North Tottenham Neighbourhood Area, Para 5.84	Not stated	Not stated	For the same reasons as set out in sub-section iii above, the key objectives for the neighbourhood should refer to North Tottenham becoming the “premier leisure destination” in London.	Paragraph 5.84, bullet point 6 should be amended to aid effectiveness as follows (deleted text struck through, proposed text in red): <i><b>“To create a new the premier leisure and sports destination for London, with the provision of complementary commercial, cultural and community uses across the neighbourhood area whilst celebrating the High Road’s rich heritage.”</b></i>	Agreed insert a premier
19	RTAAP121	NT4	Not stated	Not stated	The ‘Development Guidelines’ include that development should complement the ongoing operational requirements of THFC.	THFC consider that for clarity this should be expanded to include reference to the operational requirements envisaged as follows (deleted text struck through, proposed text in red):	The Council considers the fifth bullet point under the Development Guidelines to be sufficiently robust and flexible to take into account any future operational requirements. The suggested change is considered to be overly

						<p><b><i>“Development should complement the ongoing operational requirements of THFC which include ongoing outside broadcasting requirements as well as an NFL fanzone area.”</i></b></p> <p>Additionally, given the size of the allocation, proximity at its western end to the THFC stadium and the leisure objectives for the sub-area, the potential for new leisure opportunities should be introduced into the Development Guidelines (deleted text struck through, proposed text in red):</p> <p><b><i>“The potential for new leisure and employment opportunities to be developed along Park Lane should be explored, in line with the Council’s ambitions to revitalise this key Local Centre.”</i></b></p>	<p>prescriptive.</p> <p>Regarding the provision of leisure facilities. The Council accepts the suggested change</p>
19	RTAAP122	NT5	Not stated	Not stated	The Development Guidelines refer to part of the site having a licensed waste capacity, and this will need to be	We have provided commentary on Policy SA4 in the context of this site in Section e) above and for the reasons set	While it is noted that the licensed waste capacity has been transferred onto the Brantwood Rd site, the Council is still waiting

					<p>reprovided before development of this section of the site can commence in line with Policy SA4.</p>	<p>out consider that this guideline should be removed.</p>	<p>on demonstration that the actual maximum waste 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. Once demonstrated the waste throughput capacity of the Brantwood site will need to be updated at Table 2 of SA4 of the Site Allocations DPD, along with the associated map.</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</b></p>
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							approach accords with the methodology of the North London Waste Plan and ensures baseline consistency across Local Plan documents.
19	RTAAP123	NT7	Not stated	Not stated	In addition to referencing the Existing Planning Permission (HGY/2010/1000) reference should be made to planning and listed building consent applications HGY/2015/3000, HGY/2015/3001 and HGY/2015/3002 which were resolved to be <b>granted by Haringey's</b> Planning sub-committee in December 2015.	The description of developments are set out below: <i>HGY/2015/3000:</i> <b><i>“Proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings</i></b>	Noted. Reference to up to date planning application will be added to NT7.  Adding 'retail' to Site Allocation (A) is not considered necessary to include specific reference to the new retail store as this is built out.  Noted. Amend seventh bullet point under Site Requirements to read <b>'The retail/commercial uses...'</b>

					<p><i>and associated community and / or office building. Details of "appearance" and "scale" are reserved in relation to the sports centre building. Details of "appearance" are reserved in relation to the health centre building. Proposal includes the demolition of 3 locally listed buildings and includes works to a Grade II Listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001)."</i></p> <p><i>HGY/2015/3001: "Listed building consent for internal and external works to No.744 High Road, all in connection with the use of the building for ancillary museum uses associated with a separate planning application for the Northumberland Development Project." HGY/2015/3002 (at 44</i></p>	
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					<p><i>White Hart Lane): "Erection for a temporary period of, together with use as, a construction compound."</i></p> <p>As per the March 2015 THFC representations, the Site Allocation (part A) should be updated to make reference to retail to reflect the permitted retail uses, including the now completed retail store.</p> <p>The seventh site requirement makes reference to leisure uses being complementary. Given that the principal focus of the allocation is a leisure use, we assume that the reference should be to retail uses (deleted text struck through, proposed text in red): <i>"<del>The leisure</del> retail/commercial uses should be complementary and not compete with the uses proposed on the expanded Local Centre on the western side of</i></p>	
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						<i>the High Road within the High Road West area."</i>	
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Respondent 20: Commercial Vehicle Sales & Hire

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
20	RTAAP124	NT6	No response given	No response given	<p>We are in receipt of your letter dated 8/1/2016, 21/1/2016 and 3/3/2016. We are a family run business which had been trading on these premises since 1961. The land at 72 White Hart Lane, Tottenham, N17 is both part owned and part rented under a lease agreement by ourselves. We have no intention to sell or relocate as we are established and we known in the area for the services that we provide the local community. We also employ local people at our business providing employment and stability.</p> <p>We have also over the last few years made considerable investment at the premises with the building of our new workshop, new equipment and a new MOT testing station.</p> <p>On behalf of all the shareholders, directors and land owners (see list below), please note once again that we have no intention to sell or relocate and in fact we have plans to further invest in our business at White Hart Lane and that any disruption to our business plans would be met with</p>	No response given	Noted.

					resistance at the highest level.		
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Respondent 21: Tottenham Business Group

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
21	RTAAP125	NT 5 NT 7	No	No response given	<p>The evidence now out for consultation does not support a strategy based on a stadium scheme.</p> <p>NT5 was an AAP prepared on the back of the existing THFC scheme for a sports and leisure destination. The concept that the area should be a major sport and leisure area was adopted as set in stone. It was not tested through consultation.</p> <p>The Master plan for NT5 was presented ahead of the AAP and DPD documentation The Council has commented that it was able to set objective strategies but this does not hold true in the evidence</p> <p>The needs of the Stadium Development were allowed to prejudice the NT5 plans. No reasonable alternatives were given. NT5 is inherently linked to the</p>	No response given	<p>The spatial vision and strategy for Tottenham address opportunities in respect of the redevelopment of THFC stadium, to act as a catalyst and anchor for comprehensive regeneration of the area, following the original planning consent for the scheme. Giving effect to this vision and strategy, Policy NT 7 reflects the existing consent, and the AAP has through other site allocations, set out requirements to ensure a coordinated approach to area regeneration. Collectively the site allocations seek to</p>

				<p>Stadium. It is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. To that end discussion of local proposals for modest changes to retain the local business base was not tolerated. NT5 is unsound because the question remains whether in accordance with paragraph 182 of the NPPF it is <b>'justified'</b> in the sense that is the most appropriate when considered against the more reasonable alternatives, based on proportionate evidence. The Stadium Scheme has been acknowledged publicly as <b>delivering paltry benefits" against</b> the tremendous adverse effects for established businesses. This has been intensified by the new plans for a more intensively developed site.</p> <p>There is no evidence and no information in any of the documents, which have been out for consultation during this process <b>as to "reasonable alternatives'</b> to the present proposed scheme. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that <b>'sustainability which meets the</b> requirements of the European Directive on strategic environmental</p>	<p>ensure that the local benefits of stadium redevelopment are optimised, enabling delivery of housing and jobs to meet strategic growth requirements, along with community infrastructure to support planned growth.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of the <b>Borough's strategic</b> growth requirements.</p> <p>In preparing its Local</p>
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				<p>assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment.</p> <p>Haringey Council has an obligation to understand and provide support for its existing economy, The Locally significant employment sites in High Road West NT5 have been removed despite their strengths and against evidence in the Employment Land Study 2015 where paragraph 2,26 pledges to safeguard the best sites.</p> <p>They fulfill all the economic and land use criteria in particular with regard to the provision of <b>SME's</b> and are part of a larger cluster of existing industrial activity. Their removal would inhibit the operations of the nearby industrial uses with which they interconnect</p> <p>In the Employment Land Study March 2015 Consultation High Road West was <b>described as “a locally significant site providing a range of B2 uses. It is recognised as well occupied actively marketed with good internal circulation and parking on site”.</b> (5.15)</p>		<p>Plan documents, the Council has undertaken an updated review of its industrial land stock, as set out in the Employment Land Study (ELS) 2015. Following this review, the Council has proposed a reconfiguration of its designated employment land, informed by recommendations of the ELS, which it considers is necessary to meet objectively assessed need for employment floorspace <b>and the Borough's</b> strategic jobs target, as well as to deliver the spatial strategy. As set out in Alterations to Policy SP 2, the Council proposes to re-designate High Road West from a LSIS to LEA – Regeneration Area, and this has been reflected in the AAP. The approach has been subject to sustainability appraisal, including</p>
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				<p>It was viewed as important to safeguard B2/B8 uses and recommended as vital that any B class jobs affected are either relocated to suitable premises or to existing employment sites that have potential for further intensification. The current plans show more floor space lost in B class use where evidence in the Employment Land Survey (5.136) showed a strong demand with growth forecast, while delivering growth in B2 class where demand is shown to be weak. In 2015 it recommended that any release of employment land should not be to the detriment of successful B2/B8 businesses. The promise of replacing and resituating displaced sites to protect B2/B8 uses has not been carried through to the policy. In 2015 the Forecast demand for Industrial land was reduced by Haringey to just 32,000m<sup>2</sup> up to 2026. However the Employment Land Study 2015 predicted a total requirement of 137,000m<sup>2</sup>, which included a net reduction in demand. Therefore the predicted increase in jobs will not be matched by an increase in workspace. This indicates that Haringey will not have the capacity to relocate the existing B2/B8 businesses.</p>	<p>assessment of <b>'reasonable alternatives'</b>. The LEA – RA designation does not preclude employment uses from operating in the area, however the Council will seek an intensification of employment uses and jobs where sites are redeveloped.</p> <p>The Council does not consider that the respondent has accurately summarised the requirements of NPPF paragraph 22, regarding protection of employment sites. The Local Plan sets a positive and flexible framework for delivering sustainable economic development, which is justified by evidence, and having regard to objectively assessed needs.</p> <p>No change</p>
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					<p>Policies under DM49 have never been sustained in the High Road west NT5 Proposals and the underlying evidence has continually been ignored.</p> <p>This is not in line with the NPPF guidelines which states employment land should not be protected ONLY where there is NO PROSPECT of it being used.</p>		
21	RTAAP126	General	No response given	No response given	<p>The statutory examination of the Allocations DPD and Area Action Plans for Tottenham must consider <b>that this scheme is the “most appropriate</b> when considered against more reasonable alternatives based on proportionate evidence</p> <p>The scheme was found by the Inspectors Report on the Archway Metal Company to deliver little or no benefit against tremendous adverse effects for established local business.</p> <p>The documents out for consultation are flawed in many ways. The Scoping Reports for both the Allocations DPD and The Area Action Plan provided no information <b>as ‘to reasonable alternatives’</b> to the present proposed plan. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that</p>	<p>The wishes of the Community as demonstrated in the PETITION presented on the 28th November 2013. Should be responded to by considering reasonable alternatives to the demolitions which will have such tremendous adverse affects for local business. A scaling down of the development concessions to THFC and a scaling up of consideration for the established local businesses which now provide a substantial employment base</p>	<p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of the <b>Borough’s strategic</b> growth requirements.</p> <p>The SA Scoping Report sets out the sustainability appraisal</p>

				<p><b>“sustainability which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment and social factors.</b></p> <p>Six plans were drawn up by ARUP, one of which would have retained the existing local businesses. This or a variation of this was not presented as a reasonable alternative to the community. Strong representations by the Tottenham Business Group representing the threatened local sites to redress this by incorporating some of its features to the Council selected Option</p> <p>Evidence of Local Pressure for An Alternative to Demolition Meeting of Representatives of TBG with Alan Strickland Cabinet Minister for Regeneration 13<sup>th</sup> June 2013  Petition of 2500 local names asking for an alternative to demolition. Representatives were told they would all be required to move their businesses from the area and <b>asked to join a “Steering Group for that purpose.</b></p>	<p>and core local shopping for the existing community (particularly ethnic specialist).</p>	<p>framework against which plan proposals are assessed through the integrated impact assessment process. Consideration of reasonable alternatives for the AAP was appropriately undertaken and reported on in the Regulation 18 and Regulation 19 stage SA Reports.</p> <p>Previous decisions on planning applications are outside the scope of the Local Plan.</p> <p>The Council has carried out public consultation in line with its adopted Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
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					<p>26<sup>th</sup> May 2013 <b>Letter of ‘Blight’</b> received by affected Businesses (two days before last Consultation Meeting.</p> <p>8<sup>th</sup> October 2013 Haringey held meeting with affected businesses at the Irish Centre.</p> <p>Alan Strickland and Lyn Garner, Director of Regeneration attended Mr. Strickland again confirmed that all businesses would have to move. Lyn Garner Director of <b>Regeneration confirmed, “There would be no more metal bangers allowed in the area”, a remark that was later apologized for by Mr. Strickland.</b></p> <p>8<sup>th</sup> October 2013 The Designated <b>“Steering Group’ formed into The Tottenham Business Group.</b></p> <p>28<sup>th</sup> November 2013 Deputation to the Cabinet by The Tottenham Business Group presented the Petition (now with over 4000 signatures) requesting the protection of local businesses an alternative to demolition</p> <p>Presentation of 4000 signatures asking for alternatives to demolition.</p> <p>Response by Alan Strickland Cabinet Member for Regeneration <b>included the pledge to ‘explore options which would retain ‘ the threatened high street shops and</b></p>	
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				<p>businesses.</p> <p>25<sup>th</sup> February 2014 Chairman and Vice Chair of TBG met with ARUP designer Alan Strickland and Lyn Garner. They were shown 6 alternative plans that had been considered by the Cabinet prior to the June Consultation, They were told no consideration of alternatives or modifications.</p> <p>6. What modifications are necessary</p> <p>The wishes of the Community as demonstrated in the PETITION presented on the 28th November 2013. Should be responded to by considering reasonable alternatives to the demolitions which will have such tremendous adverse affects for local business. A scaling down of the development concessions to THFC and a scaling up of consideration for the established local businesses which now provide a substantial employment base and core local shopping for the existing community(particularly ethnic specialist).</p> <p>The exclusion of the community from the initial stages of the formulation of the Plan, their continued pressure for an alternative to save established local business and the failure of Haringey</p>		
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					to address this issue is a huge omission. The plan cannot be claimed to be robust unless there is a resolution.		
21	RTAAP127	NT7	No response given	No response given	<p>A sound plan should be justified and effective</p> <p>The Draft site NT7 was based on the NDP scheme promoted by THFC. Original permissions were granted on the basis of planning policies contained in the UDP, which were withdrawn. The developments were perpetuated based on a former planning regime when new sustainable policies had been prepared that could have secured more sustainable planning outcomes.</p> <p>There were a number of schemes/alternatives that were better than the NDP scheme but the site application was not flexible enough to have captured these benefits from different options.</p> <p>The proposed scheme does not significantly improve the economic and social wellbeing of the area, which was confirmed by the Inspectors report on the CPO inquiry into Archway Metals company.</p> <p>It was made clear that converting the NDP scheme to a site allocation would depend on public sector</p>	No response given	The spatial vision and strategy for Tottenham address opportunities in respect of the redevelopment of THFC stadium, to act as a catalyst and anchor for comprehensive regeneration of the area, following the original planning consent for the scheme. Giving effect to this vision and strategy, Policy NT 7 reflects the existing consent, and the AAP has through other site allocations, set out requirements to ensure a coordinated approach to area regeneration. Collectively the site allocations seek to ensure that the local benefits of stadium redevelopment are optimised, enabling delivery of housing and

					<p>funding which could be more effectively invested in a more appropriate regeneration and environmental purposes.</p> <p>This position has been exacerbated by the new Stadium application, which allows a massively increased stadium size and huge elevations for additional development on the South side.</p> <p>The site was originally allocated to reflect approved planning application when it was in fact the subject of a prolonged CPO inquiry, it should have been selected on the basis of a legally compliant SEA and Sustainability Appraisal. This is surely unsound unlawful practice.</p> <p>The Draft Site Allocation did not consider the merits of alternative schemes and is solely based on a scheme promoted by THFC. It shows a profoundly flawed methodology which is not a sound basis for established land use allocations within a Site Allocation DPD under Part 2 Of the Planning and Compulsory Purchase Act 2004(as amended) the regulations and the NPPF</p>		<p>jobs to meet strategic growth requirements, along with social and community infrastructure to support planned growth.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of the <b>Borough's strategic</b> growth requirements.</p>
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Respondent 22: North London Waste Authority

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	Council's
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		Policy / Figure / Para		Compliant		Sought	Comments / Response
22	RTAAP128	TH6	Yes	Yes	North London Waste Authority (NLWA) has offices located on this site. The Authority supports the proposed planning designations and development guidelines for this site as set out in the Tottenham Area Action Plan Pre-Submission Version January 2016.	None	Noted.
22	RTAAP129	TH7	Yes	Yes	North London Waste Authority (NLWA) operates a reuse and recycling centre located on this site. The Authority supports the proposed planning designations and development guidelines for this site as set out in the Tottenham Area Action Plan Pre-Submission Version January 2016. NLWA has a policy which aims for 95% of residents to live within two miles (measured as a straight line) of a Household Waste Recycling Centre (or Reuse and Recycling Centre as referred to by the London Mayor and now by NLWA). Therefore the protection of existing sites until replacements are in place fits with <b>NLWA's policy on provision, agreed in June 2010.</b>	None	Noted.

#### Respondent 23: Montagu Evans on behalf of Hale Village Properties

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
23	RTAAP130	TH 8	No	Not stated	Our previous representations concerning allocation TH8 do not appear to have been considered by the Council. In our opinion the	We therefore recommend that the following amendments are made to the draft allocation in our to render the AAP sound.	This respondent's previous representations have been considered in the preparation of the plan. Details are set out in the Regulation 18 Consultation

				<p>allocation as currently drafted, fails to maximise the opportunities available to the Council in respect of the Site. The allocation as currently drafted only suggests support for an 18 storey building and makes no comment as to whether the principle of a building above 18 storeys could be acceptable.</p> <p>Taking into consideration the strategic planning policy context for this area which due to:</p> <p>a) the recently adopted Further Alterations to the London Plan (2015) requires LB Haringey to deliver a minimum of 1,502 per annum over the Plan period, which equates to an additional 682 dwellings per annum compared with the London Plan (2011); and</p> <p>b) recent confirmation of the Tottenham Housing Zone, whereby 2,000 new homes are required to be delivered around Tottenham Hale Station the purpose of the AAP</p>	<p>TH6: Development Guidelines</p> <p>It our opinion bullet point 1 of the Development Guidelines section is negatively worded, as the policy suggests that a building of over 18 storeys will require justification and no commentary is provided in terms of potential support of a building above this height.</p> <p>It is our position that this part of the policy is unsound as it has not been positively prepared. Paragraph 182 of the National Planning Policy Framework requires Plans to be positively prepared to meet objectively assessed development requirements.</p> <p>In order to optimise the development potential of this brownfield Site, a principle which runs throughout planning policy at all tiers, the policy should be positively prepared and justified. <b>The Council's own</b> evidence</p>	<p>Statement, which includes a summary of the representations received <b>and the Council's response</b> to these.</p> <p>The allocations in the emerging Local Plan Site Allocations DPD and Tottenham AAP, confirm provision of sufficient site with capacity to meet and <b>exceed Haringey's strategic</b> housing requirement over the plan period. In accordance with the methodology, the site capacities are either based on a standard calculation as set out in the Appendix or as consented, where the development is unimplemented.</p> <p>The Council considers the AAP provides a sound basis for meeting objectively assessed need and delivering the spatial strategy for the Tottenham Area and the Borough. Within this context it sets a positive framework for managing the development of tall and taller buildings,</p>
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					<p>must be to ensure that development sites within Tottenham are fully optimised. In our opinion the allocation is currently unsound as it has not been positively prepared and is not justified.</p>	<p>base, in the form of the Urban Characterisation Study, at page 108 states that the Hale Village Tower could reach 20 – 25 storeys. In light of this context we consider that this part of the policy should be amended to ensure the Plan has been positively prepared. The amendment suggest below is, in our opinion, justified in <b>light of the Council’s</b> supporting evidence base. Therefore, in order to make this part of the policy sound we recommend that the first bullet point is reworded as follows:</p> <p><i>“Proposals for a tall building over 18 storeys should be explored in line with the Urban Characterisation Study which suggests a building of between 20 – 25 storeys could be appropriate. Any proposal for a tall building within or above these parameters will need to be of exceptional architectural quality in accordance with the DM DPD tall building</i></p>	<p>informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study.</p> <p>The Urban Characterisation Study is but one consideration in determining the appropriate height of a building, as set out by Policy DM 6, which the AAP states should be read in conjunction with this policy. TH 8 reflects the extant permission for a building of 18 storeys, and the development guidelines are considered to be positively worded, in so much as they provide there is scope for a building that exceeds this height where there is sufficient justification that the proposal satisfies other relevant Local Plan policies.</p> <p>No change.</p>
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						<i>policy.”</i>	
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Respondent 24: Canal and River Trust

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
24	RTAAP131	TH 9	No response given	No response given	You will be aware that the Canal & River Trust are in a joint venture with Muse Developments to work up a proposal for redevelopment of the Hale Wharf site. As such we have had extensive involvement in pre-application discussions and been able to feed the <b>Trust's usual requirements into the developing</b> scheme. We therefore have no further comments to make on the AAP.	Not stated.	Noted.

Respondent 25: Quod obo Muse Developments and the Canal and River Trust

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	RTAAP132	AAP 4 TH 9 Table 6	No	No response given	This response relates to the lack of clarity and inconsistencies in relation to: - the definition of <b>“replacement floorspace”</b> and <b>“replacement employment”</b> ; - indicative development capacities; - the lack of clear	1. There needs to be consistency in the terminology for <b>“replacement floorspace”</b> or <b>“replacement employment”</b> with a definition to provide clear guidance on the policy test for development proposals; 2. Inconsistencies	Further details in respect of replacement employment floorspace are set out in Policy DM 38, which sets out requirements for enabling mixed use schemes in Designated Employment Area (DEA) – Regeneration Areas.  <b>For clarification, TH 9</b>

				<p>guidance on the timescales and strategy for the reclassification of Designated Employment Areas.</p> <p>Accordingly, without such clarity and with such inconsistencies, the Plan is unsound, ineffective and not therefore deliverable over the plan period.</p> <p>Please refer to the accompanying cover letter (part (b) (i)) for full and more detailed comments.</p>	<p>between indicative development capacities should be corrected;</p> <p>3. The timescales and strategy for the reclassification of Designated Employment Areas should be provided. Incorporating such changes will make those policies effective and deliverable over the plan period.</p>	<p>paragraph 5.169 will be amended to read:  <b>“Comprehensive redevelopment to provide a mix of uses, with replacement employment floorspace, new residential and a leisure destination linked to the Lee Valley Regional Park”.</b></p> <p>It is agreed that the indicative capacity of the town centre uses for the Hale Tower in T able 6 is incorrect, and should be amended to be consistent with that in TH8 and in Table 10 in Appendix A, and reflective of consented development for the site.</p> <p>Policy SP 8 sets out the <b>Council’s strategic</b> approach to managing land within its employment land hierarchy to deliver the spatial strategy for the Borough, including land within designated DEA – Regeneration Areas. Policy DM 38 helps give effect to this policy and provides</p>
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							<p>further details in respect of the strategy for managing land designated as such, along with guidance to assist with implementation on a site basis.</p> <p>The DEA-Regeneration Area designation for this site will be reflected in the Policies Map, and will take effect once this and other Local Plan documents are adopted.</p>
25	RTAAP133	AAP 1 TH 9	No	No response given	<p>The meaning of “comprehensiveness” should be sufficiently clear so as not to prejudice the development aspirations of component parts of Site Allocations to be realised (particularly where there are multiple development parcels within Site Allocations).</p> <p>It should be clarified that in relation to Site Allocation TH9, “comprehensiveness” means that the various development parcels can come forward individually. The lack of clarify could</p>	<p>It should be made clear that in relation to Policy TH9 that “comprehensiveness” does not mean that the entire Site Allocation must be developed at the same time. The policy should be amended and clarified to allow sufficient flexibility for the development aspirations of components part of the Site Allocation to be realised, particularly given the different policy designations affecting component parts.</p> <p>Making such amendments will ensure an effective</p>	<p><b>Agreed as this is effectively the intention of ‘comprehensiveness’.</b> However, it is felt that <b>this clarification is best provided through an addition to Paragraph 4.6. Insert at the end of the third sentence of Paragraph 4.6 “..., whilst enabling the component parts of a site allocation to be developed out separately.”</b></p>

					<p>prejudice the ability to deliver important and component parts of the Site Allocation and is therefore ineffective and could undermine the deliverability of the Site Allocation over the plan period.</p> <p>More detailed comments are provided in the accompanying cover letter (part (b) (ii))</p>	<p>policy that allows multiple development parcels within Site Allocations to be developed comprehensively but not prejudice the ability to deliver important and component parts independently.</p>	
25	RTAAP134	TH 9	No	<p>No response given</p>	<p><b>The 'Development Guidelines' within policy TH9</b> fail the soundness test with regards to consistency with national planning policy.</p> <p>The guidelines state that building heights will have to respond to the proximity and openness of the greenbelt. Paragraph 79 of the National Planning Policy Framework (NPPF) addresses green belt, however there is no specific policy requirement in the NPPF in relation to the setting of the green belt, and in this</p>	<p><b>The 'Development Guidelines' on page 129</b> needs to be made clear that only the garage site (which currently lies within the greenbelt) should respond to the openness of the green belt. All other proposals should respond to other relevant policies within the local development plan documents.</p>	<p><b>Agreed. This will be amended to clarify that openness relates to the development of the Garage site but that development of the whole site will need to have regard to the site's location within the Lee Valley Regional Park.</b></p>

					<p>respect the NPPF itself does not provide guidance in respect of sites adjoining the green belt.</p> <p>Please refer to the accompanying cover later (part (b) part (iii)).</p>		
25	RTAAP135	Tottenham growth area Figure 1.4	No response given	No response given	Overall, Muse Developments and CRT welcome the generally positive approach taken in the Area Action Plan which identifies the site, at its outset, in the Tottenham Growth Area (Figure 1.4) and the requirement to maximise site opportunities in that location.	As above.	Noted, although it is not about <b>'maximising site opportunities'</b> but rather <b>'optimising site opportunities'</b> .
25	RTAAP136	AAP 4 TH 9	No	No response given	<p>b)j Employment</p> <p>Draft Policy AAP4 <b>'Employment' identifies</b> the site a Designated Employment Area with supporting Table 3 further clarifying the site designation as a Local Employment Area: Regeneration Area. Policy AAP4 indicates that the Council will re-classify some of <b>the area's</b></p>	As above.	In preparing Alterations to the Strategic Policies and other Local Plan documents concurrently, including the Tottenham AAP, the Council has undertaken an employment land review to update to its local technical evidence base. Recommendations from this review, including on the re-designation of employment land, have been considered and taken

				<p>Designated Employment Areas in due course, albeit there are no specific timescales or a strategy on how it intends to do so. Clear guidance on the re-classification of those sites should be set out in the AAP.</p> <p>This is particularly the case because proposed alterations to paragraph 5.1.7 of the Strategic Policies (the consultation for which runs concurrently with the AAP) states that the hierarchy of employment land will be reviewed and revised as necessary taking into account economic circumstances and further guidance from, amongst other things, the Tottenham AAP.</p> <p>The site specific requirements of the site allocation (TH9) on page 129 also appears to contradict the idea that the designation would be removed and states the</p>		<p>forward in the emerging Local Plan documents. In particular, Alterations to SP 8 propose that Hale Wharf be designated as a Local Employment Area – Regeneration Area, and this has been reflected in Policy AAP 4 and TH 9.</p> <p>The DEA-Regeneration Area designation for this site will be reflected in the Policies Map, and will take effect once this and other Local Plan documents are adopted. The Council may in the future undertake a further review of its employment land hierarchy, in line with the NPPF and as part of the plan, monitor and review process.</p> <p>It must be noted by the developer that the primary designation of the site is as employment land, although classified as a Regeneration Area which makes provision for mixed use development to provide for the reorientation away from</p>
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				<p>following in relation to Hale Wharf:</p> <p><b><i>“The site will hold a Designated Employment Area: Regeneration Status to recognise the contribution to the local economy that this site can make”.</i></b></p> <p>Whilst Muse and the CRT support a mixed use development on the site (to include a proportion of employment uses), this requirement is superfluous when paragraph 5.170 simply states that replacement employment is needed.</p> <p>The current employment floorspace within the site is underutilised and generally low density, whilst the quality of the buildings are deteriorating and are considered to have little, if any, potential for re-use.</p> <p>It is also recognised under paragraph 5.144 that a limited amount of</p>	<p>traditional industrial or storage uses to more intensive employment uses. Further details in respect of replacement employment floorspace are set out in Policy DM 38, which sets out requirements for enabling mixed use schemes in Designated Employment Area (DEA) – Regeneration Areas.</p> <p>For clarification, TH 9 paragraph 5.169 will be amended to read:</p> <p><b>“Comprehensive redevelopment to provide a mix of uses, with replacement employment floorspace, new residential and a leisure destination linked to the Lee Valley Regional Park”.</b></p> <p>The indicative development capacity of 1,570m<sup>2</sup> of commercial floorspace is an error. As confirmed in Table 10 of Appendix A, the indicative development</p>
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				<p>employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives such as the site which has been identified as being located within the Tottenham Hale Housing Zone.</p> <p>Given such policy aspirations within the draft AAP for a mix of uses on the site, it needs to be made clear that it is not necessary for the redevelopment of the site <b>to provide “replacement floorspace” because the type of employment uses that are compatible with mixed use schemes (which include residential uses) may result in less floorspace but retain if not increase the employment density of the site. There should therefore be consistency between terminology (whether “replacement employment” or “replacement floorspace”) and a clear definition</b></p>		<p><b>capacity should be 3,200m2 of commercial floorspace, consistent with Table 6, and a minor modification to correct this will be advanced.</b> It should be noted that these are indicative capacities necessary to demonstrate the ability of the allocations to achieve the strategic housing and job requirements for the Borough over the plan period, and are therefore also minimums where on employment land, the expectation is that redevelopment should seek to exceed the minimum commercial floorspace figure.</p>
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				<p>included within the AAP to provide clear guidance to developers on the policy test for development proposals.</p> <p>There are also inconsistencies in the site allocation overview at Table 6 (Tottenham Hale Sites Capacity) which provides an indicative development capacity of 1,570m<sup>2</sup> of commercial floorspace for Hale Wharf and the Hale Wharf site specific designation (TH9) that suggests and indicative development capacity of 3,200m<sup>2</sup>. We also note that, in any event, the development capacity attributed to the site is indicative, not prescriptive, as confirmed at paragraph 7.3 of Appendix A (<i>'Methodology for Assessing the Capacity of Allocated Sites'</i>). It is clear therefore that the indicative capacity figures comprise estimations only and it is crucial for any policy to provide sufficient</p>		
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					flexibility to consider real development proposals, taking into account other considerations such as design and layout, the size, type and mix of homes/commercial floorspace, site constraints, scheme viability and other planning policy requirements.		
25	RTAAP137	AAP 1 TH 9	No	No response given	<p>b)ii Comprehensiveness</p> <p>Whilst Muse Developments and the CRT welcome the need for development proposals in the AAP area to come forward comprehensively (draft Policy AAP1), it is critical that the application of this policy allows sufficient flexibility for the development aspirations of the component parts of sites to be realised.</p> <p>Paragraph 4.7 requires developments to demonstrate, in relation to sites such as Hale Wharf, that:  <b><i>“Larger sites on which</i></b></p>	As above.	<p>Agreed as this is effectively the intention of <b>‘comprehensiveness’</b>. However, it is felt that this clarification is best provided through an addition to Paragraph 4.6. Insert at the end of the third sentence of <b>Paragraph 4.6 “..., whilst enabling the component parts of a site allocation to be developed out separately.”</b></p>

				<p><i>there are multiple landowners in order to ensure that proposals are not prejudicing development of the remaining parcels....”</i></p> <p>Site Allocation TH9 identifies the site as incorporating the garage site across the Lea Navigation, the Paddock and the Lock Keepers Cottage to the east. The site specific requirements set out on page 129 goes on to explain that the comprehensive redevelopment for the site is required and that the component sites should be developed as part of a comprehensive proposal.</p> <p>Whilst Muse and the CRT are committed to the development of the site in a co-ordinated manner, this should not create a barrier that could otherwise prejudice the redevelopment of part of the site allocation that could act as a catalyst for further investment in the</p>		
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				<p>other development parcels.</p> <p>The application of this policy needs to consider other crucial planning considerations such as individual development proposals, site constraints, scheme viability and other planning policy requirements</p> <p>Site Allocation TH9 (and its site specific requirements) should therefore make clear that this does not necessarily mean that that proposals for the entire site allocation need to come forward as a single development proposal, so long as such proposals can demonstrate that it meets the requirements of draft Policy AAP1 and supporting text contained at paragraph 4.7 i.e. that they do not prejudice the development of the remaining parcels. For example, the development of one</p>		
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					development parcel could include the provision of significant infrastructure that could unlock the development potential of the remaining site allocation sites.		
25	RTAAP138	TH 9	No	No response given	<p>b) iii Urban design and character including tall buildings</p> <p>Muse Developments and the CRT support Policy AAP6 that directs the highest density development to Growth Areas and the taller buildings within the AAP area towards, amongst others, Ferry Lane.</p> <p>We note that Policy AAP6 is supported by the Urban Characterisation Study (2015) that ensures that the height of new buildings respond and help to define the surrounding character, whilst optimising opportunities for intensification and regeneration in order to help create legible neighbourhoods.</p>	It needs to be made clear therefore that only the garage site (which currently lies within the Green Belt) should respond to the openness of the Green Belt. All other proposals will need to respond to Policy DM5 'Locally Significant Views and Vistas' and DM6 'Building Heights' that collectively set out a detailed criteria for assessing proposals for taller buildings.	<b>Agreed. This will be amended to clarify that openness relates to the development of the Garage site but that development of the whole site will need to have regard to the site's location within the Lee Valley Regional Park.</b>

					<p>However, we note that the <b>site specific 'Development Guidelines'</b> on page 129 states that <i>"Building heights will have to respond to the proximity and 'openness' of the Green Belt"</i>.</p> <p>The National Planning Policy Framework (NPPF) is clear that the essential characteristics of Green Belt is its openness and permanence (paragraph 79). However, the same paragraph of the NPPF also states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping the land open. There is no specific policy requirement in the NPPF in relation to the setting of the Green Belt, and in this respect the NPPF itself does not provide guidance in respect of sites adjoining the Green Belt.</p> <p>It needs to be made clear therefore that only the</p>		
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					garage site (which currently lies within the Green Belt) should respond to the openness of the Green Belt. All other proposals will need to respond to Policy DM5 'Locally Significant Views and Vistas' and DM6 'Building Heights' that collectively set out a detailed criteria for assessing proposals for taller buildings. We make further comments on those policies in (d) below.		
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Respondent 26: Christine Protz

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
26	RTAAP139	TH 9	Not stated	Not stated	I have lived in Tottenham for over 70 years, and the marshes, with the length of the Lea Navigation/River from Edmonton to Hackney at its heart, have given residents a small taste of the countryside, a place to roam, to enjoy the open air and the flora and fauna. This has	In summary, no development should be higher than that currently on this site	The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to

				<p>been particularly important for me as a child, for my children and now my grandchildren. It should also be noted that people have paid quite considerable prices for apartments at the privately owned Pavilions because of the views and access to enjoyable walks and places for exercise. This will be a real blight on the <b>plans for 'gentrification' of our area</b></p> <p>The proposal is to erect 4 to 6 storey buildings along the length of the wharf site, and IN ADDITION three blocks of 14, 15 and 21 storeys, completely destroying the light, openness and aspect of the Marshes and nearby nature reserves such as The Paddock and the Wetlands. This site is not a common or garden brown field site, but borders on the Walthamstow wetlands and the Tottenham Marshes and will completely wreck the once open nature of this part of Tottenham. Tottenham has very little going for it, especially the very eastern edge, and the Marshes have long been our secret gem, enjoyed by many, many people</p>	<p>proposals shown at this public consultation rather than to the specifics set out in the allocation for TH9 : Hale Wharf. However <b>the developer's pre-application proposals and consultation is outside the scope of the Council's Local Plan</b> consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for</p>
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				<p>in the local community and further afield.</p> <p>The proposed tower blocks are completely out of keeping with this area, and a vicious kick in the teeth to local people. It says everything about how we are regarded. You need only look at the River Lea as it goes through industrialised Edmonton to see what a blight this development will be on the area. This is reminiscent of the ugly part of our history when the local Council chose to use the Marshes for dumping refuse.</p> <p>I therefore completely object to the proposed three tower blocks and have considerable reservations regarding the other buildings along the length of the Wharf. In summary, no development should be higher than that currently on this site.</p> <p>It is also important to note that this development is not needed in relation to the five year housing zone target for Haringey, so this argument cannot be used</p> <p>I would be grateful if you</p>		<p>Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The site allocation is needed to ensure the Local Plan meets objectively assessed housing <b>need and the Borough's</b> strategic housing requirement over the plan period, 2011-2026.</p> <p>No change.</p>
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					I understand you represent the developers for the land on Hale Wharf, Tottenham Lock, and you are currently consulting on the proposals. I would like you to consider this email as a formal objection to the current proposals		
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Respondent 27: Marc Roach

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
27	RTAAP140	TH 9	Not stated	Not stated	<p>I am writing to object to the plans for the proposed Hale Wharf Development.</p> <p>The building of towers on this sight is completely inappropriate - it is next to a nature reserve.</p> <p>I am completely opposed to the building of anything higher than 4 stories on this development.</p>	Not specifically stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is outside the <b>scope of the Council's Local Plan</b> consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by</p>

							<p><b>Haringey's technical evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study.</b> The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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**Respondent 28: Amar Shazad**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
28	RTAAP141	TH 9	Not stated	Not stated	1. The current warehouse buildings on the stretch of land are approximately 3 storeys high. The proposals ask for buildings which are 5/6 storeys high. This is inconsistent with the established precedent of the existing buildings along that side of the canal of 4 storeys.	Not stated	The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b>

				<p>2. The high rise buildings again are also inconsistent with the area. It cannot be compared to Hale Village, which not only has smaller buildings, but is on the other end of the canal and the other side of the Lea Valley Regional Park. These proposed buildings will not only dominate the skyline but the area around Hale Village will be overshadowed. We will lose a significant amount of sunlight. Wind tunnels will be increased, from what we already have. The sense of openness in the area will be lost and the "entrance" to the Lea Valley Regional Park will be destroyed. The area will become a giant, ugly and clustered housing zone. This development will almost act like a canyon, dwarfing everything else in an area which does not merit it. I believe that the development at the proposed height will have a wider negative implications. I am sure that you are aware that most of the comments from the public consultations were negative. The residents of the 4 Pavilions Blocks in Hale Village (280 flats) are also against the proposed plans.</p> <p>The area is already clustered, and with regeneration of the area what</p>	<p>Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, <b>as supported by Haringey's</b> technical evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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					<p>the public wanted was more "open space" and this has not been achieved and won't be achieved by building more high rise flats and skyscraper buildings. This will result in a concrete jungle rather and have adverse effects on the regional park, one of the only true areas of outstanding beauty in London.</p> <p>Ultimately all three of the high-rise flats and the remaining 5-6 floor buildings are unacceptable in area of outstanding beauty, which has been designated to become the biggest wetland area in Europe. I believe that any development on the brownfield site should be no higher than 4 storeys, to remain consistent with what is already there and to avoid destroying the open aspect of the area.</p> <p>Haringey Council is able to meet it's target without creating such vast numbers of housing on such a small piece of land right next to our regional park.</p>		
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Respondent 29: Catherine Collingborn

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure / Para					
29	RTAAP142	TH 9	Not stated	Not stated	<p>The CRT and MUSE proposed development includes three blocks of 14, 15 and 21 storeys right next to the river and right within the Lee Valley Corridor, part of the Lee Valley Park Green Belt. This is totally unacceptable.</p> <p>They will blight the Lee Valley Park which is a major community leisure resource. They will dominate the landscape, overshadowing the Paddock and destroying the long views north and south along the river and also block the views of many residents in the present Hale Village. They will also destroy the feeling of openness in walking along the river.</p> <p>Buildings should step down into the Green Belt and heights should respond to existing street hierarchy. The buildings should have a maximum of 6 storeys on the west side and 4 storeys on the east side.</p> <p>This development would provide 405 new homes. The target for Tottenham is 5000. The Council has assessed that the planned sites will deliver 5,607 homes well over</p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, <b>as supported by Haringey's</b> technical evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions</p>

					the target so none of these blocks are in fact necessary.		<p>and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The site allocation is needed to ensure the Local Plan meets objectively assessed housing need <b>and the Borough's strategic housing</b> requirement over the plan period, 2011-2026.</p> <p>No change.</p>
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Respondent 30: Peter Corley

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
30	RTAAP143	TH 9	Not stated	Not stated	The buildings are too tall as envisaged at present. 15 and 21 storey blocks will be too close to the existing Hale Village ones, it will be like a Manhattan style concrete valley ruining the vistas up the Lea valley.	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is outside the <b>scope of the Council's Local Plan</b> consultation.</p> <p>Policy TH 9 does not prescribe or set</p>

							<p>maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical evidence base</b>, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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**Respondent 31: Cyrus Razavi**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
31	RTAAP144	TH 9	Not stated	Not stated	With regards to proposals for high rise buildings near Tottenham Lock, I object because it will ruin the rural	Not stated	The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the

					<p>nature of this area, which is a precious and scarce resource in London. Housing targets can be achieved without ruining the natural environment of the the gateway to the Lea Valley.</p>	<p>consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported <b>by Haringey's technical evidence base</b>, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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Respondent 32: Lewis Jardine

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
32	RTAAP145	TH 9	Not stated	Not stated	<p>I just want to say 'No!' this is a total farcical proposal combining high rises against a nature reserve coupled with the potential future social issues that might be spawned by the next generation of tower blocks in a socially deprived area.</p> <p>However, I am not anti-redevelopment, just that buildings should be no higher than the those already on the island and should really be set back from the canal (like the existing ones) so that they do not overhang it and create a canyon like effect.</p> <p>Even observing the principles above a good number of new homes could be provided.</p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported <b>by Haringey's technical evidence base</b>, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings.</p>

							<p>The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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Respondent 33: Yvonne Spyrou

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
33	RTAAP146	TH 9	Not stated	Not stated	In response to the Consultation on the current proposal for development of Hale Wharf, I would strongly suggest that this site is neither suitable nor appropriate for buildings of 14, 15 and 21 storeys because the land is part of the Lee Valley and would impinge on the sense of openness in this area.	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to</p>

							<p>consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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**Respondent 34: Stanley Knill**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
34	RTAAP147	TH 9	Not stated	Not stated	I object to the erection of <b>any</b> buildings over 6 storeys high at Hale Wharf.  In particular I object to the three	Not stated	The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site,

				<p>proposed blocks that are 14, 15 and 21 storeys tall.</p> <p>The reasons for my objections are:</p> <ul style="list-style-type: none"> <li>• Tottenham is not New York. It is not Chicago. It is a predominantly low-rise area. These three blocks are of inhuman proportions and they would totally dominate this area if they were built.</li> <li>• To build them on this site, the gateway to the Lea Valley, is totally inappropriate. Tottenham Lock and Hale Wharf currently have a sense of open-ness - these monster blocks would totally destroy this.</li> </ul> <p>These monster towers would overshadow the Paddock nature reserve and reservoirs nearby.</p> <ul style="list-style-type: none"> <li>• These proposals are just another example of a developer from outside an area trying to bulldoze through its dystopian view of the future, regardless of the wishes of local people and the destruction that they cause. All so they can make money and feel important at our</li> </ul>	<p>and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is outside the scope of the <b>Council's Local Plan consultation.</b></p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical evidence base</b>, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected</p>
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					expense. I bet <b>they</b> don't live in the kind of area that they want Hale Wharf to be.		infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.  No change.
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Respondent 35: Neha Garg

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
35	RTAAP148	TH 9	Not stated	Not stated	<p>I would like to register my objection to the building plans at the Hale village Wharf/Tottenham Lock site.</p> <p>I have seen the plans for the proposed buildings and I would like to register my objection to the big 14, 15 and 21 story towers being proposed. This will dominate the skyline, end the sense of openness, overshadow the Paddock and the <b>reservoirs, and create a "canyon"</b> like effect with the 12-storey pavilion blocks of Hale Village on the other side.</p> <p>Since there are already plans to build 4-6 story buildings along most of the Hale village Wharf site, to which we have no objections, NB <b>Haringey can still meet it's 5 year</b></p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within</p>

					<p>Housing Zone target of 2,000 homes within 5 years, and 5,000 in total at Tottenham Hale, without building so high on this site.</p>		<p>the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The site allocation is needed to ensure the Local Plan meets objectively assessed housing need <b>and the Borough's strategic</b> housing requirement over the plan period, 2011-2026.</p> <p>No change.</p>
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Respondent 36: Lorenzo Lodi

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure / Para					
36	RTAAP149	TH 9	Not stated	Not stated	<p>I own and live in a flat in Tottenham Hale and I would like to express my strong objection to the development of the hale wharf.</p> <p>The reasons for this are:</p> <p>1) overpopulation of an area already overcrowded, whose station and shops already at capacity.</p> <p>2) High rise buildings will dominate the skyline, end the sense of openness, overshadow the Paddock and the reservoirs, <b>and create a “canyon” like effect.</b></p> <p>I consider the Lee valley an area completely inappropriate for such tall buildings and for this sort of developments.</p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council’s Local Plan</b> consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported <b>by Haringey’s technical evidence</b> base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham,</p>

							planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.  No change.
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### Respondent 37: Kunal Gupta

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
37	RTAAP150	TH 9	Not stated	Not stated	<p>My name is Kunal Gupta and I am a resident of Crane Heights, one of the Pavillions buildings, part of the Hale village.</p> <p>I would like to register my objection to the building plans at the Hale village Wharf/Tottenham Lock site.</p> <p>I have seen the plans for the proposed buildings and I would like to register my objection to the big 14, 15 and 21 story towers being proposed. This will dominate the skyline, end the sense of openness, overshadow the Paddock and the <b>reservoirs, and create a "canyon"</b> like effect with the 12-storey pavilion blocks of Hale Village on the other side.</p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within</p>

					<p>Since there are already plans to build 4-6 story buildings along most of the Hale village Wharf site, to which we have no objections, NB <b>Haringey can still meet it's 5 year</b> Housing Zone target of 2,000 homes within 5 years, and 5,000 in total at Tottenham Hale, without building so high on this site.</p>		<p>the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The site allocation is needed to ensure the Local Plan meets objectively assessed housing need <b>and the Borough's strategic</b> housing requirement over the plan period, 2011-2026.</p> <p>No change.</p>
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Respondent 38: Fred Clark

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure / Para					
38	RTAAP151	TH 9	Not stated	Not stated	<p>The wide open spaces and wide views give the Lock area a special quality, an entry as it were to the Lea Valley.</p> <p>The developer's plan must be stopped. The sense of openness will be lost.</p> <p>This is not an area for buildings of 4 to 6 storey high along much of the Hale Wharf culminating of one of 21 storey.</p> <p>Please ensure the Council rejects the plan.</p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions</p>

							and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.  No change
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### Respondent 39: Alex Tennyson

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
39	RTAAP152	TH 11	No	Yes	I feel the points in your plan directly contradict each other, in particular the line "The quantum of dedicated employment floor space on the site should match that originally built on the site." As your plan itself states, the intention is to cooperate with the local community, which is already providing jobs and services, mostly to the creative industry. This line is a nod to regressive thinking and shows a confusion in your plan on how best to proceed with this development. The	I believe your plan should focus solely on three points: - Ensuring landlords comply to regulations for both commercial and residential properties. Closing down dangerous and over populated properties and encouraging responsible and productive live work usages of the current properties. - Redevelopment of unused properties to ensure there is no uninhabited buildings on the estate. This is the most sensible element of your plan and should be the focus of any	It appears that the respondent is referring to the Preferred Options consultation document of the TAAP 9 (Feb 2015). The wording relating to the <b>'quantum of employment floor space' was amended and now reads 'The quantum of dedicated employment floor space on the site should be maximised.'</b> TH11 will ensure that future proposals for the site will increase accessibility and provide increased employment floorspace and warehouse

					<p>very existence of a planning consultation creates uncertainty which in turn inhibits the growth of the already prosperous creative community. As director of a young business resident on the estate it is already affecting my development plans. I find the line quoted above particularly worrying as it is quite clear that any comparison to original purpose of this site (primarily light industry producing textiles) is quite irrelevant to the current will of the local economy or the local demographic. Given that the floor space requirements of current resident industry and businesses is different and given that you also state in your plan that you will "Allow for warehouse living." I am concerned that there is already a conflict of interest in your own plan. I suggest a deeper consultation with the local community, I think that vast improvements could be</p>	<p>redevelopment efforts. - Redevelopment should look at the feasibility of connection up to the quietways network between the new Tottenham Hale District Centre and Markfield Park and the River Lea via a combination of Ashley Road, Fountayne Road and Markfield Rd should be enabled through development in this area.</p>	<p>living accommodation, to maintain and sustain the creative industries operating from this site. Any future proposals for the site will be assessed against all relevant Local Plan policies.</p> <p>No change</p>
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					made to the local area's connectivity and desirability (some of which you correctly identify) without drastic changes the current usages. I do not have the figures to back this up but my instinct tells me that this is already a growth area in Haringey and that your shoddy plan is a thinly veiled attempt to move developers in and tenants out without the public outcry that your cack handed actions deserve.		
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**Respondent 40: Margaret Burr and Noel Treacy**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
40	RTAAP153	AAP 5	No response given	No response given	We feel that the Council does not value the heritage of the area as can be seen in the destruction of Edmonton Dispensary; The Red House and the former White Hart Public House. That they can be so lightly discarded for the access or exit from a sports facility, which is unlikely to last for the	Not specifically stated	Comments noted. Previous planning decisions are outside the scope of this Local Plan consultation. Future proposals relating to heritage assets will be assessed against all relevant Local Plan policies.  No change

					<p>length of time these buildings have, is dismaying.</p> <p>Bruce Castle: this magnificent building has been allowed to deteriorate whilst buildings in other parts of Haringey have been prioritised for Heritage Lottery applications. Other boroughs such as Enfield and Redbridge have rebuilt their heritage assets to improve <b>residents' experience</b> of their local history.</p> <p>7 Bruce Grove: the site of our only English Heritage Blue Plaque in Tottenham continues to deteriorate when it should have had a CPO.</p>		
40	RTAAP154	AAP 6	No response given	No response given	While not objecting in principal to the construction of tall buildings some have been proposed which are inappropriately out of scale for the area such as Apex House and Hale Wharf. In addition the bland designs of both complexes have little in common with the character of the area.	Not specifically stated	<p>Comments noted. Until such time as the new policies of the Local Plan are adopted, they can only form a material consideration in determination of planning application currently before the Council. Therefore, previous planning decisions are outside the scope of this Local Plan consultation.</p> <p>No change</p>
40	RTAAP155	TH 9	No response given	No response given	The proposals for high rise buildings along the River Lea and close to the new	Not specifically stated	The Council is aware that a public consultation has been undertaken in relation to a potential future

				<p>Walthamstow wetlands are inappropriate and unnecessary. The plan refers to the importance of green spaces but a development such as this will destroy the openness and views which we currently enjoy and will destroy the rural atmosphere of this stretch of the River Lea and Paddock Community Nature Park. There is no reason for the height but low rise buildings of 6 storeys would be adequate</p>	<p>planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical evidence</b> base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and</p>
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							<p>expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
40	RTAAP156	SS 5	No response given	No response given	<p>Wards Corner could provide a dynamic and idiosyncratic entry to Tottenham but years of neglect by the Council and authorities and a desire to provide retail space for the 'chains' (just when other areas are moving away from the Nexts, Pizza Expresses et al), means that the potential of Wards Corner as a hub with opportunities for local independent small scale quality businesses, as well as artistic ventures, has not been properly explored. We want to live in a community which values the vibrancy of the market.</p>	Not specifically stated	<p>Comments noted. SS5 requires that the market is re-provided on site as part of a proposal for the site. As set out in the Site <b>Requirements of SS5, 'the new market will be required to provide a range of small and affordable units suitable for independent traders.'</b></p> <p>No change</p>

Respondent 41: Ben Scanlon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
41	RTAAP157	TH 11	No response	No response	"TH11. This area includes part of <b>the O'Donovans site. The other</b>	Not specifically	<b>Fountayne Road's industrial</b> heritage value is recognised and

			given	given	<p>part of their site will be affected by Crossrail 2. The operation is a blight on residents of Ferry Lane estate through its noise and, sometimes, dust. The operation is also a blight on Markfield Road – danger, dirt and mud, and an appalling road surface. If the operation will have to move at some time, then the Council should be working to secure the greatest benefit by working with the company to move them earlier rather than later – when land to relocate them in NE Tottenham industrial estates is still available and affordable."</p> <p>I disagree with the above profoundly. Tottenham's distinctive character is contributed to, and substantially so by having some industrial areas.</p> <p>There is very little more boring than a dull suburb entirely given over to residential use. I like walking past the Markfield Road site with its grimy ambience, trucks etc, and am pleased that it and other light industry is in my suburb. Tottenham has a long industrial history and those who do not like it could consider</p>	stated	<p>TH11 will ensure that employment use of this area is protected and employment floorspace is maximised. The site is designated as a Regeneration Area which allows employment led mixed use development, with an element of residential use which supports new and existing employment floorspace within mixed use premises. This <b>designation reflects the Council's</b> aspiration to re-introduce creative employment uses to the area.</p> <p>No change</p>
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					moving to another suburb that doesn't have such a history, if it offends them.		
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Respondent 42: Empyrean Developments Limited

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
42	RTAAP158	TH12	No	Yes	Site Allocation Herbert Road (TH12) provides a redline map, which is incorrect as it excludes an annex to a building which is incapable of remaining and nor self-supporting if the buildings within the redline are demolished. Please refer to the report for more detail. The site boundary has been repeatedly identified as wrong and acknowledged by the Local Authority. However, the error remains in the AAP.	The map needs to be corrected as per page 4 of our accompany submission "Statement of Case TH12 – Herbert Road, dated 4th March 2016	<b>Noted. For accuracy, the map boundary will be amended to include the annex building.</b>
42	RTAAP159	TH12	No	Yes	Site Allocation Herbert Road (TH12) provides indicative development capacity figures for the Herbert Road site. Empyrean wishes to contest these figures, where Policy TH12 is considered unsound as it is not justified or	The indicative development capacity figures as outlined in TH12 need to be changed to reflect the reasons as outlined in the	Disagree. The indicative development capacity for TH12 has set in accordance with the standard methodology set out in Appendix A of the TAAP. The development capacity attributed to the site is indicative and not prescriptive. The number of

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>effective.</p> <p><b>1)The policy is unsound as it is not justified</b>  The indicative figures for this site within the Tottenham AAP - Site Allocations are significantly different from <b>Empyrean's own research</b> and work, which in part was completed with GVA on half of Haringey Council.</p> <p><b>2) The Policy is unsound as it is not justified</b>  The London Plan 2015 density matrix indicates that in urban locations a density of 200-700 habitable room per hectare or between 70-260 units per hectare is acceptable. Given the site area at approximately 0.7 ha the figure of 66 net residential units is low. Based on this figure this assumes an equivalent figure of 1ha = 94.3 units. This is within the density range, however is considerably low and does not fully satisfy</p>	<p>document submitted. The indicative capacity figure needs to be flexible and non prescriptive, setting out a minimum figure for both residential and commercial development.  (Continue</p>	<p>residential units and floorspace that may be achieved on the site will be determined by many considerations including design and layout, the size and type of the homes/commercial units to be provided, relevant development management policy requirements, site constraints, scheme viability, the site area available for development and any change in the PTAL of the site.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>London Plan objectives, where:  Paragraph 3.19 of the <b>London Plan states: 'In addition, the process of managing the release of surplus industrial land should focus on bringing forward areas with good public transport accessibility which will be particularly appropriate for high density development'</b>.</p> <p>It is considered that the indicative development capacity figures for both residential and commercial are too low and do not reflect the London Plan objective to <b>deliver 'high density development' in areas with good public transport</b>, where the Herbert Road site has PTAL rating of 6a.</p> <p><b>3) The Policy is unsound as it is not effective</b>  The indicative development capacity figures are not consistent with emerging policy objectives, where:</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>The commentary provided in TH12 Policy specifically <b>highlights that: 'The quantum of dedicated employment floorspace on the site should be maximised through any development. Residential will be permitted to cross subsidise new employment stock, and should be located adjacent to the existing residential uses adjoining the site'</b>.</p> <p>Furthermore, Policy AAP3 of the emerging Tottenham Area Action Plan outlines that: <b>'Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised'</b>.</p> <p>Additionally, Paragraph 5.144 of the same document</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><b>suggests that: 'Employment land in this area will be retained and intensified in order to create a greater job density, whilst recognising that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives.'</b></p> <p>Please refer to the document submitted.</p> <p>The current indicative development capacity figures as outlined in Policy TH12 do not reflect the objective of higher density employment uses. It is considered that <b>Empyrean's site alone (within the Herbert Road site)</b> can deliver a mixed use proposal of:</p> <ul style="list-style-type: none"> <li>- The site has the potential to deliver approximately of 25,000 sqft commercial floorspace.</li> <li>- The site has the potential to deliver approximately 121 residential units.</li> </ul>		
42	RTAAP160	TH12	No	Yes	Limiting the redline defining	The site needs to	Norman Road is designated as

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>the boundary to TH12 to only the existing properties is unjustified if we consider paragraph 5.144 of the AAP document suggests that: <b>'Employment land in this area will be retained and intensified in order to create a greater job density, whilst recognising that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives.'</b></p> <p>Paragraph 5.145 goes on to <b>state that "The South</b> Tottenham employment area is establishing itself as a creative node with a reputation that is becoming known across London. There is the opportunity to build on this success by retaining existing industrial buildings and converting them to viable uses such as exible work spaces and creative workshops. This in turn will</p>	<p>be expanded, to include 2 Norman Road, as described in detail in document submitted.</p>	<p>Local Employment Area: Employment Land (EL). This designation means that the land is deemed acceptable for other employment generating uses that <b>complement the traditional 'B'</b> uses, but is not appropriate for mixed use development. This is supported by the Haringey Employment Study 2015.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>create opportunities for start up rms to grow in this area, complemented by an emerging warehouse living area.”</p> <p>With reference to the document submitted, Empyrean would contest that the Redline for TH12 should therefore be extended to include the adjoining property as described therein. This would have the added benefit of facilitating development.</p>		
42	RTAAP161	BG3	No	Yes	<p>Empyrean Developments with the owners of the Regency Banqueting Suite, which is one of the subject properties under this Site Allocation, has commissioned a Heritage Statement of Significant by Fuller Long Planning Consultants. Please refer to the report for more detail. Empyrean would contest the Heritage value of the subject building. The Local Authority has overstated the merit of the Banqueting Suite. The</p>	<p>The following paragraph should be amended from:  " The public toilets, entrance to the former cinema, and the Banqueting Suite frontage are significant heritage assets, and will be retained and brought back into active use."  To</p>	<p>Not agreed. The site is within a Conservation Area and the building is locally listed. Demolition of the existing building is therefore not permitted within the current statutory requirements.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>property's Heritage value cannot justify the constraint on development the Council would take if this policy is adopted.</p> <p>The constraint imposed would contradict policies both within the London Plan and within numerous other Haringey adopted documents, promoting high density schemes in High PTAL locations.</p> <p>Empyrean has commissioned various massing studies which support 1018 Hab Rooms/ Ha on BG3 but acknowledges that density in a High PTAL location must be a design lead matter.</p> <p>(Conservation report included)</p>	<p>" The public toilets and entrance to the former cinema are significant heritage assets, and will be retained and brought back into active use."</p> <p>AND from: "A sensitive additional storey extension to the Banqueting Suite will be acceptable where it can be demonstrated that it enhances the setting and character of the building, and the wider conservation area."</p> <p>To "Whilst there is a presumption in retaining the Banqueting Suite, a high quality design lead</p>	

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
						approach will warrant the demolition of the Banqueting Suite where it can be demonstrated that it enhances the setting and character of the building, and the wider conservation area."	

Respondent 43: Colliers on behalf of Diamond Build PLC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
43	RTAAP162	TH13	Not stated	Not stated	Diamond Leasing Ltd is the sole freehold owner of a large proportion of "Proposed Allocation TH13: Constable Crescent" (see Appendix A). The site has been occupied for a number of decades by a subsidiary of this company, Diamond Build Plc, who are a local	Site Allocation 5.177 <del>Potential development to increase accessibility, provide increased employment floorspace and warehouse living accommodation.</del> <b>Potential redevelopment of the sites for commercial-led mixed use development with</b>	The Council considers TH13, along with SP8, and DM38 and 39, and other relevant policies, to be sufficiently robust and flexible to protect and manage the stock of industrial, while supporting mixed-use schemes where they

				<p>building contracting business. It is used as the <b>firm's national Headquarters</b> and primary office location. The site is currently arranged as a builders yard with a significant office floorspace functioning alongside external and internal storage. The contracting industry has changed significantly since the firm took control of the site. Material is no longer stored at central locations, but is typically delivered directly to site. This has meant that the level of required storage has significantly reduced. The site is therefore no longer fit for purpose and operates primarily as an office.</p> <p>Our client wishes to build a bespoke purpose built unit which meets the business needs of Diamond Build Plc (approx. 500 sqm). They are seeking to self-build the development, which will allow them to showcase their work, create employment and ensure that the development is</p>	<p><b>residential.</b></p> <p><b>Proposed commentary:</b></p> <p>5.178 This area has a range of buildings of variable quality, <b>many of which are underutilised and produce unsuitable neighbours for the existing surrounding residential uses</b>, which has the <b>redevelopment potential to accommodate</b> a mix of employment and <b>residential floorspace</b> <del>warehouse living accommodation</del> in the South Tottenham area. <b>By introducing new employment floorspace, facilitated by new homes in the area, this site</b></p> <p>Site Requirements</p> <ul style="list-style-type: none"> <li>▪ The site will be given a Designated Employment Area: Regeneration Area <b>status to reflect the Council's</b> aspiration to create a mix of uses on this site through the re-introduction of <del>creative</del> employment uses.</li> <li>▪ The quantum of dedicated employment floorspace on the site should be maximised</li> </ul>	<p>facilitate site regeneration and renewal.</p>
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				<p>delivered to a high design and specification standard. They also propose to deliver additional Class B1 floorspace, with a capped rent where possible, to allow more businesses to operate from the site. Due to the low land values for employment uses in the area, there is a need to introduce a higher value use to deliver our clients scheme. Therefore, it is proposed to undertake a comprehensive redevelopment of the site for a mixed use employment (Class B1) and Residential (Class C3) scheme within the next 5 years. The inclusion of our clients site (Constable Crescent) as a <b>defined “Local Employment Area: Regeneration Area” in Policy AAP4 “Employment”</b> is essential to delivery our clients vision for the site as is considered justified, effective and consistent with national policy.</p> <p>A full project team has been appointed and initial viability and design work has been undertaken to take into</p>	<p>through any development. Residential uses will be permitted only <del>on the Stamford Road frontage</del> to cross-subsidise new employment stock <b>and should be located in the most appropriate location taking into account site constraints and opportunities in order to maximise the level of commercial floorspace deliverable on site.</b> <del>adjacent to the existing residential uses adjoining the site.</del></p> <ul style="list-style-type: none"> <li>▪ Capped commercial rents may be expected in this area in line with Policy DM38.</li> <li>▪ An element of Warehouse Living will be accepted on this site. This will be required to be in conformity with the requirements of Policy DM39.</li> </ul> <p>Development Guidelines</p> <ul style="list-style-type: none"> <li>▪ Reintroducing suitable employment generating uses is the key aim of this policy.</li> <li>▪ This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a</li> </ul>	
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				<p>consideration the sites constraints and opportunities, together with the operational needs of Diamond Build Plc. In terms of viability and site capacity, there is a need to accommodate approximately 50 residential units into the scheme in order to deliver approximately 1000sqm of employment floorspace. The employment floorspace would utilise the ground floors and the supporting residential would be located on upper floors, to enable active frontages along Stamford Road and Constable Crescent which will provide natural surveillance. This is considered a key design criteria when taking into account the level of anti-social behaviour (including graffiti) that our client has experienced over the years. Taking into account our viability appraisals, to ensure that the entire allocation can be delivered there is a need to amend the “Indicative Development</p>	<p>decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.</p> <ul style="list-style-type: none"> <li>▪ Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.</li> <li>▪ <del>Development along the edge of the retained South Tottenham LSIS area should be employment only, to avoid the creation of unsuitable neighbouring uses.</del> <b>Development should be design-led, taking into consideration site specific constraints and opportunities to ensure that the maximum deliverable employment floorspace is delivered on site.</b></li> <li>▪ The creation of development which overlooks the park on Stamford Road will be supported to improve passive surveillance.</li> </ul>	
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				<p><b>Capacity” to a more realistic number.</b></p> <p>There is a real need to ensure that the supporting <b>text included for “Allocation TH13: Constable Crescent”</b> reflects the work that has been undertaken and supports the redevelopment of our clients site to safeguard the long term future of the business in the area. The only other alternative would be for the firm to move outside of London and the site would revert to the highest value light industrial use for the site, a builders / plant yard / merchant, whereby the existing building and site layout would be retained. However, this would not meet the regeneration aims of the area and would have negative impacts on the amenity of the surrounding residential units.</p> <p>With this in mind, we request the following amendments to Allocation TH13: Constable Crescent:</p>		
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Respondent 44: Mrs Ruiyon Zhou

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
44	RTAAP163	SS5	Yes	Yes	Please either resettle me or make relevant decision. There are rats and pests. We live in appaling conditions. We are not well.	Please act to resettle us elsewhere, as this dwelling is desperate.	Noted.

## Appendix J - Responses to the Pre-Submission Tottenham Area Action Plan DPD Consultation – Document Order

### Chapter 1

Respondent 25: Quod obo Muse Developments and the Canal and River Trust

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	RTAAP135	Tottenham growth area Figure 1.4	No response given	No response given	Overall, Muse Developments and CRT welcome the generally positive approach taken in the Area Action Plan which identifies the site, at its outset, in the Tottenham Growth Area (Figure 1.4) and the requirement to maximise site opportunities in that location.	As above.	Noted, although it is not about 'maximising site opportunities' but rather 'optimising site opportunities'.

### Chapter 2

Respondent 3: Cllr Lorna Reith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RTAAP11	Para 2.65	Not stated	Not stated	I welcome the inclusion of <i>"New public spaces need to be added and existing spaces significantly improved... opportunities to provide open space as part of major development"</i>	So in terms of wording, I would suggest amending 2.65 (as set out in the response from Tottenham and Wood Green Friends of the Earth) to read <i>"Some development will"</i>	The suggested changes are considered to add an unnecessary level of detail for an introductory section highlighting key challenges and opportunities. Further, the Local Plans seeks to

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><i>schemes or master plans developed in Tottenham will be encouraged</i>". This needs to be considerably strengthened. Green open space has already been lost (railway expansion at Tottenham Hale) and more is at risk (proposed housing development along Monument Way), and more is likely to be lost if the level of proposed housing does get built. While accepting that some new open space will be created the plan lacks an overall assessment of the amount of space <b>being lost; so it isn't clear if</b> there will be a net gain or loss. The proposed increases in population require an increase in open green space and the plan should specifically accommodate that.</p> <p>There are actions that can be taken to protect and enhance the green space that exists and in doing so</p>	<p><i>lead to loss of green open space and natural habitat, for example the three-tracking and Crossrail 2 works at Tottenham Hale. New public spaces need to be added and existing spaces significantly improved including access improvements so that each part of Tottenham has a quality network of green and accessible space that supports a diversity of nature. The Council will monitor gains and losses and ensure a net gain. Opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged including opportunities at Ermine Road and Plevna Crescent</i>".</p>	<p>protect against the net loss of open space and biodiversity, and the Council therefore disagrees with parts of the suggested wording. Monitoring arrangements are discussed in Chapter 6 and need not be repeated here.</p> <p>Such requirements are also set out in Policy AAP 9: Tottenham Green Grid.</p> <p>No change.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>help preserve local wildlife. Actions it would be good to see included are:</p> <ul style="list-style-type: none"> <li>• Ensure that green corridors provide high quality natural habitat.</li> <li>• Making new developments really green – on their roofs (where not suitable for PV panels), walls and open spaces, with bird- and bat boxes integrated into structures and with appropriate mix of native species.</li> <li>• Actively conserve species we do have – for example the small colonies of House Sparrows in South and North Tottenham. Sparrows depend on access to roof space, which means they do best in older streets. Building renovation often blocks such access so it is important</li> </ul>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					to ensure it is replaced when renovation occurs.		

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	RTAAP20	Paragraph 2.65 Green Space	Not stated	Not stated	<p><b>“New public spaces need to be added and existing spaces significantly improved... opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged”.</b> (but 2.66 goes on <b>“increasing the quantity of open space is difficult in an urban borough”.</b> The Plan does not acknowledge that green open space is already at risk (eg due to railway works, potential housing development at Plevna Crescent, and proposed housing along</p>	<p>So in terms of wording, we suggest amending 2.65 to read  <i>“Some development will lead to loss of green open space and natural habitat, for example the three-tracking and Crossrail 2 works at Tottenham Hale. New public spaces need to be added and existing spaces significantly improved including access improvements so that each part of Tottenham has a quality network of green and accessible space that supports a diversity of nature. The Council will monitor gains</i></p>	<p>The suggested changes are considered to add an unnecessary level of detail for an introductory section highlighting key challenges and opportunities. Further, the Local Plans seeks to protect against the net loss of open space and biodiversity, and the Council therefore disagrees with parts of the suggested wording. Monitoring arrangements are discussed in Chapter 6 and need not be repeated here.</p> <p>Such requirements are</p>

				<p>Monument Way), and that more will be lost if its vision comes to be. Some will be created – we welcome for example the Green Grid across Tottenham Hale and the proposed Bruce Grove Wood SLOL (though we seek clarification on how the latter will be created). But there seems to be no overall assessment of space being lost; so it <b>isn't clear if there will be a net gain or loss</b>; and the rising population means we do need a net increase.</p> <p>At the same time we know that many – and probably most - of our wildlife species are in decline and we need to do much better at providing quality joined-up habitat.</p> <p>So, the Council needs to:</p> <ul style="list-style-type: none"> <li>• work with the local community to look at opportunities, including working with TfL and Network Rail to take Ermine Road and Plevna Crescent open land back into</li> </ul>	<p><i>and losses and ensure a net gain. Opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged including opportunities at Ermine Road and Plevna Crescent</i>".</p>	<p>also set out in Policy AAP 9: Tottenham Green Grid.</p> <p>No change.</p>
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					<p>public ownership, so that the remaining open land can be managed for nature and amenity for when Crossrail 2 is built and Gourley Triangle developed (the developer has not started work at Plevna Crescent despite getting planning permission on appeal last year).</p> <ul style="list-style-type: none"><li>• Ensure that green corridors do provide high quality natural habitat.</li><li>• Make new developments really green – on their roofs (where not suitable for PV panels), walls and open spaces, with bird- and bat boxes integrated into structures and with appropriate mix of native species.</li><li>• Actively conserve species we do have – for example the small colonies of House Sparrows in South and</li></ul>		
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					North Tottenham. Sparrows depend on access to roof space, which means they do best in older streets. Building renovation often blocks such access so we need to ensure it is replaced when renovation occurs.		
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Respondent 19: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RTAAP115	Table 1 & Figure 2.4	Not stated	Not stated	Table 1 lists and Figure 2.4 shows High Road West as 'Locally Significant Industrial Land'.	High Road West should be removed from this designation in the Table to reflect its removal as an LSIS in the Pre-submission version of Strategic Policy SP8. The Haringey Local Plan Strategic Policies 2016 – 2028 Policies Map (January 2016) should also be updated to reflect this change.  <b>32. Similarly, the 'High Road East Local</b>	Noted.  <b>For accuracy and clarity, Table 1 pg 21 and Figure 2.4 pg 22 will be updated to show that High Road West is a Local Employment Area – Regeneration Area as set out in Alteration 110 to the pre-submission version of the Strategic Policies DPD.</b>  Please note that High Road East is a Designated Employment Area and it was N17 Studios that was de-

						<p><b>Employment Area’ should</b> be removed from Figure 2.4 to reflect its de-allocation, as shown on the Haringey Local Plan Strategic Policies 2016 – 2028 Policies Map (January 2016).</p>	<p>allocated. The map incorrectly shows the boundary of the former N17 Studios DEA. <b>The map will be amended and updated to reflect recommendations of the Employment Land Study.</b></p>
19	RTAAP116	Town centres Paras 2.32-2.37	Not stated	Not stated	<p><b>Under the ‘Town Centres’</b> section of the AAP, paragraph 2.32 describes how the High Road in this part of North Tottenham provides a local centre which could benefit from sensitive improvements and investment. Paragraph 2.33 recognises the proposed new THFC stadium development which involves comprehensive redevelopment with a new hotel, significant retail and leisure offer, museum, offices and housing. The first phase of the development is complete and includes a large retail store (Sainsburys).</p> <p>34. Paragraph 2.35 states that there is a need to improve the town centre</p>	<p>However to aid this, the local centre boundary should as a minimum be expanded to include the Sainsburys retail store.</p> <p>This links to the Vision for the North Tottenham Neighbourhood Area set out in paragraph 5.81 of the Tottenham AAP which <b>describes a “substantially improved local centre”</b> and Site Allocation NT5: <b>‘High Road West’</b> which describes an expanded local shopping centre as well as a new local centre opposite the stadium. There needs to be much more clarity within the suite of emerging Local Plan documents as to how the Tottenham High Road North Local Shopping Centre will expand. For example,</p>	<p>Disagree. The current town centre boundary implies a historic designation not representative of the current picture or future proposals as set out in the AAP. The redevelopment of High Road West, including the relocation of the station entrance for White Hart Lane station and the creation of a new public square, will necessitate a redrawing of the town centre boundary to capture the active frontages proposed and to form a more coherent centre. It is unlikely that the Sainsbury store, which is located off the high street some distance down Northumberland Park Road would necessarily fit with this proposals. More appropriate however would be to see the town centre boundary extend to the Spurs Stadium side including the podium</p>

				<p>offer across the whole of the Tottenham area, particularly to increase visitation to the centres and ensure their viability. Paragraph 2.37 states that in North Tottenham, there is a need to realise the investment being made by THFC on their stadium as a catalyst for wider change, ensuring this area becomes a hub of activity through the week and not just on match days. This can be achieved by establishing <b>the location as a “premier leisure destination”</b> in London, whilst also retaining a local retail function to support the community. THFC strongly support the objective that the area becomes a hub of activity through the week and not just on match days. However to aid this, the local centre boundary should as a minimum be expanded to include the Sainsburys retail store.</p>	<p>policy SA3 of the Site Allocations DPD sets out amendments to town centre boundaries. To deliver its vision and objectives and support the effectiveness of the plan, a similar area-wide policy should form part of the Tottenham AAP.</p>	<p>space, which along with the new Moselle Square need to work as one (ideally managed as one) with active town centre uses fronting them/it – this would seem to <b>‘effectively’ provide the boundary of the new local centre.</b></p> <p>It is appropriate this this boundary is only drawn and confirmed once the developments on High Road West and the Spurs stadium are delivered and the town centre uses provided for.</p> <p>No change</p>
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## Chapter 3

Respondent 3: Cllr Lorna Reith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RTAAP3	Para 3.9	Not stated	Not stated	I am pleased to see that the vision <b>includes “much needed higher quality council housing”</b> but it isn't clear if this means more such housing or just improving the quality of the existing stock. Clearly, despite the improvements obtained through the Decent Homes programme, more investment in the existing stock is needed. However, given the acute shortage of good quality housing for people on low and moderate incomes it is vital that the plan provides for additional social housing.	Not stated.	The AAP seeks to deliver both improved existing council housing stock, through estate renewal and the current Decent Homes Programme, as well as new affordable housing within new residential developments. New affordable housing will comprise a range of tenures, from Starter Homes, to low cost market housing, intermediate housing products and social/affordable rent.  No change
3	RTAAP4	Para 3.15	Not stated	Not stated	It is not clear what is meant by <b>“affordable”</b> . <b>The current residents of Tottenham Hale need housing that is affordable for their level of income, not just “affordable” by government definition.</b>	Not stated.	At paragraph 3.15 the terms affordable refers to general market housing for sale or rent within the Tottenham Area, recognising the polarity between Tottenham and other parts of the Borough in terms of land values and rent levels.  No change

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	RTAAP21	Spatial vision	Not stated	Not stated	The plan needs to provide the backing for a big increase in cycling and walking – for health and environmental (air quality and climate change) reasons.	The plan needs to provide the backing for a big increase in cycling and walking.	<p><b>Haringey's Strategic Policies Local Plan</b> already supports this, including through Policy SP 7, which sets out <b>the Council's strategic approach</b> to promoting and facilitating modal shift to more sustainable forms of movement, including walking and cycling. The AAP will help give effect to these policies, including through Policy AAP 7, AAP 9 and <b>requirements on the Plan's site</b> allocations.</p> <p>No change.</p>
4	RTAAP22	Housing Paragraph 3.9	Not stated	Not stated	We welcome the fact that the vision includes “much council housing” but not clear if this means more such housing or just improving quality of existing numbers. We need both.	Change text to make it clear we need more council housing as well as better quality	<p>The vision reflects that housing will be delivered to meet need. The level of provision of social housing depends on many factors including Government policy to extend the definition of affordable housing to include ‘Starter Homes’ and a grant funding regime that prioritises affordable rent tenure at up to 80% market rents.</p> <p>No change.</p>
4	RTAAP23	Housing Paragraph 3.15	Not stated	Not stated	It is not clear what is meant by “affordable” – we need really affordable housing for low income people, not just	Set out affordability definition.	A definition of affordable housing is already included in the glossary (Appendix D). NB: this may change as a result of the Planning & Housing

					“affordable” by government definition.		Act No change.
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Respondent 19: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RTAAP117	Vision & Objectives	Not stated	Not stated	<p>THFC support the ‘Vision’ for Tottenham to become the next great area of London (paragraph 3.1) and consider that the new stadium and associated and supporting development will be an integral part of this. THFC also support the objective in paragraph 3.9 that North Tottenham will become the “premier leisure destination” in London as well as the Spatial Strategy for North Tottenham set out in paragraph 3.23:</p> <p><i>“In the North Tottenham neighbourhood, the new Tottenham Hotspur FC stadium development will provide the catalyst for comprehensive regeneration of both High Road West and Northumberland Park. The</i></p>	<p>As such, to be more effective, THFC consider that this important vision, objective and strategy needs to be supported more strongly in planning policy (as per the comments on Policy SP1 in Section c) above) and that to help delivery it should become an additional Strategic Objective. Proposed wording for Objective 9 is set out below:</p> <p><i>“Objective 9: The premier leisure destination in London</i></p> <p><i>Alongside the successful redevelopment of the THFC stadium the priority in North Tottenham is to ensure that, even on non-</i></p>	<p>The Council see the proposals for North Tottenham delivering upon all eight existing objectives rather than being an objective in its own right. In this respect, the Council considers that paragraph 3.23 sufficiently expresses <b>the Council’s vision</b> for north Tottenham.</p> <p>No change.</p>

				<p><i>priority is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further cement the area's reputation as a premier leisure destination within North London."</i></p> <p>The Tottenham Physical Development Framework and Tottenham Strategic Regeneration Framework, which are cited in paragraph 3.11 of the Tottenham AAP as helping inform the eight Strategic Objectives, both describe in their Vision creating a new leisure destination at High Road West.</p>	<p><i>match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements. We will support developments which further cement the area's reputation as the premier leisure destination within London."</i></p>	
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## Chapter 4

### AAP1

Respondent 3: Cllr Lorna Reith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RTAAP5	AAP1	Not stated	Not stated	I welcome the reference in D to <i>“reduce carbon emissions and adapt to climate change”</i> and I welcome proposals regarding decentralised energy grids. It will be important to ensure that this is given due priority in subsequent negotiations and planning conditions. I would therefore propose that all such mentions in the individual site sections should be in Site Requirements not Site Guidelines.	I would therefore propose that all such mentions in the individual site sections should be in Site Requirements not Site Guidelines.	AAP 1 is an area-wide policy and therefore applicable to all site allocations. Where the Council considers that proposals should investigate opportunities for DE on site allocations, these have been included in the development guidelines to ensure due consideration, having regard to individual site circumstances at the time of an application. The Council disagrees with suggested change, as it may not always be appropriate to require proposals to deliver DE infrastructure.  No change.

Respondent 4: Tottenham & Wood Green Friends of the Earth

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		<b>Figure / Para</b>					
4	RTAAP24	Climate Change AAP 1	Not stated	Not stated	We welcome the reference in D to “reduce carbon emissions and adapt to climate change”. We welcome proposals regarding decentralised energy grids and hope this will be given due priority in subsequent negotiations and planning conditions.	We propose that all such mentions in the individual site sections should be in Site Requirements not Site Guidelines.	AAP 1 is an area-wide policy and therefore applicable to all site allocations. Where the Council considers that proposals should investigate opportunities for DE on site allocations, these have been included in the development guidelines to ensure due consideration, having regard to individual site circumstances at the time of an application. The Council disagrees with suggested wording, as it may not always be appropriate to require proposals to deliver DE infrastructure. A more flexible approach is to include the text in the site guidelines.  No change.

**Respondent 12: Savills on behalf of Interfine Properties**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
12	RTAAP99	AAP 1, SS 2: Lawrence Road Site Allocation , (	No	Yes	<b>1) This policy is unsound as it is not effective:</b> These policies are unclear. It does not give a clear indication to the	<b>Changes Required</b> The policy should make it clear in what form the masterplan is required and should set out the	Disagree. The Policy is clear that the masterplan must show how the proposed development will successfully integrate

		Paragraph A of AAP1 and the 1st bullet point under the Site Requirements heading of SS2:Lawrence Road )			Potential Developer if the requirement for a masterplan is a separate document or if this would be covered in for example the Design and Access Statement as part of any submission. It is also unclear to what extent (area) does the masterplan need to cover.	parameters of the required masterplan.	with existing and proposed neighbouring development. The extent of the masterplan will therefore depend on the nature of the development site in the context of the extent of the site allocation and neighbouring uses. Primarily it seeks to ensure that what is proposed on part of a site allocation will not compromise the development potential of the remaining site, ensuring phased development secures an optimum site-wide outcome. It is anticipated that the masterplan will need to be prepared and consulted upon prior to any detailed planning application being worked up, but can and should still form part of the application pack. It is not appropriate for validation requirements to be set out in the Local Plan.  No change
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Respondent 13: Savills on behalf of Empyrean and Paul Simon Magic Group

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RTAAP107	AAP1	No	Yes	Policy AAP1 is unclear. It does not give a clear indication to the Potential Developer if the requirement for a masterplan is a separate document or if this would be covered in for example the Design and Access Statement as part of any submission. It is also unclear to what extent (area) does the masterplan need to cover.	The policy should make it clear in what form the masterplan is required and should set out the parameters of the required masterplan.	Disagree. The Policy is clear that the masterplan must show how the proposed development will successfully integrate with existing and proposed neighbouring development. The extent of the masterplan will therefore depend on the nature of the development site in the context of the extent of the site allocation and neighbouring uses. Primarily it seeks to ensure that what is proposed on part of a site allocation will not compromise the development potential of the remaining site, ensuring phased development secures an optimum site-wide outcome. It is anticipated that the masterplan will need to be prepared and consulted upon prior to any detailed planning application being worked up, but can and should still form part of the application pack. It is not appropriate for validation requirements to be set out in the Local Plan.

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

Respondent 25: Quod obo Muse Developments and the Canal and River Trust

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	RTAAP133	AAP 1 TH 9	No	No response given	<p>The meaning of “comprehensiveness” should be sufficiently clear so as not to prejudice the development aspirations of component parts of Site Allocations to be realised (particularly where there are multiple development parcels within Site Allocations).</p> <p>It should be clarified that in relation to Site Allocation TH9, “comprehensiveness” means that the various development parcels can come forward individually. The lack of clarify could prejudice the ability to</p>	<p>It should be made clear that in relation to Policy TH9 that “comprehensiveness” does not mean that the entire Site Allocation must be developed at the same time. The policy should be amended and clarified to allow sufficient flexibility for the development aspirations of components part of the Site Allocation to be realised, particularly given the different policy designations affecting component parts.</p>	<p>Agreed as this is effectively the intention of ‘comprehensiveness’. However, it is felt that this clarification is best provided through an addition to Paragraph 4.6. Insert at the end of the third sentence of <b>Paragraph 4.6 “..., whilst enabling the component parts of a site allocation to be developed out separately.”</b></p>

					<p>deliver important and component parts of the Site Allocation and is therefore ineffective and could undermine the deliverability of the Site Allocation over the plan period.</p> <p>More detailed comments are provided in the accompanying cover letter (part (b) (ii))</p>	<p>Making such amendments will ensure an effective policy that allows multiple development parcels within Site Allocations to be developed comprehensively but not prejudice the ability to deliver important and component parts independently.</p>	
25	RTAAP137	AAP 1 TH 9	No	<p>No response given</p>	<p>b)ii Comprehensiveness</p> <p>Whilst Muse Developments and the CRT welcome the need for development proposals in the AAP area to come forward comprehensively (draft Policy AAP1), it is critical that the application of this policy allows sufficient flexibility for the development aspirations of the component parts of sites to be realised.</p> <p>Paragraph 4.7 requires developments to demonstrate, in relation to sites such as Hale Wharf, that: <b><i>“Larger sites on which</i></b></p>	<p>As above.</p>	<p>Agreed as this is effectively the intention of <b>‘comprehensiveness’</b>. However, it is felt that this clarification is best provided through an addition to Paragraph 4.6. Insert at the end of the third sentence of <b>Paragraph 4.6 “..., whilst enabling the component parts of a site allocation to be developed out separately.”</b></p>

				<p><i>there are multiple landowners in order to ensure that proposals are not prejudicing development of the remaining parcels....”</i></p> <p>Site Allocation TH9 identifies the site as incorporating the garage site across the Lea Navigation, the Paddock and the Lock Keepers Cottage to the east. The site specific requirements set out on page 129 goes on to explain that the comprehensive redevelopment for the site is required and that the component sites should be developed as part of a comprehensive proposal.</p> <p>Whilst Muse and the CRT are committed to the development of the site in a co-ordinated manner, this should not create a barrier that could otherwise prejudice the redevelopment of part of the site allocation that could act as a catalyst for further investment in the</p>		
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				<p>other development parcels.</p> <p>The application of this policy needs to consider other crucial planning considerations such as individual development proposals, site constraints, scheme viability and other planning policy requirements</p> <p>Site Allocation TH9 (and its site specific requirements) should therefore make clear that this does not necessarily mean that that proposals for the entire site allocation need to come forward as a single development proposal, so long as such proposals can demonstrate that it meets the requirements of draft Policy AAP1 and supporting text contained at paragraph 4.7 i.e. that they do not prejudice the development of the remaining parcels. For example, the development of one development parcel could include the provision of significant infrastructure that could unlock the</p>		
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					development potential of the remaining site allocation sites.		
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## AAP2

## AAP3

Respondent 3: Cllr Lorna Reith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RTAAP6	AAP3	Not stated	Not stated	Para 4.13 – as referred to above the plan needs to deliver better housing for existing residents of Tottenham Hale, including more genuinely affordable homes as well as bigger homes to ease overcrowding.		The Local Plan seeks to facilitate the delivery of housing to meet objectively assessed need and the <b>Borough's strategic housing target</b> . This includes delivery of a wide range of housing types and tenures, including affordable housing, for both existing and new residents.  No change
3	RTAAP8	AAP3	Not stated	Not stated	A further problem with the plan is that it fails to set out how the housing needs of the existing population will be met. The priority appears to be for new developments which will be one and two bedrooms in size and will not meet the needs of families living in over-crowded, poor quality, insecure,	Not stated.	The Council considers that the Local Plan sets a clear framework to deliver housing to meet objectively assessed need and the <b>Borough's strategic housing target</b> . This includes delivery of a wide range of housing types and tenures, including affordable

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					private accommodation. While accepting that Tottenham will see new people move into the area I am concerned that existing communities across the ward will not see the benefit of regeneration and may in practice find themselves eased out. One of <b>Tottenham's key strengths is the way</b> in which people from across the globe live together, get on and contribute to the borough and society in general.		housing, for both existing and new residents. The Development Management DPD sets out borough-wide policies (applicable to the Tottenham area) to ensure that new housing development is designed to a high quality and is of an appropriate standard. It is worth noting that a new Family Housing Protection Zone, including Tottenham, has been proposed to help ensure a supply of larger and family homes in the area.  No change

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	RTAAP25	Housing policy AAP 3	Not stated	Not stated	The plan needs to deliver better housing for existing people, including more, affordable homes as well as bigger homes to ease overcrowding.	Set this out in the text.	Policy AAP 3 and supporting text reflects the approach to meet objectively assessed housing need for the Borough, including within the Tottenham AAP area. The Plan seeks to deliver improvements in housing choice for both existing and future residents. The DM Policies set out borough-wide

							policies addressing housing quality. No change.
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Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P65	APP 3	No	No response	<p>We argue that several policies and proposals made in the <i>Tottenham AAP</i> <b>do not meet the existing local communities' requirements</b> (from both residents and businesses). On the contrary, they represent an unacceptable <b>attempt to enforce a 'top-down' social and physical re-engineering</b> of large parts of Tottenham to the detriment of current <b>communities and of Tottenham's character</b>. This particular affects Tottenham, as a significant amount of foreseen of development is concentrated in this part of the Borough. Additionally, they fail to demonstrate how the revised Strategic Policies will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and</p>	<p>Lower the 10,000 target, whose burden unfairly falls on Tottenham, and justify how the extra needed social infrastructure, in addition to the existing backlog, would be provided. We strongly oppose the reduction in the affordable housing requirement</p>	<p>The Local Plan seeks to enable the delivery of housing to meet objectively assessed need and the <b>Borough's strategic housing target</b>, having regard to the the spatial strategy for Tottenham and the Borough. Parts of Tottenham have been identified as Growth Areas and Areas of Change, recognising their potential to facilitate growth through the availability of developable sites and existing and planned significant infrastructure investment, including transport infrastructure, to support this growth in a sustainable way;</p>

				<p>so on). The <i>Alterations</i> fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of Tottenham in particular. The Planning <b>Inspector for the Plan’s predecessor, the Local Development Framework</b>, made it crystal clear after extensive evidence and debate at the <b>LDF Inquiry that Haringey’s character is generally suburban.</b></p> <p>a) In several ways the AAP do not fulfill, or contradict, some of the objectives laid out in para. 3.2.2, Policy SP2 HOUSING of the <b>Strategic Policies, in particular: ‘the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of’.</b></p> <p>b) The objectively assessed requirements are for building as much genuinely affordable housing as possible, as well as meeting a deficit of green space in the densely populated wards of Tottenham. The Strategic Housing Market Assessment (<a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf</a>, p. 8) shows that 58% of currently resident households could not afford to pay even 80% of market rents in 2010. Since then, there has been rapid growth of both house prices and rents, making that assessment seriously out of date with its assumptions of very low inflation of housing costs in 2010-16. The <i>Alterations</i> (Para 3.2.18) state that the <b>Council ‘aims to ensure an adequate mix of</b></p>	<p>for development above 10 units from 50% to 40%. It should be increased to the maximum possible.</p> <p>We disagree with the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). Based on the evidence we exposed in the previous section, it is not acceptable to meet affordable accommodation targets only with shared ownership or intermediate</p>	<p><b>and in line with the Council’s</b> regeneration objectives. The capacity to deliver 10,000 new homes has been identified in the AAP site allocations and is therefore considered deliverable over the plan period.</p> <p>The definition of affordable housing is set in line with national and regional policy, so as to ensure the Local Plan is consistent with the NPPF and in general conformity with the London Plan.</p> <p>The borough-wide affordable housing target is included in the Strategic Policies Local Plan, reflected in the AAP, and is set having regard to <b>the Council’s</b> latest viability evidence which suggests that the existing target is not deliverable across the majority of site scenarios tested, and that a reduction to 40% is appropriate to ensure provision of affordable housing does not harm the delivery of housing overall.</p> <p>The affordable housing</p>
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				<p><b>dwelling is provided' but there is no detail as to how this will be achieved, especially with regard to social housing for families. The proposals for new developments are primarily for high density flats including many very tall buildings. These are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs covered. Given the extensive need in Haringey for social housing for families, how can this approach be described as a 'strategy which seeks to meet objectively assessed requirements?' The Council says responding to family housing need is 'a priority for the Council', so the question is, will this plan address this in making provision of family housing for people living here?</b></p> <p><b>The proposals for the "renewal and improvement" (including demolitions) of the council housing estates listed in the Strategic Policies, SP2 point 10, p. 42, do not include comprehensive detailed options for rehousing families living in, at minimum, like for like accommodation. Neither are there alternative options for improving the estates so people can remain there. This is not objective in any sense. Yet this is the priority group in housing need. A large consultation exercise carried out by the Council to gauge people's priorities showed that the main issue of concern to local people in Tottenham was provision of social housing, and the need to tackle rogue landlords.<sup>2</sup></b></p> <p>There are serious questions which need to be answered regarding the concept of 'rent'.</p>	<p>rent housing, both of which are out of the price range of low income families in Haringey. A truly affordable home is one that is affordable to any tenant earning the London Living Wage. This means that the only truly affordable form of housing for many low income Haringey residents is social rented. <b>'Affordable'</b> should not be defined as 80% of a market rent, which is unaffordable to the vast majority of Tottenham</p>	<p>tenure split proposed for Tottenham (Policy AAP 3) is considered necessary to rebalance the high levels of social rented accommodation in Tottenham, which equates to more than 60% of the <b>Borough's total social rented stock.</b> This policy helps give effect to London Plan policy 3.9 in supporting mixed and balanced communities, including a mix of tenure types.</p> <p>The Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy, Alterations to Policy SP 2 set <b>out the Council's strategic and selective approach for housing estate regeneration, renewal and improvement.</b> The approach is set <b>recognising the Council's commitment to improving housing stock and the limitations of the Decent Homes programme.</b> The inclusion of estate regeneration in the Local Plan is considered necessary in policy terms as housing</p>
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				<p><b>'Affordable' levels (defined as 80% of market rent in the plan and the London Plan) may not be affordable, especially if we add the substantial service charges which both social and private landlords charge in addition to rent in many buildings.</b></p> <p><b>c) The Council's Sustainable Community Strategy (2010-2016)<sup>3</sup> states 'We will continue to increase the availability of affordable housing through the optimum use of existing dwellings and by building more affordable homes'. With Government cuts and caps to benefits affecting thousands of local residents, and almost no private tenancies available at LHA rates or below, the desperate need for genuinely affordable housing and social housing generally is of even greater urgency. For people in housing need in Haringey this means social rented housing. Yet, the Council has not produced any alternative option which demonstrates how this might be achieved, even within the current housing and planning environment. Councils such as Islington and Brighton have used different strategies, but the <i>Alterations</i> rely on simply working with developers and the private rented market. The LB Islington Housing Strategy 2014-2019<sup>4</sup> challenges the concept of 80% market rent being a suitable ceiling of 'affordability', works to curb bad landlords and secure longer more secure tenancies, and seeks to make council homes cheaper to run. In Brighton, the Estate Regeneration programme<sup>5</sup> focuses on identifying small infill sites within existing council estates and building on them subject</b></p>	<p>residents. We therefore demand that a separate and clear percentage for social rented housing be set in the affordable housing provision target; 70% of that affordable housing target should be social rented housing. We support Haringey Council's objective as laid out in para. 3.2.2, Policy SP2 HOUSING that <b>'the</b> council seeks to ensure that everyone has the opportunity to live in a decent home, at a</p>	<p>renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan. Where the Council does undertake estate regeneration and renewal, it will seek to re-provide the same amount of social housing on an equivalent floorspace basis. This approach is considered necessary to ensure flexibility for re-provision to better meet changing housing needs of existing residents.</p> <p>Proposed Alterations to the Strategic Policies (Alteration 64) set out further details in respect of how the Council will engage with existing residents where estate renewal is considered, along with signposting further guidance on options available to existing tenants and leaseholders through this process.</p> <p>The Council disagrees that it has not had sufficient regard to social and community infrastructure. The Local Plan is supported by an</p>
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				<p>to detailed consultation work with local residents.</p> <p>The plan needs to provide enough social <b>housing to meet the needs of Haringey’s</b> housing waiting list within a 5 year period, plus enough for population growth. The waiting list had 8,362 people in 2013; since then the lower-priority categories (bands D and E) have been removed from the list. The ostensible reason was because it was unmanageably large, but removal of these two bands also conceals the extent of housing need, and the numbers of people living in private, temporary and substandard, overcrowded and sub-standard accommodation. In this context, the 2013 figure may give a better idea of concealed housing need than the up-to-date one.</p> <p>In addition, the plan needs to meet the requirements of population growth, assuming that this will follow the trajectory of the last decade minus the portion of that population growth attracted by residential building for sale at Hale Village and the New River development, the major new developments of that period. To accommodate the 2013 waiting list, the absolute minimum number of new social housing units should be around 8,360 plus an additional 1,700 every 3 years to cater for population growth, even before considering any <b>further increase</b> in the proportion of households who cannot afford market rents. In summary, our estimate is that, before considering any change in that proportion, Haringey would need <b>at least</b></p>	<p>price they can afford, in a community they are proud of’. <b>This key priority can only start to be met by embedding the following principles CLEARLY in the wording of Policy AAP3 D (on housing estate renewal in Tottenham):</b></p> <p>No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all</p>	<p>Infrastructure Delivery Plan (IDP) which sets out the infrastructure required to support the levels of planned growth and to deliver the spatial strategy for the Borough and Tottenham. The IDP is subject to regular review and updating over the plan period. Where appropriate, site allocation policies require specific provision of social infrastructure. The DM DPD (Policy DM 49) sets out borough-wide policies to protect against the loss of social and community infrastructure. It is recognised that delivery of infrastructure will not solely be the responsibility of the Council, and the Local Plan therefore makes clear that the spatial strategy will be delivered through a combination of public and private sector investment, with the Council working with its partners to ensure appropriate provision. To this end the Council has engaged with a wide range of service providers, including in health and education, to feed into the IDP and provide an</p>
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				<p><b>16,300 social rented units over 15 years or 1,066 per year.</b> This is more than 100% of the previous building targets <b>for all types of housing</b> before the London Plan was revised in 2015, showing that without the excessive densification now proposed, Haringey would need to find ways of helping some of its residents to meet their housing needs in other boroughs which are currently <b>less crowded or in ‘new town’ type</b> developments outside London. Even if the new target of over 20,000 homes could be achieved without excessive densification (which we very much doubt), over 75% would need to be genuinely affordable to achieve the central objective of Housing Policy 3.2. <b>Remarkably, Haringey Council’s own Joint Strategic Needs Assessment states that ‘to address both projected newly arising need and the current backlog, an annual programme of over 4,000 additional affordable homes is estimated to be required’</b> (see <a href="http://www.haringey.gov.uk/social-care-andhealth/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsnahousing#levelofneedofpopulation">http://www.haringey.gov.uk/social-care-andhealth/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsnahousing#levelofneedofpopulation</a>). This simply cannot be achieved without overspill to other areas. But it is clear that the <i>Alterations’ target of only 40% of units to be ‘affordable’</i> is absolutely inadequate and there is little clarity that <b>‘affordable’ would include social rented housing</b> which families in Tottenham on low incomes could afford.</p>	<p>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 units and no displacement of existing tenants as part of any plan for an estate. The proposed wording</p>	<p>understanding of requirements needed to meet the levels of planned growth, along with identification of the organisations/agencies that will assist with delivery.</p> <p>In terms of open space and related recreational provision, the Council has set its strategic approach in Policies SP 13 and SP 15, which the AAP will help give effect to. The approach is supported by up-to-date evidence. There is limited scope to create new major open space in Tottenham, given the imperative to optimise available sites to meet strategic growth requirements. Therefore the <b>Council’s strategic approach</b> is to address identified deficiency by improving the quality of existing spaces and enhancing accessibility to and between those spaces. Policy AAP 9 will play a key role in delivering this objective locally.</p> <p>The Council does not agree that the proposals represent an overdevelopment of sites</p>
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				<p>We would like to challenge some key assumptions and evidence base used to justify Policy AAP3 HOUSING of the Tottenham AAP, which itself reflect the Alterations to Policy SP2 HOUSING of the Strategic Policies (see our separate response), under 3 broad themes:</p> <ul style="list-style-type: none"> <li>- Overall scale of housing growth and implications for existing and future social Infrastructure</li> <li>- The question of affordability</li> <li>- The chosen approach to housing provision and to <b>'housing estate renewal'</b></li> </ul> <p>1.2.1 Overall scale of housing growth and implications for existing and future social infrastructure in Tottenham:  a) The Alterations to the Core Strategy have been prompted by the adoption of the Further Alterations to the London Plan (FALP) which were adopted in March 2015. The Haringey Local Plan has to comply with the FALP and thus the proposed alterations reflect the major changes in housing and employment targets which were included in the FALP. The strategic housing target for Haringey was increased from 820 homes per annum to 1,502 homes per annum on the basis of the GLA SHLAA - an 83% increase. This is the single highest increase of any London Borough (the increases ranging from 3% for Greenwich to 83% for Haringey. The</p>	<p><b>'reprovide</b> the same amount of social housing on an equivalent floorspace <b>basis' does</b> not guarantee those principles, and should be rephrased. There should be no demolition of structurally sound homes.</p>	<p>that would compromise deliverability of plan objectives. Indicative capacities for site allocations have been set using a standardised methodology, applying the London Plan density matrix. The appropriate density for sites will be established having regard to the nature of individual schemes, and compliance with the suite of Local Plan policies.</p> <p>The Council does not agree that flood risk compromises delivery of the plan. The spatial strategy for the Borough, along with site allocations to deliver this, has been selected having regard to a Strategic Flood Risk Assessment and sequential test, in line with the NPPF. In addition, the Local Plan includes a suite of development management policies to ensure that all proposals avoid and reduce the risk of flooding, and do not increase the risk of flooding in the Borough.</p> <p>It is noted that the Council</p>
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				<p>distribution of targets across London Boroughs displays a bias towards poorer (and denser) Boroughs, the ones which suffer from highest levels of deprivation. It is highly questionable whether Haringey land and infrastructure have the capacity to accommodate so many extra homes and the London Plan target needs to be challenged, in particular compared to the much lower rates of expansion given to West Central and Outer South-eastern boroughs. We strongly context and oppose this massive increase affecting the Borough of Haringey. We made a submission during the public consultation on the Further Alterations to the London Plan in 2014 (here <a href="https://www.london.gov.uk/sites/default/files/302OurTottenhamPlanningPolicyWorkingGroupResponse.pdf">https://www.london.gov.uk/sites/default/files/302OurTottenhamPlanningPolicyWorkingGroupResponse.pdf</a>) and presented evidence at the EiP at Session 2b (Housing need and supply) on Wednesday 3 September 2014 to make this argument. It was ignored in the subsequent version of the FALP post-EiP. These figures are unsustainable, unrealistic and unfair. The strategic priority given to new, large-scale development in Tottenham in the London Plan and in the Haringey Local Plan consultation documents cannot be realized at the expense of the people already living and working there. In the response by the LB Haringey to the consultation on the Further Alterations to the London Plan (in 2014), Steve Kelly, Assistant Director of Planning, himself <b>noted that this was a 'stretching' target that it would not meet on its own without external</b></p>	<p>has committed to a development vehicle that provides a basis for joint venture partnerships to assist with delivery of the <b>Haringey's regeneration</b> objectives. However, the Council does not consider that delivery of the Local Plan is reliant on the development vehicle, and at any rate, this is outside the scope of this Local Plan consultation.</p> <p>The adopted Strategic Policies Local Plan, Appendix <b>3, sets out the Council's</b> framework for monitoring plan performance across a range of policy topic areas. Delivery of the vision and strategic objectives for the Tottenham area will be monitored against this framework, along with an additional set of bespoke monitoring indicators and targets for the AAP, as included in Chapter 6 of the plan. The Council publishes Authority Monitoring Reports (AMRs) in line with the statutory requirements for plan monitoring, and future AMRs will include information</p>
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				<p>GLA funding and support (<a href="https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf">https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf</a>).</p> <p>b) The Tottenham AAP identifies land capable of delivering 10,000 new homes and 5,000 new jobs. We contest the scale of this growth and its concentration in Tottenham. The proposal to concentrate half of the housing delivery target (=10,000 homes) in Tottenham is particularly not realistic and potentially very highly damaging to the existing residents and businesses, environment and character of the area (see our Response to the Alterations to Strategic Policies 2011-2026). We disagree with the fact that Tottenham should host half of this targeted growth. Several wards of Tottenham already have the highest densities in the Borough (see table and map in the overall response to this APP). <b>Bruce Grove, St Ann's, Seven Sisters and Tottenham Green</b> have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate). White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land – which means that the population density in the residential areas of those North Tottenham wards is high, too.</p> <p>Tottenham has the highest level of social deprivation and suffers from a chronic shortage of key facilities such as GPs, open <b>space, schools etc...</b> <b>Tottenham cannot cater</b> for 10,000 extra residents without grave</p>	<p>on the effective implementation of the AAP policies and progress on plan delivery. This includes reporting on delivery against the borough-wide affordable housing target, which the Council has reported in previous AMRs.</p> <p>The Council considers that equalities considerations have been appropriately addressed through the integrated impact assessment of its Local Plan - this incorporates sustainability appraisal, health impact assessment and equalities impact assessment. Further information is set out in the Sustainability Appraisal for the Tottenham AAP (November 2015), including Section 4.3 and Annex IV (Equalities and Health Impacts). Equalities assessments completed for other Council strategies are outside the scope of this Local Plan.</p> <p>No change</p>
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				<p>problems for its social infrastructure and existing population. This is an unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough. How and where will social infrastructure be provided to accompany the planned 10,000 new homes is absolutely not demonstrated in this AAP. A precise list of the needed social infrastructure, with supporting evidence, to cater for (i) the backlog of need and (ii) anticipated growth is needed in the next draft AAP, with precise proposals for location on particular sites. How these amenities and services would be provided and funded – in particular through Section 106 agreements and the CIL – is not explored convincingly in the <i>AAP</i>.</p> <p>There should be a strict policy of protection of existing community centres - some of which are under threat or seeking renewed or longer leases - of pubs, post offices, and corner shops from change of use. An expansion of youth services and facilities and nurseries is absolutely vital across Tottenham.</p> <p>We consequently demand that any new development encouraged by the AAPs should not lead to any net loss of social infrastructure, and should include additional social infrastructure to serve the existing and future residents in and near Tottenham, in particular:</p> <p><b><i>i. Adequate levels of GP and health services provision:</i></b></p> <p>In London the average is 1639 patients per GP, according to a Kings Fund report on</p>		
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				<p><b>'General Practice in London'</b>. However, by going through the information for each practice provided for patients on <a href="https://www.myhealth.london.nhs.uk/">https://www.myhealth.london.nhs.uk/</a>, we can show that the average for Tottenham GPs is 2002 patients each, as outlined in the table below<sup>8</sup>. Thus Tottenham GPs have 22.2 per cent more patients on their list, on average, than London GPs in general.</p> <p>So in effect Tottenham is short of over one fifth of the GPs it needs even before we have an extra 10,000 or so homes as envisaged in the Tottenham regeneration plans. The existing situation may even be worse than that for at least three reasons:</p> <p>The number of GPs in this calculation assumes that they are all working full-time, except for one who says on the practice web site she is part-time and was counted as half. If other GPs are in fact working only part-time, the number of patients per <i>full time equivalent</i> GP would be higher.</p> <p>As a deprived area with therefore a relatively high incidence of various illnesses, and moreover many people for whom English is not their first language, Tottenham probably imposes on GPs a heavier workload per patient than the London or national average.</p> <p>Since Tottenham is characterised by a highly transient population with many migrants and students, the proportion of the resident population actually <i>registered</i> with a GP may be unusually low. If all who are entitled to be registered did register (regarded by the NHS as a desirable goal to keep people out of A</p>		
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				<p>and E departments) the number of patients per doctor might rise considerably.</p> <p>This raises the question of what specific plans are being made for extra health infrastructure in the Area Action Plan and Site Allocation documents. This is simply not clear. If an extra 10,000 homes bring in an extra 25,000 people (the exact number obviously depends on the size of dwellings and the vacancy rate), this population would need an extra 15 GPs to provide for their needs at the London average ratio of patients to doctors. A further 16 GPs are needed to reduce the patient/doctor ratio for the <i>existing</i> registered patients to the London average. This makes a total of 31 doctors needed for the N15/N17 areas. It is unrealistic to think these can be accommodated within the premises of the 25 existing practices listed in the attached spreadsheet, even if all the partners working there wanted to take on new colleagues. So a <b>number of new doctors' surgeries will be</b> needed and provision for them needs to be made within the land allocations for social infrastructure.</p> <p>This has important implications for the future <b>of the St Ann's Hospital site. It is a large area</b> of land currently devoted to health service use and capable of housing one or more GP practices, possibly also an urgent care centre, which would serve the N15 area as a whole. This would be the obvious and probably the <b>most economical way to address the 'doctor deficit' in South Tottenham. However it is too</b> far from the new housing developments</p>		
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				<p>planned around High Road West and the northern part of N17, for which additional health use land will be needed.</p> <p><i>ii. Adequate levels of quality, public open space (including major new spaces to address areas of deficiency), play areas and sports facilities:</i></p> <p>Based on the London Plan's public open space hierarchy, around 50% of Haringey is deficient in public open green space. In addition, using the Mayor's <i>Guide to Preparing Open Space Strategies - best practice guidance of the London Plan</i>, there are also huge areas of deficiency in allotment provision, children's play areas, sports pitches and nature conservation areas. These officially recognised criteria for assessing deficiency are minimums. The London Borough of Haringey Open Space Strategy - Action Plan (November 2005), Objective 1.2, reads: 'To adopt the GLA Guidelines for provision of the different types of open space as the standard to which Haringey will work towards.' 'Priority: High' 'Timescale: Immediate' That Action Plan still applies. To achieve minimum standards requires a massive expansion of provision. So the AAP and Site Allocation DPD need to make very significant provisions to deliver not only the missing open spaces but also any additional open space needed to cater for any future growth in the resident population of Tottenham.</p> <p><b>In terms of sports facilities</b>, The Haringey Open Space and Sports Assessment (2003) provides excellent information on the need to</p>		
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				<p>address deficiencies of a whole range of much needed facilities. Since then the population of Tottenham has increased greatly, and is projected to increase even further. The Council has produced a number of useful sports-related plans including: LB Haringey Sport and Physical Activity Action Plan 2005; LB Haringey Tennis Development Plan - 2010-2013; LB Haringey Football Development Plan - 2009-2012; LB Haringey Football Development Plan - 2009-2012. As an example, the Football Development Plan (Section 4 - Key Issues and Recommendations) contains detailed and useful recommendations about facilities, education, club development, health, Voluntary Sector development, girls and women's development, disability development, celebrating cultural diversity, coach education, and disaffected young people. Key recommendations regarding facilities include:</p> <p><i>'develop additional pitches and ancillary facilities in the east of Haringey where quality facilities and provision are most needed'</i></p> <p><i>'develop Service Level Agreements with a number of schools to extend community access to school facilities and to implement dual use'</i></p> <p><i>'develop the use of s. 106 agreements ..... to create or improve local sports and leisure facilities. The population in Haringey is set to rise.... Haringey Council is responsible for providing the growing community with sport and recreation facilities that are accessible</i></p>		
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				<p><i>and inclusive to meet the demand of an increasing population'.</i></p> <p>Here are some extracts from the Summary of the <b>Football Development Plan</b> regarding Facility development:</p> <p><i>Accessibility: The Haringey Open Space and Sports Assessment identified a 400m walk as the appropriate catchment for football pitches. At present, around half of the population of the borough is outside such a catchment.</i></p> <p><i>Localised facilities: To seek to provide at least one multi-use games area in each of the 19 wards in the borough, to support local efforts to expand the small-sided game. Reviewing the size and quality of the hard play areas at all 62 primary school sites in the borough and making improvements as appropriate, to facilitate skills training for the 5 - 11 year old age group.</i></p> <p><i>Overall sports participation rates: The overall rates of sports participation in Haringey are below the regional and national averages, according to the 2008 Active People survey.</i></p> <p><i>Participation by under-represented groups: The Active People survey found participation amongst underrepresented groups such as women, BME groups and disabled people is disproportionately low in Haringey.</i></p> <p><i>Football conversion rates: FA data shows the proportion of footballers as a percentage of the overall population is significantly lower in Haringey than for London or England as a whole. The mini-soccer figures are lowest of all, with conversion rates only 20% of the national average.</i></p>		
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				<p>Small-sided football: <i>Small-sided football is poorly developed at junior level, with no teams at all in the borough. Eight of the 19 wards in Haringey do not have a kickabout area at present.</i></p> <p>Pitch provision: <i>There are currently enough football pitches to meet existing demand in Haringey, but the number of pitches per capita is well below regional and national averages. This suggests current provision is only adequate because local demand levels are suppressed, possibly as a result of the lack of pitch supply. Quality of pitches and ancillary facilities: 17% of all football pitches are in poor condition, 22% do not have access to changing facilities and 60% do not have any on-site social facilities.</i></p> <p><b>iii. Adequate levels of school provision (and other educational facilities):</b></p> <p>According to a report compiled by Haringey Council in 2013<sup>10</sup> there is already a shortage of school places in various part of the Borough, in particular Tottenham. This report provides an extensive and detailed picture of the existing situation. Surplus capacity at school reception level is already incredibly tight. The Published Admissions Number are projected by the Council to be in deficit against the GLA's projections by 143 needed reception places by 2023 for Tottenham Green, Tottenham Hale, Northumberland Park, White Hart Lane and Bruce Grove wards (p. 41).</p> <p>Secondary school places will be in deficit by 10% by 2021/22. Appendix 12 of the report</p>		
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				<p>analyses the implications of the proposed new housing developments in identified growth areas (most of which are located in Tottenham) for school place planning, and states that to support the inevitable demand that will arise from the provision of more than 6,000 units across the area, planning for further capacity within local primary and secondary schools as well as any special <i>school provision will be an important component in ensuring that additional school place provision is joined up and sustainable'</i> (p. 67). The report goes on to recognize the huge challenge posed by the need for further school provision, for example in Northumberland Park: <i>'Schools in the local area are at or close to capacity at primary reception level and even before the grant of planning permission for additional units at Spurs and at Canon Rubber we were aware of the need to increase local capacity. The provision of a two form entry primary school by EACT Free School, Hartsbrook Primary, which opened in September 2012, went some way to relieving local pressure for places, but, with the roll out of the development outlined above, we are aware that we will need additional provision... There are physical constraints at almost all of the existing local school in the area meaning expansion of existing schools will be challenging at best'</i> (pp. 69-70).</p> <p><b>2.2.2 The question of affordability</b></p> <p>a) The assumptions in the <i>Housing Market Assessment</i> about growth rate of house</p>		
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				<p>prices and rents are far too low. Values applied to the viability calculations (i.e. how many 'affordable' units developers can reasonably be asked to build whilst leaving them an 'acceptable' profit) may be out of date given that many sites are public land whilst sales values for homes to be built in the next few years will be affected by the unexpectedly rapid growth of house prices in 2014-15. For example Table 1, p. 10 states that 'medium value' areas like Wood Green (N22) had a price at the base date (Dec 2010) for a 3 bed, 4 person flat of £280k but even 2 bed flats are now over £400k and even in N17 they are typically over £350k. Appendix B 1.2 table 5 has the assumption that house prices (HPI) will hardly rise between 2010 and now. But they have risen enormously! Average sales prices of residential property rose 10.71% over the last 12 months in N17 (compared to 10.28% in N15 and 9.6% in London as a whole) and 46.59% over the last five years (compared to 49.17% in N15 and 40.17% in London as a whole – data from Zoopla web site on Jan. 19th 2016). The rise in house prices and rental values in Tottenham is especially out of line with local incomes, since as noted in Haringey's Homelessness Strategy, there is a gap of £16,000 between average incomes in the east and west of the borough, and according to the Housing Market Assessment a gap of over £12,000 in the median income. The London Poverty Profile data shows Haringey lower quartile rents are £1,257 monthly and lower quartile</p>		
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					<p>GROSS earnings are 74% of lower quartile rents.<sup>11</sup> This means that the conclusion of the <i>Housing Market Assessment</i> that most of the new housing will be 'unaffordable' for existing Haringey residents is truer now more than ever. This also means that genuinely affordable housing is needed at rents that can be afforded by households on those incomes.</p> <p>b) There is also considerable ambiguity about what the affordability of 'rent' means in the context of the 'affordable rent' concept. 'Affordability' is defined to mean 80% of market rent but the rise in market rents of recent years has been much faster than incomes. Moreover a rent which is 'affordable' may not be so if we add service charges, which could be considerable, especially in high rise buildings which need lifts, water pumps and cradle-suspended operations for window cleaning and for external painting.</p> <p>c) The recent growth of rents and house prices also means that many of the viability calculations on particular sites are thrown into question – as sales values rise more than was expected, developers will obtain a windfall gain and should be required to build a larger proportion of genuinely affordable units and/or pay larger s.106 contributions. For example, in the case of the redevelopment of St. Ann's Hospital, in South Tottenham, the community group which formed the St Ann's Redevelopment Trust finally got the viability assessments disclosed after planning consent was granted. The independent viability assessment commissioned by Haringey</p>		
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				<p>calculated that there could have been more affordable housing on the site than the 14% figure which the Council and developer settled for (i.e. a further £23m worth of affordable housing). Where developers can make an acceptable level of profit with a higher proportion of affordable homes, the argument for densification falls, and with it the case for the imposition of tall buildings on a suburban landscape, with huge pressure on green space and social infrastructure and attendant risks about the unaffordability of future maintenance charges. This is especially an issue for Northumberland Park.</p> <p>2.2.3 The chosen approach to housing provision and to 'housing estate renewal' Obj. 4 of the AAP (p. 32) proposes a 'different kind of housing market'. We oppose the wording and the approach suggested by this with regard to the social housing estates located in the East of the Borough, and earmarked in the Strategic Policies for 'renewal and improvement', namely:</p> <ul style="list-style-type: none"> <li>Northumberland Park</li> <li>Love Lane</li> <li>Reynardson</li> <li>Turner Avenue</li> <li>Leabank View / Lemsford Close</li> <li>Park Grove and Durnsford Road</li> <li>Tunnel Gardens, including Blake Road</li> <li>Noel Park</li> <li>Broad Water Farm</li> </ul> <p>The arguments below underpin the site-specific comments we have made with regard</p>		
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				<p>to each of these housing estate sites.</p> <p>a) There is an assumption that bringing in higher-income residents by intensive high-rise development will produce 'mixed communities'. What does this mean? The intended inference is that Tottenham is not a mixed community now. This is a deeply flawed and spurious argument both with regard to Council estates and Tottenham as a whole. Our estates, and Tottenham as a whole, are very mixed communities indeed. The postcodes N17 and N15 are reputed to be the most diverse in Europe, and these of course are the target Tottenham postcodes for this plan. Council estates are mixed – by race, class, culture, socio-economic status and, since the Right to Buy, by housing tenure, with some leaseholders and some private tenants of leaseholders. These estates are not islands – they are in local communities and have rich and extensive social networks as evidenced by the many groups, associations and community organizations. The membership of Our Tottenham evidences this. This has also been demonstrated by research recently carried out by University College London (the Bartlett School of Planning).<sup>12</sup></p> <p>b) There is no evidence that the development of 'mixed' communities by densification of existing housing estates and change of use from industrial to residential on council-owned industrial estates will be beneficial to the local community, either in terms of housing or employment. We presented in our earlier</p>		
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				<p>response submitted in March 2015 (see text box on pg 16 of response) a mass of academic and policy research evidence to show that drawing in higher-income residents to <b>'dilute' council estate populations leads to</b> disruption of community networks, class-segregated living and social tension, rather than greater cohesion. The history of many <b>London estates where this 'solution' has been</b> applied testifies to this, and there is extensive academic research which confirms it.</p> <p>c) Community stability, adequate green space and community facilities are the key to low crime and tenant satisfaction. Densification is hostile to these objectives. In this connection we would mention a statement by <i>Architects for Social Housing</i> citing a survey that Broadwater Farm has a very low rate of crime, a very high rate of tenant satisfaction with regard to safety<sup>18</sup> and very low rent arrears. The plan asserts that the proportion of social housing in Tottenham, particularly in North Tottenham, is excessive.</p> <p>But no objective criterion or argument is given <b>about what constitutes the 'ideal' tenure mix,</b> or over what area it should be measured. According to the Haringey Joint Strategic Needs Assessment (Fig. 1 in <a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/otherfactors-affecting-health/jsna-housing">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/otherfactors-affecting-health/jsna-housing</a>), Haringey as a whole has a proportion of social rented housing very little above the London average. Moreover, given the current crisis about affordability of housing</p>		
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				<p>in London, the central objective of the plan as stated in the Strategic Policies - Housing Policy SP2 can only be achieved if a high proportion of social housing is maintained. It should also be noted that estates originally built as council housing are now effectively mixed tenure since a significant proportion of homes have been purchased under the right to buy, there are leaseholders living on estates, and other properties are now let out by private landlords.</p> <p>d) The plan does not deliver its objective of providing for the housing needs of the Haringey population, as stated in point 1 above. Where and how will those people and families displaced by these plans be housed? The plan has no detail on these critical points.</p> <p>e) Nor will it provide jobs for them, since the jobs associated with construction of new housing will be temporary and most local residents do not have the skills to access them; and moreover the plan involves the loss of many cheap, accessible small business premises of the type that Tottenham needs, both industrial and retail.</p> <p>f) The rise in private sector rents, induced by <b>the expectation of a 'gentrification' of</b> Tottenham and the continued grave shortage of social housing, will force many more residents to have to seek homes in neighbouring outer boroughs, for example Enfield, Waltham Forest and Redbridge, as well as beyond the north and eastern boundaries of London. This will put pressure on housing markets and waiting lists there,</p>		
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				<p>and on transport infrastructure as they try to commute to jobs in Haringey or in central London and to continue at local schools in <b>Haringey so as not to disrupt children's</b> education. But there is no guarantee such housing exists. In particular in any site where it is proposed to demolish housing association stock, the price paid by the Council or its development partner(s) to the housing association may not be enough to finance building or acquisition of equivalent units elsewhere to re-house the tenants, who will be <b>the housing association's responsibility</b>. There will then be a displacement effect on social housing waiting lists elsewhere in London as the housing associations struggle to find homes to re-house people whose homes they have sold for demolition.</p> <p><b>2.3 Is it the most appropriate strategy when considered against the alternatives?</b></p> <p>No. There is no assessment of the comparative economic and social costs of providing a given number of homes by demolition and rebuilding versus the cost of refurbishing, extending and converting many of the existing ones. Even some office blocks could potentially be converted to housing by stripping out the interior and leaving the basic structure standing. Architects for Social Housing (<a href="https://architectsforsocialhousing.wordpress.com/page/2/">https://architectsforsocialhousing.wordpress.com/page/2/</a>) have illustrated in the example of Knights Walk in Kennington how refurbishment and extension of existing buildings, for example by building additional</p>		
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					<p>storeys, can be much cheaper than rebuilding, as well as far less disruptive to existing residents and less wasteful of environmental resources. According to a report from the Urban Lab and Engineering Exchange at <b>University College London</b>, <b>'there is a growing body of research suggesting that extending the lifecycle of buildings by refurbishment is preferable to demolition in terms of improved environmental, social and economic impacts'</b>19. <b>See also the <i>Our Tottenham Housing Factsheet: Demolition vs Refurbishment</i></b> <a href="http://ourtottenham.org.uk/our-tottenham-factsheet-housing-demolition-vrefurbishment/">http://ourtottenham.org.uk/our-tottenham-factsheet-housing-demolition-vrefurbishment/</a>. Historically the decision to refurbish or rebuild has been subjected to NPV analysis, along the line for example of the model used by Sovereign Housing Association (see <a href="https://www.sovereign.org.uk/aboutus/strategic-asset-management/">https://www.sovereign.org.uk/aboutus/strategic-asset-management/</a>). We would expect to see a similar assessment of whether the <b>Haringey Plan's proposals for estates such as Northumberland Park or Broadwater Farm</b> represent best value for public money, taking into account also the intangible <i>social</i> costs and benefits of each alternative such as keeping the community together and <b>continuity of children's schooling</b>. For one specific group of estates, the <b>'Orlit' homes in Bounds Green</b>, the site DPD argues that refurbishment is technically impractical, but we have spoken to residents who are convinced otherwise and heard of an internal Council report which said refurbishment is</p>	
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				<p>technically feasible. See our response to the Alterations of the Strategic Objectives, where we highlight a series of alternative mechanisms/options/policies to creating extra low-cost homes and reducing rent levels. These alternatives have not been fully considered in the Tottenham AAP:</p> <ul style="list-style-type: none"><li>a) bringing into residential use rooms and flats above shops which are currently empty or used for storage, including in particular the many shops owned by the Council.</li><li>b) control of rents and of the quality of private sector lettings by registration of landlords and by creating competition from a non-profit best-practice lettings agency, which could be run as a municipal enterprise with minimal tenancy setup charges and low commissions to landlords who offer a fair deal.</li><li>c) inducing private landlords to let for longer tenancies, thus reducing the vacancy rate due to churning of tenants (approximating to almost 5% if flats remain empty for 1 week every 6 months, but only 2.5% if tenancies last <b>a year with a week's vacant period in between.</b> <b>This factor alone could 'provide' the equivalent</b> of an extra 700 homes just by reducing the vacancy rate). It could be done through a nonprofit lettings agency as proposed above. It should be noted that 17% of the households becoming homeless in Haringey become so because of no-fault evictions at the end of short term tenancies, requiring about 100 social rented vacancies per year.</li><li>d) buying empty and hard-to-sell homes to let</li></ul>		
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				<p>to homeless families through a municipal housing company (along the Enfield model) which would buy empty or under-occupied homes and save the huge cost of temporary accommodation for homeless families, thus freeing up more money for refurbishments/new building.</p> <p>e) facilitating self-build and community non-profit developments (by community development trusts or coops) on small and large sites. The Plan fails to, for example, adequately promote Community Land Trusts whose average 3% of surplus margins sought are clearly more appropriate when contrasted with the obscenely inflated and unacceptable profit margins being sought by most profit-led property development. Such property development, upon which the current Plan has <b>chosen to rely, is presented as 'the only show in town' and used as justification for failures to</b> implement or enforce social infrastructural, affordable housing and s106 obligations. Low-rise building could be done using prefabricated units which are cheaper and quicker to build than conventional construction methods.</p> <p>f) use of space over car parks, so that housing could be built over them with parking only at ground level, and car parking would rarely be the only land use for spaces currently used as car parks. Several hundred homes could be accommodated in this way at sites such as Stoneleigh Road N17 and Summerland Gardens N10.</p> <p>g) easier planning permission for owner</p>		
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				<p>occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. This could be encouraged in particular areas in partnership with local small builders and selected banks to provide finance for home extensions/attic conversions, and would provide opportunities for solar panels and quality insulation to be incorporated into the works, thus increasing the sustainability of the housing stock. There would be substantial spin-off benefits in terms of job creation, development of refurbishment/repair capacity in the local construction sector, improved community cohesion, lower childcare and elder care costs due to families being able to stay together if they wish.</p> <p>h) logistical help for older people who own much larger homes than they need (3-5 bedrooms) to let rooms or find suitable ways to sell up and move to smaller accommodation, possibly outside London, if they want to.</p> <p>i) enhancements and improvements to more single storey retail sites to make use of any available additional space, where appropriate.</p> <p>j) reduction of refurbishment/maintenance costs for social housing by adopting a different way of doing the works; this might mean re-constituting a direct labour force (with attendant important opportunities for training local youth) and/or offering tenants a cash-back on part of their rent for doing minor repairs that they are competent and willing to do, for example painting, some kitchen fitting,</p>		
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				<p>and some repairs to windows, doors, locks, taps, light fittings and floors, garden fences and gates. These are all things which owner-occupiers often do for themselves.</p> <p>k) having clear contract and/or planning conditions with developers that sites developed on public land must include social rented council homes which could be funded via the private sector element of the development.</p> <p><b>If the intention is to have a genuinely ‘mixed community’ which meets the housing needs</b> evidenced in many reports, the Local Plan should include these other options and ideas. <b>Regrettably the phrase ‘mixed community’</b> appears to be used in the context of the Haringey Local Plan in the way critiqued by <b>some academics ‘who question the evidence base for social mix policies and rhetorics that advance processes of gentrification’</b> (<i>Mixed Communities; Gentrification by Stealth?</i> Edited by Gary Bridge, Tim Butler and Loretta Lees, 2012, Bristol: Policy Press).</p> <p>We have several concerns regarding the effectiveness of the proposed <i>AAP</i>.</p> <p>a) Policy AAP3 and the site-specific proposals for sites currently occupied by social housing estates will result in expulsion of many <b>residents who will be ‘priced out’</b> of Tottenham into neighbouring areas or out of London altogether. In the meantime, rising rents brought about by the introduction of higher-value housing and the attendant uplift to the property market for older homes will</p>		
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				<p>mean a higher housing benefit bill, increasing arrears and increasing homelessness.</p> <p>b) As we have extensively argued above, there is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need, nor any assessment of the need for school places. There is no provision for additional community centres despite the loss of the Welbourne Centre, the ambiguity with regard to the Broadwater Farm Community Centre<sup>20</sup> and even the possibility of losing Tottenham Chances if a developer comes forward with a proposal that appears to justify the loss of a listed building.</p> <p>Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. But if there is no specific provision of additional childcare space in the new buildings, either this policy will be unworkable or it will result in an exacerbated shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use. There is a very serious lack of health provision, especially in Tottenham Hale. With a further 5,000 homes proposed, there should be detail about how services will be provided.</p> <p>c) According to Cabinet papers revealed to the</p>		
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				<p>public on 17.11.2015, the Council envisages extensive use of a single private sector partner for development, in a 50/50 jointly owned venture company, but this exposes the Council, our public assets and the community to serious risks. What if the chosen development partner goes bankrupt, or uses its enormous market power to bargain for higher profits and less affordable units? What if the company gets into financial difficulty and reneges on whatever commitments will be made about s.106 contributions, affordability or guarantees of re-housing to existing tenants? It is important that site development should rely on a variety of actors and development partners in order to spread the risks and to avoid any profit-driven party having undue market power. The joint venture arrangement appears to give no opportunity for community partners such as coops, community land trusts or social enterprises.</p> <p><b>Is it deliverable?</b></p> <p>Many of the <b>site-specific proposals in the AAP</b> are potentially not deliverable.</p> <ul style="list-style-type: none"> <li>b) The plan involves serious over-development of many sites as already stated in point 2(d) above.</li> <li>b) Some of the sites which will have very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will itself increase the flood risk with more land built over and unable to absorb rainwater into gardens and landscaped areas.</li> <li>c) The Council has expressed a preference for</li> </ul>		
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				<p>a very small number of development partners, which renders the plan vulnerable to being <b>'beaten down' in negotiations</b> on the <b>proportion of 'affordable' units and on infrastructure contributions</b>, as with the Spurs development.</p> <p>d) As we have argued in our response to the <i>Alterations to Strategic Policies</i>, the <i>Alterations</i>, and their translation into Policy AAP1 and AAP3 of the Tottenham AAP, reinforce the fact that is a one dimensional plan which relies on private developers and a buoyant housing market to achieve its objectives. We believe this is short-sighted and irresponsible. There are already concerns, most recently expressed by the Chancellor of the Exchequer, that the economy is weakening. There is no guarantee that a further recession might not happen, especially given the situation with the EU. In our view the Local Authority has a responsibility to develop alternative strategies for Tottenham. If the economy goes into downturn, what commitment would these developers have to Tottenham and its communities?</p> <p>e) Part of developing alternative approaches would be to examine eventualities which might occur – in other words, to carry out a risk assessment. Relying on this plan, should there be an economic collapse, this would leave, in particular, Tottenham blighted, with many communities caught within red-lined zones.</p> <p><b>f) Haringey's proposal for a joint venture</b> company comprising 50/50 ownership with a private development partner compounds the</p>		
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				<p>huge risk of this one-dimensional plan. The plan to transfer two estates to a private company is predicated on this local plan – they go hand in hand. This makes housing and development even more vulnerable to the market and leaves hundreds of tenants and residents exposed. This is discussed further in paragraph 7, section d, below.</p> <p><b>Is it flexible?</b></p> <p>As we have argued in our response to the <i>Alterations to Strategic Policies</i>, the <i>Alterations</i>, and their translation into Policy AAP1 and AAP3 of the <i>Tottenham AAP</i>, make the plan inflexible since it is one dimensional as described above in paragraph d.</p> <p>a) Estates could be refurbished and alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards from existing buildings, adding extra storeys or wings, are now well-tested strategies for this.</p> <p>b) There is nothing in the plan to say what will happen is the envisaged strategy (overall or for specific sites) cannot be achieved. We know <b>from the Council's latest proposal for a Joint Venture Company</b> approved by Cabinet in December that the Council plans to transfer to a Joint Venture Company much of its property portfolio including many sites in Wood Green and Northumberland Park which are the subject of specific Site Allocation Documents. Much will then depend on how the market affects one particular private sector partner, the one which will be chosen as 50% owner of</p>		
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				<p>the Joint Venture Company. If this company should get badly into debt, or if it should decide to pull out of the arrangement because better profits are to be made elsewhere, the strategy for these sites could be in jeopardy.</p> <p>c) The Council is planning to rely too much on a single private sector partner, and too much on large private developers altogether. It would be less risky and more flexible to envisage for each site a community partner, such as a co-op, community land trust, or community investment fund drawing on the savings of the wealthier west-of-borough residents by selling them bonds. The Council could facilitate the development of several community partners of this kind. It could also engage small local builders for small parcels of building land or for refurbishment work. This would be more flexible than relying on the Joint Venture Company and would have greater prospects of local job creation. We note that in the case of the Hale Village, the collapse of the housing market in the late <b>'noughties'</b> caused financial difficulties for the chosen private sector partner and whilst solutions can be found for a single site, this is rather more difficult where the same company is involved in several sites.</p> <p>d) Moreover, there is no flexibility envisaged in the event that publicizing plans which include demolition as an option should lead to a sharp <b>decline in market values and 'lettability'</b> in particular areas, notably Broadwater Farm and the surrounding area in SA62, and in</p>		
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				<p>Northumberland Park. Homes being left empty could lead to dereliction and social problems (such as a 'sink estate' reputation, rubbish dumping and drug dealing), affecting the attractiveness and value of nearby private housing as well as the actual estates marked for demolition.</p> <p>e) Our over-riding concern is that refurbishment should always be considered as an option alternative to demolition.</p> <p><b>Will it be able to be monitored?</b></p> <p>We have concerns that the <i>Tottenham AAP</i> cannot all be properly monitored.</p> <p>a) The site allocation documents do not specify the number of affordable units envisaged for particular sites. Thus as agreements are reached with developers for particular sites, it will be impossible to say whether meeting targets for total units or affordable units are likely to be met taking into account the remaining sites. Table 2 (Broad distribution of new housing) on p. 35 of the <i>Alterations</i> says nothing about how much 'affordable' housing will be built on each main site. This is also the case in the Site Allocation DPD and in the Tottenham AAP.</p> <p>We would expect that at the least, targets for 'affordable' units should be supplied for the sites in the upper Lee Valley Housing Opportunity Area. We also note that it is not clear whether the 'affordable' percentage target of 40% is calculated as 'new build affordable/total new build' or 'new build affordable/(total new build minus the number of social rent properties demolished or</p>		
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				<p>amalgamated into larger units)'.  b) The 'housing trajectory' graph (Appendix 1, p. 58 of the <i>Alterations</i>) which states how many units will be built in each year does not say how many will be affordable at each stage. This means that the 'affordable housing' proportion of the total cannot be monitored against the target year by year.</p> <p><b>4. Is the plan consistent with national policy?</b></p> <p>As stated above, the <i>Tottenham AAP</i> fail to demonstrate how they will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on).</p> <p>The <i>Tottenham AAP</i> fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of the Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.</p> <p><b>Equalities legislation:</b></p> <p>The effect of the <i>Alterations to Strategic Policies</i>, the <i>Alterations</i>, and their translation into Policy AAP1 and AAP3 of the <i>Tottenham AAP</i>, would be an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Haringey to the</p>		
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				<p>detriment of current communities and of <b>Haringey's character. National policy (the Equalities Act)</b> would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, the fact <b>that the plan will 'dilute' and drive out the</b> existing residents of Tottenham means that negative impacts will disproportionately affect ethnic minority people. Appendix C to the <i>Consultation on Haringey's Draft Housing Strategy 2015-2020</i> also demonstrates how the policy of knocking down council housing in order to increase home ownership through Shared Ownership would be discriminatory. It states:</p> <p><b>'Incomes in east and central Haringey have</b> reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period. Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east. Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are overrepresented in comparison with their representation in the general population of <b>Haringey... The above evidence indicates</b> there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership</p>		
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				<p>in east Haringey. White households may <b>benefit more easily.</b></p> <p>We believe that replacing council housing with so-called Affordable Rent properties is also discriminatory, given the concentration of black people in the East of the Borough where household incomes tend to be around £20,000 a year. Such incomes clearly make so-called Affordable Rents of over £800 a month desperately unaffordable. £800 is over 45% of the gross income of the typical household in Northumberland Park and the East of the borough, let alone their net income (which is <b>the GLA's affordability criteria, see page 53 of Appendix C</b>).</p> <p>We believe that the policy of demolishing council estates therefore breaches the commitment in Haringey Council's <b>Equal Opportunities Policy</b> of April 2012 to the fair provision of services. Paragraph 3.2.2 of <b>Haringey's Local Plan: Strategic Policies 2013-2026 states that: 'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community where they want to live.'</b><sup>23</sup> <b>In the light of the above it is clear that the Council proposal to demolish Northumberland Park is in breach of the Local Plan.</b> It would only be non-discriminatory if there was a plan to re-provide the same quantity of social, rented housing with permanent secure tenancies and low rents similar to the rents currently charged to council tenants in Northumberland Park. Given that no such plan exists, the inclusion of</p>		
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				<p>council housing in Northumberland Park in the site allocations is discriminatory and improvements to existing homes rather than demolition should be substituted.</p> <p>We would also note council plans to house more homeless families outside London (see <b>Haringey Council's Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18</b>). (This was a report made to the Cabinet as part of agenda papers on 16/12/2014)<sup>24</sup>. Clearly demolishing social housing without appropriate replacement in areas like Northumberland Park will lead to increasing <b>numbers of Haringey's homeless families being forced out of London. This 'social cleansing' aspect, adds to the discriminatory nature of the proposal to demolish social housing. As Appendix C of the Consultation on Haringey's Draft Housing Strategy 2015-2020 states 'Black households approach as homeless at a level which is more than twice their representation in Haringey's population compared with White households who present in numbers which are around two thirds of their representation in Haringey's general population. This indicates that Black households are particularly affected by homelessness in the borough.'</b> Therefore reducing the amount of social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. This is additional evidence of <b>the discriminatory nature of the Council's plan for Northumberland Park and Tottenham as a whole.</b></p>		
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Respondent 12: Savills on behalf of Interfine Properties

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
12	RTAAP100	AAP 3 Paragraph B	No	Yes	1) <b>The Policy is unsound as it is not effective.</b> Policy AAP 3 should be consistence with the other local plan documents. The adopted Policy SP2- Housing and the emerging Policy SP2 (Alterations to the Strategic Policies Pre-submission version January 2016) both indicate how affordable housing shall be achieved subject to viability.	<b>Changes Required</b> Amend the wording as follows (as underlined in bold). <i>B The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation <b>subject to viability.</b></i>	Policy SP 2 & DM13 are clear that the affordable housing requirement is subject to viability and the Council does not consider it necessary to repeat such details here. AAP 3 sets out the affordable housing tenure split that will apply to the Tottenham AAP area, which is the only variation from SP 2 & DM13.  No change.
12	RTAAP101	AAP 3 and SS 2 site allocation, paragraph C	No	Yes	1) <b>This policy is unsound as it is not effective.</b> Policy AAP3 Paragraph C is unclear. The minimum housing capacities for	<b>Changes Required</b> Policy SS 2 needs to illustrate the Phase 2 area to make it clear to the Potential Developer and Decision Maker that the	The Council does not consider it practical, nor is it required, to map extant planning permissions as part of the Local Plan site

					SS2 Lawrence Road indicates 178 net residential units (under Phase 2). It does not give a clear indication to the Potential Developer or Decision Maker where Phase 2 covers as indicated on the SS2 Site plan. There appears to be no clear evidence base as to where this capacity figure is derived from.	proposed residential units be referred to as minimum requirements.	allocations. Policy AAP 3.C sets out that the site capacities are minimum capacities. Site capacities have been established using a standardised methodology, as set out in AAP Annex 7.  No change.
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Respondent 13: Savills on behalf of Empyrean and Paul Simon Magic Group

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RTAAP108	AAP3	No	Yes	<b>1)The Policy is unsound as it is not effective.</b> Policy AAP 3 should be consistence with the other local plan documents. The adopted Policy SP2- Housing and the emerging Policy SP2 (Alterations to the Strategic Policies Pre-submission version January 2016) both	Amend the wording as follows (as underlined in bold) <i>B The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided</i>	Policy SP 2 is clear that the affordable housing requirement is subject to viability and the Council does not consider it necessary to repeat such details here. AAP 3 sets out the affordable housing tenure split that will apply to the Tottenham AAP area, which is the only

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					indicate how affordable housing shall be achieved subject to viability.	<i>at 60% intermediate accommodation and 40% affordable rented accommodation subject to viability,</i>	variation from SP 2.  No change.

Respondent 19: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RTAAP118	AAP3	Not stated	Not stated	Cross references to the policy need to be updated in supporting paragraphs 4.12, 4.13 and 4.15. They currently refer to AAP2.	Cross references to the policy need to be updated in supporting paragraphs 4.12, 4.13 and 4.15. They currently refer to AAP2.	Noted.  <b>Referencing will be updated.</b>

#### AAP4

Respondent 19: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RTAAP119	AAP4	Not stated	Not stated	Figure 4.1 should be updated to remove the High Road West and High Road East Employment Areas for the reasons set	Figure 4.1 should be updated to remove the High Road West and High Road East Employment Areas for the reasons set	Noted.  <b>For accuracy and clarity, Table 3 and Figure 4.1 will be updated.</b>  Please note that both High Road West

					out above.	out above.	and High Road East are Designated Employment Area and it was N17 Studios that was de-allocated. The map incorrectly shows the boundary of the former N17 Studios DEA. <b>The map will be amended and updated to reflect the recommendations of the Employment Land Study.</b>
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Respondent 25: Quod obo Muse Developments and the Canal and River Trust

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	RTAAP132	AAP 4 TH 9 Table 6	No	No response given	<p>This response relates to the lack of clarity and inconsistencies in relation to:</p> <ul style="list-style-type: none"> <li>- the definition of “replacement floorspace” and “replacement employment”;</li> <li>- indicative development capacities;</li> <li>- the lack of clear guidance on the timescales and strategy for the reclassification of Designated Employment Areas.</li> </ul> <p>Accordingly, without such clarity and with such inconsistencies, the Plan is unsound, ineffective and not therefore deliverable over the</p>	<ol style="list-style-type: none"> <li>1. There needs to be consistency in the terminology for “replacement floorspace” or “replacement employment” with a definition to provide clear guidance on the policy test for development proposals;</li> <li>2. Inconsistencies between indicative development capacities should be corrected;</li> <li>3. The timescales and strategy for the</li> </ol>	<p>Further details in respect of replacement employment floorspace are set out in Policy DM 38, which sets out requirements for enabling mixed use schemes in Designated Employment Area (DEA) – Regeneration Areas.</p> <p><b>For clarification, TH 9 paragraph 5.169 will be amended to read:</b>  <b>“Comprehensive redevelopment to provide a mix of uses, with replacement employment floorspace, new residential and a leisure destination linked to the Lee Valley</b></p>

					<p>plan period.</p> <p>Please refer to the accompanying cover letter (part (b) (i)) for full and more detailed comments.</p>	<p>reclassification of Designated Employment Areas should be provided. Incorporating such changes will make those policies effective and deliverable over the plan period.</p>	<p><b>Regional Park”.</b></p> <p>It is agreed that the indicative capacity of the town centre uses for the Hale Tower in T able 6 is incorrect, and should be amended to be consistent with that in TH8 and in Table 10 in Appendix A, and reflective of consented development for the site.</p> <p>Policy SP 8 sets out the Council’s strategic approach to managing land within its employment land hierarchy to deliver the spatial strategy for the Borough, including land within designated DEA – Regeneration Areas. Policy DM 38 helps give effect to this policy and provides further details in respect of the strategy for managing land designated as such, along with guidance to assist with implementation on a site basis.</p> <p>The DEA-Regeneration Area designation for this site will be reflected in the Policies Map, and will take effect once this and other Local Plan</p>
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							documents are adopted.
25	RTAAP136	AAP 4 TH 9	No	No response given	<p>b)i Employment</p> <p>Draft Policy AAP4 '<b>Employment</b>' identifies the site a Designated Employment Area with supporting Table 3 further clarifying the site designation as a Local Employment Area: Regeneration Area. Policy AAP4 indicates that the Council will re-classify some <b>of the area's Designated</b> Employment Areas in due course, albeit there are no specific timescales or a strategy on how it intends to do so. Clear guidance on the re-classification of those sites should be set out in the AAP.</p> <p>This is particularly the case because proposed alterations to paragraph 5.1.7 of the Strategic Policies (the consultation for which runs concurrently with the AAP) states that the hierarchy of employment land will be reviewed and revised as necessary taking into account economic circumstances and further guidance from, amongst other things, the</p>	As above.	<p>In preparing Alterations to the Strategic Policies and other Local Plan documents concurrently, including the Tottenham AAP, the Council has undertaken an employment land review to update to its local technical evidence base. Recommendations from this review, including on the re-designation of employment land, have been considered and taken forward in the emerging Local Plan documents. In particular, Alterations to SP 8 propose that Hale Wharf be designated as a Local Employment Area – Regeneration Area, and this has been reflected in Policy AAP 4 and TH 9.</p> <p>The DEA-Regeneration Area designation for this site will be reflected in the Policies Map, and will take effect once this and other Local Plan documents are adopted. The Council may in the future undertake a further review of its employment land hierarchy, in line with the</p>

				<p>Tottenham AAP.</p> <p>The site specific requirements of the site allocation (TH9) on page 129 also appears to contradict the idea that the designation would be removed and states the following in relation to Hale Wharf:</p> <p><b><i>“The site will hold a Designated Employment Area: Regeneration Status to recognise the contribution to the local economy that this site can make”.</i></b></p> <p>Whilst Muse and the CRT support a mixed use development on the site (to include a proportion of employment uses), this requirement is superfluous when paragraph 5.170 simply states that replacement employment is needed.</p> <p>The current employment floorspace within the site is underutilised and generally low density, whilst the quality of the buildings are deteriorating and are</p>		<p>NPPF and as part of the plan, monitor and review process.</p> <p>It must be noted by the developer that the primary designation of the site is as employment land, although classified as a Regeneration Area which makes provision for mixed use development to provide for the reorientation away from traditional industrial or storage uses to more intensive employment uses. Further details in respect of replacement employment floorspace are set out in Policy DM 38, which sets out requirements for enabling mixed use schemes in Designated Employment Area (DEA) – Regeneration Areas.</p> <p><b>For clarification, TH 9 paragraph 5.169 will be amended to read:</b></p> <p><b>“Comprehensive redevelopment to provide a mix of uses, with replacement employment floorspace, new residential and a leisure destination linked to the Lee Valley</b></p>
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				<p>considered to have little, if any, potential for re-use.</p> <p>It is also recognised under paragraph 5.144 that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives such as the site which has been identified as being located within the Tottenham Hale Housing Zone.</p> <p>Given such policy aspirations within the draft AAP for a mix of uses on the site, it needs to be made clear that it is not necessary for the redevelopment of the site to <b>provide “replacement floorspace” because the type</b> of employment uses that are compatible with mixed use schemes (which include residential uses) may result in less floorspace but retain if not increase the employment density of the site. There should therefore be consistency between terminology (whether <b>“replacement employment” or “replacement floorspace”</b>)</p>		<p><b>Regional Park”.</b></p> <p>The indicative development capacity of 1,570m2 of commercial floorspace is an error. As confirmed in Table 10 of Appendix A, the indicative development capacity should be 3,200m2 of commercial floorspace, consistent with Table 6, and <b>a minor modification to correct this will be advanced.</b> It should be noted that these are indicative capacities necessary to demonstrate the ability of the allocations to achieve the strategic housing and job requirements for the Borough over the plan period, and are therefore also minimums where on employment land, the expectation is that redevelopment should seek to exceed the minimum commercial floorspace figure.</p>
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				<p>and a clear definition included within the AAP to provide clear guidance to developers on the policy test for development proposals.</p> <p>There are also inconsistencies in the site allocation overview at Table 6 (Tottenham Hale Sites Capacity) which provides an indicative development capacity of 1,570m<sup>2</sup> of commercial floorspace for Hale Wharf and the Hale Wharf site specific designation (TH9) that suggests an indicative development capacity of 3,200m<sup>2</sup>. We also note that, in any event, the development capacity attributed to the site is indicative, not prescriptive, as confirmed at paragraph 7.3 of Appendix A (<i>'Methodology for Assessing the Capacity of Allocated Sites'</i>). It is clear therefore that the indicative capacity figures comprise estimations only and it is crucial for any policy to provide sufficient flexibility to consider real development proposals, taking into account other considerations such as design and layout, the size,</p>		
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					type and mix of homes/commercial floorspace, site constraints, scheme viability and other planning policy requirements.		
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## AAP5

Respondent 12: Savills on behalf of Interfine Properties

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
12	RTAAP102	AAP 5 paragraphs A and E	No	Yes	<p>1) <b>This policy is unsound as it is not effective</b>  This policy is unclear. It does not give a clear indication if Policy AAP5 (A) is applicable to the Potential Developer or the Decision Maker. It is <b>the LPA's responsibility</b> to review the Conservation Area Management plans and their boundaries.</p>	<p><b>Changes Required</b>  Policy AAP5 (A) needs to provide clear indication who this is applicable to. This policy should be the responsibility of the LPA and not the Developer/ Applicant.  Amend the wording as follows (as underlined in bold)  <i><b>The Council/LPA should review</b> <u>Reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries</u></i></p>	<p>Agreed. To clarify the approach in this regard, the policy will be amended to read:</p> <p><b>A. "The Council will seek to strengthen... and the wider historic environment. <u>This includes reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries.</u> Proposals for new development will be required to..."</b></p> <p>In addition to the above modification, delete</p>

							bullet point A.e.
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Respondent 13: Savills on behalf of Empyrean and Paul Simon Magic Group

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RTAAP109	AAP5	No	Yes	<p><b>1)This policy is unsound as it is not effective.</b>  This policy is unclear. It does not give a clear indication if Policy AAP5 (A) is applicable to the Potential Developer or the Decision Maker. It is the <b>LPA's responsibility</b> to review the Conservation Area Management plans and their boundaries.</p>	<p>Policy AAP5 (A) needs to provide clear indication who this is applicable to. This policy should be the responsibility of the LPA and not the Developer/ Applicant. Amend the wording as follows (as underlined in bold):  <i><b><u>e The Council/LPA should review</u></b></i>  <i><b><u>Reviewing</u></b></i>  <i><b><u>Conservation Area Management Plans</u></b></i>  <i><b><u>where appropriate,</u></b></i>  <i><b><u>including reviewing</u></b></i>  <i><b><u>existing boundaries</u></b></i></p>	<p>Agreed. To clarify the approach in this regard, the policy will be amended to read:</p> <p><b>A. "The Council will seek to strengthen... and the wider historic environment. <u>This includes reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries.</u> Proposals for new development will be required to..."</b></p> <p>In addition to the above modification, delete bullet point A.e.</p>

Respondent 40: Margaret Burr and Noel Treacy

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	Council's Comments /
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		Policy / Figure / Para		Compliant		Sought	Response
40	RTAAP153	AAP 5	No response given	No response given	<p>We feel that the Council does not value the heritage of the area as can be seen in the destruction of Edmonton Dispensary; The Red House and the former White Hart Public House. That they can be so lightly discarded for the access or exit from a sports facility, which is unlikely to last for the length of time these buildings have, is dismaying.</p> <p>Bruce Castle: this magnificent building has been allowed to deteriorate whilst buildings in other parts of Haringey have been prioritised for Heritage Lottery applications. Other boroughs such as Enfield and Redbridge have rebuilt their heritage assets to improve <b>residents' experience of their local history.</b></p> <p>7 Bruce Grove: the site of our only English Heritage Blue Plaque in Tottenham continues to deteriorate when it should have had a CPO.</p>	Not specifically stated	<p>Comments noted. Previous planning decisions are outside the scope of this Local Plan consultation. Future proposals relating to heritage assets will be assessed against all relevant Local Plan policies.</p> <p>No change</p>

AAP6

Respondent 3: Cllr Lorna Reith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RTAAP7	AAP6	Not stated	Not stated	<p>Para F – <b>“Ferry Lane”</b> – should differentiate between those bits of Ferry Lane in DCF and those adjacent to the river/Green Belt. In particular the Hale Wharf site is not suitable for tall buildings. These should be concentrated at the transport hub and in already built up urban areas – not at the boundary of the green belt. This approach is in line with the wording elsewhere in 4.26 - DM6 – building heights <b>should “respond to existing street hierarchy” and “decrease into the quieter hinterland areas”</b>. <b>“Where elements that are considerably taller than this consistent height such as at Seven Sisters station in the Apex House site allocation or at Northumberland Park station... they should mark something or somewhere and have a reason for being taller. These by their very nature should be few in number”</b>. Although Hale Wharf itself is</p>	<p>Para F – <b>“Ferry Lane”</b> – should differentiate between those bits of Ferry Lane in DCF and those adjacent to the river/Green Belt. In particular the Hale Wharf site is not suitable for tall buildings. These should be concentrated at the transport hub and in already built up urban areas – not at the boundary of the green belt.</p>	<p>AAP 6 (F) makes reference to taller buildings, not tall buildings. The Local Plan sets out a clear distinction between these two development types with details set out in Policy DM 6 of the DM DPD. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey’s technical</b> evidence base. It should be noted that the role and function of Green Belt as set out in the NPPF is to curb urban sprawl, but does not extent to the consideration of impacts of development outside of but adjoining Green Belt on its openness. By inference, it is therefore acceptable to have development adjacent to the Green Belt boundary and for this to be visible from the Green Belt extent.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					not Green belt land it provides the border to Green Belt land to the west, north and east (and a bit further to the south as well). So tall buildings here would severely impinge on the sense of openness that the plan says it seeks to preserve.		No change.

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	RTAAP26	AAP 6	Not stated	Not stated	Tall buildings. We do not consider the Hale Wharf site suitable for tall buildings. This is in line with the wording elsewhere in 4.26 - DM6 – building heights should “respond to existing street hierarchy” and “decrease into the quieter hinterland areas”. “Where elements that are considerably taller than this consistent height such as at Seven Sisters station in the	Para F – “ <b>Ferry Lane</b> ” – should differentiate between those bits of Ferry Lane in DCF and those next to river/Green Belt. And make it clear that hale Wharf is not suitable for tall buildings.	AAP 6 (F) makes reference to taller buildings, not tall buildings. The Local Plan sets out a clear distinction between these two development types with details set out in Policy DM 6 of the DM DPD. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b>

					<p>Apex House site allocation or at Northumberland Park station... they should mark something or somewhere and have a reason for being taller. These by their very nature should be few in <b>number</b>".</p> <p>Hale Wharf is not itself Green belt land but it has Green Belt land to the west, north and east (and a bit further to the south as well). So tall buildings here will severely impinge on the sense of openness that the plan says it seeks to preserve.</p>		<p>evidence base. Policy TH 9 sets out further detailed requirements for Hale Wharf and provides that all proposals will need to respond to the Green Belt, in line with national policy, as well as local character and ecological assets in the area.</p> <p>No change.</p>
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Respondent 10: Fiona English and Mark Ellerby

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RTAAP97	Tall buildings figure 4.2	No response given	No response given	In the Evening Standard Comment section, Tuesday 29th February, <b>they argue that 'Housing needs a more imaginative approach' to high-rise. "[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It</b>	Not stated.	The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations,

					<p>is possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular with residents; the same is true of the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] not the best answer.” The same argument could be made for Tottenham.</p>		<p>given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change</p>
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Respondent 40: Margaret Burr and Noel Treacy

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
40	RTAAP154	AAP 6	No response given	No response given	While not objecting in principal to the construction of tall buildings some have been proposed which are inappropriately out of scale for the area such as Apex House and Hale Wharf. In addition the bland designs of both complexes have little in common with the character of the area.	Not specifically stated	Comments noted. Until such time as the new policies of the Local Plan are adopted, they can only form a material consideration in determination of planning application currently before the Council. Therefore, previous planning decisions are outside the scope of this Local

							Plan consultation.
							No change

## AAP7

Respondent 3: Cllr Lorna Reith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RTAAP9	Para 4.29	Not stated	Not stated	<i>Managing and improving the capacity of the road network</i> ". <b>The accepted</b> wisdom in relation to road capacity and traffic generation is that increasing capacity merely encourages more traffic. The area around Tottenham Hale has undergone a major roadworks scheme with the removal of the gyratory, the aim of which was to reduce capacity along Broad Lane to discourage through-traffic. This approach should be strengthened.	I would suggest changing the text by deleting " <i>and improving the capacity of</i> ".	Agreed. Include a minor modification that recognises the objective of managing the capacity of the road network and improving the street environment.

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	RTAAP27	Transport Paragraph	Not stated	Not stated	Managing and improving the <b>capacity of the road network</b> ". But	We suggested changing the	Agreed. Include a minor modification that

		4.29			we know that increasing the capacity will encourage more traffic, and an aim of the gyratory works was to reduce capacity to discourage through-traffic. So why now do we want to increase it?	text by deleting " <i>and improving the capacity of</i> ".	recognises the objective of managing the capacity of the road network and improving the street environment.
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## AAP8

Respondent 3: Cllr Lorna Reith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RTAAP10	AAP8	Not stated	Not stated	While I am happy with the principle of car-free development this has to be properly managed, with adequate spaces for disabled people and proper, enforced, parking controls in surrounding streets. My experience as a ward councillor is that people move <b>into a 'car-free' development but think</b> that they will be able to find somewhere locally to park. This has caused considerable resentment and problems on the Ferry Lane estate with residents from Hale Village and the Sian housing development within the Ferry Lane estate parking on the estate. I have also had to deal with difficulties arising from inadequate provision of dedicated parking for disabled people.	Not stated.	Policy AAP 7.C sets out that parking provision will be expected to be delivered in accordance with Policy DM 32, which the Council considers makes appropriate provision for disabled people. Parking enforcement is outside the scope of this Local Plan consultation.  No change

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	RTAAP28	AAP 8	Not stated	Not stated	AAP8 and elsewhere – we welcome proposals for car-free development but stress that car-free policies are nullified unless there is comprehensive CPZs in all surrounding streets – <b>otherwise residents will “cheat”</b> by parking on nearby public highway (or estate roads) There is evidence that this already happens (people from car-free developments parking on Jarrow Road, and people from Hale Village parking here to avoid parking charges).	Set out policy aim to have comprehensive CPZs in development areas where car-free or car-capped housing is proposed.	AAP 7 sets out that proposals will be expected to comply with Policy DM 32 of the DM DPD – this provides that proposals for limited or no on-site parking will only be supporting where a CPZ exists or will be provided prior to the occupation of the development.  No change.

AAP9

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	RTAAP29	Paragraph 4.35	Not stated	Not stated	4.35 “delivering new open spaces of a	We suggest re-wording 4.35 to say “ <i>Due to the</i>	Agree that wording should be amended to better reflect

					<p>significant scale is not <b>considered</b>". Considering the growth in population and the existing deficiencies this betrays a lack of ambition. It also possibly contradicts 2.65. See our comments above on the need for more open space.</p>	<p><i>significant projected increase in housing and employment in Haringey and Tottenham, the Council will seek to establish new open space where opportunities arise, and to create linkages between them for people and wildlife. Tottenham does have a range of excellent open spaces within it, but some are being lost and others are under pressure from growing population. Development contributions have the potential to be collected and spent on adding to, improving and improving access to existing open spaces. Together, these will form a green grid of networked, high quality open spaces".</i></p>	<p>opportunities for open space provision, in line with other Local Plan policies.</p> <p>Change paragraph 4.35 to: <b>"Due to the significant need for new housing and employment in Haringey, and Tottenham, delivering new open spaces of a significant scale is not considered realistic. However the Council will seek to facilitate the creation of new open spaces where opportunities arise, and to create linkages between open spaces for people and wildlife.</b> Tottenham does have a range of excellent open spaces within it, and on its doorstep. Additionally development contributions have the potential to be collected and spent on improving, and improving access to existing open spaces. Together, these aims will form a green grid of networked, high quality open spaces.</p>
4	RTAAP30	Paragraph 4.36	Not stated	Not stated	The sentence beginning <b>"The more built up</b>	Not stated.	Noted. This is a grammatical error which will be rectified.

					character” is unintelligible. Can we have a translation? Should it be “eradication” not “education”?		Change second sentence of paragraph 4.36 to read: <b>“The more</b> built up character of many of the areas identified as being deficient in access to <u>open space</u> and nature makes the <u>eradication</u> of deficiency all the more <b>challenging”</b> .
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AAP10

AAP11

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	RTAAP31	AAP 11 – B	Not stated	Not stated	– should this be “tertiary education operators” not “tertiary employment operators”?	Not stated.	Noted.  Change policy AAP 11 (B) to read: <b>“The Council will actively seek to introduce tertiary <u>employment education operators...</u>”</b>

Chapter 5

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	RTAAP32	Paragraph 5.23	Not stated	Not stated	This makes reference to new improved SLOL at Lawrence Road but does not explain what they are. We would very much welcome such a step. What are the plans?	Explain proposals for Lawrence Road SLOL	The Council proposes to designate new Significant Local Open Land (SLOL) at the land linking Elizabeth Place and Clyde Circus. Further details are set out in Policy SS 2.

#### Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P66	AAP Chapter 5	Not stated	Not stated	We would like to see the following principles reflected in the site requirements and development guidelines for all the sites listed in the Tottenham AAP. GUIDING PRINCIPLES FOR DEVELOPMENT OF SITES IN TOTTENHAM ADVOCATED BY THE OUR TOTTENHAM NETWORK - TO BE APPLIED TO THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES OF THE AAP These principles were spelled out in Our Tottenham Response to the previous draft of the Tottenham AAP (February 2015 version). They are based on the Our Tottenham Community Charter (Appendix 1 of response) and represent a consensus about how new	Guiding principles for development of sites advocated by the Our Tottenham Network to be applied to all site requirements and development guidelines of the AAP (as	The Council does not agree with incorporating the suggested Guiding Principles into the AAP and for these to be applied to all site requirements and development guideline. In addition to the fact that these principles have not been subject to statutory consultation, their application to future development in Tottenham has not been robustly tested for deliverability or effectiveness

				<p>developments should protect existing residents and businesses and enhances their quality of life and opportunities. THESE PRINCIPLES SHOULD BE APPLIED TO THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES for all the sites in the revised AAP.</p> <p>Under Site Requirements, proposals for each site should:</p> <ol style="list-style-type: none"> <li>1. Relate to sites that are mostly vacant or derelict. Any site consisting of mostly viable buildings and usage should not be subject to a Site Allocation or earmarked for demolition or change of use, except in very exceptional circumstances (such as those buildings and activities not contributing to any of the agreed goals for Tottenham and Haringey, or being predominantly vacant or derelict). No housing that is structurally sound should be demolished. It should be recognised that a Site Allocation for development is likely to create huge uncertainty, stress and blight for the current occupants of the site – this is unnecessary and unacceptable except in the most exceptional circumstances. Local Plan policies already allow for refurbishment and renewal of existing buildings, improvements to social infrastructure and the streetscape etc.</li> <li>2. Conform to Lifetime Neighbourhoods criteria (as set out in the London Plan)</li> <li>3. In Tottenham, conform to the Community Charter for Tottenham</li> <li>4. Conform to best practice for similar sites around the UK and Europe</li> <li>5. All new housing on the site should be high</li> </ol>	<p>set out in response).</p>	<p>in achieving the delivery of <b>Haringey’s strategic housing</b> requirement and jobs target. It is highly unlikely that limiting new development to only those sites where buildings are currently vacant or derelict, and therein capping new development at 3-4 storeys, yet requiring it to be of the highest quality, carbon neutral, capable of supporting social rents, new open space and social infrastructure, would render all schemes unviable and therefore the plan undeliverable and unsound.</p> <p>An unsound plan for Tottenham and Haringey would have significant and harmful consequences for the Borough– not least that the promised strategic investment in Tottenham would be at serious risk, while the extant designations and London Plan housing requirement would remain for landowners and developers to fully exploit in the absence of a local statutory framework to manage this level of growth.</p>
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				<p>quality and genuinely affordable:</p> <ul style="list-style-type: none"> <li>- An affordable home is one that is affordable to any tenant earning the London Living Wage. 70% of such housing should be social housing.</li> <li>- A quality home means all of the following: Secure; Physically comfortable (with adequate indoor space to at least 'London Housing Design Guide 2010' standards ie Parker Morris standards plus 10% more space - and access to adequate outside garden space); It should comply with, and not exceed, the density matrix as set out in the London Plan, and built to 100% lifetimes homes standards. Designs should promote a permeable and convivial street pattern; protect and enhance the conservation and positive character of the local area. There should be easy access to schools, work, healthcare, cultural facilities, public transport, fresh affordable food, and green space. It should allow people to have control over their indoor and outdoor space, and to develop communities and support each other. Residents and communities should be empowered to make decisions and have control over their housing.</li> <li>- As stated in the Haringey Local Plan, 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 pattern of local housing heights in the various neighbourhoods should be respected and all new housing sites should conform to such patterns. In some very exceptional</li> </ul>	<p>Conversely, the proposed Local Plan is in general conformity with the London Plan, deliverable and will ensure new development and growth is sustainable for both new and existing communities.</p> <p>The Community Charter for Tottenham has not been subject to statutory consultation and the Council does not therefore consider it appropriate that all proposals conform to this.</p> <p>The Local Plan seeks to ensure that all new development in Haringey is designed and built to a high quality and positively responds to local character. This is reflected in Policy SP 11 and the proposed Haringey Development Charter (Policy DM 1) with further detailed requirements set out across the DM DPD and other Local Plan documents.</p> <p>The Local Plan sets requirements for affordable</p>
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				<p>circumstances where the overwhelming pattern of development in an area is greater, heights may be appropriate up to a maximum of 6 storeys as long as there is no overshadowing or blocking of light to nearby residences, or key sightlines.</p> <p>6. Refurbishment and renewal is preferred to demolition and re-build, unless this is impossible</p> <p>7. Development to include additional social infrastructure, including adequate levels of quality, public open space (including major new spaces to address areas of deficiency as set out in the London Plan), play areas/equipment, and a range of other social infrastructure and amenity infrastructure, to serve the residents in and near the site. No net loss of social infrastructure.</p> <p>8. No net loss of employment land and facilities unless the existing site can be demonstrated to have been unviable for a clear 3 year period.</p> <p>9. All new facilities (residential, commercial, social) to be environmentally sustainable, ie conform to highest carbon-neutral criteria</p> <p>10. Preserve the heritage and positive characteristics of the surrounding area and of Tottenham as a whole. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list</p> <p>11. For each development, all interfaces with streets, public areas or back gardens should enhance the view and contribute positively to local community experience of the site.</p> <p>12. Change of use of a site will only be</p>	<p>housing, in line with the definition of affordable housing included in the NPPF and London Plan.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan (IDP) which sets out the infrastructure required to support the levels of planned growth and to deliver the spatial strategy for the Borough and Tottenham. The IDP is subject to regular review and updating over the plan period. Where appropriate, site allocation policies require specific provision of social infrastructure. The DM DPD (Policy DM 49) sets out borough-wide policies to protect against the loss of social and community infrastructure.</p> <p>The Council considers that the Local Plan sets a positive framework for managing its employment land stock to meet objectively assessed needs for land and floorspace <b>and the Borough's strategic</b> employment target; it includes criteria to consider</p>
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				<p>allowed in exceptional circumstances (such as the current usage proven to be unviable), subject to the criteria set out here being fully adopted.</p> <p>13. A Social and Community Impact Assessment outlining how it conforms to the above principles is to be produced for each proposed development.</p> <p>Under Development Guidelines, proposals for each site should:</p> <p>a. For Site Allocations, s106 and CIL to be paid towards community benefit to be calculated as all the development profit/surplus expected less 7% for the developer (which we understand is the approx.. European average profit margin). The current CIL to be recalibrated at much higher rate to reflect this figure. At least 20% of the total to be paid shall go to local green space improvements, and at least 20% shall go to youth services and facilities in the area.</p> <p>b. Anyone displaced by the development (whether residential or commercial tenant) must be rehoused by the developer in an equivalent or improved arrangement in the final site or nearby</p> <p>c. Any prospective developer must demonstrate an active and genuine local community partner involved in the decision-making around the design and management of the future site.</p> <p>d. If there is an expression of interest for a Community Plan for the site a minimum period of 12 months shall be set aside to enable such</p>	<p>proposals involving a reduction or loss of employment land/floorspace. A blanket restriction on loss of employment land and facilities is not considered to provide a positive approach for managing land, and would not be consistent with NPPF paragraph 22.</p> <p>The Local Plan includes a suite of policies to ensure that all development proposals incorporate sustainable design, layout and construction techniques, having regard to climate change adaptation and mitigation, including carbon reduction requirements.</p> <p>The Council considers that the Local Plan sets a positive framework for managing the historic environment, and includes policies to ensure proposals have consideration to the significance of heritage assets and their setting in line with the NPPF. This includes borough-wide and Tottenham area policies and additional requirements/guidelines set within site allocations.</p>
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					<p>a Plan to be developed before any further action is taken</p> <p>e. All jobs created during and following the development to be quality jobs, above the London Living Wage, with local trade union branch involvement, and earmarked for local people as far as possible, and to include local apprenticeships.</p>		<p><b>‘Local community experience’ is a vague term</b> and the Council is unclear on how it could implement this requirement in policy terms. The Local Plan seeks to ensure that all development responds to local character and makes a positive contribution to places, including public spaces.</p> <p>Some changes of use fall within permitted development, and the Council has limited control in this respect. The Local Plan sets out the range of acceptable uses for the site allocations, which are considered necessary to meet objectively assessed need and deliver the spatial strategy for the Borough; all proposals will need comply with the uses prescribed by these site specific policies.</p> <p>The Local Plan has been subject to an integrated impact assessment, which includes considerations for social, health and equalities impacts. There is no legal</p>
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						<p>scope for the Council to require applicants to prepare social and community impact assessments.</p> <p>With regard to the additional points the respondent suggests should be included within all development guidelines:</p> <p>The suggested changes do not meet the legal tests for the use of S106 planning obligations or the statutory requirements in respect of CIL charging. In terms of CIL receipts, priorities for CIL spend are set out on the Regulation 123 list, which the Council is required to consult the public on. There is no scope within this Local Plan consultation to make modifications to these priorities.</p> <p>There is no scope for the Local Plan to set policies in respect of displacement as a result of development proposals.</p> <p><b>Haringey's Statement of Community Involvement (SCI)</b></p>
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						<p><b>sets the Council's approach</b> for involving local residents, businesses and other stakeholders on planning applications. The Local Plan sets further requirements for community consultation, such as with site masterplanning, as provided by AAP 1. However, there is no legal scope for the Local Plan to require developers to secure community partners for design and future management of development sites.</p> <p>There is no legal basis for the Council to prevent development on a site coming forward whilst a Community Plan (Neighbourhood Plan) is being prepared.</p> <p>The Local Plan seeks to increase the number and quality of jobs in the Borough, as well as to facilitate training opportunities, so as to enable residents to access a wide range of employment opportunities. The strategic approach to delivering these</p>
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							<p>objectives is set out in Policies SP 8 and SP 9, which the other Local Plan documents help give effect to; this includes seeking planning obligations to invest in training and other initiatives. It is not considered necessary to repeat borough-wide policies for each site allocation. The Living Wage is outside the scope of the Local Plan.</p> <p>No change.</p>
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## Seven Sisters Sub-area

### SS1

#### Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P67	Policy SS1	Not stated	Not stated	Much of this District Centre is situated in the Clyde Circus and Tottenham High Road/ Page Green Conservation Areas. This should be included in this policy as it is an important factor in planning the positive regeneration of the area.	Much of this District Centre is situated in the Clyde Circus and Tottenham	Policies AAP 5 and DM 9 provide that all proposals will need to have regard to the heritage assets and their setting, and the Council does not consider it necessary to

				<p>This proposal should be discussed with Tottenham Traders and the Federation of Small Businesses (North East London) before it is adopted.</p> <p>We welcome positive references to the need to protect independent traders by preventing amalgamation of units and reference to the retention of the market. However, the wording of sentence F ‘The Council will require the retention of the Seven Sisters Market in the area’, p. 58, is ambiguous, as it implies it may be relocated elsewhere in the area.</p> <p>There is widespread support by local residents and businesses to maintain the market where it is now (Wards Corner) and a viable community-led planning application for the site has been approved.</p> <p><b>Reword sentence F (p. 58): ‘The Council will require the retention of the Seven Sisters Market in the area on-site, preserving the existing building’.</b></p> <p>Residents and market traders are very concerned that the Council’s plan to retain the indoor market will only include some of the current market traders. The plan should specify that all current market traders can remain in the Seven Sisters Market.</p>	<p>High Road/ Page Green Conservation Areas. This should be included in this policy as it is an important factor in planning the positive regeneration of the area.</p> <p>Reword sentence F (p. 58): ‘The Council will require the retention of the Seven Sisters Market in the area on-site, preserving the existing building’.</p> <p>The plan should specify that all current market traders can remain in the Seven Sisters Market.</p>	<p>repeat this here. Policy SS 1 makes reference to the need for proposals respond to the historical streetscape rhythm, along with support for the retention, repair and reinstatement of historic shopfronts and facades. This appropriately reflects consideration of the historic environment for a district centre policy.</p> <p>Policy SS 5 sets out further details in respect of the market. Paragraph 5.34 states that the market should be re-provided on the site and that the size and cost of the stalls should be controlled to ensure they are accessible to local traders. However, the Local Plan cannot require that all current traders can remain in the market.</p> <p>No change.</p>
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## SS2

### 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	RTAAP33	SS 2	Not stated	Not stated	Last bullet point – should this refer to West Green Road not Seven Sisters Road?	Not stated.	Noted. Change last bullet in Development Guidelines to read:  <b>“The urban realm along, and linking to, <del>Seven Sisters Road</del> <u>West Green Road</u> should be of a high quality so as to provide a pleasant approach to Seven Sisters station by foot”.</b>

### Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P68	SS 2	No response given	No response given	Add a bullet point: All development to complement and enhance the surrounding Conservation Area. Address Open Space deficiency by ensuring a major open green space is created at the northern end of the site.	Add a bullet point: All development to complement and enhance the surrounding Conservation	The site description box notes that the site is adjacent to a conservation area. Policies AAP 5 and DM 9 provide that all proposals will need to have regard to the heritage assets and their setting, and the Council does

						Area. Address Open Space deficiency by ensuring a major open green space is created at the northern end of the site.	not consider it necessary to repeat this here.  The policy provides that a new SLOL designation will be made at the open space at the northern end of the site.  No change.
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Respondent 11: Isaac Solinsky

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
11	RTAAP98	SS 2	No response given	No response given	We would like to carry on business	Not stated.	Noted.

Respondent 12: Savills on behalf of Interfine Properties

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
12	RTAAP99	AAP 1, SS 2: Lawrence Road Site Allocation , ( Paragraph A	No	Yes	<b>1) This policy is unsound as it is not effective:</b> These policies are unclear. It does not give a clear indication to the	<b>Changes Required</b> The policy should make it clear in what form the masterplan is required and should set out the parameters of the	Disagree. The Policy is clear that the masterplan must show how the proposed development will successfully integrate with existing and

		of AAP1 and the 1st bullet point under the Site Requirements heading of SS2:Lawrence Road )			Potential Developer if the requirement for a masterplan is a separate document or if this would be covered in for example the Design and Access Statement as part of any submission. It is also unclear to what extent (area) does the masterplan need to cover.	required masterplan.	proposed neighbouring development. The extent of the masterplan will therefore depend on the nature of the development site in the context of the extent of the site allocation and neighbouring uses. Primarily it seeks to ensure that what is proposed on part of a site allocation will not compromise the development potential of the remaining site, ensuring phased development secures an optimum site-wide outcome. It is anticipated that the masterplan will need to be prepared and consulted upon prior to any detailed planning application being worked up, but can and should still form part of the application pack. It is not appropriate for validation requirements to be set out in the Local Plan.  No change
12	RTAAP101	AAP 3 and SS 2 site	No	Yes	<b>1) This policy is unsound as it is not</b>	<b>Changes Required</b> Policy SS 2 needs to	The Council does not consider it practical, nor

		allocation, paragraph C			<p><b>effective.</b></p> <p>Policy AAP3 Paragraph C is unclear. The minimum housing capacities for SS2 Lawrence Road indicates 178 net residential units (under Phase 2). It does not give a clear indication to the Potential Developer or Decision Maker where Phase 2 covers as indicated on the SS2 Site plan. There appears to be no clear evidence base as to where this capacity figure is derived from.</p>	<p>illustrate the Phase 2 area to make it clear to the Potential Developer and Decision Maker that the proposed residential units be referred to as minimum requirements.</p>	<p>is it required, to map extant planning permissions as part of the Local Plan site allocations. Policy AAP 3.C sets out that the site capacities are minimum capacities. Site capacities have been established using a standardised methodology, as set out in AAP Annex 7.</p> <p>No change.</p>
12	RTAAP103	SS2: Lawrence Rd site allocation, 4th bullet point under site requirements	No	Yes	<p><b>1)This policy is unsound as it is not effective</b></p> <p>This policy is not clear and not precise. It does not provide a clear indication if the junction falls within SS2 site area and the precise location and area.</p>	<p><b>Changes Required</b></p> <p>Policy SS2 needs to make it clear to a Potential Developer and the Decision Maker the location and area of the junction, and who's responsibility it is for this reconfiguration.</p>	<p>Disagree. It is a site requirement of any development, and the potential developer will need to consider this.</p> <p>No change</p>
12	RTAAP104	SS2, Lawrence road site allocation, 3 <sup>rd</sup> bullet point under development criteria	No	Yes	<p><b>1)This policy is unsound as it is not effective:</b></p> <p>A flexible approach to existing trees is required in line with the adopted Local Plan Policy SP13 which states: <i>'All development shall protect and improve sites</i></p>	<p><b>Changes Required</b></p> <p>This paragraph should be consistent with adopted Policy. Amend the wording as follows (as underlined in bold) <i>The existing street trees are a strong asset to the</i></p>	<p>Disagree. This comment pertains to the <b>"development guidelines"</b> which offer guidance on the most appropriate development considerations for the site, in line with paragraph 5.6 of the AAP.</p>

					<p><i>of biodiversity and nature conservation, including private gardens through its:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Protection, management and maintenance of existing trees and the planting of new trees where appropriate; and’.</i></li> </ul>	<p><i>streetscape and should be preserved, where appropriate</i></p>	<p>Policy SS 2 will be considered in conjunction with Policy SP 13.</p> <p>No change.</p>
12	RTAAP105	SS 2 Lawrence Road Site Allocation, 7 <sup>th</sup> bullet point under development criteria	No	Yes	<p>1) This policy is unsound as it is not effective. This policy should be flexible and aligned to adopted Local Policy SP4, where:</p> <p><b><i>‘The Council will promote low- and zero-carbon energy generation through the following measures:</i></b></p> <p><i>a. Requiring all developments to assess, identify and implement, where viable, site-wide and area-wide decentralised energy facilities including the potential to link into a wider network;</i></p> <p><i>b. Establishing local networks of decentralised heat and energy facilities by requiring developers to prioritise connection to</i></p>	<p><b>Changes Required</b></p> <p>This paragraph should be consistent with adopted Policy.</p> <p>Amend wording as follows (as underlined in bold).</p> <p><i>This site is identified as being in 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, where feasible.</i></p>	<p>The development guidelines offer guidance on the most appropriate development considerations for the site, including where other policies may be relevant. In this case, requirements for DE are covered by the borough-wide policies SP 4 and DM 22, which reflect that requirements are subject to technical feasibility and financial viability. The Council does not consider it necessary to repeat this here.</p> <p>No change.</p>

					<i>existing or planned networks where feasible;</i>		
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### SS3

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	RTAAP34	SS 3	Not stated	Not stated	The current estate has a lot of open space but it may be of poor quality both ecologically and amenity-wise.	The policy should require this to be improved in any redevelopment, for example restoring some of the trees.	Noted. Should the site come forward, further details on open space provision can be addressed in a site masterplan. The DM DPD sets out requirements for landscaping and open space provision.  No change.

Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P69	SS 3	No response given	No response given	We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and	We want a clear rewording on p. 63 to clarify	The Local Plan should be read in its entirety. Alterations to Policy SP 2 set out the <b>Council's strategic approach</b>

					<p>displacement of existing residents. Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.</p> <p>We want a clear rewording on p. 63 to clarify <b>the principles of the 'renewal process'</b>:</p> <p>No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes.</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.</p>	<p>the principles of the 'renewal process':</p>	<p>for housing estate renewal and improvement, and Turner Avenue is included in an initial priority list. The approach is set recognising <b>the Council's commitment to</b> improving the housing stock and the limitations of the Decent Homes programme. The inclusion of estate regeneration in the Local Plan is considered necessary in policy terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan, and will help to address objectively assessed need for housing. Further details in this respect are set out in the Alterations to Strategic Policies SP 2, along with paragraph 3.2.29, and Policy AAP 3.D.</p> <p>Paragraph 3.2.29 of the Alterations to Strategic <b>Policies set out the Council's</b> approach to engage with residents on estate renewal projects. It also states that the Council will seek to re-provide social housing on an</p>
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		<b>Figure / Para</b>					
9	RTAA P70	SS 4	No response given	No response given	p. 65, under 'Site requirements', add a bullet point stating 'there should be no loss of existing businesses'.	Under 'Site requirements', add a bullet point stating 'there should be no loss of existing businesses'.	Policy SS4 seeks redevelopment of the site to deliver new employment floorspace to help meet objectively assessed needs in this regard, and to deliver the spatial strategy for Tottenham and the Borough. Whilst the policy provides for the continuation of employment uses at this site, the Local Plan cannot require that there be no loss of existing businesses.  No change.

Respondent 13: Savills on behalf of Empyrean and Paul Simon Magic Group

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RTAAP106	SS 4	No	Yes	<b>1)The policy is unsound as it is not justified</b> The Site was identified for <b>redevelopment in Haringey's</b> Site Allocations DPD January 2014 Consultation Document as THR9- Gourley Place & Wickes Site. This	The indicative development capacity figures as outlined in SS4 need to be changed to reflect the reasons as outlined above. The indicative capacity figure needs to be flexible and	Policy AAP 3.C sets out that the site capacities are minimum capacities. These are indicative capacities (as signposted by the table in Policy SS 4) that have been established using a standardised

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>outlined a potential development capacity for 54,000m<sup>2</sup> of residential and 22,000m<sup>2</sup> of commercial development.</p> <p>In February 2015 an evidence base study was undertaken by GVA on behalf of Haringey Council to support their Local Plan preparation titled; <i>London Borough of Haringey Site Allocation Viability Assessment - February 2015</i>. This outlined that the Gourley Triangle Site has the potential to provide 213 residential units (based on an average unit size of 70sqm GIA) and 4,976sqm of business space.</p> <p>The indicative figures for this site are significantly different between the DPD January 2014 Consultation Document and the Allocation Viability Assessment - February 2015. Viability is a subjective matter and it may not always be possible to rely on the conclusions of</p>	<p>non prescriptive, setting out a minimum figure for both residential and commercial development.</p>	<p>methodology, summarised in AAP Annex 7. The purpose of the indicative figures is to demonstrate that across the Plan the Council can meet and exceed its strategic housing requirement and job growth target. The optimum capacity of development on any individual site will be determined through a robust design-led approach in accordance with Policy DM1.</p> <p>No change.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>the third party. The two key issues here are firstly that the Policy SS4 indicative development capacity figures do not reflect the evidence base study undertaken, where the figures for Policy SS4 do not correspond to the Allocation Viability Assessment - February 2015.</p> <p>Secondly, the evidence base does not provide a clear reason for the significant difference between the two indicative capacity figures for the DPD January 2014 Consultation Document and the Allocation Viability Assessment - February 2015.</p> <p><b>2)The Policy is unsound as it is not justified</b></p> <p>The London Plan 2015 density matrix indicates that in urban locations a density of 200-700 habitable room per hectare or between 70-260 units per hectare is acceptable. Given the site</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>area at approximately 2.0ha the figure of 191 net residential units is low. Based on this figure this assumes an equivalent figure of 1ha = 95.5 units. This is within the density range, however is considerably low and does not fully satisfy London Plan objectives, where: Paragraph 3.19 of the <b>London Plan states: 'In addition, the process of managing the release of surplus industrial land should focus on bringing forward areas with good public transport accessibility which will be particularly appropriate for high density development'</b>. It is considered that the indicative development capacity figures for both residential and commercial are too low and do not reflect the London Plan <b>objective to deliver 'high density development' in areas with good public</b></p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>transport, where the Gourley site has PTAL rating of 5.</p> <p><b>3) The Policy is unsound as it is not effective</b></p> <p>The indicative development capacity figures are not consistent with emerging policy objectives, where:</p> <p>The commentary provided in SS4 Policy specifically <b>highlights that: 'the Council is seeking to encourage redevelopment of the area to introduce a range higher density employment uses'</b>.</p> <p>Furthermore Policy AAP3 of the emerging Tottenham Area Action Plan outlines that: <b>'Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised'</b>.</p> <p>The current indicative development capacity</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>figures as outlined in Policy SS4 do not reflect the objective of higher density employment uses. It is considered that the Gourley site has the potential to deliver a mixed use proposal:</p> <p>The site has the potential to deliver approximately 9,000 – 12,000sqm of commercial floorspace.</p> <p>The site has the potential to deliver approximately 600 – 700 residential units.</p>		

## SS5

### Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P71	SS 5	No response given	No response given	We support the position of the Wards Corner Coalition with respect to this site. This states that the Seven Sisters Market should be reprovided on this site and cost of	The Seven Sisters Market should be reprovided on	Paragraph 5.34 states that the market should be re-provided on the site and that the size and cost of the stalls

				<p>stalls should be controlled to ensure they are accessible to local independent traders. Residents and market traders are very <b>concerned that the Council's plan to retain the indoor market</b> will only include some of the current market traders. The plan should specify that all current market traders can remain in the Seven Sisters Market. Wards Corner is a locally listed building in the Conservation Area and the ground floor is registered as an Asset of Community Value. The Seven Sisters/West Green Road Development Trust was granted planning permission for The Wards Corner Community Plan in 2014. This permission to restore and retrofit the historic former department store should take precedence over the subsequent Apex House Site Allocation statement that it is a suitable location for a tall building. Government Guidance sets out a presumption in favour of preserving buildings that make a positive contribution to the character and appearance of Conservation Areas. Development on the Apex House site should therefore be in keeping with the height and appearance of the existing Wards Department Store building.</p> <p>re-integrate what was mentioned in the previous iteration of the draft AAP: The site lies within the Seven Sisters Conservation Area and development should preserve or enhance its appearance as per the statutory requirements. This should explicitly mention locally listed buildings and refer to the <b>Council's broader policies and approach to</b></p>	<p>this site and cost of stalls should be controlled to ensure they are accessible to local independent traders</p> <p>The plan should specify that all current market traders can remain in the Seven Sisters Market</p> <p>Re-integrate what was mentioned in the previous iteration of the draft AAP: The site lies within the Seven Sisters Conservation Area and development should preserve or enhance its appearance as per the</p>	<p>should be controlled to ensure they are accessible to local traders. However, the Local Plan cannot require that all current traders can remain in the market.</p> <p>The site description box lists the relevant planning designations, including conservation areas and listed buildings. Policy SS 5 will need to be considered alongside other policies relevant to management of the historic environment, including AAP 5 and DM 9, and the Council does not consider it necessary to repeat requirements here.</p> <p>No change.</p>
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					securing the refurbishment of heritage assets along the High Road and more generally.	statutory requirements. This should explicitly mention locally listed buildings and refer to <b>the Council's</b> broader policies and approach to securing the refurbishment of heritage assets along the High Road and more generally.	
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Respondent 40: Margaret Burr and Noel Treacy

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
40	RTAAP156	SS 5	No response given	No response given	Wards Corner could provide a dynamic and idiosyncratic entry to Tottenham but years of neglect by the Council and authorities and a desire to provide retail space for <b>the 'chains' (just when other areas are moving away from the Nexts, Pizza Expresses et al)</b> , means that the potential of Wards Corner as a	Not specifically stated	Comments noted. SS5 requires that the market is re-provided on site as part of a proposal for the site. As set out in the Site <b>Requirements of SS5, 'the new market will be required to provide a range of small and affordable units suitable for independent traders.'</b>

					hub with opportunities for local independent small scale quality businesses, as well as artistic ventures, has not been properly explored. We want to live in a community which values the vibrancy of the market.		No change
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Respondent 44: Mrs Ruiyon Zhou

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
44	RTAAP163	SS5	Yes	Yes	Please either resettle me or make relevant decision. There are rats and pests. We live in appalling conditions. We are not well.	Please act to resettle us elsewhere, as this dwelling is desperate.	Noted.

SS6

Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P72	SS 6	No response given	No response given	We consider this site allocation does not provide a strong enough vision for such a key strategic site, either in terms of meeting needs of Tottenham's diverse communities; ensuring a high-quality sustainable building; or ensuring	We propose the following aspects should be mentioned and	Disagree. The Council considers that AAP acknowledges the key strategic location and opportunities for this site

				<p>a vital and viable town centre as required by the London Plan. This is especially important in relation to the value of the site and its potential to yield benefits for Tottenham. We propose the following aspects should be mentioned and the relevant policies cross-referred to:</p> <p>Need for the highest environmental standards to be achieved</p> <p>Need to ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable)</p> <p>Need to reflect and support the culture and diversity of the area</p> <p>Need to deliver affordable workspace, space for small shops, space for cultural and creative uses</p> <p>Need to enhance the public realm</p> <p>Need to ensure safety</p> <p>A tower block, let alone a 22-storey building, is inappropriate at this site. Further cross referencing is needed to key council policies relating to tall buildings, given this is the first time such a building has been proposed in this area and given the height Grainger are currently considering. If this goes ahead, this will likely be the first time these new policies allowing taller buildings are tested. There is therefore a need for caution to ensure that a precedent is not set that damages <b>Tottenham's character and strengths</b>. In particular the following policies should be explicitly referred to: Privacy, Light, Need to</p>	<p>the relevant policies cross-referred to:</p> <p>Need for the highest environmental standards to be achieved</p> <p>Need to ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable)</p> <p>Need to reflect and support the culture and diversity of the area</p> <p>Need to deliver affordable workspace, space for small shops,</p>	<p>(including in the Seven <b>"Sisters/West Green Road sub-area" vision</b> and objectives and at paragraph 5.38), which has been reflected in the policy approach to optimise its future redevelopment, contributing to delivery of the spatial strategy for Tottenham and the Borough.</p> <p>The Council considers that the suggested changes to the policy are suitably covered by the requirements set out in the AAP area-wide policies and the DM DPD, and are therefore not necessary to repeat here.</p> <p>The site falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings.</p>
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					<p>relate to surrounding buildings and heritage – it should be clarified that the building must not be so tall that it cannot relate to the surrounding area. The density and height allowable on this site should be clarified with reference to an evidence base, policy and other relevant factors (e.g. flood study).</p>	<p>space for cultural and creative uses Need to enhance the public realm Need to ensure safety</p> <p>In particular the following policies should be explicitly referred to: Privacy, Light, Need to relate to surrounding buildings and heritage – it should be clarified that the building must not be so tall that it cannot relate to the surrounding area. The density and height allowable on this site should be clarified with reference to an evidence</p>	<p>The indicative site capacity has been established using a standard methodology, as set out in AAP Appendix A.</p> <p>No change.</p>
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						base, policy and other relevant factors (e.g. flood study).	
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Respondent 14: David Sargeant

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
14	RTAAP110	SS6: Apex House & Seacole Court	No	No	What's the matter with Haringey Council these days? Why is the council going astray these days? If this Liberty taking plan was submitted to me as a Planner I will tear it up and ask the producer to return to the drawing board class. We cannot have a plan that destructs quality of life in an area containing normal quiet households. We need a better plan that is not obstructive, intrusive, pokey, constantly erecting, where perverts would love to live so that they zoom their nosey perverse eyes into neighbours gardens, where the locals should be entitled to real daylight and where the council staff and its allies should exercise respect and dignity for the natural long term setting. Seven Sisters patch close to the amenities and	Not stated	<p>The Council considers that this response does not address the focus of the consultation.</p> <p>The Council considers the AAP provides a sound basis for meeting objectively assessed need and delivering the spatial strategy for the Tottenham Area and the Borough. Within this context is sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and</p>

					<p>rail stations is definitely not New York or Canary Whatf with huge skyscrapers. Indeed skyscrapers case to major pedestrian or public area where it is also the location for transport transit poses a number of potential safety and personal risk. Therefore it is proper to note that Skyscrapers were never meant to be built for human living and any attempt to build the Towel of Babel in Seven Sisters - or even any attempt to build any building more than seven stories tall in seven sisters is corrupting the community.</p>		<p>employment outcomes in accessible locations.</p> <p>No change</p>
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## Tottenham Green Sub-area

### TG1

#### Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P73	TG 1	No response given	No response given	In the previous draft of the AAP the Leisure Centre car park was identified as a site for built development, which we opposed. There is no reference to the car park here any longer.	We argue that this site should be reintegrated	The Leisure Centre Car Park was included as proposed Policy TG 1 in the Regulation 18 Tottenham AAP (February

					<p>We argue that this site should be reintegrated into the AAP and designated to be retained as open space -- particularly to provide facilities for outdoor physical activity, which are almost completely lacking in the already densely built up central Tottenham area. There is a lack of other open space large enough to provide this. The site's location -- adjacent to both the Sports Centre and Tottenham Green -- make it a strategic location for this. It is usual for sports centres to be located adjacent to playing fields and outdoor courts, which extend and supplement their important public health role.</p>	<p>into the AAP and designated to be retained as open space -- particularly to provide facilities for outdoor physical activity</p>	<p>2015). The site allocation has been removed in response to the consultation and concerns over deliverability, including reconciliation of replacement parking. While the site is not currently open space as suggested, provision of outdoor facilities would likely result in the same concerns over deliverability – more so if the outdoor use increased demand for parking.</p> <p>No change.</p>
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## TG2

### 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	RTAAP36	TG 2	Not stated	Not stated	Is it possible to create an east-west green corridor connecting to the ecological corridor of the railway track?	Insert a Guideline accordingly	Green corridor is not an established designation; however notwithstanding this the Council does not consider that a new ecological corridor or open/green space linking to the existing ecological corridor at the railway track would be deliverable. The development guidelines are specific to the land within the site allocation boundaries.

							No change.
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Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P74	TG 2	No response given	No response given	<p>Make explicit the protection of community use (T-Chances), a very valuable asset for the area. T-Chances, is a very important community centre providing key services and <b>facilities for Tottenham's youth. The protection of T-Chances needs to be explicitly included in the site requirements.</b></p> <p>Nicholson Ct is a recently-constructed low rise residential building and should be retained. REMOVE reference to the Option that "A more comprehensive scheme would need to justify the loss of the existing listed building".</p>	<p>Make explicit the protection of community use (T-Chances).</p> <p>Nicholson Ct is a recently-constructed low rise residential building and should be retained.</p> <p>REMOVE reference to the Option that "A more comprehensive scheme would need to justify the loss</p>	<p>The policy provides that a venue for the existing community use should be secured before any redevelopment occurs – this will ensure that provision of social infrastructure is appropriately retained in accordance with Policy DM49. The Council does not consider it appropriate for the Local Plan to specify users of the community facility.</p> <p>The proposals regarding Nicholson Court and the listed building are necessary to ensure the policy is sufficiently flexible to enable development to come forward and facilitate delivery of the spatial strategy for the area. To this end, the policy is clear that any future</p>

						of the existing listed building".	<p>proposal affecting the buildings would need to be considered having regard to a comprehensive approach. Further, TG 2 signposts the heritage assets within and surrounding the site and any proposals will also be considered having regard to AAP 5 and DM 9 on managing the historic environment. Although it is noted that the heritage value of the building is questionable given it has been substantially rebuilt.</p> <p>The Council considers that the suggested changes do not provide a positive and flexible framework to support delivery of the plan.</p> <p>No change.</p>
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TG3

Respondent 7: Elizabeth Pearce

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	<b>Council's Comments / Response</b>
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		<b>Para</b>					
7	RTAAP63	TG3	Not stated	Not stated	With regard to the proposed demolition of Tottenham Police Station I simply cannot see how this will benefit the community. Having a visible police presence on the High Road is one of the most important aspects of community safety, particularly in light of the riots which occurred a few years ago.	Not stated	The policy sets out that re-provision of the police facility within Tottenham must be identified prior to the redevelopment taking place. This will ensure appropriate provision is maintained whilst enabling consideration of alternative uses on the site which can assist in delivering the spatial strategy for Tottenham.

#### Respondent 9: Our Tottenham Network

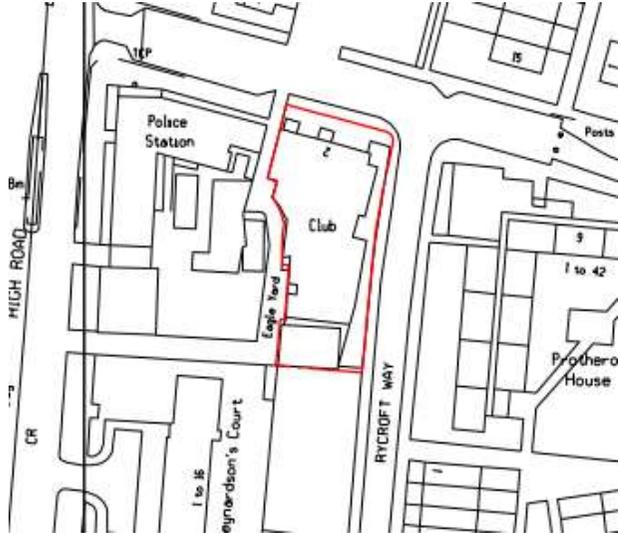
ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P75	TG 3	No response given	No response given	Remove Reynaldson Court from the brief for development. We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.	Remove Reynaldson Court from the brief for development.	Alterations to Policy SP 2 set <b>out the Council's strategic</b> approach for housing estate renewal and improvement, and Reynaldson Court is included in an initial priority list. The approach is set recognising <b>the Council's</b> commitment to improving housing stock and the limitations of the Decent Homes programme. The inclusion of estate

							<p>regeneration in the Local Plan is considered necessary in policy terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan. The Council considers that the removal of Reynardson Court <b>would compromise the plan's</b> ability to meet objectively assessed housing need and <b>the borough's strategic</b> housing delivery target. In addition, redevelopment of the site offers opportunities to enable improvements to open space provision, which is an important part of the spatial strategy.</p> <p>Alteration 64 to the Strategic Policies sets out the <b>Council's approach</b> to re-provide social housing on an equivalent floorspace basis.</p> <p>No change.</p>
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Respondent 15: SF Planning on behalf of Jigsaw Student Living

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments /
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		Figure / Para					Response
15	RTAAP111	TG 3	Not stated	Not stated	<p>By way of background, our Client, Jigsaw Student Living Ltd owns 2 Chesnut Road, to the west of High Road and to the northwest of Tottenham Hale station as outlined on the site plan overleaf. This is part of a wider site allocation within the draft document (site allocation - TG3), which is discussed later within the representation.</p> <p><b>Our Client’s site comprises of the remains of a mid-19th century villa with a frontage onto Chesnut Road which has a lawful nightclub use (sui generis). The Rycroft Way frontage comprises of various unattractive single storey additions to the original building over recent years. To the west of the site is Tottenham Police Station the western boundary fronts Eagle Yard and its eastern boundary fronts onto Rycroft Way. To the south of the site is open green space lined by semi mature trees followed by a car park between Rycroft Way and Reynardson Court fronting the High Road.</b></p> <p><i>Site Location Plan – 2 Chesnut Road</i></p> <p><b><i>Planning Designations</i></b> In terms of its planning designations, the site is located within the Tottenham Green Conservation Area, Tottenham High Road “Corridor”, within an archaeological priority area and is adjacent to locally listed buildings. The site is also within the Upper Lee Valley Opportunity Area Planning Framework (2013).</p> <p>The site is within walking distance of the</p>	<p>Our Client would therefore request the policy is updated to acknowledge the previous planning history of the site since this has been demonstrated to compromise an acceptable reuse of this sustainably and underutilized site.</p> <p>As it has been demonstrated above, the site is within close proximity to good public transport links and there is a need for visitor accommodation and / or specialist housing. These uses should therefore be</p>	<p>It should be noted that 2 Chestnut Road forms only a very small portion of the overall site allocation. The Council considers the allocation is correct as applying to the majority of the site and it would be incorrect to include student housing as a primary land use expectation of the allocation. Nevertheless, it is appropriate to include reference to the extant planning permission for 2 Chestnut Road. <b>Include extant planning Permission HGY/2013/0155 applying to 2 Chestnut Road and the fact that</b></p>

				<p>Tottenham High Road bus corridor, Bruce Grove Rail station and Tottenham Hale underground station. There is also the presence of several local and strategic cycle routes including LCN+ Link 79 which connects the site with Enfield and Waltham Forest. Chestnut Road</p>  <p><i>Planning Designations</i> In terms of its planning designations, the site is located within the Tottenham Green Conservation Area, Tottenham High Road “Corridor”, within an archaeological priority area and is adjacent to locally listed buildings. The site is also within the Upper Lee Valley Opportunity Area Planning Framework (2013). The site is within walking distance of the Tottenham High Road bus corridor, Bruce Grove Rail station and Tottenham Hale underground</p>	<p>integrated into the site allocation Policy TG.3</p>	<p><b>this provides for student accommodation.</b></p> <p>Visitor accommodation, including Hotel and Apart hotel uses are directed to locate in town centres in the first instance to support the vitality of the centres and to make effective use of local amenities. Any future proposals for the site should be in line with the requirements and guidance set out in this allocation and will be assessed against all other relevant policies.</p>
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				<p>station. There is also the presence of several local and strategic cycle routes including LCN+ Link 79 which connects the site with Enfield and Waltham Forest.</p> <p>Chestnut Road is a key corridor within the Tottenham area providing an important link between Tottenham Hale and Lea Valley Regional Park in the east and the High Road in the west. The area does therefore have very good public transport accessibility with a PTAL rating of 6a.</p> <p><b>Planning History</b></p> <p>The site has some significant planning history in recent years within the table set out below. These applications have failed to have been referenced within the draft Tottenham AAP.</p> <p><b>Planning Reference</b></p> <p>HGY/2009/1665</p>	<p><b>Description</b></p> <p><i>Demolition of existing structures and erection of 3 storey building comprising of 1 x 3 bed flat, 2 x</i></p>	<p><b>Decision</b></p> <p>Granted 27-07-10</p>	
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					<p>HGY/2009/1667 <i>two bed flat with balconies, bin and cycle store</i></p> <p><i>Demolition of existing structures and erection of four storey building comprising of 1 x 3 bed flat and 2 x 2 bed flats with balconies, erection of bin and cycle store (amended scheme).</i></p>	<p>Granted 27-07-10</p>	
					<p>HGY/2013/0155 <i>Partial demolition of existing buildings, retaining existing historical facade, construction of student accommodation over 3 and 4 floors to provide 64 student rooms and amenity areas.</i></p>	<p>Granted 26-03-13</p>	
<p><i>Policy TG3 - Tottenham Area Action Plan</i></p>							

				<p><i>Development Plan Document</i></p> <p>Our Client's site is located within the wider proposed site allocation (TG3) as set out on the site plan below. Paragraph 5.56 sets out the site allocation;</p> <p><b><i>“Subject to re-provision of the Police Station locally, conversion of the existing police station to include commercial space for SME and startup businesses. Redevelopment of Reynardson Court, and the car park to the rear, for improved housing stock and improved/enhanced open space.”</i></b></p> <p>The allocation, as previously set out, fails to mention no.2 Chesnut Road and its relevant planning history as highlighted within the table above. This is a significant material consideration, since the principle of student accommodation has already been found to be acceptable via planning application HGY/2013/0155 which is in the process of being implemented.</p> <p>Our Client would therefore request the policy is updated to acknowledge the previous planning history of the site since this has been demonstrated to compromise an acceptable reuse of this sustainably and underutilized site.</p> <p><b><i>Potential other suitable uses for no.2 Chesnut Road</i></b></p> <p>Our Client is exploring the possibility of other suitable uses for the site which would help achieve the aims and aspirations of the draft Tottenham AAP and would replace the student accommodation within the redevelopment scheme.</p>		
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				<p>In this regard, our Client has engaged with key stakeholders and Harrinegy Council regarding the potential need for other uses within this area. Alongside this, a full review of national, London Plan and emerging local policy has been undertaken to determine the suitability of potential uses for the site. This additional work has determined there is an identified need within the London Plan for short term hotel / visitor accommodation and at a local level a pressing need for specialist housing.</p> <p>- <i>Visitor Accommodation</i></p> <p>In relation to relevant planning policy which concerns visitor accommodation, the National Planning Policy Framework (NPPF - Part 2) recognises that other economic development can play an important role in ensuring the vitality of centres and encourages the development of visitor accommodation on appropriate sites. At a London level, the London Plan is a Spatial Development Strategy which covers the social, economic and environmental strategies for London up to 2036. London Plan Policy 2.7 is relevant given the sites sustainable location within the outer London Borough of Harrinegy <b>and relates to ‘Outer London: Economy’</b> requiring outer London Boroughs to identify and bringing forward capacity in areas with good public transport accessibility to accommodate leisure, retail and civic needs.</p> <p><b>London Plan Policy 4.5 relates to ‘London’s Visitor Infrastructure’ with Boroughs required to; “support London’s visitor economy and</b></p>		
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				<p><i>stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London.” [Our Emphasis]</i></p> <p>Policy 4.5 goes on to note beyond the Central Activities Zone (CAZ), visitor accommodation should be focused in town centres and opportunity and intensification areas, where there is good public transport access to central London. As previously set out the site is highly accessible and therefore an appropriate location for much needed visitor accommodation.</p> <p>Part (C) of London Plan Policy 4.5 notes Local Authorities LDFs should promote and facilitate development of a range of visitor accommodation, such as hotels, bed and breakfast accommodation, self-catering facilities, youth hostels and camping and caravan sites as well as supporting and encouraging development of good quality budget category hotels, especially in outer London.</p> <p>A Hotel / Apart-Hotel scheme would include a reception and concierge area at ground floor level to provide a checking in and out facility for guests as well as luggage storage and back of office facilities for staff of the Apart-Hotel. The upper floors would provide a total rooms for guests including separate en-suite and basic cooking facilities if required for longer stay guests.</p> <p>The proposed Apart-Hotel by its nature would provide visitor accommodation which would reduce the likely pressure on residential housing</p>		
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				<p>within the Borough to be used as visitor accommodation, whilst retaining an employment element on site.</p> <p>A proposed Hotel / Apart-Hotel on the site to provide self-contained hotel accommodation (C1 use class) that provides for short-term occupancy for visitors (in line with former ODPM Circular 03/2005) in accordance with the London Plan definition of an Apart-Hotel (Ref: London Plan Glossary – P386), is therefore fully supported at national, regional and local level.</p> <p><i>Conclusion</i></p> <p>The regeneration and improvement of this site will bring back into use a key site along Chestnut Road. As it has been demonstrated above, the site is within close proximity to good public transport links and there is a need for visitor accommodation and / or specialist housing. These uses should therefore be integrated into the site allocation Policy TG.3.</p> <p>Chestnut Road is a key corridor within the Tottenham area providing an important link between Tottenham Hale and Lea Valley Regional Park in the east and the High Road in the west. One of the key objectives for the regeneration of Tottenham is to see high quality development along this route that helps to define it is a safe and secure route between the High Road, Tottenham Green and Tottenham Hale. Furthermore, the site falls within an area with high public transport accessibility level PTAL (6a).</p> <p>We would appreciate an acknowledgement of this representation letter in due course and hope</p>		
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					these matters will inform the final drafting of the Tottenham AAP.		
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## Bruce Grove Sub-area

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	RTAAP37	Paragraph 5.70	Not stated	Not stated	New improved SLOL at Bruce Grove Wood. We strongly welcome this, what are the plans? A mini-park at the rear of the heritage buildings would give them an improved setting.	Set out the plans for this SLOL.	The Council proposes to designate land at Bruce Grove Wood as Significant Local Open Land (SLOL) giving it appropriate protection as open space. Further details on managing open space provision are set out in Policies SP 13 and DM 20.

## BG1

Respondent 16: Tezay Mustafa

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
16	RTAAP112	BG 1	No	No	In response to the proposed development of the former Bruce Grove Snooker Club and rear of the Banqueting Suite, we completely object to this scheme. As owners of the Banqueting Suite, the proposal to develop to the rear of our building is	If any sort of development is to take place, than we would argue that the existing banqueting suite is demolished to allow	The allocation requires a masterplan be prepared for the entire site and that the existing Banqueting Suite Building be retained but not

				<p>completely unacceptable as car parking is non existent along Bruce Gove as its a Red Route. This would have a huge detrimental effect on our business as all of our clients comment on how important the car park is as there is no parking along Bruce Grove. As a business that has been part of Bruce Grove for 32 years, we are in favour of redevelopment however, strongly object to the single story extension on our existing site. If any sort of development is to take place, than we would argue that the existing banqueting suite is demolished to allow for a comprehensive landmark development with the adjoining former Snooker Club. We do not see our building of having any heritage or cultural value to the area what so ever and it is only due to the fact that we have enhanced and improved it generally that it has any value. We ask the council to take into consideration the fact that the banqueting suite provides income and supports four families and once again stress that any redevelopment of the adjoining site and are own is significant enough to continually support all families involved.</p>	<p>for a comprehensive landmark development with the adjoining former Snooker Club. We do not see our building of having any heritage or cultural value to the area what so ever and it is only due to the fact that we have enhanced and improved it generally that it has any value. We ask the council to take into consideration the fact that the banqueting suite provides income and supports four families and once again stress that any redevelopment of the adjoining site and are own is significant enough to continually support all families involved.</p>	<p>necessarily its current use. Through the masterplan it could be demonstrate that redevelopment of the site requires the Banqueting Suite to be demolished and only its facade retained. However, this would need to be demonstrated through the detailed consideration of alternative site layout proposals, including those that would see the Banqueting Suite retained. This level of analysis and detail is beyond the scope of the allocation to provide and is appropriately left to masterplanning and any subsequent planning application.</p> <p>No change</p>
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BG2

Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P76	BG 2	No response given	No response given	This site includes what was previously referred to as BG4 (Moorefield Road) in the previous Fe. 2015 draft of the Tottenham AAP. For this part of the site, occupied by a building merchant, we demand NO NET LOSS OF EMPLOYMENT LAND AND FACILITIES. This site is occupied by MEMS, building merchants, a successful local business and therefore should not be subject to site allocation.	For this part of the site, occupied by a building merchant, we demand no net loss of employment land and facilities	Disagree. The policy seeks to facilitate a mixed use redevelopment to support delivery of improvements to the station. The <b>site's</b> location, next to the station, and within a town centre make it suitable for more intensive use than currently provided. The policy seeks provision for an element of employment floorspace however recognising opportunities to support town centre vitality and viability by encouraging a wider range of uses and improving the public realm.  No change

Respondent 17: Springfields Planning and Development Limited obo Ali Mentesh

ID	Rep ID	Allocation	Sound	Legally	Reason	Change Sought	Council's
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		/ Policy / Figure / Para		Compliant			Comments / Response
17	RTAAP113	BG 2 Para 5.74	No	Yes	<p>The National Planning Policy Framework (NPPF) at Paragraph 182 clarifies that a local planning authority should submit a plan for examination which it considers is “<b>sound</b>” – namely that it is:</p> <p><i>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</i></p> <p><i>Justified – the plan should be the <u>most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</u></i></p> <p><i>Effective – the plan <u>should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;</u> and</i></p> <p><i>Consistent with national policy – the plan should <u>enable the delivery of sustainable development</u> in accordance with the policies in the Framework.</i></p> <p>(NB The underlining is the objector’s emphasis)</p>	<p>The area of Site Allocation BG2 should be amended so that it deletes that part of the site area currently occupied by MEMS DIY Ltd. The area in question that should be deleted was previously identified as <i>Site Allocation BG4: Moorefield Road</i> in the Tottenham AAP Preferred Options Consultation.</p> <p>The text to Site Allocation BG2: Bruce Grove Stationcourt should be amended as follows: - to delete the <b>words ‘and 22-24 Moorefield Road,’</b> (under ‘Address’) - to delete the</p>	<p>Disagree. BG 2 seeks to facilitate a mixed use redevelopment of the site to support delivery of the spatial strategy for the area and the Borough, commensurate with <b>the site’s location</b> in an area of high public transport accessibility and partly within a town centre, with opportunities to improve the design and functionality of the station and forecourt. The policy seeks provision for an element of replacement employment and town centre floorspace, so as to ensure the site continues to deliver local jobs but this can be achieved anywhere across the entire site – and as suggested this may</p>

				<p>In this case, the Site Allocation referenced as <b>'BG2 Bruce Grove Stationcourt'</b> in the Tottenham AAP fails three of the four tests set out at paragraph 182 of the NPPF and is therefore considered unsound. The reasons for this are as follows:</p> <p><u>Site Allocation BG2 is not justified</u></p> <p>The Site Allocation BG2 is not the most appropriate strategy when considered against the alternatives.</p> <p>It will be noted that the red line area of Site Allocation BG2 includes, amongst other uses, <b>a builder's merchants</b> including a retail shop and retail/storage yard area, which is currently operated by MEMS DIY Ltd at 22-24 Moorefield Road.</p> <p>The area operated by MEMS DIY Ltd lies to the west side of Site Allocation BG2 and forms part of the overall site allocation. This element corresponds with the land of the previous Site Allocation <i>BG4: Moorefield Road</i> that was shown in the Tottenham AAP Preferred Options Consultation (Feb 2015). However, the council has now conjoined such previous site allocation with previous Site Allocation <i>BG3: Bruce Grove Station</i>, complete with the central station area to create one large Site Allocation (BG2).</p>	<p><b>words 'Builders' Yard'</b> (under 'Current/Previous Use').</p> <p>Should the adjustment to the site area also affect the indicative capacity figures, then these should be amended accordingly. It is assumed that the 11 net residential units will be deleted and most if not all of the 100sqm floorspace will be deleted. The text <b>under 'Ownership'</b> should be reviewed to confirm whether <b>'private' freeholds</b> exist.</p> <p>Under paragraph 5.74 (<b>'Site Allocation'</b>) the <b>words 'and mixed use employment and residential on</b></p>	<p>be more deliverable if entirely located on the High Street frontage of the allocation.</p> <p>The Council considers the Local Plan sets a positive framework delivering sustainable economic development, meeting objectively assessed need for employment land/ floorspace and the <b>Borough's strategic</b> jobs target, consistent with the NPPF. In preparing the AAP and other Local Plan documents concurrently, the Council has undertaken an Employment Land Study (2015) and recommendations from this study have informed the designation of employment land needed to meet</p>
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				<p>MEMS DIY Ltd is a long standing and successful business, providing building and DIY supplies for the local population. It has been operating at this site for over 30 years and is well utilised by the community for their building materials and DIY needs. The business also employs 10 people from the community providing job opportunities in the local market.</p> <p>Site Allocation BG2 proposes that the <b>existing builder's merchants is replaced</b> with mixed use residential and employment development.</p> <p>In the event of Site Allocation BG2 being supported in an adopted AAP and the site being redeveloped (which will not be easily if at all realised) then there would be a gross loss of 10 jobs. This important <b>matter is not referred to at all in the AAP's</b> documentation. It is not clear whether this is an oversight or a convenient omission. However, to both the business and its employees the potential redevelopment of the site and loss of associated jobs is a serious matter. The allocation represents a real and <b>direct threat to people's</b> livelihoods and has not been properly addressed by the LPA. The Site Allocations DPD might make employment allocations elsewhere in the borough. However, it is not known if there if will be a suitable relocation opportunity nearby for the type of shop and yard use needed,</p>	<p><i>Moorefield Road</i> should be deleted.</p> <p>Under paragraph 5.74 ('<b>Site Requirements</b>') the 8th and final bullet point and its <b>words</b> (<i>"Mixed-use residential and employment development replacing the existing Builder's Merchants will be permitted"</i>) <b>should</b> be deleted</p>	<p>identified need for a range of employment uses. This evidence supports that 22-24 Moorefield Road does not need to be retained exclusively for employment uses.</p> <p>Whilst the Council notes that there is an existing business at 22-24 Moorefield Road, it considers that this should not preclude any future proposal from incorporating uses that could better optimise use of the site in delivering the spatial strategy. The policy therefore sets out that replacement <b>of the Builder's Merchants</b> will be permitted.</p> <p>The Council notes the situation in respect of the MEMS DIY Ltd lease. It considers that delivery of the allocation is possible,</p>
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				<p>Even if this were the case, it is unlikely to be on the favourable lease terms currently enjoyed by the operators.</p> <p>The LPA may argue that the redevelopment of this part of the site for a mixed use residential/employment land use – if ever realised - will generate new jobs. However, this is somewhat speculative and fails to take account that Moorefield is a back street which does not have the prominence or footfall of High Road, this being a main artery through the Bruce Grove area. Passing trade will therefore be limited. There are also open yard uses to the west side of the site along Moorefield Road which perhaps further defines the character of the road at this location, noting that the Site Allocation does not also incorporate these other yards to deliver a comprehensive redevelopment of the area. It is not clear why open yard uses are acceptable on one side of Moorefield Road but seemingly not on the opposite side.</p> <p>Against the background of the locational characteristics described above, the council has not evidenced what type of non-residential use would be achievable at the site. A1 shops would struggle to survive. Fast food restaurants will not <b>seemingly reflect the LPA's redevelopment</b> objectives. Cafes and Restaurants are more likely to survive if located along High</p>		<p>even if site redevelopment was undertaken in phases (i.e. 22-24 Moorefield Road brought forward after other parts of the allocation). Policy AAP 1 (Regeneration and Masterplanning) provides assurance that proposals are considered comprehensively.</p> <p>The policy does not specify in detail what the appropriate replacement employment generating use(s) should be. This is in order to provide sufficient flexibility for proposals which positively contribute to plan objectives to come forward, with acceptability of use considered on a case by case basis.</p> <p>The Council has undertaken an iterative process of</p>
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				<p>Road to take advantage of passing trade and footfall. B1 or A2 offices are not best suited to the noisy environment adjacent a railway station and its line, or where dedicated parking is limited (noting the parking restrictions on Moorefield Road). There are therefore likely to be significant difficulties in attracting new employment uses or users to the land currently occupied by MEMS DIY.</p> <p>Notwithstanding this, even if the LPA or Local Plan Inspector disagrees with such assertion (such that a viable alternative employment use/user could be found) it is reasonably likely that there would be no increase in jobs at this part of the Site Allocation and in reality a potential net loss of jobs. This is because only 100sqm employment floorspace is made for the whole of the BG2 site allocation, yet MEMS DIY by itself covers a similar site area. Also, the Site Allocations DPD at paragraph 1.30 confirms that the average <b>job density across Haringey's employment areas</b> is currently 44m<sup>2</sup>/worker. Office uses are more efficient which is occupied at 12-16m<sup>2</sup>/job, but would generate only 6 to 8 jobs based on the cited 100sqm employment allocation, whereas 10 jobs currently exist. The employment efficiency of the site (jobs per sqm floorspace) as exists appears to be better than the current borough average and even the cited ratio for an office based scheme. The</p>	<p>integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of the <b>Borough's strategic growth requirements</b>. The Sustainability Appraisal concludes that the AAP is likely to have positive effects across a range of social, economic and environmental sustainability objectives.</p> <p>With respect to business relocation,</p>
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				<p>benefits to the economy and local employment of changing the employment base of the site are dubious.</p> <p>The above comments therefore seriously bring in to question the justification for <b>promoting the replacement of the site's</b> current and viable employment base. This part of the Site Allocation BG2 is not <i>the most appropriate strategy, when considered against the reasonable alternatives</i>. In this case an alternative may be to encourage visual improvements to the fabric of the site, whilst retaining the existing use and the local/community employment it provides.</p> <p>The Site Allocation is therefore not justified.</p> <p><u>Site Allocation BG2 is not Effective</u></p> <p>To be effective one of the tests is that the plan should be deliverable over its period. The timeframe for delivery indicated in Site Allocation BG2 is 2020 onwards.</p> <p>The land at MEMS DIY is owned by Network Rail (formerly Railtrack), which in turn has granted a lease to the current user of the premises. This lease operates <b>on an 'indefinite' period. This means that</b> as long as the current user wishes to remain at the site, then they can, subject to complying with the other terms of the</p>	<p>this is a matter for the landowner to discuss with the lease, regarding termination of the lease arrangements. If a CPO was advanced, this would only be as a last resort, but would likely look at options for relocation on acceptable terms. In this regard, both network rail and the Council have significant landholding across the borough that may provide for a more suitable location for the operation of the existing builders merchants.</p> <p>No change</p>
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				<p>lease. MEMS DIY Ltd has no intention of vacating the premises. The lease of the land has provided the company - and continues to provide them - with a sound platform on which to operate a viable business.</p> <p>The business is well established and in the absence of any agreement to relocate (of which there is no intention) then the policy could only be implemented via Compulsory Purchase Actions and the indefinite lease being determined through the legal processes. It will also be noted that there is unlikely that any replacement area for this use will be available in the borough on such favourable terms as exist.</p> <p>It seems reasonably likely that the Site Allocation cannot be realised or cannot be realised without significant legal and other obstacles, the outcome of which cannot be determined at this stage. The policy is therefore not effective.</p> <p><u>Site Allocation BG2 is not Consistent with National Policy</u></p> <p>The NPPF at Paragraph 7 states that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles. The economic</p>		
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				<p>role includes contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. In this case, for Site Allocation BG2 to be effective it would require the closure of a successful business which currently contributes to the local economy. The Site Allocation does not support this enterprise. Furthermore, there is no policy or site allocation in place to provide replacement premises for this user in the locality. The economic role is therefore not performed by Site Allocation BG2.</p> <p>The social role includes supporting strong, vibrant and healthy communities, with accessible local services that reflect the <b>community's needs. The services provided</b> by the current business on the site are needed by the community, this being evidenced by the longevity of the business operation at this site for many years. The social role is therefore not performed by Site Allocation BG2.</p> <p>Paragraph 9 of the NPPF advises that pursuing sustainable development involves <b>seeking positive improvements in people's</b> quality of life, including (but not limited to) making it easier for jobs to be created in cities, towns and villages. In this case, the proposed Site Allocation BG2 implies the loss of current jobs in this city location,</p>		
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				<p>without certainty of replacement employment for the current users of the site or certainty of new employment uses being created (particularly given the constraints referred to in the earlier part of this representation). This approach is therefore contrary to the tenets of policy.</p> <p>Paragraph 10 of the NPPF states that Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. At a micro scale there is a distinction to be made between the local characteristics of High Road (main artery through the area) and Moorefield Road (a back road) and their respective ability to foster new retail or employment uses. For reasons stated earlier, particular commercial uses may be less easy to attain viability along the Moorefield Road part of Site Allocation BG2. The local circumstances are not accounted for, contrary to the NPPF.</p> <p>Paragraph 17 (Core Planning Principles) of the NPPF states, inter alia, that Plans should: set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the business communities; and promote the vitality of our main urban areas. In this case the needs of MEMS DIY Ltd, who are part of</p>		
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				<p>the business community, have not been catered for. Their business need to be stay at the premises. The business, complete with its employment and services to the community, adds to the vitality of this urban area. Core Planning Principles of the NPPF are disregarded in these respects.</p> <p>Paragraph 19 of the NPPF states that The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. 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. In this case the impact of implementing Site Allocation BG2 would be to decimate a longstanding and viable business, as opposed to supporting its growth as required by national planning policy.</p> <p>Paragraph 21 of the NPPF states that investment in business should not be overburdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment. In drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth and support</p>		
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				<p>existing business sectors, taking account of whether they are expanding or contracting. However, in this case, Site Allocation BG2 might bring uncertainty for the current business owners and affect their business decisions with the uncertainty of site redevelopment being threatened (potential via compulsory purchase powers). This would have the opposite effect of encouraging economic growth and does little to support the business of MEMS DIY Ltd. Therefore, Site Allocation BG2 does not accord with national policy.</p> <p>Paragraph 70 of the NPPF states that to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: plan positively for the provision and use of community facilities (such as local shops) and other local services to enhance the sustainability of communities; guard against the unnecessary loss of valued facilities and services; and ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community. In this case the established premises at MEMS DIY provides both a local shop and a form of social facility Both members of the local community and local trades people use this important facility and have done for many years, which demonstrates</p>		
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				<p>its value to them. It is unnecessary to lose such valued facility and Site Allocation BG2 fails to guard against this, contrary to paragraph 19 of the NPPF.</p> <p>Paragraph 151 of the NPPF states that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in the Framework, including the presumption in favour of sustainable development. Paragraph 152 of the NPPF explains that local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.</p> <p>As explained earlier, the economic and social dimensions of sustainable development (pursuant to Paragraph 7 of the NPPF) are not observed by Site Allocation BG2 and therefore the tenets of paragraphs 151 and 152 of the NPPF are not complied with.</p> <p>Furthermore, paragraph 152 details that where adverse impacts are unavoidable,</p>		
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				<p>measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. In the case of Site Allocation BG2, it effect is to create an adverse impacts upon a viable business and local facility and these adverse impacts could be avoided. If Site Allocation BG2 is implemented there are no compensatory measures set out for dealing with the adverse impacts created ie loss of a business, loss of a local facility, loss of viable employment in this particular business sector. Paragraph 152 of the NPPF is therefore ignored.</p> <p>Paragraph 154 of the NPPF states that Local Plans should be aspirational but <b>'realistic'</b>. They should address the spatial implications of economic, social and environmental change. In this case, Site Allocation BG2 is aspirational but not realistic given the circumstances set out in this representation. Issues include the indefinite lease arrangements with the freeholder, the current business not wishing to relocate and (in the event it is legally forced to leave the site) the practical and financial difficulties in finding a new and viable alternative site in the locality.</p> <p>Paragraph 155 of the NPPF states that early and meaningful engagement and</p>		
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				<p>collaboration with businesses is essential. LB Haringey is aware of the business operation at MEMS DIY Ltd but has not collaborated with the business. Paragraph 157 states that, crucially, Local Plans should be based on co-operation with private sector organisations. In this case the LPA has not co-operated with MEMS DIY Ltd.</p> <p>Paragraph 160 of the NPPF states that local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should work closely with the business community. However, the LPA has not worked closely with MEMS DIY Ltd (as part of the local business community), does not appear to have any clear understanding of its commercial operation and has therefore failed to recognise its business needs, contrary to the requirements of national planning policy.</p> <p>Paragraph 173 (Ensuring viability and deliverability) of the NPPF states that 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</p>		
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		<b>/ Para</b>					
9	RTAA P77	BG 3	No response given	No response given	The site consists of viable buildings and usage and therefore should not be subject to a site allocation. Any future development should conform to the Guiding Principles set out in our overall response to the AAP.	Any future development should conform to the Guiding Principles set out in our overall response to the AAP.	Disagree. The policy seeks to facilitate a mixed use redevelopment to support delivery of the spatial strategy for the area and the Borough, commensurate with <b>the site's location in an area</b> of high public transport accessibility and within a town centre. The policy makes provision for appropriate town centre uses, however recognising opportunities to support town centre vitality and viability through comprehensive redevelopment to improve the public realm and townscape. The site allocation sets out where retention of existing buildings is required.  <b>Please refer the Council's response above regarding Our Tottenham Network's "Guiding Principles".</b>  No change

Respondent 42: Empyrean Developments Limited

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
42	RTAAP161	BG3	No	Yes	<p>Empyrean Developments with the owners of the Regency Banqueting Suite, which is one of the subject properties under this Site Allocation, has commissioned a Heritage Statement of Significant by Fuller Long Planning Consultants. Please refer to the report for more detail. Empyrean would contest the Heritage value of the subject building. The Local Authority has overstated the merit of the Banqueting Suite. The property's Heritage value cannot justify the constraint on development the Council would take if this policy is adopted.</p> <p>The constraint imposed would contradict policies both within the London Plan and within numerous other Haringey adopted documents, promoting high density schemes in High PTAL locations.</p> <p>Empyrean has commissioned various massing studies which support 1018 Hab Rooms/ Ha on BG3 but acknowledges that density in a High PTAL location must be a design lead matter.</p>	<p>The following paragraph should be amended from:          " The public toilets, entrance to the former cinema, and the Banqueting Suite frontage are significant heritage assets, and will be retained and brought back into active use."          To          " The public toilets and entrance to the former cinema are significant heritage assets, and will be retained and brought back into active use."          AND from:          "A sensitive additional storey extension to the Banqueting Suite will be acceptable where it can be demonstrated that it enhances the</p>	<p>Not agreed. The site is within a Conservation Area and the building is locally listed. Demolition of the existing building is therefore not permitted within the current statutory requirements.</p> <p>No change</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					(Conservation report included)	setting and character of the building, and the wider conservation area." To "Whilst there is a presumption in retaining the Banqueting Suite, a high quality design lead approach will warrant the demolition of the Banqueting Suite where it can be demonstrated that it enhances the setting and character of the building, and the wider conservation area."	

BG4

Respondent 9: Our Tottenham Network

I	Rep	Allocati	Sound	Legally	Reason	Change	Council's Comments /
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D	ID	on / Policy / Figure / Para		Compliance		Sought	Response
9	RTAA P78	BG 4	No response given	No response given	<p>NO NET LOSS OF EMPLOYMENT LAND AND FACILITIES: The site is occupied by the Tottenham Delivery Office which provides a vital public service including retrieval of parcels and special delivery items and therefore should not be subject to a site allocation. Howarth, a timber and building merchant, occupies part of the proposed site allocation. It is a thriving local business which should not be displaced.</p> <p>In the back of this site is the only open space in Bruce Grove. The Impact of any development on BG2 on this adjacent green space needs to be very carefully considered and in Site Requirements the council should aim to ensure the protection of the Ecological Valuable Site.</p>	Not stated	<p>The policy seeks to facilitate a mixed use redevelopment to support delivery of the spatial strategy for the area and the Borough, <b>commensurate with the site's</b> location in an area of high public transport accessibility, within a town centre, and to optimise opportunities for improved access to Bruce Grove Wood, which is currently not accessible and suffers from fly-tipping and invasive pests. The policy seeks provision for an element of employment floorspace and increase in job density. This site was nominated by Royal Mail for this Local Plan, as the delivery office is potentially surplus to requirements.</p> <p>With respect to Bruce Grove Wood, the Local Plan includes policies to ensure appropriate consideration for protection of open space and ecological sites, including SP</p>

							13 and policies in the DM DPD. The Local Plan should be read in its entirety.  No change
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### North Tottenham Sub-area

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	RTAAP38	Paragraph 5.94	Not stated	Not stated	Creation of high-quality public space network.	This should include good habitat (trees, hedgerows etc) connecting the Lee Valley and Bruce Castle etc.	The bullet is emphasising the objective to deliver a network of high quality open space. This can include habitat improvements, but the Council does not consider it necessary to state here. Biodiversity considerations for public realm are covered in Policy SP 13.  No change.

Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P79	North Tott	No	Not stated	Our Tottenham regards the plans set out in NT1 to NT5 in their entirety as plans for	Not stated	Disagree. The AAP seeks to give effect to the Strategic

		Neighbourhood Area			<p>wholesale demolition of council housing and its replacement with mainly private housing. See the overall arguments and representations we have made about this issue in our generic response to the Tottenham AAP and in our separate response to the Alterations to Strategic Policies.</p> <p><b>We note in this connection the Council's plans</b> as set out in the Northumberland Park Masterplan of February 2015 which envisages three scenarios for the NT4 Northumberland Park area, all of which involve the demolition of the majority of the council housing in the area. The scenarios 9.2-9.5 all specify only a small number of council homes <b>to be 'retained' with the others</b> in the area clearly on a demolition list. We believe the <b>Masterplan reflects the Council's current</b> thinking on the desirability of demolitions. If the Council has changed its mind on this issue it should state so publicly and unequivocally. If the Council has changed its mind about the Masterplan proposals then there is no need for the Site Allocations NT3-5 as it is not necessary to include areas as site allocations if refurbishment not demolition is what is needed.</p> <p>We believe that these plans are inappropriate and unsound as they will reduce the quantity of social housing in Haringey and they are discriminatory as they will have a worse adverse impact on Black and Ethnic Minority (BME) groups when compared to other groups. We propose that improvement to the existing homes rather than demolition is the</p>		<p>Policies Local Plan, which provides that North Tottenham will play a key role in accommodating future growth and delivering the spatial strategy for the Borough. This includes increasing the amount of housing in Tottenham, including affordable housing, to meet objectively assessed <b>need and the Borough's</b> strategic housing requirement.</p> <p>The Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy, Alterations to Policy SP 2 set out the <b>Council's strategic</b> approach for housing estate regeneration, renewal and improvement, and Northumberland Park is included in an initial priority list. The approach is set <b>recognising the Council's</b> commitment to improving housing stock and the limitations of the Decent Homes programme. The inclusion of estate regeneration in the Local Plan</p>
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					<p>most appropriate course of action. We believe <b>this can be achieved by removing the ‘red zone’ site allocations from areas in NT3, NT4 and NT5</b> and improving buildings in these areas, not demolishing them. The material below is the evidence we wish to cite in support of our objections to policies NT1-5 and the site allocations in NT3, NT4 and NT5 as well as evidence for our alternative.</p> <p>If public spaces are not well-looked after, then the Council should improve its custodianship of these areas. The scenarios set out in the Northumberland Park Masterplan for the demolition of over a thousand council properties (tenanted and leasehold) is a grossly disproportionate response to this problem. The demolition is also a grossly disproportionate response to the issue of North-South road links.</p> <p>Mass demolition is a totally disproportionate response to a problem that is not described with any specificity here. High density developments produce much worse spatial problems with narrow pedestrianized areas without sunlight between very closely built blocks as in Hale Village. But NT3-5 envisages a huge increase in housing density in terms of increases in net residential units.</p>		<p>is considered necessary in policy terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan.</p> <p>The Council has commissioned preliminary work to help inform future masterplan considerations for the area (Northumberland Park – Strategic Framework Report, February 2015), which was subject to public consultation. This report sought to establish key principles for change in the area, along with an understanding of potential broad options for a future masterplan. It is expected that this work will be further developed in the future, including more refined options, in consultation with the local community. Any such detailed options/scenarios, however, are outside the scope of this Local Plan consultation.</p> <p>The above noted masterplanning work has</p>
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							<p>informed the principles of relevant AAP sub-area policies and site allocations, particularly in relation to identified key challenges and opportunities. The Council considers the AAP policies are necessary to give effect to the spatial strategy, establishing principles of land use and key objectives for area/site redevelopment. Any future development proposal will be required to comply with the Local Plan.</p> <p>No change</p>
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Respondent 19: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RTAAP120	North Tottenham Neighbourhood Area, Para 5.84	Not stated	Not stated	For the same reasons as set out in sub-section iii above, the key objectives for the neighbourhood should refer to North Tottenham becoming the "premier leisure destination" in London.	Paragraph 5.84, bullet point 6 should be amended to aid effectiveness as follows (deleted text struck through, proposed text in red): <i><b>"To create a new the premier leisure and sports destination for London, with the provision of complementary commercial, cultural and community uses across the neighbourhood area</b></i>	<b>Agreed include 'a premier'</b>

						<i>whilst celebrating the High Road's rich heritage."</i>	
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NT1

Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P80	NT1	No	Not stated	A large amount of social housing lies within a ten minute walk of Northumberland Park including Kenneth Robbins House and the surrounding small blocks, Robert Burns House, Charles Bradlaugh House, Haynes Close, Waverley Road, Rothbury Walk, Scotswood Walk, Blaydon Close and Trulock Court. It is true that many but certainly not all of the people who live in these blocks have below average incomes. However, putting their homes in Site allocations which will enable developers to demolish their homes will not benefit them at all. It is highly unlikely (see below) that most of them will be re-housed in the area. This means they will not benefit from the advantages of easy access to central London from the new Crossrail link in terms of work opportunities. Allowing these tenants to remain in the area with the Crossrail link will be a much better alternative to including their homes in Site Allocations NT3	The only way to make this policy sound is to prevent demolitions and remove the council estates from Site Allocations	The Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy for the Borough, Alterations to Policy <b>SP 2 set out the Council's</b> strategic approach for housing estate regeneration, renewal and improvement, and Northumberland Park is included in an initial priority list.  Transport improvements at Northumberland Park station will create a significant uplift in accessibility with the area, and provide a basis for increasing density and optimising the development

					and NT4. The only way to make this policy sound is to prevent demoltions and remove the council estates from Site Allocations.		<p>potential of sites, enabling opportunities to increase local housing supply. The Council is seeking to ensure that existing and new residents benefit from these enabling transport improvements.</p> <p>The Council considers the site allocations are necessary to deliver the spatial strategy as well as to meet objectively assessed need and the <b>Borough's strategic housing</b> requirement.</p> <p>No change.</p>
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NT2

NT3

Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P81	NT3-5	Not stated	Not stated	We are very concerned that the proposal to build new housing in Northumberland Park on	All council estates should	The AAP seeks to give effect to the Strategic Policies Local

				<p>the site of existing estates in fact bears no <b>relation to local people's aspirations but could</b> actually facilitate wholesale demolition and rebuilding. We find evidence of this in the <b>proposed Alterations to Haringey's Adopted Strategic Policies 2011-2026.</b></p> <p>Alteration 53 sets out an initial list of housing <b>estates to be 'regenerated'</b>. Northumberland Park is one of the estates set out here. The reason box for Alteration 53 states that the <b>alteration: 'Recognises the Council's</b> commitment to improving its existing housing stock and the limitations of the Decent Homes Programme for a significant number of <b>Council-owned homes.'</b></p> <p>The Council has stated clearly their desire for <b>the 'regeneration' of Northumberland Park to take place through a 'Development Vehicle'</b>. <b>Now according to Haringey Council's</b> September 2015 Future of Housing Review the Development Vehicle the Council wishes <b>to set up: '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></p> <p>The clear implication here is that estates on the regeneration list, including Northumberland Park may well be knocked down. The idea of right to return is only stated as a possibility not a guarantee. Given reductions in government grants for new social housing build, it is very unlikely that Haringey Council could demolish the total number of council homes it is considering for demolition in Northumberland Park and re-</p>	<p>be removed from the site allocations included in the Tottenham Area Plan.</p>	<p>Plan, which provides that North Tottenham will play a key role in accommodating future growth and delivering the spatial strategy for the Borough. This includes increasing the amount of housing in Tottenham, including affordable housing, to meet objectively assessed <b>need and the Borough's</b> strategic housing requirement.</p> <p>In seeking to deliver the spatial strategy for the Borough, Alterations to Policy <b>SP 2 set out the Council's</b> strategic approach for housing estate regeneration, renewal and improvement, and Northumberland Park is included in an initial priority list.</p> <p>The site allocations referred by the consultee are clear that any future development will be required to be in accordance with a masterplan, prepared with resident involvement.</p> <p>Proposed Alteration 64 of the Strategic Policies Local Plan</p>
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				<p>provision anything but a small proportion of the homes at social rent. So-called <b>'Affordable Rented' housing and Shared Ownership are</b> outside the income ranges of most Broadwater Farm residents and most Tottenham residents. 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: <b>'At present local authority</b> 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 <b>secure or affordable rents.'</b></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. 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.</p> <p>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.</p>		<p>sets out that where the Council undertakes estate renewal, it will seek to re-provide the same amount of social housing on an equivalent floorspace basis, ensuring sufficient flexibility to re-provide housing to better meet changing needs of existing residents.</p> <p>The site allocations set out principles for potential future site redevelopment, which any future proposal would need to comply with. The <b>"Development Vehicle"</b> and <b>"Estate Renewal and Rehousing and Payments Policy"</b> are outside the scope of this Local Plan consultation.</p>
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				<p>The existing residents of Northumberland Park will gain nothing from such a policy. In this connection we must also mention the <b>Council's proposed Estate Renewal and Rehousing and Payments Policy</b>. This policy which is intended to determine how council tenants will be rehoused when their homes are <b>demolished states: '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></p> <p>There is absolutely no guarantee that council tenants will be rehoused in the new homes on Northumberland Park. It is likely that they will just be put on the list to be transferred to other council estates in Haringey as seems to be happening to most of the Love Lane tenants (see below.) It is therefore clear that most of the council tenants in Northumberland Park have no real interest in the demolition of their homes and refurbishment not demolition should occur.</p> <p>The only way to retain affordable housing in the area is not to knock down council estates in the first place. As the Our Tottenham Guiding Principles state, sites consisting of mostly viable buildings should not be earmarked for demolition. The council estates in Northumberland Park are viable and the provision of new high density estates with much less social housing will be disastrous, not an improvement. Refurbishment does not require inclusion of areas NT3-5 on a site allocation therefore all council estates should be removed from the site allocations included</p>		
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					in the Tottenham Area Plan.		
9	RTAA P82	NT3	Not stated	Not stated	<p>In the context of the Northumberland Park Masterplan's scenarios for mass demolitions of council housing it is obvious that the large <b>amount of social housing or 'unbalanced housing stock with an overbalance of small, socially rented stock' is seen as a problem by the Council</b> rather than a reasonable response to the level of housing need in the area.</p> <p><b>The Council's response to this alleged problem is: 'Redevelopment will create more, new, and better housing with greater diversity of scale, size, tenure and type.'</b></p> <p><b>The Council's uniquely targeted approach to social housing estates as needing the insertion of private housing to create 'diversity of...tenure' is blatant discrimination against local people on the basis of their economic status.</b> This approach is quite rightly not being used to criticise streets of predominantly owner occupiers by claiming they are in need <b>of social housing to make a 'mixed and balanced community'.</b> All such references and bias against social and council housing should be removed from all Council documents as untrue, biased and discriminatory. This approach is clearly a cover to try to justify the sell-off or use of some Council land cheaply to property developers, and to justify the increasing abandonment of the need to address the needs of local people for more (not less) social housing as the only genuinely affordable and secure housing for thousands of residents.</p>	All such references and bias against social and council housing should be removed from all Council documents as untrue, biased and discriminatory.	<p>The AAP seeks to give effect to the Strategic Policies Local Plan, which provides that North Tottenham will play a key role in accommodating future growth and delivering the spatial strategy for the Borough. This includes increasing the amount of housing in Tottenham, including affordable housing, to meet objectively assessed <b>need and the Borough's</b> strategic housing requirement. The Local Plan also seeks to deliver a mix of housing in terms of size, tenure and type to facilitate sustainable development, in line with the NPPF.</p> <p>The Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy, Alterations to Policy SP 2 set <b>out the Council's strategic</b> approach for housing estate regeneration, renewal and improvement. The approach is set recognising the <b>Council's commitment to</b> improving housing stock and</p>

						<p>the limitations of the Decent Homes programme. The inclusion of estate regeneration in the Local Plan is considered necessary in policy terms as housing renewal is a very different proposition to the more typical market-led brownfield redevelopment advocated elsewhere in the plan.</p> <p>The Council has commissioned preliminary work to help inform future masterplan considerations for the area (Northumberland Park – Strategic Framework Report, February 2015), which was subject to public consultation. This report sought to establish key principles for change in the area, along with an understanding of potential broad options for a future masterplan. It is expected that this work will be further developed in the future, including more refined options, in consultation with the local community. Any such detailed options/scenarios, however, are outside the scope of this</p>
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							Local Plan consultation. No change
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#### NT4

##### 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	RTAAP40	NT 4 Northumberland Park	Not stated	Not stated	The large-scale redevelopment opens up the opportunity to create some east-west ecological corridors.	Include requirement for east-west ecological corridors.	The objective here is to reconfigure the existing open spaces and to make these more functional for use by the local community. This may therefore be at odds with a requirement to create an east west ecological corridor.  No change

##### Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAAP81	NT3-5	Not stated	Not stated	We are very concerned that the proposal to build new housing in Northumberland Park on the site of existing estates in fact bears no	All council estates should be removed	The AAP seeks to give effect to the Strategic Policies Local Plan, which provides that

				<p><b>relation to local people's aspirations but could</b> actually facilitate wholesale demolition and rebuilding. We find evidence of this in the <b>proposed Alterations to Haringey's Adopted Strategic Policies 2011-2026.</b></p> <p>Alteration 53 sets out an initial list of housing <b>estates to be 'regenerated'</b>. <b>Northumberland Park</b> is one of the estates set out here. The reason box for Alteration 53 states that the <b>alteration: 'Recognises the Council's</b> commitment to improving its existing housing stock and the limitations of the Decent Homes Programme for a significant number of <b>Council-owned homes.'</b></p> <p>The Council has stated clearly their desire for the <b>'regeneration' of Northumberland Park to take place through a 'Development Vehicle'</b>. <b>Now according to Haringey Council's</b> September 2015 Future of Housing Review the Development Vehicle the Council wishes <b>to set up: 'is unlikely to be a refurbishment</b> vehicle, and transfer would most likely be on the basis of decanting tenants and potentially <b>offering them the opportunity to return.'</b></p> <p>The clear implication here is that estates on the regeneration list, including <b>Northumberland Park</b> may well be knocked down. The idea of right to return is only stated as a possibility not a guarantee. Given reductions in government grants for new social housing build, it is very unlikely that Haringey Council could demolish the total number of council homes it is considering for demolition in Northumberland Park and re-provision anything but a small proportion of</p>	<p>from the site allocations included in the Tottenham Area Plan.</p>	<p>North Tottenham will play a key role in accommodating future growth and delivering the spatial strategy for the Borough. This includes increasing the amount of housing in Tottenham, including affordable housing, to meet objectively assessed <b>need and the Borough's</b> strategic housing requirement.</p> <p>In seeking to deliver the spatial strategy for the Borough, Alterations to Policy <b>SP 2 set out the Council's</b> strategic approach for housing estate regeneration, renewal and improvement, and Northumberland Park is included in an initial priority list.</p> <p>The site allocations referred by the consultee are clear that any future development will be required to be in accordance with a masterplan, prepared with resident involvement.</p> <p>Proposed Alteration 64 of the Strategic Policies Local Plan sets out that where the</p>
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				<p>the homes at social rent. So-called <b>'Affordable Rented' housing and Shared Ownership</b> are outside the income ranges of most Broadwater Farm residents and most Tottenham residents. 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: <b>'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.'</b></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. 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.</p> <p>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.</p> <p>The existing residents of Northumberland Park</p>		<p>Council undertakes estate renewal, it will seek to re-provide the same amount of social housing on an equivalent floorspace basis, ensuring sufficient flexibility to re-provide housing to better meet changing needs of existing residents.</p> <p>The site allocations set out principles for potential future site redevelopment, which any future proposal would need to comply with. The <b>"Development Vehicle" and "Estate Renewal and Rehousing and Payments Policy" are outside the scope</b> of this Local Plan consultation.</p>
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				<p>will gain nothing from such a policy.</p> <p>In this connection we must also mention the <b>Council's proposed Estate Renewal and</b> Rehousing and Payments Policy. This policy which is intended to determine how council tenants will be rehoused when their homes are <b>demolished states: '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></p> <p>There is absolutely no guarantee that council tenants will be rehoused in the new homes on Northumberland Park. It is likely that they will just be put on the list to be transferred to other council estates in Haringey as seems to be happening to most of the Love Lane tenants (see below.) It is therefore clear that most of the council tenants in Northumberland Park have no real interest in the demolition of their homes and refurbishment not demolition should occur.</p> <p>The only way to retain affordable housing in the area is not to knock down council estates in the first place. As the Our Tottenham Guiding Principles state, sites consisting of mostly viable buildings should not be earmarked for demolition. The council estates in Northumberland Park are viable and the provision of new high density estates with much less social housing will be disastrous, not an improvement. Refurbishment does not require inclusion of areas NT3-5 on a site allocation therefore all council estates should be removed from the site allocations included in the Tottenham Area Plan.</p>		
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9	RTAA P83	NT4	No	Not stated	<p>We believe that the Council will not be able to reprovide genuinely affordable housing in the Northumberland Park area if its plans for mass demolitions go ahead. The Northumberland Park Strategic Framework Report (i.e. the <b>'Masterplan'</b>) <b>only provides for</b> the preservation of a very small percentage of the existing council homes in any of the scenarios. <b>Even in the 'Minimal Intervention' scenario</b> only 183 council homes are preserved with 1154 council homes (909 tenanted and 245 leasehold) being demolished. It is therefore dishonest to argue that good quality homes will be preserved when actually the emphasis is on mass demolition and new provision of mainly high density non-social housing. Nowhere in the Northumberland Park Strategic Framework Consultation Report does it indicate that the residents of Northumberland Park were told by any representative of the Council that the <b>Council's plans would mean the mass</b> demolition of council housing. It is grossly unacceptable to consult about a regeneration plan without informing residents of the scale of demolitions contemplated. Our Tottenham therefore believes that a lawful consultation into the demolition of such a large quantity of council housing has not taken place. The Site Allocations NT3-5 are therefore unsound and all council housing should be removed from them. Instead the refurbishment of council estates should be carried out which does not require inclusion in Site Allocations in the Local Plan.</p>	No stated	<p>The Local Plan does not propose wholesale demolition of council housing. In seeking to deliver the spatial strategy, Alterations to Policy SP 2 set <b>out the Council's strategic</b> approach for housing estate regeneration, renewal and improvement.</p> <p>Proposed Alteration 64 of the Strategic Policies Local Plan sets out that where the Council undertakes estate renewal, it will seek to re-provide the same amount of social housing on an equivalent floorspace basis, ensuring sufficient flexibility to re-provide housing to better meet changing needs of existing residents.</p> <p>The Council has commissioned preliminary work to help inform future masterplan considerations for the area (Northumberland Park – Strategic Framework Report, February 2015), which was subject to public consultation. This report sought to establish key principles for change in the</p>
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				<p>The Northumberland Park Masterplan- the Northumberland Park Strategic Framework Report states that new homes in the area will be between 3-10 stories. Our Tottenham <b>believes that Tottenham’s existing pattern of low-rise housing (2-3 stories) in residential suburban development should be respected.</b> The high-density plans for Northumberland Park sound nightmarish. It is clear that the whole process of developing the plan for Northumberland Park has used very misleading language. The Northumberland Park Strategic Framework Consultation Report suggests that respondents wanted homes <b>with gardens to be built . The ‘traditional street pattern principle here seems to relate to such aspirations. The high-density plans, however, are clearly about housing most residents in blocks not houses (see the plan for the new blocks on page 97 of the Strategic Framework Report.) The gardens referred to are therefore communal which is not what most residents imagined when they agreed with an aspiration for homes with gardens. Existing council estates have communal gardens. The ‘home with a garden’ promise appears to have been used to deceive residents into supporting Council demolition plans. Again it is clear that the alleged consent of local residents to the Council’s regeneration plans is not informed consent.</b></p>	<p>area, along with an understanding of potential broad options for a future masterplan. It is expected that this work will be further developed in the future, including more refined options, in consultation with the local community. Any such detailed options/scenarios, however, are outside the scope of this Local Plan consultation.</p> <p>The site allocations set out principles for land use that any future development proposal would need to be compliant with, and will be considered alongside other Local Plan policies, including those setting out affordable housing requirements. These requirements have been subject to viability testing and the Council therefore considers the proposals to be deliverable.</p> <p>The Local Plan consultations have been carried out in line <b>with the Council’s adopted</b> Statement of Community Involvement and the Town and Country Planning (Local</p>
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							Planning) (England) Regulations 2012. No change
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Respondent 18: GW & JA Green

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
18	RTAAP114	NT4	No response given	No response given	Support comprehensive planning of policy area to create new residential neighbourhoods. Generally mid-rise development of 3 – 10 storeys would be appropriate, with increasing density and height near to NT7 redevelopment.	Not stated.	Noted.

Respondent 19: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RTAAP121	NT4	Not stated	Not stated	The 'Development Guidelines' include that development	THFC consider that for clarity this should be expanded to include reference to the	The Council considers the fifth bullet point under the Development Guidelines to

				<p>should complement the ongoing operational requirements of THFC.</p>	<p>operational requirements envisaged as follows (deleted text struck through, proposed text in red):  <b><i>“Development should complement the ongoing operational requirements of THFC which include ongoing outside broadcasting requirements as well as an NFL fanzone area.”</i></b></p> <p>Additionally, given the size of the allocation, proximity at its western end to the THFC stadium and the leisure objectives for the sub-area, the potential for new leisure opportunities should be introduced into the Development Guidelines (deleted text struck through, proposed text in red):  <b><i>“The potential for new leisure and employment opportunities to be developed along Park Lane should be explored, in line with the Council’s ambitions to revitalise this key Local Centre.”</i></b></p>	<p>be sufficiently robust and flexible to take into account any future operational requirements. The suggested change is considered to be overly prescriptive.</p> <p>Regarding the provision of leisure facilities. <b>The Council accepts the suggested change</b></p>
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NT5

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	RTAAP39	NT 5 last bullet	Not stated	Not stated	The Moselle. Can this be deculverted?	Insert guideline accordingly	Proposals will be required to investigate opportunities for deculverting in line with Policy DM 28.  No change.

#### Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P81	NT3-5	Not stated	Not stated	We are very concerned that the proposal to build new housing in Northumberland Park on the site of existing estates in fact bears no <b>relation to local people's aspirations but could</b> actually facilitate wholesale demolition and rebuilding. We find evidence of this in the <b>proposed Alterations to Haringey's Adopted Strategic Policies 2011-2026</b> . Alteration 53 sets out an initial list of housing <b>estates to be 'regenerated'</b> . Northumberland Park is one of the estates set out here. The reason box for Alteration 53 states that the <b>alteration: 'Recognises the Council's</b> commitment to improving its existing housing stock and the limitations of the Decent Homes	All council estates should be removed from the site allocations included in the Tottenham Area Plan.	The AAP seeks to give effect to the Strategic Policies Local Plan, which provides that North Tottenham will play a key role in accommodating future growth and delivering the spatial strategy for the Borough. This includes increasing the amount of housing in Tottenham, including affordable housing, to meet objectively assessed <b>need and the Borough's</b> strategic housing requirement.

				<p>Programme for a significant number of Council-owned homes.’</p> <p>The Council has stated clearly their desire for the ‘regeneration’ of Northumberland Park to take place through a ‘Development Vehicle’.</p> <p>Now according to Haringey Council’s September 2015 Future of Housing Review the Development Vehicle the Council wishes to set up: ‘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.’</p> <p>The clear implication here is that estates on the regeneration list, including Northumberland Park may well be knocked down. The idea of right to return is only stated as a possibility not a guarantee. Given reductions in government grants for new social housing build, it is very unlikely that Haringey Council could demolish the total number of council homes it is considering for demolition in Northumberland Park 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. 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</p>		<p>In seeking to deliver the spatial strategy for the Borough, Alterations to Policy SP 2 set out the Council’s strategic approach for housing estate regeneration, renewal and improvement, and Northumberland Park is included in an initial priority list.</p> <p>The site allocations referred by the consultee are clear that any future development will be required to be in accordance with a masterplan, prepared with resident involvement.</p> <p>Proposed Alteration 64 of the Strategic Policies Local Plan sets out that where the Council undertakes estate renewal, it will seek to re-provide the same amount of social housing on an equivalent floorspace basis, ensuring sufficient flexibility to re-provide housing to better meet changing needs of existing residents.</p> <p>The site allocations set out principles for potential future</p>
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				<p>2015 he writes that: ‘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 <b>secure or affordable rents.</b>’</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. 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.</p> <p>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. The existing residents of Northumberland Park will gain nothing from such a policy.</p> <p>In this connection we must also mention the <b>Council’s proposed Estate Renewal and Rehousing and Payments Policy</b>. This policy which is intended to determine how council tenants will be rehoused when their homes are <b>demolished states: ‘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></p> <p>There is absolutely no guarantee that council tenants will be rehoused in the new homes on</p>		<p>site redevelopment, which any future proposal would need to comply with. The <b>“Development Vehicle”</b> and <b>“Estate Renewal and Rehousing and Payments Policy”</b> are outside the scope of this Local Plan consultation.</p>
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					<p>Northumberland Park. It is likely that they will just be put on the list to be transferred to other council estates in Haringey as seems to be happening to most of the Love Lane tenants (see below.) It is therefore clear that most of the council tenants in Northumberland Park have no real interest in the demolition of their homes and refurbishment not demolition should occur.</p> <p>The only way to retain affordable housing in the area is not to knock down council estates in the first place. As the Our Tottenham Guiding Principles state, sites consisting of mostly viable buildings should not be earmarked for demolition. The council estates in Northumberland Park are viable and the provision of new high density estates with much less social housing will be disastrous, not an improvement. Refurbishment does not require inclusion of areas NT3-5 on a site allocation therefore all council estates should be removed from the site allocations included in the Tottenham Area Plan.</p>		
9	RTAA P84	NT5	No	Not stated	<p>We support the representation separately made by the Tottenham Business Group with regard to NT5.</p> <p>A sound plan should be positively prepared. The statutory examination of the Allocations DPD and Area Action Plans for Tottenham <b>must consider that this scheme is the “most appropriate when considered against more reasonable alternatives based on proportionate evidence”</b>. The evidence now out for consultation does not support a</p>	Not stated	<p>The spatial vision and strategy for Tottenham address opportunities in respect of the redevelopment of THFC stadium, to act as a catalyst and anchor for comprehensive regeneration of the area, following the original planning consent for the scheme. Giving effect to this vision and strategy, Policy NT 7 reflects the</p>

				<p>strategy based on a stadium scheme. The scheme was found by the Inspectors Report on the Archway Metal Company to deliver little or no benefit against tremendous adverse effects for established local business. The documents out for consultation are flawed in many ways. The Scoping Reports for both the Allocations DPD and The Area Action Plan <b>provided no information as 'to reasonable alternatives' to the present</b> proposed plan. The proposal for NT5 was prepared on the back of the existing Tottenham Hotspurs FC scheme for a sports and leisure destination. The concept that the area should be a major sport and leisure area was adopted as set in stone. It was not tested through consultation. The Master plan for NT5 was presented ahead of the AAP and DPD documentation. The Council has commented that it was able to set objective strategies but this does not hold true in the evidence. Six plans were drawn up by ARUP, one of which would have retained the existing local businesses. This or a variation of this was not presented as a reasonable alternative to the community. Strong representations by the Tottenham Business Group representing the threatened local sites to redress this by incorporating some of its features to the Council selected Option. At the initial Consultation each version of the plan presented had no alternative to the demolition of local shops and businesses. These demolitions can only be directly attributable to the needs of the Stadium Development NT7. The needs of the Stadium Development were</p>	<p>existing consent, and the AAP has through other site allocations, including NT 5, set out requirements to ensure a coordinated approach to area regeneration. Collectively the site allocations seek to ensure that the local benefits of stadium redevelopment are optimised, enabling delivery of housing and jobs to meet strategic growth requirements, along with social and community infrastructure to support planned growth.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of <b>the Borough's</b> strategic growth requirements.</p>
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				<p>allowed to prejudice the NT5 plans. No reasonable alternatives were given. NT5 is inherently linked to the Stadium. It is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. To that end discussion of local proposals for modest changes to retain the local business base was not tolerated.</p> <p>NT5 is unsound because the question remains whether in accordance with paragraph 182 of <b>the NPPF it is 'justified' in the sense that is the most appropriate</b> when considered against the more reasonable alternatives, based on proportionate evidence. The Stadium Scheme has been acknowledged publicly as delivering <b>paltry benefits" against</b> the tremendous adverse effects for established businesses. This has been intensified by the new plans for a more intensively developed site.</p> <p>There is no evidence and no information in any of the documents, which have been out for consultation during this process as to <b>"reasonable alternatives' to the present</b> proposed scheme. This is inconsistent with the EAPP regulations and the advice in <b>paragraph 165 of the NPPF that 'sustainability</b> which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment.</p> <p>The exclusion of the community from the initial stages of the formulation of the Plan, their continued pressure for an alternative to save</p>	<p>The Council has consulted the public in preparation of the High Road West Masterplan Framework. Whilst this document will help to inform delivery of the development principles set out in the AAP, it is a non-statutory document and as such is not subject to the same requirements as the Local Plan, including in terms of its production process. The Local Plan consultations have been carried out in line <b>with the Council's adopted</b> Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>In preparing its Local Plan documents, the Council has undertaken an updated review of its industrial land stock, as set out in the Employment Land Study (ELS) 2015. Following this review, the Council has proposed a reconfiguration of its designated employment land, informed by recommendations of the ELS,</p>
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				<p>established local business and the failure of Haringey to address this issue is a huge omission. The plan cannot be claimed to be robust unless there is a resolution.</p> <p>Haringey Council has an obligation to understand and provide support for its existing economy. The Locally significant employment sites in High Road West NT5 have been removed despite their strengths and against evidence in the Employment Land Study 2015 where paragraph 2,26 pledges to safeguard the best sites. They fulfill all the economic and land use criteria in particular with regard to the provision of SMEs and are part of a larger cluster of existing industrial activity. Their removal would inhibit the operations of the nearby industrial uses with which they interconnect. In the Employment Land Study March 2015 Consultation High Road West was described as “a locally significant site providing a range of B2 uses. It was viewed as important to safeguard B2/B8 uses and recommended as vital that any B class jobs affected are either relocated to suitable premises or to existing employment sites.</p> <p>The plans for the new housing in the High Road West area completely contradict the <b>results of the Council’s own survey and, we believe they are therefore unlawful.</b> The High Road West Consultation Feedback Report of August 2013 clearly states that respondents <b>on the Love Lane estate want ‘traditional homes with gardens, built to low density’.</b> Love Lane residents are clear they do not</p>		<p>which it considers is necessary to meet objectively assessed need for employment floorspace and <b>the Borough’s strategic jobs target</b>, as well as to deliver the spatial strategy. As set out in Alterations to Policy SP 2, the Council proposes to re-designate High Road West from a LSIS to LEA – Regeneration Area, and this has been reflected in the AAP. The approach has been subject to sustainability appraisal, including <b>assessment of ‘reasonable alternatives’.</b> The LEA – RA designation does not preclude employment uses from operating in the area, however the Council will seek an intensification of employment uses and jobs where sites are redeveloped.</p> <p>The responses to the High Road West masterplan consultation borne no regard to the existing nature of development on the site, which already has several tower blocks poorly laid out and of variable quality. The plan seeks to replace these</p>
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				<p>want high rise blocks being built .The Consultation Feedback Report is quite clear that residents in the wider High Road West area did not want high-rise residential blocks, preferring low rise blocks of 3-5 stories. The Tottenham High Road West Masterplan Framework indicates clearly, however, that there is an intention to build a large number of urban blocks at 5-6 levels and towers at 12-14 levels . 12-14 levels is higher than any of the council blocks currently in the High Road West area (the highest currently being 3 towers which are ten levels.) It is quite clear that the High Road West plans completely contradict the wishes of the residents as expressed in the consultation documents.</p> <p>The High Road West Consultation Feedback states clearly that Love Lane residents wanted to remain as Council tenants. No scheme has ever been identified by the council that might have allowed all Love Lane residents to come back into new properties on the existing site as council tenants. Indeed policy towards rehousing Council tenants has always been the opposite. After the Love Lane consultation the Council made the following policy statement:</p> <p>'...re-provision of low quality existing council housing with an equal quantum (on a habitable rooms basis) of higher quality modern social housing is not a financially viable option. The building of higher density mixed tenure developments, which increase the quality and range of the affordable housing options for local people is likely to be the only realistic</p>		<p>existing council homes and adding more housing. Neither could be achieved through low-rise redevelopment.</p> <p>No change</p>
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				<p>options [sic], and even then, will require significant public subsidy may require flexible application of normal planning policy <b>expectations for affordable housing provision.</b>' We accept that this statement is missing from the new version of this document. However, the new proposal for Northumberland Park is for the building of new housing by a Joint <b>Venture. As noted in our response to the 'Key Objectives for Northumberland Park section (above) the Joint Venture scheme being proposed for Northumberland Park will provide private tenancies not Council tenancies.</b></p> <p>In addition we must note that still in 2016, 4 years after consultation with the residents of Love Lane began, no concrete plans are in place to re-house Love Lane residents in newly built homes on the Love Lane site. We cite in evidence for this the result of a Freedom of Information request made by Jacob Secker regarding this issue (see Appendix for a copy of the full correspondence.) As of 23/02/2016 the Council does not have a list of those who want to be re-housed on the site of the existing Love Lane estate. This indicates that there is no clear plan for rehousing tenants in the new housing. We believe that without such a plan demolition should not go ahead. This is because the alleged agreement of Love Lane residents to demoltion was predicated on promises that they would be re-housed in the new housing.</p> <p>The Council should never have let the</p>		
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					<p>residents of Love Lane believe that new council homes would be built on the Love Lane site if they went along with the demolition of existing homes. Consulting on something that the Council was never going to let happen without making this clear to residents was dishonest and invalidates the results of the consultation. We believe this was unlawful. It is clearly inappropriate and was a fairly underhand way of convincing the residents that the alternative of refurbishment not demoliton for the Council homes on this site was not something that needed to be considered as they would all be getting new, homes with better facilities anyway. Given that the latter is not true the whole basis for demolition and including the Love Lane estate as a site allocation is fatally undermined and the Love Lane should therefore not be included in this site allocation. Plans for refurbishment should be advanced rather than demolition. The Council should be honest about the chances of Love Lane residents being re-housed in proposed new buildings on the site and be honest about whether they will have Council, permanent secure tenancies and their rent levels if they do move to the new housing. Once honest information has been given residents of the estate could have be balloted on whether they want refurbishment or demoliton.</p>		
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Respondent 19: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RTAAP122	NT5	Not stated	Not stated	The Development Guidelines refer to part of the site having a licensed waste capacity, and this will need to be reprovided before development of this section of the site can commence in line with Policy SA4.	We have provided commentary on Policy SA4 in the context of this site in Section e) above and for the reasons set out consider that this guideline should be removed.	<p>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 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. Once demonstrated the waste throughput capacity of the Brantwood site will need to be updated at Table 2 of SA4 of the Site Allocations DPD, along with the associated map.</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</b></p>

							accords with the methodology of the North London Waste Plan and ensures baseline consistency across Local Plan documents.
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Respondent 21: Tottenham Business Group

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
21	RTAAP125	NT 5 NT 7	No	No response given	<p>The evidence now out for consultation does not support a strategy based on a stadium scheme.</p> <p>NT5 was an AAP prepared on the back of the existing THFC scheme for a sports and leisure destination. The concept that the area should be a major sport and leisure area was adopted as set in stone. It was not tested through consultation.</p> <p>The Master plan for NT5 was presented ahead of the AAP and DPD documentation The Council has commented that it was able to set objective strategies but this does not hold true in the evidence</p> <p>The needs of the Stadium</p>	No response given	<p>The spatial vision and strategy for Tottenham address opportunities in respect of the redevelopment of THFC stadium, to act as a catalyst and anchor for comprehensive regeneration of the area, following the original planning consent for the scheme. Giving effect to this vision and strategy, Policy NT 7 reflects the existing consent, and the AAP has through other site allocations, set out requirements to ensure a coordinated approach to area regeneration. Collectively the site</p>

				<p>Development were allowed to prejudice the NT5 plans. No reasonable alternatives were given. NT5 is inherently linked to the Stadium. It is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. To that end discussion of local proposals for modest changes to retain the local business base was not tolerated. NT5 is unsound because the question remains whether in accordance with paragraph 182 of <b>the NPPF it is 'justified' in the sense</b> that is the most appropriate when considered against the more reasonable alternatives, based on proportionate evidence. The Stadium Scheme has been acknowledged publicly as delivering <b>paltry benefits" against the</b> tremendous adverse effects for established businesses. This has been intensified by the new plans for a more intensively developed site. There is no evidence and no information in any of the documents, which have been out for consultation during this process as to <b>"reasonable alternatives' to the</b> present proposed scheme. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that</p>		<p>allocations seek to ensure that the local benefits of stadium redevelopment are optimised, enabling delivery of housing and jobs to meet strategic growth requirements, along with community infrastructure to support planned growth.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of the <b>Borough's strategic</b> growth requirements.</p> <p>In preparing its Local</p>
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				<p><b>'sustainability which meets the</b> requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment.</p> <p>Haringey Council has an obligation to understand and provide support for its existing economy, The Locally significant employment sites in High Road West NT5 have been removed despite their strengths and against evidence in the Employment Land Study 2015 where paragraph 2,26 pledges to safeguard the best sites.</p> <p>They fulfill all the economic and land use criteria in particular with regard <b>to the provision of SME's and are</b> part of a larger cluster of existing industrial activity. Their removal would inhibit the operations of the nearby industrial uses with which they interconnect</p> <p>In the Employment Land Study March 2015 Consultation High Road <b>West was described as "a locally significant site providing a range of B2 uses. It is recognised as well occupied actively marketed with good internal circulation and parking</b></p>		<p>Plan documents, the Council has undertaken an updated review of its industrial land stock, as set out in the Employment Land Study (ELS) 2015. Following this review, the Council has proposed a reconfiguration of its designated employment land, informed by recommendations of the ELS, which it considers is necessary to meet objectively assessed need for employment floorspace and the <b>Borough's strategic jobs</b> target, as well as to deliver the spatial strategy. As set out in Alterations to Policy SP 2, the Council proposes to re-designate High Road West from a LSIS to LEA – Regeneration Area, and this has been reflected in the AAP. The approach has been subject to sustainability appraisal, including assessment of <b>'reasonable</b></p>
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				<p><b>on site”. (5.15)</b></p> <p>It was viewed as important to safeguard B2/B8 uses and recommended as vital that any B class jobs affected are either relocated to suitable premises or to existing employment sites that have potential for further intensification. The current plans show more floor space lost in B class use where evidence in the Employment Land Survey (5.136) showed a strong demand with growth forecast, while delivering growth in B2 class where demand is shown to be weak. In 2015 it recommended that any release of employment land should not be to the detriment of successful B2/B8 businesses.</p> <p>The promise of replacing and resituating displaced sites to protect B2/B8 uses has not been carried through to the policy. In 2015 the Forecast demand for Industrial land was reduced by Haringey to just 32,000m<sup>2</sup> up to 2026. However the Employment Land Study 2015 predicted a total requirement of 137,000m<sup>2</sup>, which included a net reduction in demand.</p> <p>Therefore the predicted increase in jobs will not be matched by an increase in workspace.</p> <p>This indicates that Haringey will not</p>		<p><b>alternatives’. The LEA – RA designation does not preclude employment uses from operating in the area, however the Council will seek an intensification of employment uses and jobs where sites are redeveloped.</b></p> <p>The Council does not consider that the respondent has accurately summarised the requirements of NPPF paragraph 22, regarding protection of employment sites. The Local Plan sets a positive and flexible framework for delivering sustainable economic development, which is justified by evidence, and having regard to objectively assessed needs.</p> <p>No change</p>
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					<p>have the capacity to relocate the existing B2/B8 businesses</p> <p>Policies under DM49 have never been sustained in the High Road west NT5 Proposals and the underlying evidence has continually been ignored.</p> <p>This is not in line with the NPPF guidelines which states employment land should not be protected ONLY where there is NO PROSPECT of it being used.</p>		
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## NT6

### Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P85	NT6	No response given	No response given	<p>We strongly oppose the loss or displacement of a community facility and employment land. The continuous existence of the Irish Centre needs to be guaranteed in the site <b>requirements, not 'the potential to accommodate community uses'</b>. <b>Specify that the existing community use should be re-provided ONSITE before any redevelopment occurs.</b></p>	<p>Specify that the existing community use should be re-provided ONSITE before any redevelopment occurs.</p>	<p>The policy provides that the existing community use should be re-provided before any redevelopment occurs – this will ensure that provision of social infrastructure is appropriately retained (whether on this site or elsewhere in the local area). The Council considers that the suggested change, to</p>

							require re-provision on site, does not provide a sufficiently flexible approach to enable development to come forward.  No change
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Respondent 20: Commercial Vehicle Sales & Hire

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
20	RTAAP124	NT6	No response given	No response given	<p>We are in receipt of your letter dated 8/1/2016, 21/1/2016 and 3/3/2016. We are a family run business which had been trading on these premises since 1961. The land at 72 White Hart Lane, Tottenham, N17 is both part owned and part rented under a lease agreement by ourselves. We have no intention to sell or relocate as we are established and we known in the area for the services that we provide the local community. We also employ local people at our business providing employment and stability.</p> <p>We have also over the last few years made considerable investment at the premises with the building of our new workshop, new equipment and a new MOT testing station.</p> <p>On behalf of all the shareholders, directors and land owners (see list below), please note once again that we have no intention to sell or relocate</p>	No response given	Noted.

					and in fact we have plans to further invest in our business at White Hart Lane and that any disruption to our business plans would be met with resistance at the highest level.		
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## NT7

### Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P86	NT 7	No response given	No response given	<p>The Tottenham AAP DPD does not consider research on stadium led development and regeneration, which finds very little contribution to the local economy – jobs provided are generally small scale and part time and arguments about local multiplier effects do not take place in practice. Therefore, the new Spurs stadium should not be presented as a driver of economic development in Tottenham. See response submitted in the March 2015 Local Plan consultation by Mark Panton, Birkbeck University, on this point for more information, and the recent London Assembly Regeneration Committee report on this topic.</p> <p>We support the representation separately made by the Tottenham Business Group with regard to NT7.</p>	Not stated	The spatial vision and strategy for Tottenham address opportunities in respect of the redevelopment of THFC stadium, to act as a catalyst and anchor for comprehensive regeneration of the area, following the original planning consent for the scheme. Giving effect to this vision and strategy, Policy NT 7 helped shape the existing consented scheme, ensuring changes were made to address key issues such as ensuring the frontage of the new building reinstated a consistent and active frontage to the High Street,

				<p>The Draft site NT7 was based on the NDP scheme promoted by THFC. Original permissions were granted on the basis of planning policies contained in the UDP, which were withdrawn. The developments were perpetuated based on a former planning regime when new sustainable policies had been prepared that could have secured more sustainable planning outcomes. There were a number of schemes/alternatives that were better than the NDP scheme but the site application was not flexible enough to have captured these benefits from different options. The proposed scheme does not significantly improve the economic and social wellbeing of the area, which was confirmed by the Inspectors report on the CPO inquiry into Archway Metals company. It was made clear that converting the NDP scheme to a site allocation would depend on public sector funding which could be more effectively invested in a more appropriate regeneration and environmental purposes.</p> <p>This position has been exacerbated by the new Stadium application, which allows a massively increased stadium size and huge elevations for additional development on the South side.</p> <p>The site was originally allocated to reflect approved planning application when it was in fact the subject of a prolonged CPO inquiry, it should have been selected on the basis of a</p>	<p>and that provision was made for new health facilities to serve the wider area. The uses on the site also reflect the desire to see the stadium provide for activity, and thereby, jobs throughout the week. Provision is also made to ensure a coordinated approach to area regeneration. Collectively the site allocations seek to ensure that the local benefits of stadium redevelopment are optimised, enabling delivery of housing and jobs to meet strategic growth requirements, along with social and community infrastructure to support planned growth.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the</p>
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					<p>legally compliant SEA and Sustainability Appraisal. This is surely unsound unlawful practice.</p> <p>The Draft Site Allocation did not consider the merits of alternative schemes and is solely based on a scheme promoted by THFC. It shows a profoundly flawed methodology which is not a sound basis for established land use allocations within a Site Allocation DPD under Part 2 of the Planning and Compulsory Purchase Act 2004(as amended) the regulations and the NPPF.</p> <p>Heritage buildings should be retained. All housing development at this site should be genuinely affordable social housing and matching the scale of the nearby terraced housing. S.106 obligations should be restored.</p>		<p>spatial strategy for Tottenham, taking account of <b>the Borough's strategic</b> growth requirements.</p> <p>Planning obligations negotiated/agreed on previous planning permissions are outside the scope of this Local Plan consultation.</p> <p>No change</p>
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Respondent 19: Quod on behalf of THFC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RTAAP123	NT7	Not stated	Not stated	In addition to referencing the Existing Planning Permission (HGY/2010/1000) reference should be made to planning and listed building consent applications HGY/2015/3000,	The description of developments are set out below: <i>HGY/2015/3000:</i> <b><i>“Proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class</i></b>	<b>Noted. Reference to up to date planning application will be added to NT7.</b>  Adding 'retail' to Site Allocation (A) is not considered necessary

				<p>HGY/2015/3001 and HGY/2015/3002 which were resolved to be granted by Haringey's Planning sub-committee in December 2015.</p>	<p><i>C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and / or office building. Details of "appearance" and "scale" are reserved in relation to the sports centre building. Details of "appearance" are reserved in relation to the health centre building. Proposal includes the demolition of 3 locally listed buildings and includes works to a Grade II Listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001)."</i></p> <p><i>HGY/2015/3001:</i></p>	<p>to include specific reference to the new retail store as this is built out.</p> <p>Noted. Amend seventh bullet point under Site Requirements to read <b>'The retail/commercial uses...'</b></p>
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						<p><b><i>“Listed building consent for internal and external works to No.744 High Road, all in connection with the use of the building for ancillary museum uses associated with a separate planning application for the Northumberland Development Project.”</i></b>  <i>HGY/2015/3002 (at 44 White Hart Lane):</i>  <b><i>“Erection for a temporary period of, together with use as, a construction compound.”</i></b></p> <p>As per the March 2015 THFC representations, the Site Allocation (part A) should be updated to make reference to retail to reflect the permitted retail uses, including the now completed retail store.</p> <p>The seventh site requirement makes reference to leisure uses being complementary. Given that the principal focus of the allocation is a leisure use, we assume that the reference should be to retail uses (deleted text struck through, proposed text in red):  <b><i>“The <del>leisure</del></i></b></p>	
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						<i>retail/commercial uses should be complementary and not compete with the uses proposed on the expanded Local Centre on the western side of the High Road within the High Road West area.”</i>	
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Respondent 21: Tottenham Business Group

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
21	RTAAP125	NT 5 NT 7	No	No response given	<p>The evidence now out for consultation does not support a strategy based on a stadium scheme.</p> <p>NT5 was an AAP prepared on the back of the existing THFC scheme for a sports and leisure destination. The concept that the area should be a major sport and leisure area was adopted as set in stone. It was not tested through consultation.</p> <p>The Master plan for NT5 was presented ahead of the AAP and DPD documentation The Council has commented that it was able to set objective strategies but this does not hold true in the</p>	No response given	The spatial vision and strategy for Tottenham address opportunities in respect of the redevelopment of THFC stadium, to act as a catalyst and anchor for comprehensive regeneration of the area, following the original planning consent for the scheme. Giving effect to this vision and strategy, Policy NT 7 reflects the existing consent, and the AAP has through other site allocations, set out

				<p>evidence</p> <p>The needs of the Stadium Development were allowed to prejudice the NT5 plans. No reasonable alternatives were given. NT5 is inherently linked to the Stadium. It is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. To that end discussion of local proposals for modest changes to retain the local business base was not tolerated. NT5 is unsound because the question remains whether in accordance with paragraph 182 of the NPPF it is <b>'justified' in the sense</b> that is the most appropriate when considered against the more reasonable alternatives, based on proportionate evidence. The Stadium Scheme has been acknowledged publicly as delivering <b>paltry benefits" against the</b> tremendous adverse effects for established businesses. This has been intensified by the new plans for a more intensively developed site.</p> <p>There is no evidence and no information in any of the documents, which have been out for consultation during this process as to <b>"reasonable alternatives' to</b></p>		<p>requirements to ensure a coordinated approach to area regeneration. Collectively the site allocations seek to ensure that the local benefits of stadium redevelopment are optimised, enabling delivery of housing and jobs to meet strategic growth requirements, along with community infrastructure to support planned growth.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham,</p>
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				<p>the present proposed scheme. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that <b>‘sustainability which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment.</b></p> <p>Haringey Council has an obligation to understand and provide support for its existing economy, The Locally significant employment sites in High Road West NT5 have been removed despite their strengths and against evidence in the Employment Land Study 2015 where paragraph 2,26 pledges to safeguard the best sites.</p> <p>They fulfill all the economic and land use criteria in particular with <b>regard to the provision of SME’s</b> and are part of a larger cluster of existing industrial activity. Their removal would inhibit the operations of the nearby industrial uses with which they interconnect In the Employment Land Study March 2015 Consultation High Road West was described as “a</p>	<p>taking account of the <b>Borough’s strategic</b> growth requirements.</p> <p>In preparing its Local Plan documents, the Council has undertaken an updated review of its industrial land stock, as set out in the Employment Land Study (ELS) 2015. Following this review, the Council has proposed a reconfiguration of its designated employment land, informed by recommendations of the ELS, which it considers is necessary to meet objectively assessed need for employment floorspace <b>and the Borough’s</b> strategic jobs target, as well as to deliver the spatial strategy. As set out in Alterations to Policy SP 2, the Council proposes to re-designate High Road West from a LSIS to LEA – Regeneration Area, and this has been</p>
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				<p>locally significant site providing a range of B2 uses. It is recognised as well occupied actively marketed with good internal <b>circulation and parking on site</b>". (5.15)</p> <p>It was viewed as important to safeguard B2/B8 uses and recommended as vital that any B class jobs affected are either relocated to suitable premises or to existing employment sites that have potential for further intensification The current plans show more floor space lost in B class use where evidence in the Employment Land Survey (5.136) showed a strong demand with growth forecast, while delivering growth in B2 class where demand is shown to be weak. In 2015 it recommended that any release of employment land should not be to the detriment of successful B2/B8 businesses. The promise of replacing and resituating displaced sites to protect B2/B8 uses has not been carried through to the policy. In 2015 the Forecast demand for Industrial land was reduced by Haringey to just 32,000m2 up to 2026 However the Employment Land Study 2015 predicted a total requirement of 137,000m2, which</p>	<p>reflected in the AAP. The approach has been subject to sustainability appraisal, including assessment of <b>'reasonable alternatives'</b>. The LEA – RA designation does not preclude employment uses from operating in the area, however the Council will seek an intensification of employment uses and jobs where sites are redeveloped.</p> <p>The Council does not consider that the respondent has accurately summarised the requirements of NPPF paragraph 22, regarding protection of employment sites. The Local Plan sets a positive and flexible framework for delivering sustainable economic development, which is justified by evidence, and having regard to objectively assessed needs.</p>
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					<p>included a net reduction in demand. Therefore the predicted increase in jobs will not be matched by an increase in workspace. This indicates that Haringey will not have the capacity to relocate the existing B2/B8 businesses Policies under DM49 have never been sustained in the High Road west NT5 Proposals and the underlying evidence has continually been ignored. This is not in line with the NPPF guidelines which states employment land should not be protected ONLY where there is NO PROSPECT of it being used.</p>		No change
21	RTAAP127	NT7	No response given	No response given	<p>A sound plan should be justified and effective The Draft site NT7 was based on the NDP scheme promoted by THFC. Original permissions were granted on the basis of planning policies contained in the UDP, which were withdrawn. The developments were perpetuated based on a former planning regime when new sustainable policies had been prepared that could have secured more sustainable planning outcomes. There were a number of schemes/alternatives that were better Than the NDP scheme but the site</p>	No response given	The spatial vision and strategy for Tottenham address opportunities in respect of the redevelopment of THFC stadium, to act as a catalyst and anchor for comprehensive regeneration of the area, following the original planning consent for the scheme. Giving effect to this vision and strategy, Policy NT 7 reflects the existing consent, and the AAP has through other site

				<p>application was not flexible enough to have captured these benefits from different options.</p> <p>The proposed scheme does not significantly improve the economic and social wellbeing of the area, which was confirmed by the Inspectors report on the CPO inquiry into Archway Metals company.</p> <p>It was made clear that converting the NDP scheme to a site allocation would depend on public sector funding which could be more effectively invested in a more appropriate regeneration and environmental purposes.</p> <p>This position has been exacerbated by the new Stadium application, which allows a massively increased stadium size and huge elevations for additional development on the South side.</p> <p>The site was originally allocated to reflect approved planning application when it was in fact the subject of a prolonged CPO inquiry, it should have been selected on the basis of a legally compliant SEA and Sustainability Appraisal. This is surely unsound unlawful practice.</p> <p>The Draft Site Allocation did not consider the merits of alternative schemes and is solely based on a scheme promoted by THFC. It</p>	<p>allocations, set out requirements to ensure a coordinated approach to area regeneration. Collectively the site allocations seek to ensure that the local benefits of stadium redevelopment are optimised, enabling delivery of housing and jobs to meet strategic growth requirements, along with social and community infrastructure to support planned growth.</p> <p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to</p>
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					shows a profoundly flawed methodology which is not a sound basis for established land use allocations within a Site Allocation DPD under Part 2 Of the Planning and Compulsory Purchase Act 2004(as amended) the regulations and the NPPF		delivering the spatial strategy for Tottenham, taking account of the <b>Borough's strategic</b> growth requirements.
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Respondent 22: North London Waste Authority

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RTAAP129	TH7	Yes	Yes	<p>North London Waste Authority (NLWA) operates a reuse and recycling centre located on this site. The Authority supports the proposed planning designations and development guidelines for this site as set out in the Tottenham Area Action Plan Pre-Submission Version January 2016.</p> <p>NLWA has a policy which aims for 95% of residents to live within two miles (measured as a straight line) of a Household Waste Recycling Centre (or Reuse and Recycling Centre as referred to by the London Mayor and now by NLWA). Therefore the protection of existing sites until replacements are in place fits with NLWA's policy on provision, agreed in June 2010.</p>	None	Noted.

Tottenham Hale Sub-area

Respondent 9: Our Tottenham Network

I	Rep	Allocati	Sound	Legally	Reason	Change	Council's Comments /
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D	ID	on / Policy / Figure / Para		Compliant		Sought	Response
9	RTAA P87	Tott Hale NA	No response given	No response given	<p>One of the implementation considerations set out as an introduction to the plans for Tottenham Hale TH1 – TH13 states that this is <b>an area where ‘targeted investment can best accelerate the delivery of substantial volumes of new homes and jobs’</b>. It suggests that for 5000 homes and 4000 jobs to be created, <b>there is a need for ‘early infrastructure planning’ with reference to utility providers</b>. Yet, the infrastructure is more than utilities; scant and superficial mention is made of the need for a health infrastructure for example, which even now, before 5000 people move in, is entirely inadequate for the local population. People moving into Hale Village find it difficult to register with a GP for example and things have not yet improved. One GP surgery in some type of temporary building is due to opening April 2016, but this is only after a very long campaign. It does not bode well for future infrastructure developments especially for health services.</p> <p>The housing proposed in the plans is largely high rise tower blocks. These are likely to be one and two bedroom flats. Para 5.143 states <b>that ‘higher levels of family housing will be concentrated on sites less proximate to the centre...’</b> <b>Where will these be, and will they be genuinely affordable social housing for the</b></p>	Not stated	<p>New permanent healthcare facilities are to be provided on the Welbourne Centre site (TH10) with assessed capacity to meet the existing shortfall and planned growth.</p> <p>The Local Plan seeks to deliver housing to meet objectively assessed need <b>and the Borough’s strategic</b> housing target. This includes delivery of a wide range of housing types and tenures, including affordable housing, for both existing and new residents. Policy AAP 3 sets out further details in this regard. The Council has proposed through Policy DM 16 a Family Housing Protection Zone, including parts of Tottenham, to help ensure provision for larger and family sized homes, in addition to those delivered through new development.</p> <p>The Council considers that the Local Plan sets a positive</p>

				<p>hundreds of families in housing need in Tottenham? Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise.</p> <p>The entire thrust of these plans is to create a forest of tower blocks which will impact on our local physical environment; our park; and on local families who need proper affordable homes. Little account is taken of these matters in these proposals which give a green light to developers to build over 15 storeys and with high densities. We oppose this approach since it will change the character of the area, pays no regard to the quality of life of existing residents and has very scant provision for social housing.</p> <p>Tottenham Hale has a very high proportion of families living in private rented and temporary accommodation. The AAP for Tottenham Hale does not mention tenants yet the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments</p>		<p>framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The Housing Zone bid put forward for Tottenham Hale includes significant affordable housing. Although it is noted that this will be predominantly affordable rent, provision has been made for a wide range of tenures, including low cost market housing. However, <b>Council's plans to see more affordable housing</b> are likely to be significantly compromised by the Housing &amp; Planning Act and the</p>
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							requirement, therein, to prioritise 'Starter Homes' as an affordable housing product.  No change
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TH1

Respondent 6: Zena Brabazon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RTAAP54	TH 1	No response given	No response given	There are serious concerns about Tottenham Hale being designated a district centre. The proposals for development do not mention the impact of a night time economy which can be <b>detrimental to a community's</b> quality of life. This is largely a residential area and consideration should be given as to how the creation of a district centre and potential night time economy will affect residents. This is a serious omission and needs to be rectified and spelt out so local people can make an informed judgement.	This is largely a residential area and consideration should be given as to how the creation of a district centre and potential night time economy will affect residents.	The designation of a new District Centre at Tottenham Hale is in line with the London Plan (2015), Table A2.2, which provides scope for this change to the town centre hierarchy. The creation of the centre is considered necessary to support future growth in this part of Tottenham, and will complement rather than compete with the existing hierarchy. The designation has been assessed for its impact on other centres, both within and outside the Borough, in accordance with the NPPF (see evidence base

							<p>-Tottenham Hale Retail Impact Assessment). In addition, the Sustainability Appraisal (SA) for this AAP specifically assessed the approach for designating a new District Centre, and concluded there are likely positive effects across a number of sustainability objectives. The Council provided the public with an opportunity to comment on the approach at the Regulation 18 stage of consultation.</p> <p>No change</p>
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Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P88	TH 1	No response given	No response given	There are serious concerns about Tottenham Hale being designated a district centre. The proposals for development do not mention the impact of a night time economy which can be <b>detrimental to a community's quality of life.</b> This is largely a residential area and consideration should be given as to how the	Not stated	The designation of a new District Centre at Tottenham Hale is in line with the London Plan (2015), Table A2.2, which provides scope for this change to the town centre hierarchy. The creation

					creation of a district centre and potential night time economy will affect residents. This is a serious omission and needs to be rectified and spelt out so local people can make an informed judgement.		of the centre is considered necessary to support future growth in this part of Tottenham, and will complement rather than compete with the existing hierarchy. It is considered that the new district centre will provide for the full range of town centre uses including evening economy uses. The design of the new district centre will take this into account in its layout, ensuring such use is compatible with neighbouring uses. Further controls can be put in place to manage the effects of any evening economy uses either through the planning application process or through licensing.  No change
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## TH2

Respondent 6: Zena Brabazon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RTAAP55	TH 2	No	No	We consider the proposals to be	Not	The Council has established

			response given	response given	<p>an over-development. The plans here propose up to eleven storeys, yet when the last permission was given for Tottenham Hale the number of storeys proposed was nine. There is an emerging pattern here where developers get agreement for a certain height, and then return for a couple of additional storeys which is then granted. This sets a precedent for higher towers elsewhere irrespective as to whether or not they are appropriate. In this instance eleven storeys above the station is in effect 12 or 13 storeys since the station is already there, and this will be in front of a current wall of blocks at Hale Village which now form the eastern aspect of the site. This will only intensify the concentration of tower blocks in the area. We draw your attention to the CABA report on the initial designs for Hale Village which expressed clear criticism of the wall of blocks proposed. In this AAP new buildings on Watermead Way extends this <b>'wall' much further.</b></p> <p>The station has just undergone extensive re-modelling at significant public cost. The new</p>	stated.	<p>indicative development capacities for the AAP site allocations using a standardised methodology, which applies the London Plan density matrix. Further, the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. TH 2 falls within the envelope of an area considered suitable for tall buildings, as supported by this technical evidence.</p> <p>Planning decisions on applications made under current adopted policy are outside the scope of this consultation.</p> <p>No change</p>
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					station interchange and new 'urban square' will create further disruption.		
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Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P89	TH 2	No response given	No response given	We consider the proposals to be an over-development. The plans here propose up to eleven storeys, yet when the last permission was given for Tottenham Hale the number of storeys proposed was nine. There is an emerging pattern here where developers get agreement for a certain height, and then return for a couple of additional storeys which is then granted. This sets a precedent for higher towers elsewhere irrespective as to whether or not they are appropriate. In this instance eleven storeys above the station is in effect 12 or 13 storeys since the station is already there, and this will be in front of a current wall of blocks at Hale Village which now form the eastern aspect of the site. This will only intensify the concentration of tower blocks in the area. We draw your attention to the CABE report on the initial designs for Hale Village which expressed clear criticism of the wall of blocks proposed. In this AAP new buildings on Watermead Way extends this	Not stated	The Council has established indicative development capacities for the AAP site allocations using a standardised methodology, which applies the London Plan density matrix. Further, the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. TH 2 falls within the envelope of an area considered suitable for tall buildings, as supported by this technical evidence.  Planning decisions on

					<p><b>‘wall’ much further.</b> The station has just undergone extensive re-modelling at significant public cost. The new <b>station interchange and new ‘urban square’</b> will create further disruption.</p>		<p>applications made under current adopted policy are outside the scope of this consultation.</p> <p>No change</p>
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### TH3

#### 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	RTAAP41	TH 3, 4, 5, 6 –	Not stated	Not stated	We agree that parking should be minimised. But see comments re need for CPZ above.	Not stated.	Noted.
4	RTAAP42	TH 3	Not stated	Not stated	<b>“Opportunities to green the existing SINC adjoining the railway line”</b> – we agree. This should be partly to recompense for losses elsewhere.	Not stated.	Noted.

#### Respondent 6: Zena Brabazon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RTAAP56	TH 3	No response given	No response given	Haringey Council has plans to revitalise Tottenham High Road and to make Seven Sisters station an anchor site for the High Road. To develop an enlarged retail centre at Tottenham Hale is	Not stated.	The designation of a new District Centre at Tottenham Hale is in line with the London Plan (2015), Table A2.2, which provides scope for this change to the town centre hierarchy. The creation of the

				<p>more than likely to contradict the <b>Council's first aim</b>. The current retail park is busy and successful, and is a day time centre. These proposals would significantly increase the usage, again over developing which will cause even greater traffic problems, air contamination and noise pollution. These plans are silent on Ferry Lane which is the direct route into Tottenham Hale from Walthamstow. How will developing a new town centre and extending the retail park impact on Ferry Lane and the people who live along it? People mainly drive to retail centres, yet no mention is made in this proposal of traffic issues and management.</p> <p>No mention is made of potential night time activities which remains a serious omission. This is a residential area and even with the developments you propose will remain so. Anyone living locally will know that despite the improvements from the new gyratory, traffic problems are still very frequent and significant. For people living along Broad Lane, and indeed for children attending Earlsmead School, air pollution is a real day-to-day issue.</p>	<p>centre is considered necessary to support future growth in this part of Tottenham, and will complement rather than compete with the existing hierarchy. The designation has been assessed for its impact on other centres, both within and outside the Borough, in accordance with the NPPF (see evidence base -Tottenham Hale Retail Impact Assessment).</p> <p>The proposal is set within the context of positively managing change and delivering the spatial strategy for the area, recognising the levels of planned growth and high levels of public transport accessibility will support interventions aimed at delivering transition of a retail park to a more traditional town centre format.</p> <p>No change</p>
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					Finally, these proposals seek to create a town centre for an area which is not a town and is essentially a transport interchange. It is not like Stratford which always was a shopping and town centre, nor is it like Walthamstow which has always had a main shopping urban street. This is an artificial development which runs the risk of destroying a perfectly good and popular retail park, imposing even more very tall buildings with over intensification, whilst also undermining the development of Tottenham High Road.		
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Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P90	TH 3	No response given	No response given	Haringey Council has plans to revitalise Tottenham High Road and to make Seven Sisters station an anchor site for the High Road. To develop an enlarged retail centre at Tottenham Hale is more than likely to <b>contradict the Council's first aim. The current</b> retail park is busy and successful, and is a day time centre. These proposals would	Not stated	The designation of a new District Centre at Tottenham Hale is in line with the London Plan (2015), Table A2.2, which provides scope for this change to the town centre hierarchy. The creation of the centre is considered

				<p>significantly increase the usage, again over developing which will cause even greater traffic problems, air contamination and noise pollution. These plans are silent on Ferry Lane which is the direct route into Tottenham Hale from Walthamstow. How will developing a new town centre and extending the retail park impact on Ferry Lane and the people who live along it? People mainly drive to retail centres, yet no mention is made in this proposal of traffic issues and management.</p> <p>No mention is made of potential night time activities which remains a serious omission. This is a residential area and even with the developments you propose will remain so. Anyone living locally will know that despite the improvements from the new gyratory, traffic problems are still very frequent and significant. For people living along Broad Lane, and indeed for children attending Earlsmead School, air pollution is a real day-to-day issue. Finally, these proposals seek to create a town centre for an area which is not a town and is essentially a transport interchange. It is not like Stratford which always was a shopping and town centre, nor is it like Walthamstow which has always had a main shopping urban street. This is an artificial development which runs the risk of destroying a perfectly good and popular retail park, imposing even more very tall buildings with over intensification, whilst also undermining the development of Tottenham High Road.</p>	<p>necessary to support future growth in this part of Tottenham, and will complement rather than compete with the existing hierarchy. The designation has been assessed for its impact on other centres, both within and outside the Borough, in accordance with the NPPF (see evidence base -Tottenham Hale Retail Impact Assessment).</p> <p>The proposal is set within the context of positively managing change and delivering the spatial strategy for the area, recognising the levels of planned growth and high levels of public transport accessibility will support interventions aimed at delivering transition of a retail park to a more traditional town centre format.</p> <p>No change</p>
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#### TH4

##### 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	RTAAP41	TH 3, 4, 5, 6 –	Not stated	Not stated	We agree that parking should be minimised. But see comments re need for CPZ above.	Not stated.	Noted.

##### Respondent 6: Zena Brabazon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RTAAP57	TH 4	No response given	No response given	The petrol station is a very useful local service which is located at the confluence of many roads. We wish it to be retained. Building a 15 storey tower on the adjacent site at the corner of Ashley Road is entirely unnecessary and out of keeping with this side of Tottenham Hale. This proposal from the planning service seems more aligned to the financial interests of developers to have highest densities on every piece of land in our locality.	Not stated.	The proposals seek to address objectively assessed needs whilst seeking to deliver the spatial strategy for the Tottenham AAP area and the Borough. The Local Plan approach for determining the appropriate density for individual sites is set out in the DM Policies DPD, which the Council considers to be in general conformity with the London Plan. Comments on petrol station are noted however in delivering the spatial strategy, the Council will seek to introduce appropriate town centre uses and to promote more sustainable modes of transport, recognising

							the high PTAL rating of the site. No change
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Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P91	TH 4	No response given	No response given	The petrol station is a very useful local service which is located at the confluence of many roads. We wish it to be retained. Building a 15 storey tower on the adjacent site at the corner of Ashley Road is entirely unnecessary and out of keeping with this side of Tottenham Hale. This proposal from the planning service seems more aligned to the financial interests of developers to have highest densities on every piece of land in our locality.	Not stated	The proposals address objectively assessed needs whilst seeking to deliver the spatial strategy for the Tottenham AAP area and the Borough. The Local Plan approach for determining the appropriate density for individual sites is set out in the DM Policies DPD, which the Council considers to be in general conformity with the London Plan. Comments on petrol station are noted however in delivering the spatial strategy the Council will seek to introduce appropriate town centre uses and to promote more sustainable modes of transport, recognising the high PTAL rating of the site.

							No change
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## TH5

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	RTAAP41	TH 3, 4, 5, 6 –	Not stated	Not stated	We agree that parking should be minimised. But see comments re need for CPZ above.	Not stated.	Noted.

## TH6

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	RTAAP41	TH 3, 4, 5, 6 –	Not stated	Not stated	We agree that parking should be minimised. But see comments re need for CPZ above.	Not stated.	Noted.

Respondent 22: North London Waste Authority

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RTAAP128	TH6	Yes	Yes	North London Waste Authority (NLWA) has offices located on this site. The Authority supports the proposed planning designations and development	None	Noted.

					guidelines for this site as set out in the Tottenham Area Action Plan Pre-Submission Version January 2016.		
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Respondent 6: Zena Brabazon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RTAAP58	TH 6	No response given	No response given	The model of the new Tottenham Hale which was used in earlier consultation sessions included tower blocks along Watermead Way. It is not clear from the map in the AAP if these are still proposed. The accompanying text is unclear <b>stating only that 'the proximity of the new Harris Academy to the north and Down Lane Park to the north and west make the area particularly suitable for larger units along those edges'. What does this actually mean?</b> If it means 22 storey tower blocks (as indicated in the model) then it is likely that they will impact on the view people have from the Park View Road side of Tottenham Hale. We wish to retain that view as that enhances our quality of life and enjoyment of the park. No regard is given in	Not stated.	The model referred was not used as part of the Local Plan consultation; rather this was used for the public consultation on the non-statutory District Centre Framework. Any future planning proposals will need <b>to comply with the Council's</b> statutory development plan, which the AAP will form part of, once adopted. The site requirements / development guidelines for TH 6 provide a basis for considering the scale and massing of buildings, having regard to local character, and these will be considered alongside other policies in the DM DPD (including policies on character, building heights and local views). The Local Plan does not prescribe building heights and these will be considered on a case basis, having regard to individual

					these proposals to the impact on existing residents in this part of Tottenham Hale.		<p>site circumstances.</p> <p>The AAP has been subject to an integrated impact assessment, which has considered the likely impact of proposals across a range of sustainability objectives, along with equalities and health considerations.</p> <p>No change</p>
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Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P92	TH 6	No response given	No response given	The model of the new Tottenham Hale which was used in earlier consultation sessions included tower blocks along Watermead Way. It is not clear from the map in the AAP if these are still proposed. The accompanying text is <b>unclear stating only that 'the proximity of the new Harris Academy to the north and Down Lane Park to the north and west make the area particularly suitable for larger units along those edges'. What does this actually mean? If it means 22 storey tower blocks (as indicated in the model) then it is likely that they will impact on the view people have from the Park View Road side of Tottenham Hale. We wish</b>	Not stated	The model referred was not used as part of the Local Plan consultation; rather this was used for the public consultation on the non-statutory District Centre Framework. Any future planning proposals will need <b>to comply with the Council's</b> statutory development plan, which the AAP will form part of, once adopted. The site requirements / development guidelines for TH 6 provide a

					to retain that view as that enhances our quality of life and enjoyment of the park. No regard is given in these proposals to the impact on existing residents in this part of Tottenham Hale.		<p>basis for considering the scale and massing of buildings, having regard to local character, and these will be considered alongside other policies in the DM DPD (including policies on character, building heights and local views). The Local Plan does not prescribe building heights and these will be considered on a case basis, having regard to individual site circumstances.</p> <p>The AAP has been subject to an integrated impact assessment (sustainability appraisal), which has considered the likely impact of proposals across a range of sustainability objectives, along with equalities and health considerations.</p> <p>No change</p>
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TH7

Respondent 4: Tottenham & Wood Green Friends of the Earth

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		<b>Para</b>					
4	RTAAP43	TH 7	Not stated	Not stated	“subject to the reprovision of the licensed waste capacity at the Ashley Road depot site” and last bullet point. But has any such reprovision been planned? The TAAP does not name a site, and surely it should.	Designate a site for new civic amenity site in Tottenham Hale	In line with the London Plan, sites with licensed waste capacity must be safeguarded until alternative provision has been made – see Policy SA 4 for further details. Re-provision will be considered on a case by case basis. The North London Waste Plan will designate potential additional sites required to meet the strategic waste apportionment.  No change.

## TH8

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	RTAAP44	TH 8	Not stated	Not stated	The tower at Hale Village – no justification has been produced for a building over 18 storeys and it isn't needed for housing target,	Set firm limit of 18 storeys	The height limit reflects the extant planning permission, which is referenced in the policy. Hale Village falls within the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey's technical evidence</b> base. The policy provides that proposals over 18 stories will need to be justified, and the Council considers this approach is sufficiently flexible to consider proposals having regard to their individual merits.  No change.

Respondent 6: Zena Brabazon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RTAAP59	TH 8	No response given	No response given	Permission for this was already granted for 18 storeys and for a hotel. It now appears that this site is to be developed as residential flats at even greater heights. This would constitute glaring over development in this already congested site full of tower blocks.	Not stated.	TH 8 reflects the extant planning permission, which includes a tall building. The policy does not prescribe building heights for future proposals, but requires that any future applications for tall buildings above the current permitted height (18 storeys) will require justification and also need to comply with Policy DM 6.  No change

Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P93	TH 8	No response given	No response given	Permission for this was already granted for 18 storeys and for a hotel. It now appears that this site is to be developed as residential flats at even greater heights. This would constitute glaring over-development in this already	Not stated	The height limit reflects the extant planning permission, which is referenced in the policy. Hale Village falls within the envelope of an

					congested site full of tower blocks.		area considered suitable for tall buildings, as supported by Haringey's technical evidence base. The policy provides that proposals over 18 stories will need to be justified, and the Council considers this approach is sufficiently flexible to consider proposals having regard to their individual merits.  No change
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Respondent 23: Montagu Evans on behalf of Hale Village Properties

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
23	RTAAP130	TH 8	No	Not stated	Our previous representations concerning allocation TH8 do not appear to have been considered by the Council. In our opinion the allocation as currently drafted, fails to maximise the opportunities available to the Council in respect of the Site. The allocation as currently drafted only suggests support for an 18	We therefore recommend that the following amendments are made to the draft allocation in our to render the AAP sound.  TH6: Development Guidelines  It our opinion bullet point 1 of the Development Guidelines section is negatively worded, as the	<b>This respondent's previous</b> representations have been considered in the preparation of the plan. Details are set out in the Regulation 18 Consultation Statement, which includes a summary of the representations received <b>and the Council's response</b> to these.  The allocations in the

				<p>storey building and makes no comment as to whether the principle of a building above 18 storeys could be acceptable.</p> <p>Taking into consideration the strategic planning policy context for this area which due to:</p> <p>a) the recently adopted Further Alterations to the London Plan (2015) requires LB Haringey to deliver a minimum of 1,502 per annum over the Plan period, which equates to an additional 682 dwellings per annum compared with the London Plan (2011; and</p> <p>b) recent confirmation of the Tottenham Housing Zone, whereby 2,000 new homes are required to be delivered around Tottenham Hale Station the purpose of the AAP must be to ensure that development sites within Tottenham are fully optimised. In our opinion the allocation is currently unsound as it has not been positively prepared</p>	<p>policy suggests that a building of over 18 storeys will require justification and no commentary is provided in terms of potential support of a building above this height.</p> <p>It is our position that this part of the policy is unsound as it has not been positively prepared. Paragraph 182 of the National Planning Policy Framework requires Plans to be positively prepared to meet objectively assessed development requirements.</p> <p>In order to optimise the development potential of this brownfield Site, a principle which runs throughout planning policy at all tiers, the policy should be positively prepared and <b>justified</b>. The Council's own evidence base, in the form of the Urban Characterisation Study, at page 108 states that the Hale Village Tower could reach 20 – 25 storeys. In light of this context we consider that</p>	<p>emerging Local Plan Site Allocations DPD and Tottenham AAP, confirm provision of sufficient site with capacity to meet and <b>exceed Haringey's strategic</b> housing requirement over the plan period. In accordance with the methodology, the site capacities are either based on a standard calculation as set out in the Appendix or as consented, where the development is unimplemented.</p> <p>The Council considers the AAP provides a sound basis for meeting objectively assessed need and delivering the spatial strategy for the Tottenham Area and the Borough. Within this context it sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study.</p>
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					and is not justified.	<p>this part of the policy should be amended to ensure the Plan has been positively prepared. The amendment suggest below is, in our opinion, justified <b>in light of the Council’s</b> supporting evidence base. Therefore, in order to make this part of the policy sound we recommend that the first bullet point is reworded as follows:</p> <p><i>“Proposals for a tall building over 18 storeys should be explored in line with the Urban Characterisation Study which suggests a building of between 20 – 25 storeys could be appropriate. Any proposal for a tall building within or above these parameters will need to be of exceptional architectural quality in accordance with the DM DPD tall building policy.”</i></p>	<p>The Urban Characterisation Study is but one consideration in determining the appropriate height of a building, as set out by Policy DM 6, which the AAP states should be read in conjunction with this policy. TH 8 reflects the extant permission for a building of 18 storeys, and the development guidelines are considered to be positively worded, in so much as they provide there is scope for a building that exceeds this height where there is sufficient justification that the proposal satisfies other relevant Local Plan policies.</p> <p>No change.</p>
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TH9

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	RTAAP45	TH9 Hale Wharf. Site Requirements – penultimate bullet	Not stated	Not stated	The environmental impacts could include lighting – the water channel between the wharf and the Paddock is unlit	The new development must have suitably adapted street lighting, of a light wavelength, location, angling and timing to ensure that no disturbance is caused to bats, moths and other nocturnal wildlife. But the requirement must also apply to lighting from homes – through a ban on security or other external lighting, and measures to control spillage of light from indoors. And this must be conditioned in such a way as to ensure continuing long-term compliance with enforcement measures.	The matter of light pollution is addressed in Policy DM 9, which provides that proposals will be required to have appropriate regard to the impact on natural habitats, including watercourses. This is a borough-wide policy that will apply to proposals on this site.  No change.
4	RTAAP46	TH9	Not stated	Not stated	Development guidelines – we support second bullet, ie the development must not adversely impact on ecological assets		Noted.
4	RTAAP47	TH9 5 <sup>th</sup> bullet	Not stated	Not stated	We agree it must respond to proximity and openness of Green Belt. The site is not <i>adjacent to</i> but <i>within</i>	Set limit of 6 storeys for this site.	The site description box sets out the relevant planning designations, which the Council

					<p>the river corridor and Green Belt, with the river to one side and the Paddock and reservoirs to the other, The sense of openness should be preserved from Ferry Lane northwards, including around the lock. High buildings at this point would create the reverse of openness, and create a canyon feel, with Hale Village at 12 storeys on one side and new high buildings on the other.</p>		<p>considers are accurate. Parts of the are adjacent to designated Green Belt. Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b> evidence base. Policy TH 9 sets out further detailed requirements for Hale Wharf and provides that all proposals will need to respond to the Green Belt, in line with national policy, as well as local character and ecological assets in the area. The Council does not consider the imposition of a building height restriction is sufficiently flexible to consider proposals having regard to their individual merits and a design-led approach.</p> <p>No change.</p>
4	RTAAP48	TH9 6 <sup>th</sup> bullet	Not stated	Not stated	<p>Support. The development must be responsive to the natural environment. This should include green walls/roofs facing river on both sides, and incorporate bird and bat</p>		<p>Noted.</p>



		<b>Figure / Para</b>					
9	RTAA P94	TH 9	No response given	No response given	Permission for this was already granted for 18 storeys and for a hotel. It now appears that this site is to be developed as residential flats at even greater heights. This would constitute glaring over-development in this already congested site full of tower blocks.	Not stated	The Council assumes this comment refers to planning permission granted at the adjacent site (TH 8). The height limit reflects the extant planning permission, which is referenced in the policy. Part of Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b> evidence base. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings.  No change

**Respondent 24: Canal and River Trust**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	<b>Council's</b> Comments / Response
24	RTAAP131	TH 9	No response given	No response given	You will be aware that the Canal & River Trust are in a joint venture with Muse Developments to work up a proposal for redevelopment of the Hale Wharf site. As such we have had extensive involvement in pre-application discussions and been able to feed the	Not stated.	Noted.

					Trust's usual requirements into the developing scheme. We therefore have no further comments to make on the AAP.		
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Respondent 25: Quod obo Muse Developments and the Canal and River Trust

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	RTAAP132	AAP 4 TH 9 Table 6	No	No response given	<p>This response relates to the lack of clarity and inconsistencies in relation to:</p> <ul style="list-style-type: none"> <li>- the definition of “replacement floorspace” and “replacement employment”;</li> <li>- indicative development capacities;</li> <li>- the lack of clear guidance on the timescales and strategy for the reclassification of Designated Employment Areas.</li> </ul> <p>Accordingly, without such clarity and with such inconsistencies, the Plan is unsound, ineffective and not therefore deliverable over the plan period.</p>	<ol style="list-style-type: none"> <li>1. There needs to be consistency in the terminology for “replacement floorspace” or “replacement employment” with a definition to provide clear guidance on the policy test for development proposals;</li> <li>2. Inconsistencies between indicative development capacities should be corrected;</li> <li>3. The timescales and strategy for the reclassification of Designated Employment Areas should be provided. Incorporating such changes will make those policies effective and deliverable over the plan period.</li> </ol>	<p>Further details in respect of replacement employment floorspace are set out in Policy DM 38, which sets out requirements for enabling mixed use schemes in Designated Employment Area (DEA) – Regeneration Areas.</p> <p><b>For clarification, TH 9 paragraph 5.169 will be amended to read:</b>  <b>“Comprehensive redevelopment to provide a mix of uses, with replacement employment floorspace, new residential and a leisure destination linked to the Lee Valley Regional Park”.</b></p> <p>It is agreed that the indicative capacity of the</p>

					<p>Please refer to the accompanying cover letter (part (b) (i)) for full and more detailed comments.</p>	<p>town centre uses for the Hale Tower in Table 6 is incorrect, and should be amended to be consistent with that in TH8 and in Table 10 in Appendix A, and reflective of consented development for the site.</p> <p>Policy SP 8 sets out the <b>Council's strategic</b> approach to managing land within its employment land hierarchy to deliver the spatial strategy for the Borough, including land within designated DEA – Regeneration Areas. Policy DM 38 helps give effect to this policy and provides further details in respect of the strategy for managing land designated as such, along with guidance to assist with implementation on a site basis.</p> <p>The DEA-Regeneration Area designation for this site will be reflected in the Policies Map, and will take effect once this and other Local Plan documents are adopted.</p>
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25	RTAAP133	AAP 1 TH 9	No	No response given	<p>The meaning of “<b>comprehensiveness</b>” should be sufficiently clear so as not to prejudice the development aspirations of component parts of Site Allocations to be realised (particularly where there are multiple development parcels within Site Allocations).</p> <p>It should be clarified that in relation to Site Allocation TH9, “<b>comprehensiveness</b>” means that the various development parcels can come forward individually. The lack of clarify could prejudice the ability to deliver important and component parts of the Site Allocation and is therefore ineffective and could undermine the deliverability of the Site Allocation over the plan period.</p> <p>More detailed comments are provided in the accompanying cover letter (part (b) (ii))</p>	<p>It should be made clear that in relation to Policy TH9 that “<b>comprehensiveness</b>” does not mean that the entire Site Allocation must be developed at the same time. The policy should be amended and clarified to allow sufficient flexibility for the development aspirations of components part of the Site Allocation to be realised, particularly given the different policy designations affecting component parts.</p> <p>Making such amendments will ensure an effective policy that allows multiple development parcels within Site Allocations to be developed comprehensively but not prejudice the ability to deliver important and component parts independently.</p>	<p><b>Agreed as this is effectively the intention of ‘comprehensiveness’.</b> However, it is felt that this clarification is best provided through an addition to Paragraph 4.6. Insert at the end of the third sentence of <b>Paragraph 4.6 “..., whilst enabling the component parts of a site allocation to be developed out separately.”</b></p>
25	RTAAP134	TH 9	No	No response	The ‘Development Guidelines’ within policy	The ‘Development Guidelines’ on page 129	Agreed. This will be amended to clarify that

				given	<p>TH9 fail the soundness test with regards to consistency with national planning policy.</p> <p>The guidelines state that building heights will have to respond to the proximity and openness of the greenbelt. Paragraph 79 of the National Planning Policy Framework (NPPF) addresses green belt, however there is no specific policy requirement in the NPPF in relation to the setting of the green belt, and in this respect the NPPF itself does not provide guidance in respect of sites adjoining the green belt.</p> <p>Please refer to the accompanying cover later (part (b) part (iii)).</p>	<p>needs to be made clear that only the garage site (which currently lies within the greenbelt) should respond to the openness of the green belt. All other proposals should respond to other relevant policies within the local development plan documents.</p>	<p><b>openness relates to the development of the Garage site but that development of the whole site will need to have regard to the site's location within the Lee Valley Regional Park.</b></p>
25	RTAAP136	AAP 4 TH 9	No	No response given	<p>b)i Employment</p> <p>Draft Policy AAP4 <b>'Employment'</b> identifies the site a Designated Employment Area with supporting Table 3 further clarifying the site designation as a Local</p>	As above.	<p>In preparing Alterations to the Strategic Policies and other Local Plan documents concurrently, including the Tottenham AAP, the Council has undertaken an employment land review to update to its local technical evidence base.</p>

				<p>Employment Area: Regeneration Area. Policy AAP4 indicates that the Council will re-classify <b>some of the area's</b> Designated Employment Areas in due course, albeit there are no specific timescales or a strategy on how it intends to do so. Clear guidance on the re-classification of those sites should be set out in the AAP.</p> <p>This is particularly the case because proposed alterations to paragraph 5.1.7 of the Strategic Policies (the consultation for which runs concurrently with the AAP) states that the hierarchy of employment land will be reviewed and revised as necessary taking into account economic circumstances and further guidance from, amongst other things, the Tottenham AAP.</p> <p>The site specific requirements of the site allocation (TH9) on page</p>		<p>Recommendations from this review, including on the re-designation of employment land, have been considered and taken forward in the emerging Local Plan documents. In particular, Alterations to SP 8 propose that Hale Wharf be designated as a Local Employment Area – Regeneration Area, and this has been reflected in Policy AAP 4 and TH 9.</p> <p>The DEA-Regeneration Area designation for this site will be reflected in the Policies Map, and will take effect once this and other Local Plan documents are adopted. The Council may in the future undertake a further review of its employment land hierarchy, in line with the NPPF and as part of the plan, monitor and review process.</p> <p>It must be noted by the developer that the primary designation of the site is as employment land, although classified as a Regeneration Area which makes provision</p>
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				<p>129 also appears to contradict the idea that the designation would be removed and states the following in relation to Hale Wharf:</p> <p><b><i>“The site will hold a Designated Employment Area: Regeneration Status to recognise the contribution to the local economy that this site can make”.</i></b></p> <p>Whilst Muse and the CRT support a mixed use development on the site (to include a proportion of employment uses), this requirement is superfluous when paragraph 5.170 simply states that replacement employment is needed.</p> <p>The current employment floorspace within the site is underutilised and generally low density, whilst the quality of the buildings are deteriorating and are considered to have little, if any, potential for re-use.</p>		<p>for mixed use development to provide for the reorientation away from traditional industrial or storage uses to more intensive employment uses. Further details in respect of replacement employment floorspace are set out in Policy DM 38, which sets out requirements for enabling mixed use schemes in Designated Employment Area (DEA) – Regeneration Areas.</p> <p>For clarification, TH 9 paragraph 5.169 will be amended to read:</p> <p><b>“Comprehensive redevelopment to provide a mix of uses, with replacement employment <u>floorspace</u>, new residential and a leisure destination linked to the Lee Valley Regional Park”.</b></p> <p>The indicative development capacity of 1,570m<sup>2</sup> of commercial floorspace is an error. As confirmed in Table 10 of Appendix A, the indicative</p>
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				<p>It is also recognised under paragraph 5.144 that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives such as the site which has been identified as being located within the Tottenham Hale Housing Zone.</p> <p>Given such policy aspirations within the draft AAP for a mix of uses on the site, it needs to be made clear that it is not necessary for the redevelopment of the site to provide “replacement floorspace” because the type of employment uses that are compatible with mixed use schemes (which include residential uses) may result in less floorspace but retain if not increase the employment density of the site. There should therefore be consistency between terminology (whether “replacement employment”</p>		<p>development capacity should be 3,200m2 of commercial floorspace, consistent with Table 6, and a minor modification to correct this will be advanced. It should be noted that these are indicative capacities necessary to demonstrate the ability of the allocations to achieve the strategic housing and job requirements for the Borough over the plan period, and are therefore also minimums where on employment land, the expectation is that redevelopment should seek to exceed the minimum commercial floorspace figure.</p>
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				<p>or “replacement floorspace”) and a clear definition included within the AAP to provide clear guidance to developers on the policy test for development proposals.</p> <p>There are also inconsistencies in the site allocation overview at Table 6 (Tottenham Hale Sites Capacity) which provides an indicative development capacity of 1,570m<sup>2</sup> of commercial floorspace for Hale Wharf and the Hale Wharf site specific designation (TH9) that suggests an indicative development capacity of 3,200m<sup>2</sup>. We also note that, in any event, the development capacity attributed to the site is indicative, not prescriptive, as confirmed at paragraph 7.3 of Appendix A (<i>Methodology for Assessing the Capacity of Allocated Sites</i>). It is clear therefore that the indicative capacity figures comprise estimations only and it is crucial for any</p>		
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					policy to provide sufficient flexibility to consider real development proposals, taking into account other considerations such as design and layout, the size, type and mix of homes/commercial floorspace, site constraints, scheme viability and other planning policy requirements.		
25	RTAAP137	AAP 1 TH 9	No	No response given	<p>b)ii Comprehensiveness</p> <p>Whilst Muse Developments and the CRT welcome the need for development proposals in the AAP area to come forward comprehensively (draft Policy AAP1), it is critical that the application of this policy allows sufficient flexibility for the development aspirations of the component parts of sites to be realised.</p> <p>Paragraph 4.7 requires developments to demonstrate, in relation to sites such as Hale Wharf, that:  <b><i>“Larger sites on which there are multiple</i></b></p>	As above.	<p>Agreed as this is effectively the intention of <b>‘comprehensiveness’</b>. However, it is felt that this clarification is best provided through an addition to Paragraph 4.6. Insert at the end of the third sentence of <b>Paragraph 4.6 “..., whilst enabling the component parts of a site allocation to be developed out separately.”</b></p>

				<p><i>landowners in order to ensure that proposals are not prejudicing development of the remaining parcels....”</i></p> <p>Site Allocation TH9 identifies the site as incorporating the garage site across the Lea Navigation, the Paddock and the Lock Keepers Cottage to the east. The site specific requirements set out on page 129 goes on to explain that the comprehensive redevelopment for the site is required and that the component sites should be developed as part of a comprehensive proposal.</p> <p>Whilst Muse and the CRT are committed to the development of the site in a co-ordinated manner, this should not create a barrier that could otherwise prejudice the redevelopment of part of the site allocation that could act as a catalyst for further investment in the other development parcels.</p>		
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					<p>The application of this policy needs to consider other crucial planning considerations such as individual development proposals, site constraints, scheme viability and other planning policy requirements</p> <p>Site Allocation TH9 (and its site specific requirements) should therefore make clear that this does not necessarily mean that that proposals for the entire site allocation need to come forward as a single development proposal, so long as such proposals can demonstrate that it meets the requirements of draft Policy AAP1 and supporting text contained at paragraph 4.7 i.e. that they do not prejudice the development of the remaining parcels. For example, the development of one development parcel could include the provision of significant infrastructure that could unlock the development potential of</p>		
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					the remaining site allocation sites.		
25	RTAAP138	TH 9	No	No response given	<p>b) iii Urban design and character including tall buildings</p> <p>Muse Developments and the CRT support Policy AAP6 that directs the highest density development to Growth Areas and the taller buildings within the AAP area towards, amongst others, Ferry Lane.</p> <p>We note that Policy AAP6 is supported by the Urban Characterisation Study (2015) that ensures that the height of new buildings respond and help to define the surrounding character, whilst optimising opportunities for intensification and regeneration in order to help create legible neighbourhoods.</p> <p>However, we note that the <b>site specific 'Development Guidelines' on page 129</b> states that "<i>Building heights will have to</i></p>	<p>It needs to be made clear therefore that only the garage site (which currently lies within the Green Belt) should respond to the openness of the Green Belt. All other proposals will need to respond to Policy DM5 '<b>Locally Significant Views and Vistas</b>' and DM6 '<b>Building Heights</b>' that collectively set out a detailed criteria for assessing proposals for taller buildings.</p>	<p><b>Agreed. This will be amended to clarify that openness relates to the development of the Garage site but that development of the whole site will need to have regard to the <b>site's</b> location within the Lee Valley Regional Park.</b></p>

				<p><i>respond to the proximity and 'openness' of the Green Belt".</i></p> <p>The National Planning Policy Framework (NPPF) is clear that the essential characteristics of Green Belt is its openness and permanence (paragraph 79). However, the same paragraph of the NPPF also states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping the land open. There is no specific policy requirement in the NPPF in relation to the setting of the Green Belt, and in this respect the NPPF itself does not provide guidance in respect of sites adjoining the Green Belt.</p> <p>It needs to be made clear therefore that only the garage site (which currently lies within the Green Belt) should respond to the openness of the Green Belt. All other proposals will need to respond to Policy DM5</p>		
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					<p>'Locally Significant Views and Vistas' and DM6 'Building Heights' that collectively set out a detailed criteria for assessing proposals for taller buildings. We make further comments on those policies in (d) below.</p>		
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Respondent 26: Christine Protz

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
26	RTAAP139	TH 9	Not stated	Not stated	<p>I have lived in Tottenham for over 70 years, and the marshes, with the length of the Lea Navigation/River from Edmonton to Hackney at its heart, have given residents a small taste of the countryside, a place to roam, to enjoy the open air and the flora and fauna. This has been particularly important for me as a child, for my children and now my grandchildren. It should also be noted that people have paid quite considerable prices for apartments at the privately owned Pavilions because of the views and access to enjoyable</p>	<p>In summary, no development should be higher than that currently on this site</p>	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation rather than to the specifics set out in the allocation for TH9 : Hale Wharf. However <b>the developer's pre-application proposals and consultation is outside the scope of the Council's Local Plan consultation.</b></p>

				<p>walks and places for exercise. This will be a real blight on the <b>plans for 'gentrification' of our area</b></p> <p>The proposal is to erect 4 to 6 storey buildings along the length of the wharf site, and IN ADDITION three blocks of 14, 15 and 21 storeys, completely destroying the light, openness and aspect of the Marshes and nearby nature reserves such as The Paddock and the Wetlands. This site is not a common or garden brown field site, but borders on the Walthamstow wetlands and the Tottenham Marshes and will completely wreck the once open nature of this part of Tottenham. Tottenham has very little going for it, especially the very eastern edge, and the Marshes have long been our secret gem, enjoyed by many, many people in the local community and further afield.</p> <p>The proposed tower blocks are completely out of keeping with this area, and a vicious kick in the teeth to local people. It says everything about how we are regarded. You need only look at</p>		<p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The site allocation is needed to ensure the Local Plan meets</p>
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				<p>the River Lea as it goes through industrialised Edmonton to see what a blight this development will be on the area. This is reminiscent of the ugly part of our history when the local Council chose to use the Marshes for dumping refuse.</p> <p>I therefore completely object to the proposed three tower blocks and have considerable reservations regarding the other buildings along the length of the Wharf. In summary, no development should be higher than that currently on this site.</p> <p>It is also important to note that this development is not needed in relation to the five year housing zone target for Haringey, so this argument cannot be used</p> <p>I would be grateful if you I understand you represent the developers for the land on Hale Wharf, Tottenham Lock, and you are currently consulting on the proposals. I would like you to consider this email as a formal objection to the current proposals</p>	<p>objectively assessed housing <b>need and the Borough's</b> strategic housing requirement over the plan period, 2011-2026.</p> <p>No change.</p>
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Respondent 27: Marc Roach

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
27	RTAAP140	TH 9	Not stated	Not stated	<p>I am writing to object to the plans for the proposed Hale Wharf Development.</p> <p>The building of towers on this sight is completely inappropriate - it is next to a nature reserve.</p> <p>I am completely opposed to the building of anything higher than 4 stories on this development.</p>	Not specifically stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is outside the <b>scope of the Council's Local Plan</b> consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical evidence base, including</b> the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned</p>

							and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.  No change.
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Respondent 28: Amar Shazad

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
28	RTAAP141	TH 9	Not stated	Not stated	<p>1. The current warehouse buildings on the stretch of land are approximately 3 storeys high. The proposals ask for buildings which are 5/6 storeys high. This is inconsistent with the established precedent of the existing buildings along that side of the canal of 4 storeys.</p> <p>2. The high rise buildings again are also inconsistent with the area. It cannot be compared to Hale Village, which not only has smaller buildings, but is on the other end of the canal and the other side of the Lea Valley Regional Park. These proposed buildings will not only dominate the skyline but the area around Hale Village will be</p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area</p>

				<p>overshadowed. We will lose a significant amount of sunlight. Wind tunnels will be increased, from what we already have. The sense of openness in the area will be lost and the "entrance" to the Lea Valley Regional Park will be destroyed. The area will become a giant, ugly and clustered housing zone. This development will almost act like a canyon, dwarfing everything else in an area which does not merit it. I believe that the development at the proposed height will have a wider negative implications. I am sure that you are aware that most of the comments from the public consultations were negative. The residents of the 4 Pavilions Blocks in Hale Village (280 flats) are also against the proposed plans.</p> <p>The area is already clustered, and with regeneration of the area what the public wanted was more "open space" and this has not been achieved and won't be achieved by building more high rise flats and skyscraper buildings. This will result in a concrete jungle rather and have adverse effects on the regional park, one of the only true areas of outstanding beauty in London.</p>	<p>considered suitable for tall buildings, <b>as supported by Haringey's</b> technical evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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					<p>Ultimately all three of the high-rise flats and the remaining 5-6 floor buildings are unacceptable in area of outstanding beauty, which has been designated to become the biggest wetland area in Europe. I believe that any development on the brownfield site should be no higher than 4 storeys, to remain consistent with what is already there and to avoid destroying the open aspect of the area.</p> <p>Haringey Council is able to meet it's target without creating such vast numbers of housing on such a small piece of land right next to our regional park.</p>		
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Respondent 29: Catherine Collingborn

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
29	RTAAP142	TH 9	Not stated	Not stated	The CRT and MUSE proposed development includes three blocks of 14, 15 and 21 storeys right next to the river and right within the Lee Valley Corridor, part of the Lee Valley Park Green Belt. This is totally unacceptable.	Not stated	The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this

				<p>They will blight the Lee Valley Park which is a major community leisure resource. They will dominate the landscape, overshadowing the Paddock and destroying the long views north and south along the river and also block the views of many residents in the present Hale Village. They will also destroy the feeling of openness in walking along the river.</p> <p>Buildings should step down into the Green Belt and heights should respond to existing street hierarchy. The buildings should have a maximum of 6 storeys on the west side and 4 storeys on the east side.</p> <p>This development would provide 405 new homes. The target for Tottenham is 5000. The Council has assessed that the planned sites will deliver 5,607 homes well over the target so none of these blocks are in fact necessary.</p>	<p>public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, <b>as supported by Haringey's</b> technical evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The site allocation is needed to ensure the Local Plan meets objectively assessed housing need <b>and the Borough's strategic housing</b></p>
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							requirement over the plan period, 2011-2026. No change.
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Respondent 30: Peter Corley

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
30	RTAAP143	TH 9	Not stated	Not stated	The buildings are too tall as envisaged at present. 15 and 21 storey blocks will be too close to the existing Hale Village ones, it will be like a Manhattan style concrete valley ruining the vistas up the Lea valley.	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is outside the <b>scope of the Council's Local Plan</b> consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical evidence base</b>, including the Urban Characterisation Study and the Potential Tall Buildings Validations</p>

							<p>Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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Respondent 31: Cyrus Razavi

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
31	RTAAP144	TH 9	Not stated	Not stated	With regards to proposals for high rise buildings near Tottenham Lock, I object because it will ruin the rural nature of this area, which is a precious and scarce resource in London. Housing targets can be achieved without ruining the natural environment of the gateway to the Lea Valley.	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the</p>

							<p>Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported <b>by Haringey's technical evidence base</b>, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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Respondent 32: Lewis Jardine

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
32	RTAAP145	TH 9	Not stated	Not stated	I just want to say 'No!' this is a total farcical proposal combining	Not stated	The Council is aware that a public consultation has been undertaken in

				<p>high rises against a nature reserve coupled with the potential future social issues that might be spawned by the next generation of tower blocks in a socially deprived area.</p> <p>However, I am not anti-redevelopment, just that buildings should be no higher than the those already on the island and should really be set back from the canal (like the existing ones) so that they do not overhang it and create a canyon like effect.</p> <p>Even observing the principles above a good number of new homes could be provided.</p>	<p>relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported <b>by Haringey's technical evidence base</b>, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p>
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							No change.
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Respondent 33: Yvonne Spyrou

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
33	RTAAP146	TH 9	Not stated	Not stated	In response to the Consultation on the current proposal for development of Hale Wharf, I would strongly suggest that this site is neither suitable nor appropriate for buildings of 14, 15 and 21 storeys because the land is part of the Lee Valley and would impinge on the sense of openness in this area.	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the</p>

							<p>Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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Respondent 34: Stanley Knill

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
34	RTAAP147	TH 9	Not stated	Not stated	<p>I object to the erection of <b>any</b> buildings over 6 storeys high at Hale Wharf.</p> <p>In particular I object to the three proposed blocks that are 14, 15 and 21 storeys tall.</p> <p>The reasons for my objections are:</p> <ul style="list-style-type: none"> <li>Tottenham is not New York. It is not Chicago. It is a predominantly low-rise area. These three blocks are of inhuman proportions and they</li> </ul>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is outside the scope of the <b>Council's Local Plan consultation.</b></p> <p>Policy TH 9 does not prescribe or set maximum building heights, as</p>

				<p>would totally dominate this area if they were built.</p> <ul style="list-style-type: none"> <li>To build them on this site, the gateway to the Lea Valley, is totally inappropriate. Tottenham Lock and Hale Wharf currently have a sense of open-ness - these monster blocks would totally destroy this.</li> </ul> <p>These monster towers would overshadow the Paddock nature reserve and reservoirs nearby.</p> <ul style="list-style-type: none"> <li>These proposals are just another example of a developer from outside an area trying to bulldoze through its dystopian view of the future, regardless of the wishes of local people and the destruction that they cause. All so they can make money and feel important at our expense. I bet <b>they</b> don't live in the kind of area that they want Hale Wharf to be.</li> </ul>		<p>the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical evidence</b> base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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Respondent 35: Neha Garg

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	Council's Comments / Response
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		Policy / Figure / Para		Compliant		Sought	
35	RTAAP148	TH 9	Not stated	Not stated	<p>I would like to register my objection to the building plans at the Hale village Wharf/Tottenham Lock site.</p> <p>I have seen the plans for the proposed buildings and I would like to register my objection to the big 14, 15 and 21 story towers being proposed. This will dominate the skyline, end the sense of openness, overshadow the Paddock and the <b>reservoirs, and create a “canyon”</b> like effect with the 12-storey pavilion blocks of Hale Village on the other side.</p> <p>Since there are already plans to build 4-6 story buildings along most of the Hale village Wharf site, to which we have no objections, NB <b>Haringey can still meet it’s 5 year</b> Housing Zone target of 2,000 homes within 5 years, and 5,000 in total at Tottenham Hale, without building so high on this site.</p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council’s</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey’s technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it</p>

							<p>appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The site allocation is needed to ensure the Local Plan meets objectively assessed housing need <b>and the Borough's strategic</b> housing requirement over the plan period, 2011-2026.</p> <p>No change.</p>
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Respondent 36: Lorenzo Lodi

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
36	RTAAP149	TH 9	Not stated	Not stated	<p>I own and live in a flat in Tottenham Hale and I would like to express my strong objection to the development of the hale wharf.</p> <p>The reasons for this are:  1) overpopulation of an area already overcrowded, whose station and shops already at</p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is</p>

					<p>capacity.</p> <p>2) High rise buildings will dominate the skyline, end the sense of openness, overshadow the Paddock and the reservoirs, <b>and create a “canyon” like effect.</b> I consider the Lee valley an area completely inappropriate for such tall buildings and for this sort of developments.</p>		<p><b>outside the scope of the Council’s</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported <b>by Haringey’s technical evidence</b> base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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Respondent 37: Kunal Gupta

ID	Rep ID	Allocation /	Sound	Legally	Reason	Change	<b>Council’s Comments / Response</b>
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		Policy / Figure / Para		Compliant		Sought	
37	RTAAP150	TH 9	Not stated	Not stated	<p>My name is Kunal Gupta and I am a resident of Crane Heights, one of the Pavillions buildings, part of the Hale village.</p> <p>I would like to register my objection to the building plans at the Hale village Wharf/Tottenham Lock site.</p> <p>I have seen the plans for the proposed buildings and I would like to register my objection to the big 14, 15 and 21 story towers being proposed. This will dominate the skyline, end the sense of openness, overshadow the Paddock and the <b>reservoirs, and create a “canyon”</b> like effect with the 12-storey pavilion blocks of Hale Village on the other side.</p> <p>Since there are already plans to build 4-6 story buildings along most of the Hale village Wharf site, to which we have no objections, <b>NB Haringey can still meet it’s 5 year</b> Housing Zone target of 2,000 homes within 5 years, and 5,000 in total at Tottenham Hale, without building so high on this site.</p>	Not stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council’s</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey’s technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it</p>

							<p>appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>The site allocation is needed to ensure the Local Plan meets objectively assessed housing need <b>and the Borough's strategic</b> housing requirement over the plan period, 2011-2026.</p> <p>No change.</p>
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Respondent 38: Fred Clark

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
38	RTAAP151	TH 9	Not stated	Not stated	<p>The wide open spaces and wide views give the Lock area a special quality, an entry as it were to the Lea Valley.</p> <p>The developer's plan must be stopped. The sense of openness will be lost.</p>	Not stated	The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is

					<p>This is not an area for buildings of 4 to 6 storey high along much of the Hale Wharf culminating of one of 21 storey.</p> <p>Please ensure the Council rejects the plan.</p>		<p><b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as <b>supported by Haringey's technical</b> evidence base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change</p>
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Respondent 40: Margaret Burr and Noel Treacy

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
40	RTAAP155	TH 9	No response given	No response given	<p>The proposals for high rise buildings along the River Lea and close to the new Walthamstow wetlands are inappropriate and unnecessary. The plan refers to the importance of green spaces but a development such as this will destroy the openness and views which we currently enjoy and will destroy the rural atmosphere of this stretch of the River Lea and Paddock Community Nature Park. There is no reason for the height but low rise buildings of 6 storeys would be adequate</p>	Not specifically stated	<p>The Council is aware that a public consultation has been undertaken in relation to a potential future planning application on this site, and that the consultation has included potential proposals for the Hale Wharf site. It is assumed that the respondent is referring to proposals shown at this public consultation. However this is <b>outside the scope of the Council's</b> Local Plan consultation.</p> <p>Policy TH 9 does not prescribe or set maximum building heights, as the Council considers this approach does not provide sufficient flexibility to consider proposals having regard to their individual merits. However, it is noted that Hale Wharf falls within the envelope of an area considered suitable for tall buildings, as supported by <b>Haringey's technical evidence</b> base, including the Urban Characterisation Study and the Potential Tall Buildings Validations Study. The Council considers that the Local Plan sets a positive framework for managing the</p>

							<p>development of tall and taller buildings. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change.</p>
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## TH10

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	RTAAP50	TH10 Welbourne Centre	Not stated	Not stated	We are concerned about the loss of open green space from the proposed housing development. The Plan must ensure that the Green Link at least compensates for this in terms of area, and improves on it in terms of habitat quality. The last bullet point of D Guidelines notes that the wall currently provides a noise barrier. If this is removed then the new development needs to provide at least as good an acoustic barrier	Specify how new homes will be protected from noise and air pollution?	<p>The open space is non-designated. The site requirements set out how new development should interface with this open space. New development offers opportunities to improve the quality and function of this space.</p> <p>Measures to be implemented for protection against</p>

					from traffic noise. How will the new homes be protected from noise and air pollution?		pollution will be considered having regard to individual proposals. Policy DM 23 sets out criteria to ensure appropriate protection in this regard, and will be considered alongside TH 10.  No change
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Respondent 6: Zena Brabazon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RTAAP61	TH 10	No response given	No response given	Given the shortage of public housing, the proximity of this site to Chestnuts estate, and the fact that Haringey owns the land, it would make good sense to build council housing on this site. Having a health centre underneath, and access to some community meeting space would be welcome given the shortage of primary health and community facilities in the area. We would oppose yet another tower since this is a residential area with low rise blocks. The highest block is Warren Court, which is set back from the road and is eight or nine storeys.	Not stated.	The site allocation provides for comprehensive redevelopment of the site, including a mix of appropriate town centre and residential uses. All proposals for residential development will need to make appropriate provision for affordable housing in line with other Local Plan policies.  The Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. Part of TH 10

				<p>The Welbourne site is surrounded by a four and one five storey block, A tower would be entirely out of keeping with the estate and with Park View Road. Would this be allowed or even considered in other parts of Haringey? The Welbourne centre site is not in the proposed Tottenham Hale District Centre, it is in a quiet residential neighbourhood comprising residential streets of terraced housing and a low rise estate. Building a tower block on this site, which in these plans would stand almost opposite another tower block would destroy the character of our neighbourhood and be entirely out of keeping with the rest of the area's layout.</p> <p>Monument Way is a main road which is greened, provides protection for the nearby houses from air and noise pollution through high walls and through an earth bund and high willow fencing. It is preferable for the area to remain as it is. If there is further housing on this road there must be very strong measures to prevent air contamination and pollution which could seriously harm peoples'</p>	<p>falls within the envelope of an area considered suitable for tall buildings, as supported by this technical evidence. The TH 10 development guidelines are clear that proposals along Monument Way site of the allocation should respond to the established heights within the Chesnut Estate.</p> <p>Measures to be implemented for protection against pollution will be considered having regard to individual proposals. Policy DM 23 sets out criteria to ensure appropriate protection in this regard, and will be considered alongside TH 10.</p> <p>No change</p>
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Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RTAA P95	TH 10	No response given	No response given	<p>Given the shortage of public housing, the proximity of this site to Chestnuts estate, and the fact that Haringey owns the land, it would make good sense to build social housing on this site. Having a health centre underneath, and access to some community meeting space would be welcome given the shortage of primary health and community facilities in the area. We would oppose yet another tower since this is a residential area with low rise blocks. The highest block is Warren Court, which is set back from the road and is eight or nine storeys.</p> <p>The Welbourne site is surrounded by a four and one five storey block. A tower would be entirely out of keeping with the estate and with Park View Road. Would this be allowed or even considered in other parts of Haringey? The Welbourne centre site is not in the proposed Tottenham Hale District Centre, it is in a quiet residential neighbourhood comprising residential streets of terraced housing and a low rise estate. Building a tower</p>	Not stated	<p>The site allocation provides for comprehensive redevelopment of the site, including a mix of appropriate town centre and residential uses. All proposals for residential development will need to make appropriate provision for affordable housing in line with other Local Plan policies.</p> <p>The Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. Part of TH 10 falls within the envelope of an area considered suitable for tall buildings, as supported by</p>

					<p>block on this site, which in these plans would stand almost opposite another tower block would destroy the character of our neighbourhood and be entirely out of keeping <b>with the rest of the area's layout.</b></p> <p>Monument Way is a main road which is greened, provides protection for the nearby houses from air and noise pollution through high walls and through an earth bund and high willow fencing. It is preferable for the area to remain as it is. If there is further housing on this road there must be very strong measures to prevent air contamination and pollution <b>which could seriously harm peoples' health.</b></p>		<p>this technical evidence. The TH 10 development guidelines are clear that proposals along Monument Way site of the allocation should respond to the established heights within the Chesnut Estate.</p> <p>Measures to be implemented for protection against pollution will be considered having regard to individual proposals. Policy DM 23 sets out criteria to ensure appropriate protection in this regard, and will be considered alongside TH 10.</p> <p>No change</p>
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## TH11

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	RTAAP51	TH11	Not stated	Not stated	<b>This area includes part of the O'Donovans site.</b> The other part of their site will be affected by Crossrail 2. The operation is a blight on residents of Ferry Lane estate through its noise and, sometimes, dust. The operation is also a blight on		Noted. Existing authorised uses are outside the scope of this local plan consultation.

					Markfield Road – danger, dirt and mud, and an appalling road surface. If the operation will have to move at some time, then the Council should be working to secure the greatest benefit by working with the company to move them earlier rather than later – when land to relocate them in NE Tottenham industrial estates is still available and affordable		
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Respondent 39: Alex Tennyson

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
39	RTAAP152	TH 11	No	Yes	I feel the points in your plan directly contradict each other, in particular the line "The quantum of dedicated employment floor space on the site should match that originally built on the site." As your plan itself states, the intention is to cooperate with the local community, which is already providing jobs and services, mostly to the creative industry. This line is a nod to regressive thinking and shows a confusion in your plan on how best to proceed with	I believe your plan should focus solely on three points: - Ensuring landlords comply to regulations for both commercial and residential properties. Closing down dangerous and over populated properties and encouraging responsible and productive live work usages of the current properties. - Redevelopment of unused properties to ensure there is no uninhabited buildings on the estate. This is the most sensible element of your plan and should be	It appears that the respondent is referring to the Preferred Options consultation document of the TAAP 9 (Feb 2015). The wording relating to the <b>'quantum of employment floor space'</b> was amended following that consultation and now reads <b>'The quantum of dedicated employment floor space on the site should be maximised.'</b> TH11 will ensure that future proposals for the site will increase accessibility and provide increased employment

				<p>this development. The very existence of a planning consultation creates uncertainty which in turn inhibits the growth of the already prosperous creative community. As director of a young business resident on the estate it is already affecting my development plans. I find the line quoted above particularly worrying as it is quite clear that any comparison to original purpose of this site (primarily light industry producing textiles) is quite irrelevant to the current will of the local economy or the local demographic. Given that the floor space requirements of current resident industry and businesses is different and given that you also state in your plan that you will "Allow for warehouse living." I am concerned that there is already a conflict of interest in your own plan. I suggest a deeper consultation with the local community, I think that vast</p>	<p>the focus of any redevelopment efforts. - Redevelopment should look at the feasibility of connection up to the quietways network between the new Tottenham Hale District Centre and Markfield Park and the River Lea via a combination of Ashley Road, Fountayne Road and Markfield Rd should be enabled through development in this area.</p>	<p>floorspace and warehouse living accommodation, to maintain and sustain the creative industries operating from this site. Any future proposals for the site will be assessed against all relevant Local Plan policies.</p> <p>No change</p>
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					improvements could be made to the local area's connectivity and desirability (some of which you correctly identify) without drastic changes the current usages. I do not have the figures to back this up but my instinct tells me that this is already a growth area in Haringey and that your shoddy plan is a thinly veiled attempt to move developers in and tenants out without the public outcry that your cack handed actions deserve.		
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Respondent 41: Ben Scanlon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
41	RTAAP157	TH 11	No response given	No response given	"TH11. This area includes part of <b>the O'Donovans site. The other</b> part of their site will be affected by Crossrail 2. The operation is a blight on residents of Ferry Lane estate through its noise and, sometimes, dust. The operation is also a blight on Markfield Road – danger, dirt and mud,	Not specifically stated	<b>Fountayne Road's industrial</b> heritage value is recognised and TH11 will ensure that employment use of this area is protected and employment floorspace is maximised. The site is designated as a Regeneration Area which allows employment led mixed use development, with

				<p>and an appalling road surface. If the operation will have to move at some time, then the Council should be working to secure the greatest benefit by working with the company to move them earlier rather than later – when land to relocate them in NE Tottenham industrial estates is still available and affordable."</p> <p>I disagree with the above profoundly. Tottenham's distinctive character is contributed to, and substantially so by having some industrial areas.</p> <p>There is very little more boring than a dull suburb entirely given over to residential use. I like walking past the Markfield Road site with its grimy ambience, trucks etc, and am pleased that it and other light industry is in my suburb. Tottenham has a long industrial history and those who do not like it could consider moving to another suburb that doesn't have such a history, if it offends them.</p>	<p>an element of residential use which supports new and existing employment floorspace within mixed use premises. This <b>designation reflects the Council's</b> aspiration to re-introduce creative employment uses to the area.</p> <p>No change</p>
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## TH12

Respondent 42: Empyrean Developments Limited

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
42	RTAAP158	TH12	No	Yes	<p>Site Allocation Herbert Road (TH12) provides a redline map, which is incorrect as it excludes an annex to a building which is incapable of remaining and nor self-supporting if the buildings within the redline are demolished.</p> <p>Please refer to the report for more detail.</p> <p>The site boundary has been repeatedly identified as wrong and acknowledged by the Local Authority. However, the error remains in the AAP.</p>	<p>The map needs to be corrected as per page 4 of our accompany submission</p> <p><b>“Statement of Case TH12 – Herbert Road, dated 4th March 2016</b></p>	<p><b>Noted. For accuracy, the map boundary will be amended to include the annex building.</b></p>
42	RTAAP159	TH12	No	Yes	<p>Site Allocation Herbert Road (TH12) provides indicative development capacity figures for the Herbert Road site.</p> <p>Empyrean wishes to contest these figures, where Policy TH12 is considered unsound as it is not justified or effective.</p> <p><b>1)The policy is unsound as</b></p>	<p>The indicative development capacity figures as outlined in TH12 need to be changed to reflect the reasons as outlined in the document submitted. The indicative</p>	<p>Disagree. The indicative development capacity for TH12 has set in accordance with the standard methodology set out in Appendix A of the TAAP. The development capacity attributed to the site is indicative and not prescriptive. The number of residential units and floorspace that may be achieved on the site will be determined by many</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><b>it is not justified</b> The indicative figures for this site within the Tottenham AAP - Site Allocations are significantly different from <b>Empyrean's own research</b> and work, which in part was completed with GVA on half of Haringey Council.</p> <p><b>2) The Policy is unsound as it is not justified</b> The London Plan 2015 density matrix indicates that in urban locations a density of 200-700 habitable room per hectare or between 70-260 units per hectare is acceptable. Given the site area at approximately 0.7 ha the figure of 66 net residential units is low. Based on this figure this assumes an equivalent figure of 1ha = 94.3 units. This is within the density range, however is considerably low and does not fully satisfy London Plan objectives, where: Paragraph 3.19 of the</p>	<p>capacity figure needs to be flexible and non prescriptive, setting out a minimum figure for both residential and commercial development. (Continue</p>	<p>considerations including design and layout, the size and type of the homes/commercial units to be provided, relevant development management policy requirements, site constraints, scheme viability, the site area available for development and any change in the PTAL of the site.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><b>London Plan states: 'In addition, the process of managing the release of surplus industrial land should focus on bringing forward areas with good public transport accessibility which will be particularly appropriate for high density development'.</b></p> <p>It is considered that the indicative development capacity figures for both residential and commercial are too low and do not reflect the London Plan objective to <b>deliver 'high density development' in areas with good public transport</b>, where the Herbert Road site has PTAL rating of 6a.</p> <p><b>3) The Policy is unsound as it is not effective</b></p> <p>The indicative development capacity figures are not consistent with emerging policy objectives, where: The commentary provided in TH12 Policy specifically <b>highlights that: 'The quantum</b></p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>of dedicated employment floorspace on the site should be maximised through any development. Residential will be permitted to cross subsidise new employment stock, and should be located adjacent to the existing residential uses adjoining the <b>site</b>'.</p> <p>Furthermore, Policy AAP3 of the emerging Tottenham Area Action Plan outlines that: <b>'Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised'</b>.</p> <p>Additionally, Paragraph 5.144 of the same document <b>suggests that: 'Employment land in this area will be retained and intensified in</b></p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>order to create a greater job density, whilst recognising that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives.' Please refer to the document submitted.</p> <p>The current indicative development capacity figures as outlined in Policy TH12 do not reflect the objective of higher density employment uses. It is considered that <b>Empyrean's site alone (within the Herbert Road site)</b> can deliver a mixed use proposal of:</p> <ul style="list-style-type: none"> <li>- The site has the potential to deliver approximately of 25,000 sqft commercial floorspace.</li> <li>- The site has the potential to deliver approximately 121 residential units.</li> </ul>		
42	RTAAP160	TH12	No	Yes	Limiting the redline defining the boundary to TH12 to only the existing properties is unjustified if we consider	The site needs to be expanded, to include 2 Norman Road, as	Norman Road is designated as Local Employment Area: Employment Land (EL). This designation means that the land

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>paragraph 5.144 of the AAP document suggests that: <b>'Employment land in this area will be retained and intensified in order to create a greater job density, whilst recognising that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives.'</b></p> <p>Paragraph 5.145 goes on to <b>state that "The South Tottenham employment area is establishing itself as a creative node with a reputation that is becoming known across London. There is the opportunity to build on this success by retaining existing industrial buildings and converting them to viable uses such as exible work spaces and creative workshops. This in turn will create opportunities for start up rms to grow in this area, complemented by an</b></p>	described in detail in document submitted.	is deemed acceptable for other employment generating uses that <b>complement the traditional 'B'</b> uses, but is not appropriate for mixed use development. This is supported by the Haringey Employment Study 2015.

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>emerging warehouse living area.”</p> <p>With reference to the document submitted, Empyrean would contest that the Redline for TH12 should therefore be extended to include the adjoining property as described therein. This would have the added benefit of facilitating development.</p>		

### TH13

Respondent 43: Colliers on behalf of Diamond Build PLC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
43	RTAAP162	TH13	Not stated	Not stated	<p>Diamond Leasing Ltd is the sole freehold owner of a large proportion of “<b>Proposed Allocation TH13: Constable Crescent</b>” (see Appendix A). The site has been occupied for a number of decades by a subsidiary of this company, Diamond</p>	<p>Site Allocation 5.177 <del>Potential development to increase accessibility, provide increased employment floorspace and warehouse living accommodation.</del> <b>Potential redevelopment of the sites for commercial-led mixed</b></p>	<p>The Council considers TH13, along with SP8, and DM38 and 39, and other relevant policies, to be sufficiently robust and flexible to protect and manage the stock of industrial, while supporting mixed-use</p>

				<p>Build Plc, who are a local building contracting business. It is used as the <b>firm's national Headquarters</b> and primary office location. The site is currently arranged as a builders yard with a significant office floorspace functioning alongside external and internal storage. The contracting industry has changed significantly since the firm took control of the site. Material is no longer stored at central locations, but is typically delivered directly to site. This has meant that the level of required storage has significantly reduced. The site is therefore no longer fit for purpose and operates primarily as an office.</p> <p>Our client wishes to build a bespoke purpose built unit which meets the business needs of Diamond Build Plc (approx. 500 sqm). They are seeking to self-build the development, which will allow them to showcase their work, create employment and ensure</p>	<p><b>use development with residential.</b></p> <p><b>Proposed commentary:</b></p> <p>5.178 This area has a range of buildings of variable quality, <b>many of which are underutilised and produce unsuitable neighbours for the existing surrounding residential uses</b>, which has the <b>redevelopment potential to accommodate</b> a mix of employment and <b>residential floorspace</b> <del>warehouse living accommodation</del> in the South Tottenham area. <b>By introducing new employment floorspace, facilitated by new homes in the area, this site</b></p> <p>Site Requirements</p> <ul style="list-style-type: none"> <li>▪ The site will be given a Designated Employment Area: Regeneration Area <b>status to reflect the Council's</b> aspiration to create a mix of uses on this site through the re-introduction of <del>creative</del> employment uses.</li> <li>▪ The quantum of dedicated employment floorspace on</li> </ul>	<p>schemes where they facilitate site regeneration and renewal.</p>
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				<p>that the development is delivered to a high design and specification standard. They also propose to deliver additional Class B1 floorspace, with a capped rent where possible, to allow more businesses to operate from the site. Due to the low land values for employment uses in the area, there is a need to introduce a higher value use to deliver our clients scheme. Therefore, it is proposed to undertake a comprehensive redevelopment of the site for a mixed use employment (Class B1) and Residential (Class C3) scheme within the next 5 years. The inclusion of our clients site (Constable Crescent) as a <b>defined “Local Employment Area: Regeneration Area” in Policy AAP4 “Employment”</b> is essential to delivery our clients vision for the site as is considered justified, effective and consistent with national policy.</p> <p>A full project team has been appointed and initial viability and design work has been</p>	<p>the site should be maximised through any development. Residential uses will be permitted only <del>on the Stamford Road frontage</del> to cross-subsidise new employment stock <b>and should be located in the most appropriate location taking into account site constraints and opportunities in order to maximise the level of commercial floorspace deliverable on site.</b> <del>adjacent to the existing residential uses adjoining the site.</del></p> <ul style="list-style-type: none"> <li>▪ Capped commercial rents may be expected in this area in line with Policy DM38.</li> <li>▪ An element of Warehouse Living will be accepted on this site. This will be required to be in conformity with the requirements of Policy DM39.</li> </ul> <p>Development Guidelines</p> <ul style="list-style-type: none"> <li>▪ Reintroducing suitable employment generating uses is the key aim of this policy.</li> <li>▪ This site is identified as being in an area with potential for being part of a decentralised energy</li> </ul>	
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				<p>undertaken to take into consideration the sites constraints and opportunities, together with the operational needs of Diamond Build Plc. In terms of viability and site capacity, there is a need to accommodate approximately 50 residential units into the scheme in order to deliver approximately 1000sqm of employment floorspace. The employment floorspace would utilise the ground floors and the supporting residential would be located on upper floors, to enable active frontages along Stamford Road and Constable Crescent which will provide natural surveillance. This is considered a key design criteria when taking into account the level of anti-social behaviour (including graffiti) that our client has experienced over the years. Taking into account our viability appraisals, to ensure that the entire allocation can be delivered there is a need to amend</p>	<p>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.</p> <ul style="list-style-type: none"> <li>▪ Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.</li> <li>▪ <del>Development along the edge of the retained South Tottenham LSIS area should be employment only, to avoid the creation of unsuitable neighbouring uses.</del> <b>Development should be design-led, taking into consideration site specific constraints and opportunities to ensure that the maximum deliverable employment floorspace is delivered on site.</b></li> <li>▪ The creation of development which overlooks the park on Stamford Road will be supported to improve passive surveillance.</li> </ul>	
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				<p>the “Indicative Development Capacity” to a more realistic number.</p> <p>There is a real need to ensure that the supporting <b>text included for “Allocation TH13: Constable Crescent”</b> reflects the work that has been undertaken and supports the redevelopment of our clients site to safeguard the long term future of the business in the area. The only other alternative would be for the firm to move outside of London and the site would revert to the highest value light industrial use for the site, a builders / plant yard / merchant, whereby the existing building and site layout would be retained. However, this would not meet the regeneration aims of the area and would have negative impacts on the amenity of the surrounding residential units.</p> <p>With this in mind, we request the following amendments to Allocation TH13: Constable Crescent:</p>		
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## Chapter 6

### Appendices

#### No Policy Specified

Respondent 1: David Smolira

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	RTAAP1	AAP general	No	Yes	My concern relates to the area covered by the Tottenham Area Action Plan. Although I recognise that the eastern half of SEVEN SISTERS WARD has limited capacity for development, it is nonetheless a very important area of South Tottenham and one that if excluded from the AAP fails to benefit from or be taken account in the development of policy and provision in the south of the borough. Surely it makes more sense to extend the area covered by the AAP to the	To extend the Tottenham Area Action Plan South to the borough boundary to include the eastern half of Seven Sisters Ward.	Disagree. The AAP boundary is drawn such that it identifies the growth opportunities within Tottenham and its surrounds. The southern part of the borough is not intended to be an area of significant growth as set out in the Haringey Spatial Strategy to which the AAP gives effect. The inclusion of the eastern half of Seven Sisters Ward within the AAP may give rise to expectations regarding intensification, which would not be supported by the strategic investment in social and physical

					borough boundary with Hackney. In addition, Hackney is undertaking similar planning in the north of their borough and it seems to me to be important for better coordination and joined-up policy development that the two AAP meet and that the two boroughs work together for the benefit of the people of south east Haringey and north Hackney, especially given that the infrastructure housing and service provisions will impact on all the people in these areas		<p>infrastructure programmed for Tottenham Hale and North Tottenham.</p> <p>There still however remains opportunities to work with Hackney about the appropriate management of the area that lies between our two growth areas.</p> <p>No change</p>
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Respondent 2: Sport England

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	RTAAP2	Not stated	No response given	No response given	<p><b>Further to Sport England's email dated 23rd March 2015, we note the Council's intentions</b> to provide adequate social infrastructure to support new development and growth. We welcome the potential of partnerships with schools that could help facilities such as playing fields to meet the sporting needs of the community.</p> <p>However, Sport England remains unclear as to whether existing playing field sites are intended to be protected or whether it is intended that</p>	Expect any policy in the APP to be very explicit on the need to retain (in playing field use) and not prejudice the use of the existing playing field	<b>Haringey's Local Plan</b> recognises the role of sport and recreation in supporting sustainable development, in line with the NPPF. This is made clear in the adopted Strategic Policies Local Plan, including policies SP 13 (Open Space and

				<p>they will be lost to development. Sport England would expect any policy in the APP to be very explicit on the need to retain (in playing field use) and not prejudice the use of the existing playing field land. Working with the provisions of the NPPF, Sport England recognises the role of sport and recreation as a fundamental part of sustainable development, and expects local authorities to plan positively for these needs and demands accordingly. The protection and provision of opportunities to participate in sport is seen as fundamental to the health and well-being of communities (NPPF, section 8), meaning that local authorities must plan and provide accordingly through policy and development management. Without a robust and up-to-date assessment of need (as required by paragraph 73 of the NPPF), there is a risk that a local plan document could be considered unsound.</p> <p>Sport England will resist the allocation of any playing field site for development unless there is a robust assessment (Playing Pitch Strategy to Sport England methodology: <a href="https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/">https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/</a>) in place at the point of allocation which has clearly shown the open space, buildings or land to be surplus to requirements. Should any policy seek to allocate any existing playing field land or formal built sports facilities for redevelopment, we would strongly urge the Council to discuss this</p>	land.	<p>Biodiversity) and SP 15 (Culture and Leisure), which set out <b>the Council's</b> approach to plan positively for playing fields and related facilities. The DM DPD and site allocations give effect to the Strategic Policies. Accordingly, the Council will seek to enhance and protect against the loss of these open spaces and leisure facilities, unless it can be suitably demonstrated these are surplus to requirements. This policy approach is supported by assessments of open space provision, as included in the technical evidence base; in addition the Council is currently finalising an updated Playing Pitch Strategy, which will inform the Infrastructure Delivery Plan (IDP), and help to</p>
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					directly with Sport England.		ensure an appropriate level of provision to support planned growth in the Borough.
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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	RTAAP19	Flood risk	Not stated	Not stated	Much of the proposed development will be in the River Lee floodplain, and only 10m above sea level. The floods of 2015/16 have shown <b>previous assessments re "1 in 100 years" etc to be no longer valid. The world is on course for 3.7°C warming. So where will sea level be in 100 or 200 years (when on current trends the buildings we put up now may still be required)?</b>	So there should be a new point recognising that –a new assessment should be carried out looking at global warming up to 3.7°C.	The Council has undertaken a flood risk assessment in line with the NPPF and associated guidance, making an appropriate allowance for climate change.  No change.

Respondent 5: Tim Kay

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
5	RTAAP52	AAP Generally	Not stated	Not stated	I have just spent a depressing hour reading the Tottenham area	I urge you to please	The Council considers that the AAP provides a positive

				<p>development plan. As a resident of Tottenham Hale I have to say I am opposed to the entirety of the plan which appears to favour a small variation on the Hale Village development being parachuted into every small parcel of land available. This would transform Tottenham into a cut price Stratford without the landscaping and sports facilities. As <b>a local resident I value Tottenham's</b> diversity and feel that the plan solely involves setting aside areas to provide developers with land on which to build high-rise dwelling completely out of character with the area and without considering the needs of those who actually live here.</p> <p>I also feel that the presentation of information, low key consultation process and lack of information about means of communicating views to the council on the matter to be at worst calculated to reduce opportunity to raise objections and at best negligent.</p> <p>Tottenham needs regeneration <i>not</i> re-creating as some Bouygues / large developers profit scheme and I urge you to please reconsider the plan.</p>	reconsider the plan	<p>framework for managing growth, regeneration and investment in the area, having regard to objectively assessed needs. The Local Plan sets out a clear framework for managing tall buildings, supported by local evidence, which identifies a few strategic locations where such proposals will be considered acceptable and having regard to local character. The Local Plan consultations have been carried <b>out in line with the Council's</b> adopted Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>No change</p>
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Respondent 6: Zena Brabazon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RTAAP53	Not specified	No response	No response	<p>I am writing to object to the development proposals for Tottenham Hale as set out in the AAP of January 2016. My name is Zena Brabazon. I am chair of our local residents' group, Dowsett Estate Residents' Association.</p> <p><b>General Comments</b></p> <p>One of the implementation considerations set out as an introduction to the plans for Tottenham Hale TH1 – TH13 <i>states that this is an area where 'targeted investment can best accelerate the delivery of substantial volumes of new homes and jobs'</i>. It suggests that for 5000 homes and 4000 jobs to be created, there is a need for <b>'early infrastructure planning'</b> with reference to utility providers. Yet, the infrastructure is more than utilities; scant and superficial mention is made of the need for a health infrastructure for example, which even now, before 5000 people move in, is entirely inadequate for the local population. People moving into Hale Village find it difficult to register with a GP for</p>	Not stated.	<p>The Local Plan is accompanied by an Infrastructure Delivery Plan (IDP) setting out the key infrastructure requirements needed to support delivery of the spatial strategy for the Borough and the Tottenham area, including key responsibilities and timeframes for this, recognising the many partners that will assist in delivering the Local Plan over its lifetime. The IDP is subject to regular review and updating over the plan period.</p> <p>The Local Plan seeks to deliver housing to meet objectively assessed <b>need and the Borough's</b> strategic housing target. This includes delivery of a wide range of housing types and tenures, including affordable housing, for both existing and new residents. Policy AAP 3 sets out further details in this regard. The Council has proposed through Policy DM 16 a Family Housing Protection Zone, including parts of Tottenham, to help ensure provision for larger and family sized homes, in addition to those delivered through new development.</p>

				<p>example and things have not yet improved. One GP surgery in some type of temporary building is due to opening April 2016, but this is only after a very long campaign. It does not bode well for future infrastructure developments especially for health services.</p> <p>The housing proposed in the plans is largely high rise tower blocks. These are likely to be one and two bedroom flats. Para 5.143 states <b>that 'higher levels of family housing will be concentrated on sites less proximate to the centre...'</b> Where will these be, and will they be genuinely affordable social housing for the hundreds of families in housing need in Tottenham? Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise.</p> <p>The entire thrust of these plans is to create a forest of tower blocks which will impact on our local physical environment; our park; and on local families who need proper affordable homes. Little account is taken of these matters in these proposals which give a green light to developers to build over 15</p>	<p>The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change</p>
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					<p>storeys and with high densities. I oppose this approach since it will change the character of the area, pays no regard to the quality of life of existing residents and has very scant provision for social housing.</p> <p>Tottenham Hale has a very high proportion of families living in private rented and temporary accommodation. The AAP for Tottenham Hale does not mention tenants yet the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments.</p>		
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Respondent 7: Elizabeth Pearce

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
7	RTAAP62	ALL	No	No	I do not consider the plan to be legally compliant on the grounds that I have not had any actual consultation regarding the future of the property where I have lived for 40 years. This form alone is full of jargon and	I believe that representatives from the council should be coming and speaking to residents in each building or estate which is earmarked for 'improvement' or demolition. The lack of	The Local Plan consultations have been carried out in line <b>with the Council's adopted</b> Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.

				<p>for the average tenant impossible to understand let alone complete. At no point has any representative from the council personally contacted me to advise or reassure me of what it going to happen to my home. I would expect, at the very least, to have someone come and speak to residents to reassure them that they are not simply going to be 'rehoused' elsewhere in unsuitable areas or left to find their own alternative accomodation. There have not been enough public meetings to offer information to tenants on these issues. I contacted the council and was told that no final decisions have been made regarding my home at Reynardson Court however it would seem that it has been earmarked for demolition rather that improvement. I am retired and simply cannot afford to move to privately rented accomodation or even so called 'affordable housing'.</p>	<p>information is simply unacceptable. Jargon free, easy to understand information should be made readily available.</p>	<p>While the Local Plan allocate sites for estate renewal or improvement, the Council is committed to, and statutorily required to, engage with residents of each estate prior to commencing any proposals for renewal or improvement in accordance with s105 of the Housing Act. It is at this stage, or through the Haringey Housing Strategy, that tenants and leaseholders will be advised of the range of options available to them leading up to and prior to commencement of any proposal on their estate.</p> <p>No change</p>
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					<p>I do not want to move from my home. Paragraph 3.2.2 of Haringey's Local Plan: Strategic Policies 2013 - 2026 states that: <b>'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community they want to live.'</b> For the above reasons, I believe that the possible demolition of Reynardson Court and other council states in Tottenham contravenes the <b>Council's own policies.</b></p>		
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Respondent 8: Russell Dove

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
8	RTAAP64	All Tottenham Area Action Plan	No	No	There is a legal obligation to consult with residents. This documents under consultation here, and their previous versions, are complex, poorly designed, consist of multiple documents with appendices and are effectively	To make the consultation as a whole legally compliant and sound it should be rerun with a longer consultation period, supported by effective engagement with residents in public, online and in the streets/ shopping centres	The Local Plan consultations have been carried out in line with the <b>Council's adopted</b> Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012. In

				<p>impossible for any ordinary resident to address. This form for making representations and the structure is itself couched in language that is very difficult to understand even for an educated resident. If the consultation is to have any validity it must address residents in clear comprehensible language, or at the very least a summary should be provided outlining the key principles and concrete proposals contained in the plan to which residents could then respond. The requirement to address each document separately is further offputting and adds to the complexity. In addition, the two open events were also poorly publicised and not sufficiently accessible to residents. I learned of them only after they had taken place.</p>	<p>and other places where large numbers of people travel or congregate. Of the 10 sites where there was a public presentation only 3 out of 10 were located in Tottenham. This is not appropriate where a key part of the total plan and some of the most wide-ranging proposals relate to Tottenham. The initial consultation referred to, quoted in the text here (page 11, point 1.24) only 80 people were contacted out of a total population of over 100,000 in Tottenham. This consultation is unlikely to have achieved a much greater reach. In terms of specific content, the Action Plan is both vague in its overall aim and principles and over-specific in detail in relation to particular sites, and does not sufficiently draw these two elements together. For example, there are references to a landmark tall building at the Seven Sisters Apex House site (page 63, point 5.38) where it is argued that the location</p>	<p>recognition that the Council was consulting on a number of Local Plan documents at the same time, the consultation periods were extended beyond the statutory minimum of all occasions.</p> <p>The Council considers that the Local Plan is sound with the proposals justified by a robust technical evidence base, and positively prepared, having regard to meeting objectively assessed needs, including for housing.</p> <p>No change</p>
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						<p>is “a suitable location for a high quality tall building” without no evidence or argument why this should be the case. What features of the surroundings justify this? This has evidently been predetermined since no evidence for this assertion is given here. Where does this meet the needs of Haringey or Tottenham in particular? I have selected just one example since it is simply not possible to go into all the elements for reasons of time. Not all sites and elements of the plan are objectionable, but evidence is lacking. I would need to see greater evidence provided throughout both for the specific proposals and the business case that underlies them. I would like to see a much closer, evidence-based arguments how this plan addresses <b>the needs of Tottenham’s</b> existing residents and the new ones who are likely to move in. How do these <b>plans relate to the council’s</b> existing social housing</p>	
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						<p>waiting lists? What research has been carried out to identify what kind of people can afford to buy the new housing provided under this plan, other than landlords. Does this plan provide a long-term future <b>for Tottenham's new</b> residents under existing tenancy laws? Much of this is speculative and any growth is focused on public sector development. Any social housing referred to is <b>based on 'renewal'</b> – in itself possibly/ probably a good thing in certain individual cases - but there is no parallel expansion of genuinely affordable, low-rent social housing to match the large number of new properties to buy or address existing demand. The plan as a whole therefore does not address <b>London's housing crisis</b> or the immediate needs of Tottenham.</p>	
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Respondent 10: Fiona English and Mark Ellerby

ID	Rep ID	Allocation	Sound	Legally	Reason	Change	Council's Comments
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		/ Policy / Figure / Para		Compliant		Sought	/ Response
10	RTAAP96	Design in Tottenham	No response given	No response given	<p>In the Evening Standard Comment section, Tuesday 29th February, they argue that <b>‘Housing needs a more imaginative approach’ to high-rise.</b> “[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular with residents; the same is true of the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] <b>not the best answer.</b>” The same argument could be made for Tottenham.</p> <p>Further to our email of 2nd March, we would like to draw your attention to the alternative approach to adopted by Brighton &amp; Hove City Council which we feel offers a sensible and useful answer to many of the objections we raised. <a href="http://www.brighton-">http://www.brighton-</a></p>	<p>Further to our email of 2nd March, we would like to draw your attention to the alternative approach to adopted by Brighton &amp; Hove City Council which we feel offers a sensible and useful answer to many of the objections we raised.</p>	<p>The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p>

					<a href="http://hove.gov.uk/content/housing/council-housing/new-homes-neighbourhoods">hove.gov.uk/content/housing/council-housing/new-homes-neighbourhoods</a>		No change.
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Respondent 9: Our Tottenham Network

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
21	RTAA P126	General	No response given	No response given	<p>The statutory examination of the Allocations DPD and Area Action Plans for Tottenham must consider that this scheme is <b>the "most appropriate</b> when considered against more reasonable alternatives based on proportionate evidence</p> <p>The scheme was found by the Inspectors Report on the Archway Metal Company to deliver little or no benefit against tremendous adverse effects for established local business. The documents out for consultation are flawed in many ways.</p> <p>The Scoping Reports for both the Allocations DPD and The Area Action Plan provided no <b>information as 'to reasonable alternatives'</b> to the present proposed plan. This is inconsistent with the EAPP regulations and the advice in <b>paragraph 165 of the NPPF that "sustainability</b> which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider</p>	<p>The wishes of the Community as demonstrated in the PETITION presented on the 28th November 2013. Should be responded to by considering reasonable alternatives to the demolitions which will have such tremendous adverse affects for local business.</p>	<p>The Council has undertaken an iterative process of integrated impact assessment of the plan proposals (Tottenham AAP Sustainability Appraisal reports) which it considers meets the relevant statutory requirements in this regard. The SA includes consideration of reasonable alternatives and assesses approaches to delivering the spatial strategy for Tottenham, taking account of <b>the Borough's strategic</b> growth requirements.</p> <p>The SA Scoping Report sets out the sustainability appraisal framework against which plan proposals are assessed through the</p>

				<p>the likely significant effects on the environment and social factors.</p> <p>Six plans were drawn up by ARUP, one of which would have retained the existing local businesses. This or a variation of this was not presented as a reasonable alternative to the community. Strong representations by the Tottenham Business Group representing the threatened local sites to redress this by incorporating some of its features to the Council selected Option</p> <p>Evidence of Local Pressure for An Alternative to Demolition  Meeting of Representatives of TBG with Alan Strickland Cabinet Minister for Regeneration 13<sup>th</sup> June 2013  Petition of 2500 local names asking for an alternative to demolition.  Representatives were told they would all be required to move their businesses from the <b>area and asked to join a “Steering Group for that purpose.</b>  <b>26<sup>th</sup> May 2013 Letter of ‘Blight” received by affected Businesses (two days before last Consultation Meeting.</b>  8<sup>th</sup> October 2013 Haringey held meeting with affected businesses at the Irish Centre.  Alan Strickland and Lyn Garner, Director of Regeneration attended  Mr. Strickland again confirmed that all businesses would have to move.  Lyn Garner Director of Regeneration <b>confirmed, “There would be no more metal</b></p>	<p>A scaling down of the development concessions to THFC and a scaling up of consideration for the established local businesses which now provide a substantial employment base and core local shopping for the existing community (particularly ethnic specialist).</p>	<p>integrated impact assessment process. Consideration of reasonable alternatives for the AAP was appropriately undertaken and reported on in the Regulation 18 and Regulation 19 stage SA Reports.</p> <p>Previous decisions on planning applications are outside the scope of the Local Plan.</p> <p>The Council has carried out public consultation in line with its adopted Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
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				<p>bangers allowed in the area”, a remark that was later apologized for by Mr. Strickland.</p> <p>8<sup>th</sup> October 2013 The Designated “Steering Group’ formed into The Tottenham Business Group.</p> <p>28<sup>th</sup> November 2013 Deputation to the Cabinet by The Tottenham Business Group presented the Petition (now with over 4000 signatures) requesting the protection of local businesses an alternative to demolition</p> <p>Presentation of 4000 signatures asking for alternatives to demolition.</p> <p>Response by Alan Strickland Cabinet Member for Regeneration included the pledge to ‘explore options which would retain ‘ the threatened high street shops and businesses.</p> <p>25<sup>th</sup> February 2014 Chairman and Vice Chair of TBG met with ARUP designer Alan Strickland and Lyn Garner. They were shown 6 alternative plans that had been considered by the Cabinet prior to the June Consultation, They were told no consideration of alternatives or modifications.</p> <p>6. What modifications are necessary</p> <p>The wishes of the Community as demonstrated in the PETITION presented on the 28<sup>th</sup> November 2013. Should be responded to by considering reasonable alternatives to the demolitions which will have such tremendous adverse affects for local business. A scaling down of the development concessions to THFC and a scaling up of consideration for the established local businesses which now provide a substantial employment base and core local shopping for</p>		
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					<p>the existing community(particularly ethnic specialist).</p> <p>The exclusion of the community from the initial stages of the formulation of the Plan, their continued pressure for an alternative to save established local business and the failure of Haringey to address this issue is a huge omission. The plan cannot be claimed to be robust unless there is a resolution.</p>		
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## Appendix K - Respondents to the Pre-Submission Tottenham Area Action Plan DPD Consultation

ID	Respondent	Wishes to Attend Hearings
45	Environment Agency	No
46	Cushman and Wakefield on behalf of Royal Mail Group	Not Stated
47	Amec Foster Wheeler on behalf of National Grid	Not Stated
48	CGMS on behalf of Mr Green	Not Stated
49	London Borough of Hackney	Not stated
50	CGMS on behalf of Highgate Capital LLP	Not Stated
51	Alison Armour	Not Stated
52	Greater London Authority	Not Stated
53	Transport for London	
54	Historic England	Not stated

## Appendix L - Responses to the Pre-Submission Tottenham Area Action Plan DPD Consultation – Respondent Order

### Respondent 45: Environment Agency

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
45	RTAAP164	Sites: SS2, SS2, TG2, BG3, BG4	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</i>	Noted. The development guidelines will be amended to reflect the first sentence of the suggested change. Guidance in the second sentence is covered in the relevant DM Policy. This wording is consistent with other site allocations in the Plan.  <b>The Development guidelines for Sites SS2, TG2, BG3 and BG4</b>

						<i>risk management and remediation strategy.</i>	amended to read:  The site lies in a groundwater Source Protection Zone and as such the Council will expect developments to demonstrate no adverse impact on water quality therefore development should consider this receptor in any studies undertaken.
45	RTAAP165	Generally	Not stated	Not stated	Whilst there is no reference to flood risk, water resources or biodiversity in the overarching policies of the action plan, we are satisfied that management and mitigation of the potential negative effect of flooding can be provided by the Borough-wide flood risk management policies in the DM Policies DPD. Therefore we have not requested	We have reviewed a number of site allocations that fail to identify the correct level of flood risk, and groundwater sensitivity. This is required to ensure that these sites are	Site allocations will be reviewed and updated to reflect appropriate levels of flood risk, groundwater

					<p>additional wording in the AAP.</p> <p>We have reviewed a number of site allocations that fail to identify the correct level of flood risk, and groundwater sensitivity. This is required to ensure that these sites are submitted with the appropriate level of assessment, in line with the guidance in the NPPF.</p> <p>Furthermore a number of site allocations have failed to acknowledge the presence of culverted main rivers on site, or made reference to the need for deculverting in their site guidelines. Deculverting is a key Water Framework Directive action for much of the Moselle Brook in Tottenham, and failure to secure improvements in the river prevents reductions in flood risk, and important ecological gains in the area.</p>	<p>submitted with the appropriate level of assessment, in line with the guidance in the NPPF</p> <p>Furthermore a number of site allocations have failed to acknowledge the presence of culverted main rivers on site, or made reference to the need for deculverting in their site guidelines</p>	<p><b>sensitivity and presence of culverted main rivers.</b></p>
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**Respondent 46: Cushman and Wakefield on behalf of Royal Mail Group**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	RTAAP166	BG 4	No	Not stated	We act on behalf of the Royal Mail Group (RMG), the owner of the Delivery Office forming part of the above site. Our client notes that site BG4 is identified for a mixed residential and employment development after 2020 to provide some 48	Delivery office be excluded from the Site allocations at the next plan stage.	<p>Royal Mail nominated this site <b>through Haringey's "Call for Sites"</b> process informing plan production, and it has therefore been included for consideration in the Local Plan.</p> <p>The Council considers that delivery of the allocation is possible, even if</p>

					<p>dwelling and some 370 sq m of commercial floorspace. Our client has reviewed their property portfolio and wishes to advise your Council that this facility is deemed essential to the ongoing operations of RMG in North London and will not be available for redevelopment until after the end of the plan period at the earliest. The identified development incorporating this site will therefore not be deliverable within the timeframe of the emerging local plan, including the Tottenham Area Action Plan.</p> <p>We appreciate that this lack of availability will impact on the <b>'soundness' of the plan as it will not be justified or effective</b> and so are instructed to draw this position to your attention notwithstanding the consultation period has closed.</p>		<p>site redevelopment was undertaken in phases (i.e. Sorting office brought forward after other parts of the allocation). Policy AAP 1 (Regeneration and Masterplanning) provides assurance that proposals are considered comprehensively. This will ensure flexibility over the course of the plan period.</p> <p>No change.</p>
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**Respondent 47: Amec Foster Wheeler on behalf of the National Grid**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
47	RTAAP167	Generally	Not stated	Not Stated	An assessment has been carried out with respect to <b>National Grid's electricity and gas transmission apparatus</b> which includes high voltage electricity assets and high	Not stated	Noted.

				<p>pressure gas pipelines and also National Grid Gas <b>Distribution's Intermediate / High Pressure apparatus.</b></p> <p>National Grid has identified the following high pressure Underground electricity Cables as falling within the Tottenham AAP boundary: 265973 266031</p> <p>National Grid has identified the following high pressure Overhead Powerlines as falling within the Tottenham AAP boundary: VC Route – 275kV from Tottenham substation in Haringey to Hackney substation in Hackney. ZBH Route - 275kV from Tottenham substation in Haringey to Redbridge substation in Redbridge. ZBC Route - 275kV from Tottenham substation in Haringey to Waltham Cross substation in Epping Forest. ZBD Route - 275kV from Tottenham substation in Haringey to Waltham Cross substation in Epping Forest.</p> <p>National Grid has identified the following Substation as falling within the Tottenham AAP boundary: Tottenham Substation</p> <p>From the consultation information provided, the above Underground and Overhead Electricity Powerlines do not interact with any of the proposed development sites.</p> <p><i>Gas Distribution – Low / Medium Pressure</i></p> <p>Whilst there is no implications for National Grid Gas <b>Distribution's Intermediate / High Pressure apparatus,</b> there may however be Low Pressure (LP) / Medium</p>		
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					Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact <a href="mailto:plantprotection@nationalgrid.com">plantprotection@nationalgrid.com</a>		
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Respondent 48: CGMS on behalf of Mr Green

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
48	RTAAP168	TH11	Not stated	Not stated	The site at Foutayne Road is allocated under the Tottenham Area Action Plan Policy TH11 and is recognised as having the potential for development to increase accessibility and provide increased employment floorspace and warehouse living accommodation. On behalf of my client, we welcome this mixed use designation however seek to challenge the intensification of employment land on the site and indicative housing capacity.	Not stated	Noted.
48	RTAAP169	TH11	Not stated	Not stated	<b><i>Policy AAP4 Employment</i></b> In accordance with table 3 within the emerging Site Allocations Document, the site at Foutayne Road has <b>been designated as a 'Local</b>	Revise employment floorspace requirements for TH11	Policy DM 39.A(b) provides that the Council will take into account lawful planning uses on sites, to establish the existing baseline with respect to the intensification of the

				<p>Employment Area: <b>Regeneration Area.</b> In paragraph 6.13 of the emerging Development Management Document it <b>states that 'mixed use redevelopment of employment land will be restricted' to such designations and that 'the Strategic Policies Local Plan provides the basis for a more flexible approach to development in such Regeneration Areas. Furthermore, the London Plan and Haringey's Strategic Policies require that more intensive land uses are directed to highly accessible locations. Mixed-use schemes proposed on non-designated employment sites will not be considered suitable if they are in areas of poor public transport accessibility.'</b></p> <p>This site has evolved over the past 15 years to become predominantly residential in use with a well-established warehouse community with around 500 residents. The majority of the units are in residential use (previously</p>	<p>employment offer and re-provision of the existing warehouse community. This policy should be read in conjunction with TH 11.</p> <p>The Council has proposed a reconfiguration of its designated employment land, informed by recommendations of the Employment Land Study (2015), which it considers is necessary to meet objectively assessed need for employment floorspace <b>and the Borough's strategic jobs target</b>, as well as to deliver the spatial strategy. The Council considers this site has strategic importance as an employment location, and will seek to maximise employment floorspace and jobs on this site, whilst recognising the existing authorised residential uses. The LEA – RA designation provides sufficient flexibility for enabling mixed use proposals to come forward, where viability is an issue.</p> <p>No change.</p>
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					<p>commercial space). The majority of this space has been in established residential use by the host community for 5-10 + years and therefore capable of qualifying for a Certificate of Lawfulness of Existing Use as residential. To designate the land as employment floorspace therefore contradicts paragraph 22 of the NPPF, which states: <b>“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.”</b> On this basis we suggest that the designation as a Local Employment Regeneration Area is relaxed given the high proportion of the site is currently in residential use and has been for over 5 years, and the prospect of the use returning to employment use is unrealistic.</p> <p>The AAP Policy TH11 states that the Council aspire to create a mix of uses through <b>the ‘re-introduction of</b></p>		
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					<p>creative employment uses,' and that 'employment generating uses should be maximised subject to the other aims of the policy being met.' <b>On behalf of my client</b> we do not agree with the inclusion of these statements given significant proportions of the site are currently in residential use and very limited employment floorspace currently operational within the site. Re-introducing previous employment uses at this site will be detrimental to the thriving warehouse community at Foutnayne Road.</p>		
48	RTAAP170	TH11	Not stated	Not stated	<p><b>Policy AAP3 Housing</b> Point C in emerging AAP policy AAP3 states '<b>development proposals</b> incorporating a housing element will be expected to provide the housing in accordance with the minimum capacities, set out in the Site Allocations in this AAP. Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local</p>	<p>Revise density requirements for TH11</p> <p>We recommend that in line with policy AAP3, the wording of the TH11 policy and the suggested number of units be amended to encourage maximum density.</p>	<p>Indicative development capacities for site allocations have been set using a standardised methodology, applying the London Plan density matrix, as set out in AAP Appendix A. These are minimum capacities, which may be exceeded subject to other policy requirements being satisfied. The Local Plan is clear that the London Plan density matrix should not be applied prescriptively, and the appropriate residential density</p>

				<p>facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and <b>Haringey's Local Plan are not compromised.'</b></p> <p>My client supports the inclusion of this statement as it is considered that the site at Fountayne Road has the capacity to provide a higher density scheme over that suggested within the draft policy. Emerging Site Allocation TH11 sets out an indicative capacity of 113 residential units with 3,900m<sup>2</sup> of commercial floorspace. Assuming the average unit size would be 70m<sup>2</sup>, the commercial floorspace would therefore equate to approximately 33% of the total amount of floorspace proposed.</p> <p><i>Density and the London Plan Matrix</i></p> <p>On this basis, the density of a proposal with 3,900m<sup>2</sup> of commercial floorspace and 113 new units on a site with a total area of 2.1ha would be 81 units per hectare. With reference to the density matrix within the London Plan</p>		<p>for sites will be established having regard to the nature of the scheme and individual site circumstances, to be considered through the planning application/decision process.</p> <p>The Council considers the AAP provides a sound basis for meeting objectively assessed need and delivering the spatial strategy for the Tottenham Area and the Borough. Within this context it sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations Validations Study. The Local Plan does not provide that this site is suitable for a tall building. The appropriate height of development on this site will be considered having regard to Policy DM 6.</p> <p>No change.</p>
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				<p>(table 3.2), the Fountayne Road, LB Haringey LB Haringey March 2016 4/5</p> <p>proposed density range should be between 45 and 260 units per hectare for a site with this PTAL rating. The proposed density is not being fully maximised taking into account the sites sustainable location and the existing residential units on the site. In proposing 360 units on the site (based on there being 3,900m<sup>2</sup> of commercial floorspace and the average unit size being 70m<sup>2</sup>) the density on the site would be 260 units per hectare hence meeting the maximum density as suggested in London Plan table 3.2. Notwithstanding this, paragraph 3.10 within the emerging Development Management Document takes a different approach in stating:</p> <p><b>'Whilst useful, the matrix is</b> but one consideration or tool to be used in informing the appropriate development density applicable to an</p>		
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				<p>individual site. Other considerations should include local context, site specific circumstances, housing need, housing choice, and the achievement of quality design being of equal weighting.'</p> <p>On this basis, the suggested indicative capacity for residential units should be reviewed and increased, taking into account both the existing units on the site and the sustainable location of the site. Therefore, we recommend that in line with policy AAP3, the wording of the TH11 policy and the suggested number of units be amended to encourage maximum density.</p> <p><i>Building Heights</i> The Growing London Report <b>by the Mayor's Design</b> Advisory Group examined <b>how best to meet London's</b> housing needs, and suggests that <b>'we have to make better</b> use of the land we have available. We have to develop more densely, and we need to do so within the context of the existing urban fabric and</p>		
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					<p><b>communities.'</b></p> <p>In addition, London Plan Policy 7.7 supports tall building in locations which improve legibility of an area by emphasising visual significance and contribute towards improving permeability of a site, and significantly contribute towards local regeneration. A tall building on the Fountayne Road site would therefore accord with this Policy. Currently the site allocation has no guidance on acceptable building height. The site is in a very sustainable location bound by a railway line to the south and other employment/ mixed uses to the east and west. Given significantly taller buildings will be brought forward to the north of the site on the retail park and around Tottenham Hale, medium height development should be supported on this site.</p> <p>The policy also needs to have flexibility to ensure a viable scheme can be delivered, which may require an increase in height at an</p>		
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					<p>appropriate part of the site to ensure the full regeneration benefits of the site are deliverable.</p> <p>Furthermore, Policy DM6 restricts the development of tall buildings to Tottenham Hale, Northumberland Park, and Woodgreen and Harringey Heartlands, as demonstrated on map 2.2. Given the site at Fountayne Road is located within Tottenham Hale we suggest that this should be included within the policy wording of the Site Allocation TH11. This should be encouraged in order to achieve a high density mixed use scheme as outlined above.</p>		
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**Respondent 449: London Borough of Hackney**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
49	RTAAP171	General	Not stated	Not stated	<p><b>It is the Council's view that joint working</b> on the Tottenham AAP/ Stamford Hill area is essential to successfully tackle the specific growth issues and challenges associated with meeting the needs of the community in this area. This is particularly the case with regard</p>	Not stated	<p>Noted. Haringey Council will continue to liaise with LB Hackney on cross-boundary matters, in line with the Duty to Cooperate, and welcomes opportunities to work together to discuss the most</p>

					to meeting the growing need for large family homes, schools and social infrastructure such as Synagogues. The South Tottenham AAP outlines some of the issues, opportunities, and challenges associated with its regeneration. Hackney is keen to work with Haringey in meeting these challenges going forward.		appropriate way to address these.
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Respondent 50: CGMS on behalf of Highgate Capital LLP

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
50	RTAAP172	SS2: Lawrence Road	Not stated	Not Stated	<p>The site at Lawrence Road is not currently allocated as designated <b>employment land within Haringey's</b> existing adopted Local Plan, including the Haringey UDP and Proposals Map 2006 and Core Strategy (2011). Indeed the site was designated as a Site Specific Proposal or rather identified as a large site in the borough where it was considered that there was potential for development to occur within the plan period. This sought for mixed residential and employment use with a commitment to prepare a planning brief as was applied with the Lawrence Road SPD (2007).</p> <p>The site therefore does not fall within the provisions of Strategic Policy SP8 which defines Local Employment Areas as</p>	<p>Reduce the proposed indicative capacity of the site in terms of employment floorspace such that it is more favourable to optimising housing delivery on site.</p> <p>Greater flexibility in respect to</p>	<p>Whilst the site is not designated within <b>Haringey's employment</b> land hierarchy, the policy reflects the existing non-designated employment generating land and floorspace at the site, which it considers should be retained and/or redeveloped in order to meet objectively assessed need for employment floorspace <b>and the Borough's</b> strategic jobs target, as well as to deliver the spatial strategy. <b>Haringey's Workspace</b></p>

				<p><b>“local employment generating sites in the borough that need protection”.</b></p> <p>Notwithstanding, further commentary stipulates at paragraph 5.1.20 of the Pre-Submission version of the alterations to Strategic Policies (2011-2026) that; <b>“A review of the Borough’s existing employment land and buildings was undertaken in 2009. The Employment Study 2009 provided an assessment of the employment land and demand in the borough. The study recommended that all existing employment sites (designated or otherwise) be retained. Therefore, in the first instance, support will be given for all designated sites and smaller sites to remain in employment use. However, flexibility will be shown for alternative uses that complement the employment uses, contribute to social infrastructure or provide training”.</b></p> <p>Though there is a degree of flexibility shown, this is not fully consistent with policy commentary outlined in the National Planning Policy Framework (<b>“The Framework”</b>) which states at paragraph 22 that, <b>“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”.</b></p> <p>Evidently there is a strategic drive to enable the release of land last in use for employment purposes wherein there is no reasonable prospect of such use</p>	<p>prescribed design parameters including heights, scale and density of any future development within the site allocation.</p>	<p>Viability Assessment (2015) recognises the potential for the site to contribute to strategic employment objectives, and includes consideration of viability for Plan delivery.</p> <p>The Council considers that the proposed development requirements and guidelines (such as on building height, scale and density) are necessary to ensure that development positively responds to local character, and are sufficiently flexible to enable proposals to come forward.</p> <p>No change</p>
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				<p>being sustained in the long term. This position has been reinforced through proposed amendments to incumbent policy in the Framework which was recently published for public consultation. One such aspect examined the rigidity of paragraph 22 and whether greater flexibility could be elicited through proposed alterations to the Framework. As quoted;</p> <p><i>“We propose to amend paragraph 22 of the Framework to make clear that unviable or underused employment land should be released unless there is significant and compelling evidence to justify why such land should be retained for employment use. At a minimum, this would include an up-to-date needs assessment and significant additional evidence of market demand. As set out in Planning Practice Guidance, appropriate consideration should also be given to trends in land values for commercial and employment uses, against land values for other uses including residential”.</i></p> <p>Thus in cases where the Council cannot robustly determine the long term protection of sites, this should be released for alternative uses such as <b>residential. Though it's accepted that</b> Haringey enlist a hierarchical approach to the release of surplus employment land, this is unduly caveated through the site allocation process and similarly in</p>		
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					<p>policy primarily in relation to non-designated employment land.</p> <p>When considered in light of the proposed site allocation at Lawrence Road (SS2) in the Tottenham AAP, where the land is evidently has been vacant for some time and indeed underutilised, greater flexibility should be given to alternative uses in that it should be clear that the principal use should be for residential, to be complemented by a portion of commercial. As per the site allocation requirements, this could seek an affordable, high quality commercial element, and therefore sufficient re-provision rather than more holistic commercial retention being applied which is clearly unviable on this site and in this current climate. We explore the provisions of the pre-submission version of the Development Management DPD further in our dedicated representations below, however it is clear that where there is no compelling or significant evidence of market interest then indicative targets seeking re-provision of commercial floorspace should be relaxed.</p> <p>More practically the site allocation must also comply with and address matters of viability which are established at paragraph 173 of the Framework which reads:</p> <p><i>“Pursuing sustainable development requires careful attention to viability and</i></p>		
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				<p><i>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. The client would therefore ask the Council to reconsider and reduce the proposed indicative capacity of the site in terms of employment floorspace such that it is more favourable to optimising housing delivery on site. This would satisfy overall strategic drive in tackling acute housing need in such areas.</p> <p>In addition to this, Highgate Capital LLP would seek greater flexibility in respect to prescribed design parameters including heights, scale and density of any future development within the site</p>		
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					<p>allocation. This would not prejudice the overall masterplan approach but would serve to enhance the vitality and viability of the site and thus sustain its deliverability over the plan period. Evidently the site is suitable for intensive and compact residential-led mixed use development as has been defined by ongoing policy coverage of the site as per the extant UDP and the Lawrence Road SPD (2007).</p> <p>Thus Highgate Capital LLP supports the overall masterplan approach including the necessity to be influenced and receptive to the Lawrence Square scheme. However the client would seek greater promotion of a flexible variation in building heights to enhance the streetscene and that reinforces the vibrancy of the area. The promotion of heights fronting on to Lawrence Road is therefore supported as is the capacity to make better use of the land such that it is developed more densely and within the parameters of emerging policy DM6.</p>		
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**Respondent 51: Alison Armour**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
51	RTAAP173	BG 2: PO Delivery Office /	Not Stated	Not Stated	(BRUCE GROVE WOOD - designated a site of local ecological interest in the UDP)	Not stated	Policy DM 1 sets out requirements on all new development to ensure

		Sorting Office		<p>Further to my response to the earlier consultation dated 6<sup>th</sup> March 2014, copy herewith, I make the following comments:</p> <p>I am glad to see that it is no longer thought necessary to combine workshops with housing at this location, or to connect with Sperling Road. However I am still concerned with the matters of security I raised previously, both in respect of residents in the development and re the occupiers of Sperling Road houses whose gardens back onto the site.</p> <p>I repeat that the development should be low rise and not more than 2 storey – as are the terraces in Sperling Road and Moorefields Road – or there would be issues of overlooking. The development should also be low density.</p> <p>I note that Bruce Grove Wood is not mentioned in the new edition of this Site Allocation. I hope that the aspirations expressed in the UDP of 2006 will not be abandoned. Should the site at BR2 become available in the future, the woodland character of the surrounding area should be respected for the benefit of those who live in this still tranquil area.</p>		<p>protection of amenity.</p> <p>The appropriate residential density for sites will be established having regard to Policy DM 11. The AAP sets out indicative development capacities using a standardised methodology, which applies the London Plan density matrix.</p> <p>The appropriate building height for the site will be established having regard to AAP 6 and DM 6.</p> <p>No change</p>
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					<p>Although carless developments are favoured it should be remembered that Sperling Road already has a severe problem of lack of parking caused by drivers who do not live in the street.</p> <p>[Also attached: 2014 consultation representation relating to this site, for reference]</p>		
51	RTAAP174	BG3: Bruce Grove Station	Not Stated	Not Stated	<p><b><u>BG3 – BRUCE GROVE STATION</u></b></p> <ul style="list-style-type: none"> <li>This attractive locally listed building which enhances the Conservation Area should not be spoilt by any development.</li> </ul>	Not stated	<p>Policy BG 2 sets out that proposals will be required to enhance the locally listed station building and the conservation area.</p> <p>No change</p>
51	RTAAP175	BG4: Moorefield Road	Not Stated	Not Stated	<p><b><u>BG4 – MOOREFIELD ROAD</u></b></p> <ul style="list-style-type: none"> <li>I hope the useful Mems remains in occupation of this site.</li> <li>4 storeys is far too high for this location and would alter the character of the street to its detriment. The space is really too small for residential use. The adjoining buildings are only 2 storeys.</li> </ul>	Not stated	<p>The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, with the approach informed by local evidence. The appropriate building height for the site will be established having regard to Policies AAP 6 and DM 6.</p> <p>The Council considers residential uses are appropriate. The policy seeks to facilitate a mixed use redevelopment to</p>

							support delivery of the spatial strategy for the area and the Borough, commensurate with the <b>site's location in an area of high public transport accessibility</b> , at a train station, and within a town centre.
							No change
	RTAAP176	TG1:Leisure Centre Car Park	Not Stated	Not Stated	<p><b><u>TG1 – TOTTENHAM LEISURE CENTRE CAR PARK</u></b></p> <ul style="list-style-type: none"> <li>• A car park is required in this <b>location for the centre's users</b>. This need will vastly increase if the Library were to become an Information Hub (such as in Enfield and other boroughs where the use has expanded dramatically).</li> <li>• I would support the suggestion of making an outdoor gym for teenagers in this location.</li> <li>• The suggested Tower (as appears in the Tottenham Model in JMP's N17 Office) is <b>entirely</b> inappropriate at this location. I would compete with the listed buildings to their detriment. The human scale grand buildings need space around them to set off their monumentality. The space could be improved and</li> </ul>	Not stated	<p>This site allocation has been removed from the Local Plan.</p> <p>No change</p>

					should be part of the Green (the medieval village green).		
51	RTAAP177	TG2: Tottenham Chances	Not Stated	Not Stated	<p><b><u>TG2 –TOTTENHAM CHANCES</u></b></p> <ul style="list-style-type: none"> <li>• This site should not be used for a 5 storey development. Any development should be small scale and low rise. It should respect the listed and locally listed buildings and not detract from the settings of each of these.</li> <li>• Views of the former High School from the High Road must be maintained.</li> </ul>	Not stated	<p>The Council considers that the Local Plan sets a positive framework for managing the development of tall and taller buildings, with the approach informed by local evidence. The appropriate building height for the site will be established having regard to Policies AAP 6 and DM 6.</p> <p>No change</p>
51	RTAAP178	SS3: Apex House	Not Stated	Not Stated	<p><b><u>SS3 – APEX HOUSE + SEACOLE COURT</u></b></p> <ul style="list-style-type: none"> <li>• Present plans are too tall and too bulky. Not a gateway but an eyesore in the making. A challenging site to make anything attractive but to make it profitable will entail making it ugly. Solution = lower expectations of profit.</li> <li>• I had understood from the architects that Seacole Court was not to be affected.</li> </ul>	Not stated	<p>The Council considers the AAP provides a sound basis for meeting objectively assessed need and delivering the spatial strategy for the Tottenham Area and the Borough. Within this context is sets a positive framework for managing the development of tall and taller buildings, informed by local evidence, including the Urban Characterisation Study and Potential Tall Buildings Locations</p>

							<p>Validations Study. The Council considers it appropriate to make provision for tall and taller buildings on specific sites and locations, given the ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations.</p> <p>No change</p>
51	RTAAP179	SS5: Wards Corner	Not Stated	Not Stated	<p><b><u>SS5 – WARDS CORNER</u></b></p> <ul style="list-style-type: none"> <li>If the Council is serious about developing a destination development then only the WCC is going to achieve that. If that route is not taken then we will have an ugly white elephant.</li> </ul>		<p>Noted. The Council considers that the Local Plan sets a positive framework for delivering the spatial strategy for the Borough and Area.</p> <p>No change</p>
51	RTAAP180	General	Not Stated	Not Stated	<ul style="list-style-type: none"> <li>Re Bruce Grove (paras 3.10, 3.17) – the idea that BG should be a District Centre and so be targeted for new development because it is going to get new investment is misconceived. New housing in the BG Ward is extremely limited as the area is already almost 100% developed. The retail in the High Road at BG is restricted by small sizes of</li> </ul>		<p>The Council considers that Bruce Grove has an important role to play in helping to deliver the spatial strategy for Tottenham and the Borough. The introductory section to the Bruce Grove sub-area clearly reflects that there is comparatively limited growth potential</p>

					shops. Eg ASDA is too small to offer a decent range of food and one has to shop elsewhere outside the area for many essential items. None of the many national chains which have used this shop premises over the past 30 years have made a success of it. The new <b>Sainsbury's in Park Road has the</b> attraction of wide choice and short queues but is so under used as to be unsustainable. <b>The Council's attempt to</b> engineer retail offer is bound to fail and social engineering is not the answer.		within this sub area, but that there are nonetheless a number of opportunities for new development to positively contribute to improving it over the plan period. The District Centre is established within <b>Haringey's town centre</b> hierarchy and the Local Plan seeks to enhance the vitality and viability of these centres.  No change
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Respondent 52: Greater London Authority

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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52	RTAAP181	General	Not stated	Not stated	<p>The Mayor strongly supports the thrust of the Area Action Plan (AAP) in terms of its vision and strategic objectives for Tottenham, and welcomes the progression of this plan since February 2015. The target to deliver 10,000 new homes across the AAP area over the plan period represents 67% of <b>Haringey's London Plan housing target up to 2025</b>. This level of <b>ambition reflects Tottenham's status as one of the Mayor's Housing Zones</b>, and is supported in line with London Plan Policy 3.3 and the objectives of the Upper Lee Valley Opportunity Area Planning Framework (OAPF). Moreover, having regard to the proposed housing numbers coming forward within strategic schemes in the area, the Mayor is satisfied that the AAP target is realistic and deliverable.</p> <p>Further to comments made previously by the GLA, the Haringey Employment Land Study (2015) makes an important contribution to the Local Plan evidence base. For Tottenham, the Council has taken an approach to</p>		The Council welcomes support for the plan proposals.
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				<p>employment land management which carefully considers employment land characteristics and regenerative potential. In this regard the AAP appropriately safeguards Strategic Industrial Land, whilst proposing a number of changes to locally designated employment areas - with the intention of nurturing and retaining a diverse local employment base in Tottenham for the long-term, as well as supporting strategic objectives for regeneration through pragmatic revisions to the allocation of selected employment sites - where these are well placed to contribute towards urban renewal in accordance with the London Plan and Upper Lee Valley OAPF.</p> <p>In strategic transport terms the AAP addresses various planned connectivity improvements through the area (including Crossrail 2 and capacity enhancements along the West Anglia Main Line), and recognises that these improvements contribute to the potential for future housing and</p>		
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					<p>economic growth in Tottenham. The Council is advised that the Mayor is considering potential mechanisms for capitalising on the value uplift from Crossrail 2 - so that this may be harnessed to support the delivery of this infrastructure, and/or other public benefits as appropriate. Moreover, the specific acknowledgement (at AAP area-wide and site specific level) of the need to support the delivery Crossrail 2 (including its land take), as well as the importance of making the most of the development opportunities it offers, is supported. A number of further detailed comments set out within Appendix 1 and 2.</p>		
52	RTAAP182	Figure 1.4, Tottenham AAP key diagram	Not stated	Not stated	<p>(London Plan Reference: General)  As discussed at a recent meeting, GLA officers encourage the Council to work up this figure into a simple and legible key diagram which identifies the primary growth areas and spatial objectives of the AAP. The Council is encouraged to engage with Enfield Council as part of this work, with a view to ensuring that key spatial diagrams coming forward locally in this</p>	Modifications to diagram	<p><b>Agreed. The Council will work to bring forward a revised and more detailed spatial strategy diagram for inclusion at Figure 1.4 of the AAP.</b></p>

					part of the Upper Lee Valley may be read clearly alongside each other.		
52	RTAAP183	Figure 4.1: Designated employment areas in Tottenham	Not stated	Not stated	<p>(London Plan Reference: Policies 2.17 and 4.4) As discussed at preferred option stage, GLA officers <b>support the Council's revisions</b> to a number of areas of employment land in Tottenham - which are intended to nurture and protect a diverse local employment base as well as support strategic objectives for mixed use regeneration in accordance with the London Plan and Upper Lee Valley OAPF.</p> <p>Moreover, following recent discussions, GLA officers <b>welcome the Council's</b> confirmation that it intends to correct a clerical omission at Figure 4.1 - ensuring that the diagram properly identifies the Millmead Strategic Industrial Location at Tottenham Hale.</p>	Alterations to diagram to properly identify the Millmead Strategic Industrial location at Tottenham Hale	<b>Figure 4.1 amended to appropriately identify Millmead Industrial Estate as Strategic Industrial Location (SIL), in line with the London Plan.</b>

Respondent 53: Transport for London

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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53	RTAAP184	General	Not Stated	Not Stated	The extensive reference at an area-wide and site specific level to the need to support the development Crossrail 2 and its land take, as well as the need to maximise the opportunities it offers for the development if individual sites, is welcomed.	Not stated	The Council welcomes support for the proposals.
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**Respondent 54: Historic England**

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
54	RTAAP185	AAP5 A	No	Not stated	This policy appears to <b>state that 'proposals for new development will be required to review ... Conservation Area Management Plans where appropriate, including reviewing existing boundaries'</b> . This implies that new development will engage in the process of reviewing conservation management plans and boundaries. The responsibility for conservation area designation and management lies with the local planning authority as set out in the Town and Country Planning (Listed	This policy appears to <b>state that 'proposals for new development will be required to review ... Conservation Area Management Plans where appropriate, including reviewing existing boundaries'</b> . The inclusion of the above policy is in conflict with national policy and would make the plan unsound. It should therefore be removed.  It is with concern that Policy AAP5 does not include a reference to archaeology or Archaeological Priority Areas. This needs to be addressed so that the	Noted. To appropriately reflect that the Council is responsible for reviewing CAMPs, Policy AAP 5.A will be amended as follows:  <b>A. "The Council will seek to strengthen... and the wider historic environment. <u>This includes reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries.</u> Proposals for new development will be required to:".</b>  <b>A.e Reviewing Conservation Area</b>

				<p>Buildings and Conservation Areas) Act 1990. The inclusion of the above policy is in conflict with national policy and would make the plan unsound. It should therefore be removed.</p> <p>In addition it should be noted that the AAP and several of the site allocations identified overlap with the Tottenham High Road <b>APA's and the Lea Valley</b> APA. It is with concern that Policy AAP5 does not include a reference to archaeology or Archaeological Priority Areas. This needs to be addressed so that the policy considers expected development issues. For example paragraphs referring to archaeology and Archaeological Priority Areas and Policy DM9 Management of the Historic Environment and the process of consultation, submission</p>	<p>policy considers expected development issues.</p>	<p><b>Management Plans where appropriate, including reviewing existing boundaries.</b></p> <p>Policy DM 9 sets out the borough-wide approach to ensure appropriate consideration for archaeology for all proposals, including in the Tottenham Area. The Council does not consider it necessary to repeat this here. For the site allocations in the AAP, Archaeological Priority Areas are signposted in the accompanying site description box, where relevant.</p>
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					of Desk-based Assessments and the preference for the preservation and management of archaeological heritage assets in-situ should be added to policy AAP5 and reflected in the site allocations where there are overlaps with APAs.		
54	RTAAP186	AAP 8	No	Not stated	Part F of the policy states that <i>‘Opportunities to create new space for enterprise and commercial uses to the rear properties fronting the High Road will be permitted’</i> . This policy appears ill defined. There are a significant number of designated heritage assets which front the High Road. The consideration of alterations to boundaries and curtilage structures would require consideration against policies for designated heritage assets and their settings. In addition employment uses may be incompatible with the	The inclusion of the above policy is in conflict with national policy and would make the plan unsound. It should therefore be removed or revised.	Policy AAP8.F sets out a principle for development along the High Road, which can help to support delivery of the spatial strategy for the Tottenham area and meet identified need for employment floorspace. All proposals will be considered having regard to their impact on the significance of heritage assets and their setting, as set out elsewhere in the Local Plan. The plan policies should be considered in their entirety. It is noted that the supporting text describes some of the key features of the historic environment along the High Road, to

					current use of the frontage building. The inclusion of the above policy is in conflict with national policy and would make the plan unsound. It should therefore be removed or revised.		give an indication of local character that proposals will need to respond to.  No change.
54	RTAAP187	Site Allocation NT 5	No	Not stated	The Site Requirement appears to give statutory weight to the West High Road Masterplan Framework, which is a non-statutory document. The Site Requirements <b>state that</b> “The regeneration of heritage assets should be considered where the benefits of change and sympathetic development can enhance the overall feasibility and benefit of future investment into the future of heritage <b>buildings in the area</b> ”. This does not comply with the NPPF paragraphs 132 to 135 in respect of harm to designated and undesignated heritage assets and does not	The Site Requirements stating <b>that “The</b> regeneration of heritage assets should be considered where the benefits of change and sympathetic development can enhance the overall feasibility and benefit of future investment into the future of heritage <b>buildings in the area”</b> should be removed.	Disagree, although poorly worded, the Council considers the site requirement to be relevant to both the regeneration of High Road West and the retention and enhancement of heritage assets. Council would suggest however, that this is reworded along the lines:  <b>“Where feasible, viable uses should be sought for existing heritage assets, which may require sensitive adaptations and sympathetic development to facilitate”</b>  Archaeological Priority Areas are identified

					<p>constitute a positive strategy as set out in paragraph 126 of the NPPF. The inclusion of the above policy is in conflict with national policy and would make the plan unsound. It should therefore be removed.</p> <p>We also note that no mention appears to be made of the Archaeological Priority Areas within the proposed AAP area. As the need to address archaeological issues arising in these areas is likely to be a consideration for future development proposals we would recommend that a reference to the Local Authorities borough wide-policy for archaeology is included.</p>		<p>within the 'Planning designations' section of site allocations affecting an Archaeological Priority Area.</p>
54	RTAAP188	Heritage and cultural assets paragraph 2.50	Not stated	Not stated	<p>We would suggest that it would be helpful to state the area contains a '<i>large</i>' number of listed buildings. This would be consistent with 2.51 which states '<i>there</i></p>	<p>We would suggest that it would be helpful to state the area contains a '<i>large</i>' number of listed buildings.</p>	<p>Amend first sentence of paragraph 2.50 to read:</p> <p>The Tottenham area contains a <u>large</u> number of listed buildings, both</p>

					<i>remains a large number of heritage assets across the AAP area on the Heritage at Risk Register</i> '.		statutory listed and local listed.
54	RTAAP189	Heritage at Risk paragraph 2.55	Not stated	Not stated	In identifying that <b>Historic England</b> ' <i>has included several of the listed buildings in the Heritage at Risk Register</i> ' it would be appropriate to clarify that this is compiled on information provided by the local authority. This statement reoccurs at a number of locations within the text.	It would be appropriate to clarify that this is compiled on information provided by the local authority.	Amend second last sentence of paragraph 2.55 to read:  Recognising this, Historic England has included several of the listed buildings in the Heritage at Risk Register, <u>which is compiled using information provided by the Council.</u>
54	RTAAP190	Objective 8: Enhancement of heritage assets paragraph 3.18 -	Not stated	Not stated	We would suggest ' <i>wear and tear</i> ' is replaced by ' <i>are in very bad and vulnerable condition, underused and in many case face an uncertain future</i> '. This better reflects the reasons for inclusion on the register.	We would suggest ' <i>wear and tear</i> ' is replaced by ' <i>are in very bad and vulnerable condition, underused and in many case face an uncertain future</i> '.	The paragraph is not only referring to assets on the Heritage at Risk Register. However, the Council agrees that the term ' <b>wear and tear</b> ' could be replaced with text to better set in context the objective for enhancement of heritage assets.  Amend first sentence of paragraph 3.18 to read:  Tottenham has a

							number of significant heritage assets which are facing pressures from development, <u>some of which are in poor and vulnerable condition, underused and facing an uncertain future.</u>
54	RTAAP191	AAP 6	Not stated	Not stated	Part A of the policy <b>states that “Tottenham’s Growth Areas provide the opportunity to establish a new urban character in these areas”</b> . We would therefore recommend that this is amended to <b>read ‘The significant change planned for Tottenham’s Growth Areas provides the opportunities to establish a new and contextual urban character for these areas’</b> . The reason for this is that the Growth Areas as identified in Figure 3.1 (page 33) encompass areas of conservation area, designated heritage assets, and areas of local character and	AAP6 .A - We would recommend that this is <b>amended to read ‘The significant change planned for Tottenham’s Growth Areas provides the opportunities to establish a new and contextual urban character for these areas’</b> .  Tall and taller buildings - It would be helpful to clarify the differentiation within this document.	The Council considers that objectives and considerations for historic environment are adequately covered throughout the plan, including AAP 5 and paragraphs 2.50 – 2.56. The Plan should be considered in its entirety.  AAP 6 signposts Policy DM 6, which clearly sets out the definitions and policies for tall and taller buildings. The Council does not consider it necessary to repeat this here.  No change.

					<p>identity. This change will better reflect Policy AAP5 that proposals for new development will be required to: a. <b><i>reflect relevant character appraisals and management plans for the area</i></b>; and b: the need to respond <i>'sensitively to the distinctive character and significance of heritage assets'</i></p> <p>In addition Policy AAP6 refers to <b><i>Taller</i></b> buildings (2 to 3 storeys taller than existing context) rather than <b><i>Tall</i></b> buildings (10+ storeys), the definition of which is set out in the Local Plan Development Management Policies (DM6). It would be helpful to clarify the differentiation within this document.</p>		
54	RTAAP192	Neighbourhood Areas and Opportunity Sites	Not stated	Not stated	As general rule it is noted that in this section identifies and discusses wider heritage, townscape and character issues but	Due to the archaeological sensitivities this heritage issues should be referenced and highlighted in the text.	Policy DM 9 sets out the borough-wide approach to ensure appropriate consideration for archaeology for all proposals, including in

					<p>does not mention archaeology and Archaeological Priority Areas. Due to the archaeological sensitivities this heritage issues should be referenced and highlighted in the text. For example paragraphs referring to archaeology and Archaeological Priority Areas and Policy DM9 Management of the Historic Environment and the process of consultation, submission of Desk-based Assessments and the preference for the preservation and management of archaeological heritage assets in-situ should be added to each of the areas within the Tottenham AAP have allocated sites which overlap with the current Archaeological Priority Areas.</p>		<p>the Tottenham Area. The Council does not consider it necessary to repeat this here. For the site allocations in the AAP, Archaeological Priority Areas are signposted in the accompanying site description box, where relevant.</p> <p>No change.</p>
54	RTAAP193	Bruce Grove Sub Area	Not stated	Not stated	The text in paragraphs 5.56 and 5.66 appear to contradict each other	The text in paragraphs 5.56 and 5.66 appear to contradict each other	Paragraphs 5.65 and 5.66 are referring to different parts of the

					through referring ‘to buildings of varying scale, origin and design and the High Road is primarily fronted by three and four storey Victorian buildings’. This should be clarified.	through referring ‘to buildings of varying scale, origin and design and the High Road is primarily fronted by three and four storey Victorian buildings’. This should be clarified.	High Road within the Bruce Grove Area.  No change.
54	RTAAP194	Improvement Sites Paragraph 5.67	Not stated	Not stated	In addition to the reference to locally listed buildings there are a significant number of buildings making a positive contribution to the conservation area and a number of grade II listed buildings requiring repair, and the viable reuse.	Not stated.	Additional text to paragraph 5.67 second bullet:  <u>In addition, there are a number of a number of grade II listed buildings requiring repair, and viable reuse</u>
54	RTAAP195	North Tottenham Neighbourhood Area Urban Realm Improvements paragraph 5.94 –	Not stated	Not stated	The reference to “safety” in the final paragraph is unclear. This needs to be clarified.	The reference to “safety” in the final paragraph is unclear. This needs to be clarified.	For clarity, text will be amended to bring it in line with Policy DM 2, which sets out further details on safe environments.  Amend paragraph 5.94 final bullet to read:  Enhancing the heritage assets that contribute positively to the conservation area by a programme of improvements to

							refurbish and reuse existing buildings, including facade and public realm improvements and <del>increased safety</del> <u>safer and more accessible environments.</u>
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