

Question 2

The AAP is consistent with the distribution of growth set out in the Strategic Policies, including the majority of growth being located in the Growth Areas of Tottenham Hale and North Tottenham. The sites deliver a significant amount of the growth identified in the Strategic Policies. Further details in this regards are set out in the technical papers on housing and employment.

Question 3

The capacity of the sites within the AAP is accounted for in the technical paper regarding the distribution of housing growth in the borough. This demonstrates that sites allocated in the AAP have capacity for 13,453 net new homes, 3,100 of which have already been delivered.

Growth Areas by their definition promote change to the existing character of an area. Where appropriate, the site allocations seek to identify site specific characteristics within and surrounding the site which would benefit from retention or enhancement, and these are set out in the development guidelines.

The Tottenham High Road Area of Change (including Seven Sisters and Bruce Grove) seek to facilitate improvements and to sustain vitality of the area, including the urban realm, whilst developing sites to either preserve or enhance historic assets or improve those which detract from the heritage character.

Outside of Growth Areas and Areas of Change, the existing suburban character and environment is to be retained through protection from conversion. These areas will benefit significantly from improvements to social and physical infrastructure, being provided within the Growth Areas.

Infrastructure requirements have been demonstrated that they can be met through the Infrastructure Delivery Plan update 2016.

All development will be designed to provide a high quality environment, and this will be achieved through the policies in the DMDPD. It is expected that a step change in the overall quality of the environment, particularly in Growth Areas, will be created in Tottenham through the AAP. Issues such as existing overcrowding in existing housing stock and overconcentration of social rented stock will be addressed through providing new residential development, including affordable residential stock in Tottenham.

Local distinctiveness will be retained, there are a number of assets within Tottenham which will be safeguarded, and their setting enhanced through actions supported through the AAP. Policies seeking to protect heritage assets and Conservation Areas have been included, as well as special consideration of the character of Tottenham High Rd, of the Tottenham Green area. Where assets to

the local area are on, or are in close proximity to site allocations, the development on the site will be expected to adapt to maintain or enhance its setting. The fact that all of the development can be accounted for on site allocations also means that other characterful buildings will not experience undue pressure to change in order to meet housing targets.

AAP5 sets requirements in respect of the historic environment, consistent with national policy, to ensure that development and area regeneration positively responds to Tottenham's local character. The site development capacities are indicative, having been established using a standardised methodology, and the most appropriate capacity for sites will be determined through a detailed design-led process. Through this process the Council expects all proposals to have regard to the Urban Characterisation Study and Conservation Area Appraisals and Management Plans, where appropriate, to ensure they are informed by a clear understanding of heritage assets and their wider setting. To assist applicants the description boxes for all site allocations signpost relevant heritage assets, and reinforce the need for proposals to take these into account. The AAP does not include a specific policy on archaeology as this is covered by the borough-wide policy DM9.

Question 4

A phased trajectory of sites is included in the technical paper on Local Plan housing figures, which can be used as the basis for monitoring.

It is considered that the risks to delivery of meeting the targets set in the London Plan are more significant than issues at the borough-level. Macroeconomic effects that stall house building are likely to have a pan-London impact, and Haringey is well placed by demonstrating lower existing land values, to weather potential shocks to the market. Tottenham Hale is a Housing Zone, where there is significant committed investment to accelerate delivery of sites and help ensure the area's potential is realised.

Question 5

In Tottenham, there is identified as being an overconcentration of socially rented housing, some of which is not of a high quality. It also suffers from some of the lowest socioeconomic conditions, with a particular correlation between these factors in areas in which social housing proportions are at their highest. It is logical therefore to change the mix of tenures in these areas, alongside other policies. It is important however to note that AAP3 seeks to avoid the continuation of this trend by creating a mix of properties more significantly balanced towards intermediate housing products than affordable rented housing products. It does not have a material effect on existing levels of social/affordable housing stock, and indeed this type of housing will grow, but at a slower rate than other tenures in this area.

Question 6

The approach in policies (allocations) that may impact upon existing employment assets is consistent in that in order to achieve increases in job densities, areas of low job density in high PTAL locations will be permitted to densify. The Council is protecting through its employment policies areas in

which lower density industrial and warehousing uses will be permitted. As such, where businesses, which may still be viable, are affected by proposals to redevelop over the plan period, there will be locations from which they can operate within the local area. This is seen as an appropriate way to deliver upon opportunities for employment growth in an existing urban area. In this regard, the replacement employment floorspace should generally be consistent with the higher-density future for the site.

Question 7

It is accepted that the provision of a decentralised energy network will be subject to feasibility/viability, as with all policy interventions on sites. In line with London Plan Policy 5.5, Haringey's Decentralised Energy Masterplan (2016), is a technical and financial study that sets out possible energy hub / centre locations and routes for DE networks at an area wide level in the borough. This should be used by applicants to help meet their requirements under London Plan Policy 5.6 and the energy assessment for their Development proposal. Further to this, Development sites are expected to follow the DE 'hierarchy' set out in the London Plan (Policy 5.6) and Local Plan (DM22).

Question 8

The workspace viability study sets out that the delivery and occupation of new workspace in Haringey has a significant dependency on its market price. It is not likely that speculative office development of a large scale will be lettable in Haringey, and this is felt even more acutely in Tottenham. As the delivery of new employment floorspace will need to be enabled by a higher value use (generally residential). In order for this employment floorspace to be lettable over the long term, it needs to be affordable. The aim of this element of the policy is to release some of the value from the residential development, to ensure that the employment element can remain affordable in the short-medium term. It is considered that this is required in order to make a number of the developments acceptable in planning terms, and that this is directly related to the development. As such a planning obligation could be justified to ensure that the development is acceptable.