

LONDON BOROUGH OF HARINGEY
TOTTENHAM AREA ACTION PLAN
INSPECTOR'S DRAFT MATTERS AND ISSUES FOR EXAMINATION

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Hearing sessions will be on Tuesday **6 September 2016, 7 September and 8 September 2016** at Haringey Civic Centre, High Road, Wood Green N22 8LE.

Representors' statements must be received by **5pm Wednesday 17 August 2016**

The Council's statements must be received by **5pm on Tuesday 23 August 2016**

Please see the published Guidance Notes which contain information on the content of written statements. Appendix A to this note explains the format.

www.haringey.gov.uk/planning-policy/local-plan/examination-public-local-plan-eip

The hearing sessions are likely to follow the order of the matters set out below. There will be sessions arranged by each neighbourhood area where specific policies will be dealt with. A draft timetable will be published by **9 August 2016**.

MATTERS AND ISSUES

The MATTERS identified are either overriding issues for all sites or relate to specific policies or site allocations. These are the issues upon which I want further information and are likely to be followed up at the hearing session. Not all policies where representations have been made are included, because, in many cases, they relate to detailed matters which would be addressed in any future planning application or I am satisfied with the Council's approach.

MATTER 1 – LEGAL COMPLIANCE

1. Has the Plan been prepared in accordance with the Council's Local Development Scheme? Has the consultation complied with the requirements of the Statement of Community Involvement and the Duty to Cooperate? How has the Public Sector Equality Duty been considered and complied with in Plan preparation?

MATTER 2 – AREA WIDE ISSUES

2. Whether the scale and distribution of development conform to the London Plan and are consistent with the Strategic Policies (including alterations)? How would the proposed numbers of dwellings and amount of jobs, and employment and retail land relate to the remaining 10 year timescale for the Strategic Plan?
3. Whether it can be demonstrated that there is capacity for 10,000 new dwellings, including the necessary infrastructure to support this level of growth. Whether it can be demonstrated that a good quality environment, including local distinctiveness and protection of residents living conditions, can be maintained having regard to the proposed level of growth?
4. The Plan is ambitious, particularly for Tottenham Hale. Whether there are significant risks to delivery and how the plan has taken this into account? Whether the objectives of the plan are viable and deliverable? Whether there is the trajectory of sites showing a timescale for delivery, against which progress can be monitored?
5. Whether the affordable housing tenure split in AAP3, which does not follow the Development Management policy DM13, is justified? Whether AAP3 tenure split would ensure that proposed development/redevelopment would meet the needs of the residents of Tottenham, having regard to the significant numbers of residents living in the area who are renting social housing?
6. Are the policies which seek mixed use consistent and reasonable in their approach to re-provision of employment floor space? What is meant by cross subsidise, and why does it apply to some mixed use policies (SS4, TH6, TH12, TH13) and not others? Can it be demonstrated to be viable? Why do some mixed use policies (BG4, TH9) seek replacement employment and others do not?

7. The criterion on Decentralised Energy attached is not clear? Who might require the land for easement? How have you assessed the implications of this criterion on viability/deliverability? Should this say 'where feasible'?
8. 'Capped commercial rents' is not a clear description. How will this be applied, where is the justification? Planning obligations can only be sought where they meet the Statutory Tests and the site requirements should indicate that this is the case.

MATTER 3 – NEIGHBOURHOOD AREAS AND OPPORTUNITY SITES HOUSING RENEWAL (SS3, TG3, NT3, NT4, NT5)

9. Can it be demonstrated that the approach to the renewal/regeneration of housing estates, in particular North Tottenham where the largest sites are, would not lead to loss of social housing/floor space and would provide for the range of dwellings necessary to meet need?
10. Whether demolition, as part of the renewal process, is the most appropriate option when considered against all reasonable alternatives?
11. Can it be demonstrated that renewal/regeneration of sites is viable and deliverable?

MATTER 4 - NEIGHBOURHOOD AREAS AND OPPORTUNITY SITES OTHER MATTERS

Seven Sisters/West Green Road

12. SS1. Whether the policy would be too restrictive? What would the effect be on the viability and vitality of the shopping centre? Criteria B – will this restrict choice, restricting the viability of units? Internal alterations cannot always be controlled, how will this policy be effective?
13. SS2. Where there are numerous landowners and the site may be developed in parts, is it reasonable to expect a master plan? Who will provide the master plan? Whether the criteria would be onerous?
14. SS4. Whether the impact on existing businesses and their contribution to the local economy has been taken into account? What is expected in terms of cross subsidies and can it be demonstrated that this is justified and viable?
15. SS6. Whether the guidelines would be sufficient to ensure an appropriate scale/height of development is achieved?

Tottenham Green and Bruce Grove

16. TG2, BG2. How has the effect on the existing community or business use been taken into account? Can it be demonstrated that these sites are deliverable if there are existing, viable uses.

North Tottenham

17. NT6. How has the effect on the existing community use been taken into account? Can it be demonstrated that the site is deliverable if there are existing, viable uses.
18. NT7. Clarification of the extent of the planning permission is needed and its relationship to the allocation policy and site area.

Tottenham Hale

19. TH1. Whether the District Centre designation would negatively affect the residential environment?
20. TH3. Whether it can be demonstrated that the establishment of a District Centre at Tottenham Hale would not affect the vitality and viability of other nearby shopping Centres?
21. TH4, TH6, TH9, TH10. Whether the guidelines would ensure an appropriate scale of development whilst protecting the existing environment?
22. TH11. Whether the policy is too restrictive in only seeking 'warehouse living' rather than any other type of residential unit? Is this justified?

MATTER 5 – MONITORING AND DELIVERY

23. Whether the Plan deals adequately with uncertainty? What provisions have been made to ensure flexibility? Whether sufficient consideration has been given to monitoring and triggers for review?

Appendix A - Format for statements

- A. Statements should not be longer than **3,000 words** on A4 paper, printed on both sides. Photographs in A4 format and annotated (back or front).
- B. No need to repeat your original representation. Important: you should only answer questions as they relate to the content of your original representation and no other matters or issues.
- C. All statements must be headed with the representor's **name** and be clearly marked, at the top, right hand corner, with the appropriate **matter/issue number** and **representor reference**, e.g. 'Matter 1 and/or issue 1/ Representor 12 / Mr Smith' for Mr Smith. The Council's Statements should be separately referenced LBH/ followed by the matter/issue.
- D. It is the quality of the reasoning that carries weight, not the bulk of the documents.

- E. Appendices to statements should be limited to that which is essential and should not contain extracts from any publication which is already before the Examination. Appendices should have a contents page and be paginated throughout. Anyone submitting appendices should indicate in their statement which parts they are especially relying upon.
- F. Where paper copies are submitted these should be stapled at the top left corner, with **no spiral binding**. Electronic copy of statements and appendices should be sent to the Programme Officer (in Word or PDF format) for the Examination web page as an email attachment by the specified deadline.
- G. Late submissions and additional material **are unlikely to be accepted** on the day of the relevant hearing session since this can cause disruption and result in unfairness, and might result in an adjournment of the hearing. If material is not received by the deadlines stated above, the Programme Officer will assume that you are relying only on the original representations.