



**Haringey Council**

<b>Report for:</b>	<b>Regulatory Committee</b>	<b>Item Number:</b>	
<b>Title:</b>	<b>Local Plan Preparation</b>		
<b>Report Authorised by:</b>	<b>Lyn Garner, Director, Planning, Regeneration and Development</b>		
<b>Lead Officer:</b>	<b>Matthew Paterson, Head of Strategic Planning</b>		
<b>Ward(s) affected:</b>	<b>All</b>		

## **1. Describe the issue under consideration**

1.1 This report summarises the responses received to public consultation on the four draft Haringey Local Plan documents:

- The Alterations to Haringey's Local Plan: Strategic Policies, which was adopted in 2013;
- The draft Development Management DPD;
- The draft Site Allocations DPD; and
- The draft Tottenham Area Action Plan (AAP)

1.2 It seeks Regulatory Committee's comments on the consultation responses received and the endorsement of Council officers initial consideration of, and draft response to, the main issues raised and how these are to be addressed through the preparation of the pre-submission versions of each document.

1.3 These development plan documents are required to give effect to the Council's commitments previously set out through the Local Plan: Strategic Policies (2013), and associated area based regeneration programmes in Tottenham, to meet the local development needs of the borough and ensure that such development and growth is actively managed for the benefit of residents and local businesses.



## **2. Cabinet Member introduction**

- 2.1 The Corporate Plan 2015-18 confirms this Council's commitment to harness growth and investment in the Borough so that it delivers positive outcomes for every ward and community. This suite of Local Plan documents is the next phase of our ongoing commitment to manage community and development interests through a clear, long-term and locally defined "development plan" for the Borough.
- 2.2 The four DPDs engage with the significant challenges surrounding growth that our communities have already highlighted in previous consultations; including effectively managing infrastructure, safeguarding heritage and green space, and helping to ensure that new homes and economic development benefit all Haringey's residents and businesses. The documents provide a means to address the increased housing and employment targets set out in the London Plan (2015), through plan led, as opposed to ad hoc, planning decision making.
- 2.3 Against a backdrop of significant development pressure across London, these documents are critical to ensuring that Haringey can promote, and carefully guide development to deliver high quality new homes, create and support new jobs, enable economic growth and manage improved infrastructure provision.
- 2.4 The proposed Alterations to Haringey's Local Plan: Strategic Policies is necessary owing to the step change in housing delivery across the Capital as set out in the London Plan 2015. Amending our strategic housing policies will enable the other Local Plan documents to recognise and manage the growth that is anticipated. Strategic policies that deal with the infrastructure needed to support sustainable growth are also being revisited as a result of the new growth targets.
- 2.5 The Development Management DPD will provide a suite of planning policies addressing a range of planning themes. It will be a central tool for making planning decisions, ensuring those that accord with and deliver the strategic vision and objectives receive support, and development at odds with the spatial strategy can be resisted.
- 2.6 The Site Allocations DPD seeks to allocate sufficient land to accommodate the future development needs of the borough, with the exception of sites and land in Tottenham which are to be covered within the Tottenham AAP. Each allocation identifies the type and quantum of use(s) proposed for each site, alongside other site specific matters to be considered in advancing a development proposal for a particular site.
- 2.7 The Tottenham AAP reflects the significant focus that the Council has given to realising the aspirations for change amongst the community and the opportunities that exist within this area to capitalise on investment and infrastructure. The AAP will also reflect the ongoing aspirations for the key regeneration areas in Tottenham and will provide a clear spatial strategy to allow coordinated development within Tottenham.



### **3. Recommendations**

Regulatory Committee is recommended to:

- A) Note the summary of the main consultation comments received to the draft Local Plan documents (the draft alterations to the Strategic Policies DPD; the draft Development Management Policies DPD; the draft Site Allocations DPD; and the draft Tottenham Area Action Plan DPD) as set out in the tables at Appendices A through D of this report.
- B) Provide comment, if any, on the consultation responses received and the officer proposed response thereto for reporting to Cabinet.
- C) Recommend(subject to (B) above) to Cabinet that it adopt the Council's proposed response to the comments received, including proposed further amendments, as set out in the tables at Appendices A through D of this report and report the same for consideration and approval to Full Council.
- D) Note that this report provides only a summary of the consultation responses received, and that the full list of responses is available to view on the Council's website via the following link: <http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/local-plan-consultation/representations-received-response-local-plan-consultation-9-february-27-march-2015-companies>

### **4. Alternative options considered**

- 4.1 The Council could choose not to review the Local Plan: Strategic Policies, which was only adopted in March 2013. However, since that date, further alterations have been made to the London Plan which significantly increases Haringey's strategic housing requirement. As a result, the Council's current spatial strategy for the borough makes insufficient provision to manage this new level of growth. As the new regional policy is adopted and forms part of the Borough Local Plan, the fact that Haringey's spatial strategic is not up-to-date will not prevent development coming forward to meet and exceed the new housing target. The National Planning Policy Framework (NPPF) clearly states, at paragraph 14, that where the development plan is absent, silent or relevant policies are out-of-date, the Council will grant proposals permission unless material considerations indicate otherwise, or the development does not accord with the NPPF.
- 4.2 The NPPF and evidence underpinning the further alternations to the London Plan, and to the Local plan also, demonstrate a need to revisit the housing assumptions within the Strategic Policies DPD (2013), especially if the other supporting local plan documents are to be progressed further. Not undertaking the alterations would render the vast majority of the existing Strategic Policies out-of-date, and



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significantly compromise the ability of the Council, as the Local Planning Authority, to make planning decisions based on local strategic circumstances. Accordingly, not reviewing the document is not recommended as a viable alternative.

- 4.3 The Development Management DPD, the Sites Allocations DPD, and the Tottenham AAP, will significantly improve the Council's ability to manage and promote high quality sustainable development (and resist unsustainable development) across the borough, so not producing these documents is not considered to be an appropriate or viable alternative.
- 4.4 For the four development plan documents, the current stage of plan-preparation represents a formal statutory stage in line with previously agreed programme of work contained with the Local Development Scheme. The Council has therefore determined that it wishes to prepare these Development Plan Documents. The Development Plan Documents have been prepared in accordance with the relevant planning regulations and the Council is required to consult on them prior to the formal submission stages.

## **5. Background information**

### Consultation

- 5.1 Following Cabinet approval in January 2015, the alterations to the Strategic Policies and the 'preferred option' drafts of three local plan documents, were published for public consultation from 9 February to 27 March 2015.
- 5.2 Public consultation on the four Local Plan documents was carried out in accordance with the Council's adopted Statement of Community Involvement (2011) and statutory requirements, this included:
  - Notification by letter/e-mail on 9 February to over 1,200 individuals and organisations already registered on the planning consultation database;
  - A reminder e-mail sent to those on the database on 14 March;
  - Notification letters to all landowners and occupiers within the boundary of sites proposed for allocation;
  - Public notice placed in the local newspaper on 12 February;
  - Reference and loan copies of each document and the accompanying sustainability appraisals were made available in each of the Borough libraries, at the Civic Centre & Planning Reception at Riverpark House, and on the Council's website.
- 5.3 In addition to the above, and in an effort to engage the wider public in the consideration of the draft local plan documents, articles were placed in the February editions of the Haringey People Magazine (which is delivered to all households in the Borough) and the Tottenham News. The following series of drop in sessions and public meetings were also held:



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- Turner Avenue Steering Group (22 Jan)
- Park Grove and Dunsford Road Steering Group (29 Jan)
- St Ann's & Haringey Area Forum Meeting (3 Feb)
- Northumberland Park Area Forum (5 Feb)
- Tunnel Gardens / Blake Estate Residents Meeting (5 Feb)
- Highgate & Muswell Hill Area Forum (5 Feb)
- Tamar Residents Meeting (12 Feb)
- Reynardson Residents Meeting (12 Feb)
- River Park House drop in session (16 Feb)
- Tangmere Steering Group (18 Feb)
- Broad Water Farm RA (18 Feb)
- Turner Avenue Drop in Session (Sat 21 Feb)
- High Road West / Love Lane RA (25 Feb)
- Wood Green Library drop in session (25 Feb)
- River Park House Member drop in session (4 Mar)
- Hillcrest RA (9 Mar)
- West Green & Bruce Grove Area Forum (9 Mar)
- Muswell Hill Library Drop in Session (10 Mar)
- Stellar House, Altair Close, The Lindales and Bennetts Close Residents and Community Association (10 Mar)
- 163 Park Lane Drop in Session (11 Mar)
- Northumberland Park and Park Lane Residents and Community Association (12 Mar)
- All Ward Member drop in session (18 Mar)
- Headcorn & Tenterden Residents Association (24 Mar)
- Summersby Road RA (26 Mar)

5.4 The aim of the consultation was to invite public and stakeholder views and comments on the proposed policies or sites being put forward for consideration, and to enable consultees to offer up further information, to enable the preparation of the next iterations of the documents – the pre-submission versions.

5.5 Notwithstanding the above, criticism was received on the extent and adequacy of the consultation process. Whilst meeting the obligations within the Council's adopted Statement of Community Involvement (2011), officers have subsequently meet with some of the concerned parties representing some of the residents groups to see how consultation on the documents could be improved, and where feasible, these new techniques and standards have been incorporated in the update to the Council's Statement of Community Involvement (which is currently out for consultation). Officers will also be seeking to ensure that the lessons learnt and feedback received on the earlier consultation process can be incorporated into the next round of consultation on these documents planned for later in the year.

### Comments Made and Council's Proposed Response



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- 5.6 In total, over 650 representations were received to the consultation on the four draft documents. These came from a wide range of respondents from individuals and residents associations through to local community groups, local businesses, developers, agents, landowners and statutory bodies. The respondents made in excess of 6,000 detailed comments to the proposed policies and site allocations, and officers have drafted a response to each.
- 5.7 A summary of the comments received and officer initial consideration and draft response to these is set out in Appendices to this report. The full set of responses received is available to view on the Council's website:  
<http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/local-plan-consultation/representations-received-response-local-plan-consultation-9-february-27-march-2015-companies> . The Regulatory Committee is asked to provide comment, if any, on the consultation responses received and officer proposed response thereto for reporting to Cabinet and ultimately Full Council for approval.
- 5.8 The 6,000+ detailed comments, and Council's response to each, will be set out in full in Consultation Statements to be prepared for each document. The Consultation Statements will be reported to Cabinet and Full Council for approval for publication alongside the revised documents.

## **6. Next steps**

- 6.1 Following Regulatory Committee, the four local plan documents will be worked up into the final versions and be reported to Cabinet on 20<sup>th</sup> October and Full Council on 23<sup>rd</sup> November for approval for pre-submission consultation and then submission to the Secretary of State.
- 6.2 Pre-submission consultation is part of the statutory process and will run concurrently for the four documents. It is expected that consultation will start on 1<sup>st</sup> December following the call in period after the Full Council meeting. The consultation is required to be of not less than 6 weeks. Due to the Christmas period falling into the consultation period, a consultation deadline of 29<sup>th</sup> January is proposed. This will ensure a consultation period of approximately 8.5 weeks overall, including Christmas.
- 6.3 The Regulation 19 stage is a formal consultation stage and focuses on the legality and soundness of the documents. Following the close of consultation, there is no opportunity to make further changes to the documents, except for very minor amendments, such as corrections to spelling or factual errors. The responses received are analysed by the Council and then submitted with the pre-submission versions of the documents to the Secretary of State to be considered by the Planning Inspector appointed to undertake the examination.



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- 6.4 The submission of the documents, representations, and any proposed minor modifications (if necessary) is likely to take place in March 2016, and will trigger the commencement of the Examination in Public procedure.
- 6.5 The appointed Independent Planning Inspector will review and assess the documents having regard to the representation received and the four *Tests of Soundness*:
1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements
  2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
  3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities
  4. Consistent with national policy: enabling the delivery of sustainable development
- 6.6 Where the Inspector considers that issues remain that might affect the 'soundness' of the documents, they will convene a hearing to discuss these specific matters, and will invite respondents to attend to give their views.
- 6.7 The Examination in Public process can take more than 3 months and will only conclude once the Planning Inspector has issued their Report, which can include any prescribed modifications the Inspector considers necessary to overcome any 'soundness' concerns. If the documents are found to be sound, the Council can then proceed to formally adopt and implement these as part of the Local Plan.

## **7. Comments of the Chief Finance Officer and financial implications**

- 7.1 The cost of preparing, publishing, and consulting on the documents contained within this report is contained within existing Planning budgets. The intention remains that all four local plan documents be run in tandem in terms of pre-submission consultations, submission, examination and adoption. This will save on the costs involved with separate publication, consultation and examination, and will make the most efficient and effective use of resources. The agreement of these plans should support delivery of Council priorities around Economic Growth and improved infrastructure. Any financial impact of responding to comments will need to be considered in the relevant Cabinet and Full Council reports.

## **8. Comments of the Assistant Director of Corporate Governance and legal implications**

- 8.1 The Assistant Director of Corporate Guidance has been consulted on the preparation of this report and comments as follows.
- 8.2 The four development plan documents, when adopted, will form part of the statutory development plan for the Borough against which any subsequent applications for



planning permission would be tested. That being the case there is a statutory process to be undertaken.

- 8.3 The legal requirements for preparing and consulting on Development Plan Documents are set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Development) (England) Regulations 2012. This includes formal consultation at the Regulation 18 stage and consideration of any and all consultation responses received before proceeding to the next stage.
- 8.4 Furthermore, the Supreme Court has recently endorsed the following general principles of consultation relevant to the consideration namely:
- That consultation must be at a time when proposals are still at a formative stage;
  - That the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response;
  - That adequate time must be given for consideration and response; and
  - That the product of consultation must be conscientiously taken into account in finalising any statutory proposals.
- 8.5 In short, in order to achieve the necessary degree of fairness, the obligation is to let those who have a potential interest in the subject matter know in clear terms what the proposal is and exactly why it is under positive consideration, telling them enough (which may be a good deal) to enable them to make an intelligent response. The obligation, although it may be quite onerous, goes no further than this.
- 8.6 Having regard to the forth principal, and having been the subject of Regulation 18 consultation, the Council must take into account the representations received and, where appropriate, show how these have been addressed in preparing the next iteration of the plan – the Regulation 19 pre-submission consultation documents.
- 8.7 Thereafter the documents will be considered by the Cabinet and, on a recommendation from Cabinet, must be approved by the Full Council and published under Regulation 19, together with other “proposed submission documents”, before they can be submitted to the Planning Inspectorate for examination in public (EiP). This provides a formal opportunity for the local community and other interested parties to consider the documents, which the Council would like to adopt, and comment thereon with an ability to make representations to the EiP.
- 8.8 There is a requirement that borough development plan documents must be in conformity with the London Plan and, under the Localism Act 2011, there is also placed on plan-making authorities, a statutory duty to co-operate with adjoining authorities and prescribed bodies and persons in the preparation of development plan documents. This duty requires active and constructive engagement with those parties and to have regard to the activities of those parties.



8.9 A failure to comply with any of the statutory requirements may result in a development plan document being found 'unsound' at the examination in public.

## **9. Equalities and Community Cohesion Comments**

9.1 The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:

- tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- advance equality of opportunity between people who share those protected characteristics and people who do not;
- foster good relations between people who share those characteristics and people who do not.

9.2 Together the four local plan documents referred to in this report will provide the Council with a strategic framework to help deliver a range of outcomes including new homes, jobs, local economic growth and improved social infrastructures and capital for residents across the borough including groups who share the characteristics protected by the Equality Act 2010.

9.3 The Regulation 18 consultation has sought to take account of the Council's general equality duty by ensuring that all sections of Haringey communities, especially those who share the Equality Act's protected characteristics, have had the opportunity to participate and have their say on the proposed policies and site allocations.

9.4 The report is seeking member comment to the proposed officer response to the comments received to public consultation. Following confirmation of a way forward on each of these issues, the final documents will be prepared and will then be subject to a full Sustainability Appraisal that will include EqIA. This will ensure the final policies have been considered for their potential impact on all sections of Haringey communities, but in particular, those with protected characteristics.

9.5 On the whole, the draft DPDs will not materially disadvantage any section of the Haringey communities.

## **10 Head of Procurement Comments**

10.1 There are no procurement issues currently associated with the preparation of the Local Plan. However, if further justification is deemed necessary to enable the Direction to be confirmed or to address matters of 'soundness', specialist consultancy services may need to be procured to gather any additional information. Such costs will need to be met but the Planning Policy budget and will need to accord to Council's procurement protocols.

## **11 Policy Implication**



11.1 Preparation of the Alterations to the Strategic Policies DPD, the Site Allocations DPD, the Development Management DPD, and the Tottenham AAP, aligns with our Corporate Plan vision and objectives to actively manage and drive growth and development, specifically;

**Priority 4 (Growth)** by maximising opportunities for significant residential and commercial growth and development targeted at areas of the Borough that can accommodate change and have the capacity to do so; priority 4 includes a specific commitment to focus regeneration and investment in Tottenham and Wood Green.

**Priority 5 (Housing)** by providing the policy framework necessary to enable the delivery of a significant numbers of new homes and policies controls necessary to ensure such growth and development results in a high quality and attractive residential amenity

11.2 The progression of the four development plan documents to adoption is therefore considered consistent with, and crucial to, delivery of the Corporate Plan Priorities.

## **12 Reasons for Decision**

12.2 These documents are to form Haringey's Local Plan. Without them it will be challenging for the Council to deliver the borough wide aspirations and corporate objectives we have to manage change and growth for the benefit of existing and future residents and businesses. It would also become increasingly challenging to determine and influence development proposals which fail to deliver sustainable development outcomes in Haringey. These local plan document will be more up to date and consistent with the London Plan 2015 and the National Planning Policy Framework than the current version of the Local Plan: Strategic Policies (2013) and Haringey's Saved UDP polices.

12.3 Public consultation is important in informing the emerging policies and site allocations of the Local Plan. It is equally important that the Council give consideration to the comments received and show how these have been taken into account or addressed through changes to the documents.

12.4 The recommendations of the Regulatory Committee will enable the Planning Policy Team to progress with the production of the pre-submission versions of the four documents for reporting to Cabinet and Full Council, in accordance with the timetable set out in the Council's adopted Local Development Scheme.

## **13 Use of Appendices**

13.2 Appendix A: Summary of Comments Received to the Schedule of Proposed Alterations to the Local Plan: Strategic Policies;



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13.3 Appendix B: Summary of Comments Received to the draft Development Management Policies: Preferred Option consultation document;

13.4 Appendix C: Summary of Comments Received to the draft Site Allocations: Preferred Option consultation document; and

13.5 Appendix D: Summary of Comments Received to the draft Tottenham AAP: Preferred Option consultation document

## **14 Local Government (Access to Information) Act 1985**

14.1 The following documents are of relevance to this report:

- Haringey Local Plan: Strategic Policies (2013)
- Draft Proposed Amendments to the Haringey Local Plan: Strategic Policies (January 2015);
- Haringey draft Site Allocations DPD: Preferred Option consultation document (January 2015);
- Haringey draft Development Management Policies DPD: Preferred Options consultation document (January 2015);
- The draft Tottenham AAP: Preferred Option consultation document (January 2015);
- Haringey Statement of Community Involvement (Updated 2011);
- Haringey Revised Statement of Community Involvement (draft 2015);
- The Planning and Compulsory Purchase Act 2004;
- The Town and Country Planning (Local Planning) (England) Regulations 2012;
- National Planning Policy Framework 2012;
- The London Plan 2015;
- The London Strategic Housing Land Availability Assessment (2013);
- Haringey Unitary Development Plan (2006) with Saved Policies (2009);
- Haringey Strategic Housing Market Assessment (2014);
- Urban Characterisation Study (February 2015), including Supplementary addendum (October 2015);
- Haringey Employment Land Review Update (February 2015);
- Open Spaces and Biodiversity Study (October 2014);
- Haringey Retail & Town Centres Study (April 2013) & Updated Retail Assessment (October 2015).



**Appendix A: Summary of Comments Received to the Schedule of Proposed Alterations to the Local Plan: Strategic Policies**

Ref	Summary of Comments Received	Proposed Response
<b>Alterations 1 – 28 Introduction &amp; Spatial Strategy</b>		
SA1	Support for increasing housing requirement	Noted and welcomed
SA2	Not sure what evidence has been used to justify the uplift in housing especially in Tottenham	Uplift based on assessed borough need for further housing. Borough’s current spatial strategy establishes areas to accommodate growth based on wide range of assessments including character, heritage, public transport, investment in infrastructure, land availability, economic regeneration and employment needs, flooding and other constraints.
SA3	Shortfall of affordable housing across the Borough. These plans contain a great deal of upheaval for social housing tenants.	Amendment proposed to clarify that the Plan seeks to address the need to improve or replace council housing on certain Council housing estates where building fabric is failing and not viable to repair, or layouts are poor, or to address socio-economic issues such as deprivation; or to realise opportunities to achieve more homes to meet local needs. Across the Plan it is about significantly increasing housing supply, including affordable housing, to meet local housing needs.
SA4	22,000 extra homes also 22,000 jobs. To make sure that local people are ready for these jobs we need an active third sector	The assessment for housing needs is very different to the assessment for jobs growth resulting in the different target figures. DM policy introduced to support co-location in community facilities to make provision for 3 <sup>rd</sup> Sector engagement. Council’s Economic Development Strategy to pick up on training and skills, but the new DM policy on planning obligations will help secure training from new development.
SA5	Does the actual rate of job growth, if any, correlate with the projected growth?	Yes, past and current trends are an important factor taken into account in preparing the projections, particularly, which employment sectors have/are growing and which have been or are in decline.
SA6	Suggest that projected jobs figures are included by area.	Propose amendment to include job growth figures projected within each growth area and area of change.
SA7	Alterations suggest a reference to the provision of ‘modest growth’ on a ‘limited number of brownfield regeneration infill sites’. What evidence supports this change in policy and where are these sites shown?	The evidence is the Strategic Housing Land Availability Assessment for London, which identified brownfield land outside of growth area and areas of change suitable and available for redevelopment. Sites are set out in the draft Site Allocations DPD. Amendment made to cross reference Site Allocations DPD



SA8	What is meant by 'modest' growth?	Within the Muswell Hill Area Neighbourhood, 11 sites are proposed for allocation with potential to accommodate 521 new home over the next 11 years - circa 2.6% of Haringey's strategic housing requirement, which is considered 'modest' in the context of other neighbourhoods.
SA9	Suggest Hillcrest is not a brownfield site	Land is currently occupied by development and the open space is not designated nor forms private garden space. Council's view remains that the vast majority of the site, expressly excluding SINC land at and around the boundary, falls within the definition of brownfield land
SA10	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	It is the role of the London Plan to reconcile housing needs with land supply across the capital. The strategic housing requirement figure from the London Plan 2015 for Haringey is based broadly on the SHLAA, the methodology of which was agreed by all 33 boroughs. The opportunity to challenge Haringey's strategic housing requirement was through the Further Alterations to the London Plan in 2014. However, it should be noted that, even if the figure was less than 1,502 per annum, the Council is retains the requirement to meet its objectively assessed housing need, which is 1,345 homes per annum. The Council is currently in the process of revising its Infrastructure Delivery Plan, to ensure the infrastructure required to support both existing and new populations is identified and planned for. No change
<b>Alterations 29 – 44 Policy SP1 Managing Growth</b>		
SA11	Located half of the Borough's growth in Tottenham is not realistic and potentially highly damaging to the existing residents and businesses.	The spatial strategy is based on a wide range of sustainability criteria and evidence including land availability, transport infrastructure, planned investment in infrastructure, and urban character. Council seeks to ensure growth benefits local residents and businesses. No change.
SA12	Replace 'meet' with 'aim to achieve' when talking about housing targets	Terminology reflects duty on Council in national policy to <u>meet</u> their objectively assessed needs.
SA13	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 possible.	It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not support this.
SA14	An 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.	Delivery of affordable housing continues to be reliant on securing grant. The Government's condition on grant is that it funds intermediate and affordable rent not social rent. Haringey's need for affordable housing is significant. By not



		advocating the pursuing of grant, the LPA would not be maximising delivery to meet this significant need and would not meet the challenging target of 40% affordable.
SA15	strongly disagree with the approach embedded in the wording of Alt53 and Alt64 about Housing Estate Regeneration and Renewal	<b>Further amendments are proposed to both Alt53 and Alt64 to clarify that the Plan seeks to address the need to improve or replace council housing on certain Council housing estates where building fabric is failing and not viable to repair, or layouts are poor, or to address socio-economic issues such as deprivation; or to realise opportunities to achieve more homes to meet local needs.</b>
SA16	There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for an estate.	<b>An amendment is proposed to Alt 64 to clarify that replacement of social housing will be sought on an equivalent floorspace basis.</b> Recognises need to alter housing mix to meet current demand for different sized social homes.
SA17	There should be no demolition of structurally sound homes.	Beyond replacing structurally unsound buildings, the Council considers there are a number of reasons why estate renewal is appropriate including opportunities to address deprivation or to make more efficient use of the land. An amendment is proposed to clarify the grounds for estate renewal and include reasoning in the relevant Site Allocation.
SA18	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.	Agreed. The approach to consulting with and engaging existing residents in any development proposal on these sites is set out in the Council's Housing Investment Strategy and is a requirement of s105 of the Housing Act 1985. <b>A further alteration to this effect has been added to Alt64.</b>
<b>Alternations 45 – 65 Policy SP2 Housing</b>		
SA19	The current increase in population in Tottenham is already unmanageable. Tottenham is already far more densely populated than the west of Haringey Borough. Why would Haringey Council agree to make this disparity even worse and then even worse again by adding an additional 10,000 homes? The London Plan does not that dictate that these additional 10,000 homes have to be located in Tottenham rather than the rest of the borough. This is not just as it will lead to an unfair burden on the infrastructure and to social stress and unrest. We believe Tottenham lives matter.	Under the current spatial strategy adopted in 2013, Tottenham is to contribute 5,120 new homes. This equates to 64% of the Borough's growth. Wood Green delivers 21% and the rest of the borough 15%. With the uplift in Haringey's strategic housing requirement, Tottenham's contribution reduces 50% of the Borough's growth. Wood Green increases to 25% (5,000 homes) and the rest of the borough increase to 25% (5,000 homes). The location of new housing growth reflects the investment being made in strategic transport and the availability of land/sites for redevelopment. The Site Allocations DPD does identify potential strategic brownfield development sites in the west of the borough, however opportunities are limited and



		accessibility is generally poor with little prospect for significant improvement. On this basis, the Council is content that the spatial strategy, even with the housing uplift, is still the most sustainable and appropriate strategy to manage Haringey's growth needs. <b>No change</b>
SA20	Support the Council's aim to maximise and exceed its strategic housing target.	Noted
SA21	The identification of the capacity for Wood Green / Haringey Heartland s is not in line with the London Plan - 2,000 jobs, and a minimum of 1,000 new homes	The figures within the London Plan are indicative and are minimums. In preparing the draft Site Allocations DPD the Council has identified further development capacity within the area.
SA22	What more definitive map of the growth areas required	These now refined through master planning work for Hale, High Road West, Northumberland Park, and more recently Wood Green. More detailed maps will accompany the Reg 19 documents.
SA23	Mixed use development in the Regeneration Area of the LEA is part of the overall requirement Haringey's housing requirements.	Mixed use development within Regeneration Areas of the LEA should seek to optimise employment outputs commensurate with infrastructure provision. Housing is an enabler.
SA24	Does not accord with the London Plan's requirement to identify the objectively assessed housing needs to seek to exceed the London Plan target.	Council has identified strategic sites with development capacity for 20,040 new homes. With the addition of small sites and windfalls the Local Plan makes sufficient provision to exceed its London Plan target, and therefore fully accords to the London Plan.
SA25	Propose homes in the Areas of Limited Change should be noted as being a minimum requirement.	<b>Agreed.</b> All housing figures in the Local Plan are minimum figures. <b>Amend Table 3.1 (Alt 32) to state that the housing figures therein are minimums.</b>
SA26	What is the nature of the links to and benefits for ....communities?	Amendment to clarify that Growth Areas will be subject to significant inward investment delivering new jobs, better transports links, and new and improved social infrastructure.
SA27	Community Infrastructure Study needs updating for these new plans to reflect the growth	An updated IDP will be published alongside the Reg 19 consultation documents
SA28	No clear provision for existing council tenants	The provision for existing Council tenants is to be outlined in the Council's Housing Strategy.
SA29	To arbitrarily change the target to more than double what was previously thought suitable suggests a disregard for what is realistic or consistent with previous objectives about preserving the character of the townscape	Across London densities are increasing or are planned to increase to accommodate London's growth. The character of some areas will change, consistent with the London Plan density matrix. Such change, follows centuries of change to London's townscape. However, growth areas represent a relatively small area of the borough, the vast majority of existing communities will not be subject to significant change and local planning



		policies are in place to preserve existing character, especially that of value to the local community. <b>No change</b>
SA30	We do not see any consideration within the proposed alterations of the impact of the recent changes to permitted development.	No, such changes were intended to be time limited to three years. Where the Council considers there might be unacceptable harm from the permitted development it has the ability to introduce an Article 4 Direction.
SA31	Object to securing affordable housing contributions on sites below 10 units.	This is extant policy and the Government's attempt to restrict the seeking of affordable housing from developments of less than 10 has been quashed by the High Court. No change
SA32	Suggest the 20% rate be reduced to 10% for small sites contribution rather than remove entirely, as a compromise. This should be insisted on	The rate is based on evidence of viability and need. It cannot however be insisted upon as is also subject to material considerations, which include site specific circumstances that may make this not feasible. No change
SA33	Need to make provision for older people	DM Policy on housing includes securing a mix of housing and meeting specific needs, such as that of the elderly population. No change is required in the Strategic Policies DPD
SA34	Support the proposal to determine the housing mix on a site by site basis.	Noted no change
SA35	Strongly support the Council's recognition that windfall sites will contribute to meeting and exceeding the housing need in Haringey and London.	Noted no change
SA36	Object to the statement that re-providing the existing council housing with higher quality modern social housing is not currently a financially viable option	The statement is supported by current viability evidence based on site specific redevelopment proposals. To replace social housing requires significant cross subsidy. An amendment is proposed to clarify that, estate renewal is likely to result in the creation of mixed tenure developments where there is potential for creating a cross subsidy to support the replacement of social housing units on a floorspace basis.
SA37	Council evidence suggests development on sites within Haringey Heartland/Wood Green is unviable if it were to provide 30% affordable housing provision. A lower percentage should be set for Wood Green.	This is a borough-wide figure and reflects viability across the borough. Site circumstances are taken into account in the new DM Policy on Affordable Housing. No change
<b>Alterations 66 – 90 Policies SP3 – SP17</b>		
SA38	Proposed amendment Alt72 should be withdrawn. We strongly disagree with the proposed downgrading of the employment land status of Crusader Industrial Estate; High Road West; part of Vale	The redesignation of High Rd West is essential to meeting the spatial vision of the Plan.  Vale/Eade Rd (SA37), and Crusader Industrial Estate (SA35) are in close proximity to the



	Road/Tewksbury Road; and White Hart Lane	<p>proposed Harringay Warehouse District, and area of significant growth potential in the borough. It is considered necessary to give these sites a RA status in order to create the flexibility to capitalise on the unique characteristics emerging in this area resulting from existing patterns of warehouse living.</p> <p>White Hart Lane will be retained as LSIS, this is an error in the document and will be amended</p>
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**Appendix B: Summary of Comments Received to the draft Development Management Policies: Preferred Option consultation document**

**DM1-DM11 (Development and Design policies)**

Ref	Summary of Comments	Proposed Response
	<b>DM1 Delivering high quality design, DM2 Design standards and quality of life, DM3 Privacy and protection from overlooking, DM4 Public art</b>	
DM1	There do not appear to be specific guidelines for backland sites.	Inclusion of new DM policy on backland development.
DM2	Appropriate levels of daylight and sunlight should be explained and standards set.	Requirement to provide adequate levels of daylight and sunlight included. Policy does not set standards, however Council will use BRE good practice guidance.
DM3	Disagree with findings of Urban Characterisation Study (character setting typologies). This could have significant impact on densities allowed in the local area.	UCS applied a consistent methodology. The character of an area is one of a number of considerations in determining the appropriate density for a site.
DM4	Object to building separation distances in DM3. 20m+ at first floor and 10+m for each additional floor is overly prescriptive and not deliverable.	Agree that the policy is overly prescriptive and should be removed on the basis that Council can rely on the amenity policy to control overlooking.
DM5	Policy should include a commitment to Rights of Light on Council estates.	Rights of Light fall to be considered through specific legislation separate to the planning process – which does consider day-lighting as part of consideration around amenity .
	<b>DM5 Siting and design of tall buildings</b>	
DM6	DM5 and Map 2.2 are too prescriptive. Policy puts a ceiling on heights, limits the potential for tall buildings elsewhere in the borough and does not provide the Council or developers with sufficient flexibility in their approach to the siting of tall buildings.	Policy refined to set requirements on proposals for ‘tall’ as well as ‘large’ buildings, drawing on baseline from UCS and new technical evidence. This will provide a framework for considering building height on a case specific basis having regard to site circumstances. The Council will continue to identify locations it considers are suitable for tall buildings in line with the London Plan.
DM7	Objections to / concerns with DM5. It will allow development of tall buildings across the borough. Tall buildings are not	Only certain locations in the borough will be considered suitable for tall buildings. The policy sets a positive framework for managing tall



	appropriate in Haringey.	buildings in line with the London Plan.
DM8	Concern with adverse impact on amenity, local character and environment.	DM policies will ensure new development is designed to respond to local character and protect amenity.
DM9	Definition of tall building needs to be clarified. What is basis for 11+ storeys as a benchmark?	The Strategic Policies already includes a definition of a “tall building” having regard to the definition in the London Plan (30m plus) which equates to approx 10 stories. Documents are amended to provide this definition consistently throughout.
<b>DM6 Locally important views and vistas</b>		
DM10	A number of views are included in Conservation Area Management Plans which should be considered	Not all views within CAMP were picked up by UCS. Policy revised to require applications to consider views which identified in USC as well as CAMP.
DM11	Suggest several additional views to be included in the plan	These views will be considered and assessed using the LVMG methodology through additional evidence base study. Those that meet the criteria will be promoted for inclusion.
DM12	Suggest additional policy criteria to protect following: views of and from large parks and open spaces; views into, within and from conservation areas; views of listed and landmark buildings and monuments.	The policy will manage those local views identified through the LVMG methodology. The DM policies provide sufficient protection for local character, including open space and historic environment.
<b>DM7 Shopfronts, signage and on-street dining, DM8 Advertisements, DM9 Telecommunications</b>		
DM13	DM7 and DM8 exceed the criteria permitted in the TCP (Control of Advertisements) (England) Regulations 2007 and the advice in NPPF/G.	Policy revised to be in line with the Regulation and national policy and guidance.
DM14	Transport for London has requirements that it imposes on advertisement boards on the Transport for London Road Network (TLRN).	Policy DM8 supporting text amended to signpost TLRN requirements.
DM15	DM9 approach is entirely negative. The only policy required is that advertisements are well-designed and enhance the urban environment.	Disagree. The proposed policy is considered to provide sufficient basis for controlling this type of development.
DM16	Wording of DM9 is ambiguous and potentially overly restrictive on telecoms equipment.	Policy amended to state that apparatus must be limited to minimum operational requirement.
DM17	Policy does not reflect role that telecoms has in supporting business and the economy.	Policy amended to reflect Council support for telecoms in delivering economic development but also the need for sponsorship and publicity to engage suppliers through the Council’s Economic Development Strategy.
<b>DM10 Waste management for all development, DM11 New waste facilities</b>		
DM18	DM10 needs sufficient flexibility to respond to waste collection arrangements which may change over the course of the plan.	The policy is sufficiently flexible to enable the waste collection authority to change its collection arrangements if required.
DM19	Suggest additional policy for refuse storage	The policy will apply to all development proposals



	<p>in conversions. Too often there is not enough space in the front amenity areas to accommodate bins. When these are provided it is often at the loss of the front garden area or the outlook from ground floor and basement.</p>	<p>including conversions. DM policies will ensure new development is designed to respond to local character and protect amenity.</p>
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**DM12-DM15 (Historic environment policies)**

Ref	Summary of Comments Received	Proposed Response
	<p><b>DM12 Management of the historic environment, DM13 Heritage led regeneration, DM14 Facade retention, DM15 Archaeology</b></p>	
DM20	<p>Reasons for justification to loss or harm of heritage assets should be more closely aligned to the NPPF.</p>	<p>Policy amended to clarify the statutory test in respect of development affecting heritage assets following recent court judgements and the NPPF.</p>
DM21	<p>Additional reference should be made to the ‘setting’ of assets in the context of assessing harm or loss of heritage assets.</p>	<p>Policy amended to include consideration for ‘setting’ of heritage assets.</p>
DM22	<p>Concern that the policy goes beyond the NPPF in specifying that the delivery of affordable housing will outweigh the loss of a heritage asset. Policy singles out AH as the only public benefit considered.</p>	<p>Policy amended to reflect that proposals involving substantial harm or loss of heritage assets will be weighed against wider public benefit, in line with requirements in the legislation and policy in NPPF. Reference to affordable housing removed as the policy will not list all potential public benefits to be weighed; these will be considered on a case by case basis.</p>
DM23	<p>The cumulative loss of architectural features should be limited if not stopped altogether in all areas in the borough.</p>	<p>The Local Plan seeks to preserve and enhance the historic environment however recognising the need to include scope for consideration of proposals that would result in harm or loss of heritage assets in line with national policy.</p>
DM24	<p>DM14 (facade retention) appears to relate to all buildings regardless of whether they are heritage assets.</p>	<p>Policy amended to clarify that it will apply to buildings where the facade is identified as worthy of protection and retention, such as through the building’s listing or conservation area appraisal.</p>

**DM16-DM24 (Housing policies)**

Ref	Summary of Comments Received	Proposed Response
	<p><b>DM16 Housing supply, DM17 Housing mix, DM18 Housing design and quality</b></p>	
DM25	<p>DM17 does not meet the flexibility tests within the NPPF. There should not be restrictions on housing mix as this could create delivery problems. The policy should therefore include a caveat related to viability.</p>	<p>Consideration of viability is inherent across the whole local plan without explicitly mentioning it in every policy. This does not mean the policy does not meet the flexibility tests within the NPPF.</p>
DM26	<p>Object to DM17c which restricts proposals made up exclusively of 1 and 2 bedroom units. Policy does not give sufficient weight to site constraints, scheme viability and</p>	<p>The policy is not a blanket restriction on such proposals rather it sets out opportunities where such provision can contribute to mixed and balanced communities. This approach is consistent</p>



	housing market demand. Policy is overly prohibitive and therefore inconsistent with NPPF in support of sustainable development.	with NPPF in that it will ensure housing needs are met through the provision of a range of housing types and sizes.
DM27	The 2014 SHMA sets out a shortfall of 1 and 2 bed units. The DM17c restrictions on schemes made exclusively of 1 and 2 bedroom units will lead to sub-letting / subdividing of existing housing units or a rash of HMOs.	DM17c has flexibility to enable such schemes to come forward where they contribute to mixed and balanced communities. The policy approach to meet need for family housing and to better manage conversions and HMOs is provided in DM22 and DM23. The plan should be read as a whole.
DM28	The word 'affordable' is misleading as it cannot be equated with 'social'.	No change. DM17 uses the Government's definition of affordable housing.
DM29	Policy should guarantee no net loss of social housing units and no displacement of existing tenants as part of any plan for an estate.	The policy for the re-provision of affordable housing is set out in SP2 and DM19.
DM30	The key consideration for housing should not be density but of residential quality of proposed development, local context and the place it will create. The Council should not apply the London Plan density matrix prescriptively.	The policy recognises the density matrix is but one consideration informing the optimum housing potential of a site. All proposals will be required to be designed to positively respond to local character in line with DM1 and DM2.
DM31	Internal space standards are too small.	Council will apply the Mayor for London's internal space standards which are recommended minimum standards. These are consistent and acceptable standards applicable across London.
DM32	Local Plan should reflect findings of Government Housing Standards Review.	This will be monitored. Policies will be subject to outcomes of the Review, changes to Building Regulations and emerging Minor Alterations to the London Plan.
DM33	Council should develop local standards for play space.	Council will apply the play space standards set in the London Plan Supplementary Planning Guidance, which are considered appropriate for the borough.
DM34	There should be a commitment to meaningful pre-application discussion with the local community on housing design issues.	DM1 recognises the need for early engagement with the local community and Council as an important part of the design process.
DM35	Concern that policy supporting residential extensions will lead to a loss of garden land	Local Plan will include a new DM policy on backland development. Note that the policy sets criteria to ensure extensions are well designed.
DM36	The target of 10% of the total new homes to be wheelchair accessible should be raised to 20%	The 10% target is set by London Plan policy.
<b>DM19 Affordable housing</b>		
DM37	Object to the methodology on viability assessments for affordable housing. Council should consider other assessment models	In line with London Plan approach, the Council considers that existing / alternative use value is the appropriate benchmark approach for



	(e.g. developer's return value or market value approach).	determining the level of affordable housing a scheme can viably deliver. This approach is well established, accepted through the planning appeal process and is considered to be easily definable based the current planning land use designation.
DM38	Policy should be amended to reflect national policy, which exempts schemes of 10 and fewer dwellings from affordable housing obligations.	The application of the Ministerial Statement as representing national policy has been successfully challenged in the courts (September 2015). An appeal against the judgement is expected. Council will monitor the position over the coming months. For now the policy remains extant.
DM39	Oppose the reduction in the affordable housing requirement for development above 10 units from 50% to 40%. It should be increased to the maximum possible.	Viability evidence indicates that the 50% target is not viable in Haringey and that a reduction to 40% is appropriate to ensure that provision of affordable housing does not harm overall housing delivery. Continuation with an "unviable" policy would fail the test of soundness in the plan examination process.
DM40	A lower affordable housing target should be set to ensure delivery of housing / regeneration.	As above. Viability evidence suggests 40% target is appropriate.
DM41	Demand that a separate and clear percentage for social rented housing be set in the affordable housing provision target; and 70% of that affordable housing target should be social rented housing.	The Local Plan approach to affordable housing is consistent with national and regional policy by definition. The Council has tested the viability of the affordable housing target. The affordable housing tenure split is in conformity with the London Plan.
DM42	National policy allows schemes of 10 and fewer dwellings to be exempted from affordable housing obligations. Policy should be amended to reflect this.	See above: National policy position is being monitored and plan will need to respond accordingly.
<b>DM20 Self-build and custom build housing, DM21 Specialist housing</b>		
DM43	The Council should adopt a definition of 'self-build' housing in order to appropriately control this type of development	NPPF compliant definition of self build added to glossary.
DM44	Object to requirement for all student accommodation proposals to be made available for occupation by members of a specified educational institution(s).	The policy is in conformity with the London Plan. However, policy revised to clarify that proposals must meet identified need for student bed spaces.
DM45	A higher proportion of new dwellings should be specialist accommodation for the elderly.	The policy supports proposals which increase housing provision and choice for the elderly.
<b>DM22 Residential conversions, DM23 HMOs</b>		
DM46	DM22 should include a gross original floorspace threshold as required for dwellings outside the FHPZ. Policy DM22.B would allow smaller family homes to be converted in the FHPZ, which is unlikely the intention of the policy.	Policy DM22(b) does include a gross original floorspace threshold as requirement.



DM47	DM23 does not allow for consideration of regeneration benefits that may be brought about through the redevelopment of poor quality HMOs.	The Local Plan aims to drive up the standards of all types of accommodation including HMO accommodation. Whilst poor quality HMO accommodation can usefully provide low cost accommodation options, this is often done without planning permission or satisfying Haringey's Environmental Health Standards. The Local Plan (and associated Housing strategy) reflect the Council commitment to high quality housing for everyone.
<b>DM24 Basement development and light wells</b>		
DM48	Council should adopt basement policies modelled on those in Kensington and Chelsea and which Camden is preparing.	The plan is seeking to ensure the alignment of its proposed basement policy with Camden Council who are in the process of updating their basement policy.

**DM25-DM27 (Nature Conservation and Open Space)**

	<b>Summary of Comments Received</b>	<b>Proposed Response</b>
<b>DM25 Nature conservation, DM 26 Open Space, DM27 Green Grid</b>		
DM49	A balance between development and nature conservation will need to be struck including where a site has multiple designations.	The balance between competing land use requirements is determined by the adopted spatial strategy, which the DM policies seek to give effect to, and by the assumption in favour of sustainable development, which requires important or significant areas for nature conservation are not adversely impacted by development.
DM50	DM25 has too much emphasis on mitigation. Focus should be on protection and enhancement of biodiversity in first instance.	Local Plan is clear that priority is for protection and enhancement. However, policy revised to provide more detailed guidance on how proposals should respond to this requirement, along with further criteria for mitigation.
DM51	Policy is not supported by up-to-date evidence	Open Space and Biodiversity study completed. Emerging Playing Pitch Strategy will be considered.
DM52	DM26 is too restrictive in requiring assessments to justify the loss of undesignated open space.	Policy amended to clarify requirement is for designated open space and non-designated where these are or have been recently used for sports or recreation purposes.
DM53	DM26a wording on development proposals resulting in loss of open space is ambiguous.	Policy wording amended to bring it in line with NPPF (para 74).
DM54	DM26d is too prescriptive in requiring that ancillary facilities must be small scale.	Term 'small scale' is removed in preference to relying on the term 'ancillary' and further defining this. Development on open space will be supported where it is ancillary to a leisure use and does not adversely impact on the character and function of open space.
DM55	Policy should introduce more flexibility to allow for enhancements to educational facilities, such as ancillary facilities for sport,	Policy is sufficiently flexible to allow new or enhanced ancillary uses for sport, irrespective of whether they are linked to education facilities.



	which is a vital part of national curriculum.	
DM56	Requirement for all new development to provide open space or make financial contributions is not consistent with national policy.	Requirement modified to be clear that, where sites can provide for their own open space needs the expectation is that provision will be made on site . Council will use CIL receipts toward strategic green infrastructure, as per Regulation 123 list. On-site open space will be sought, either by planning obligations or condition, in line with standards set in London Plan SPG.
DM57	No consideration given to the replacement or enhancement of existing open space provision as part of a development scheme.	Policy amended to enable reconfiguration of open space where this will not result in a net loss and there are demonstrable benefits in doing so.
DM58	There should be no encroachment on or at edges of parks and open spaces. Concern that some site allocations contradict DM26e.	Where development is proposed for an allocated site, its design will be considered against DM26.
DM59	Concern there are no plans for new open space when some site allocations suggest existing open space will be removed e.g. development on publically owned green and open spaces, such as on housing estates.	Local Plan policies protect against loss of designated open space and require new development to ensure appropriate provision of amenity space. Opportunities for new open space are limited and therefore Local Plan approach is to improve access to and quality of existing open space.
DM60	Concern DM26 will preclude the installation of small serviced mooring bollards/posts along the River Lee Navigation.	The policy already allows for ancillary uses of the open space, which includes the Blue Ribbon Network.
DM61	There is not adequate definition or justification supporting the designation of SLOL. Furthermore, SLOL is not listed on London Plan typologies of open space.	Boroughs have the discretion to identify land uses of importance locally and to recognise these in the Local Plan. The SLOL designation has already been through examination and was found sound.
DM62	Concern with impact on proposals to promote use of Lee Valley Regional Park for leisure use. Parts of park are European protected sites.	Local Plan will be subject to Habitats Regulations Assessment to ensure there are no unacceptable adverse impacts on European sites. Individual applications will need to consider impact upon protected sites/habitats/species.

**DM28- DM41 (Environmental Sustainability)**

	<b>Summary of Comments Received</b>	<b>Proposed Response</b>
	<b>DM28 Allowable solutions, DM29 Sustainable refurbishment and retrofitting, DM30 decentralised energy, DM31 overheating and cooling, DM32 Living roofs and green walls, DM33 Improving the sustainability of heritage assets, DM34 Environmental protection</b>	
DM63	DM28 does not conform to the new national framework on allowable solutions.	Policy amended to focus only on local carbon offset fund rather than allowable solutions.
DM64	DM30 is not sufficiently flexible to ensure that development comes forward in a timely and viable manner.	Clarification that requirements are subject to technical feasibility and financial viability.
DM65	The Council cannot require that all major development located near a Decentralised	DM30 amended to 'expect developers to prioritise connection to' rather than 'require' in line with



	Energy Network to connect that network.	London Plan.
	<b>DM35 Managing and reducing flood risk, DM36 Flood risk assessment, DM37 Sustainable Drainage systems, DM38 Critical drainage Areas, DM39 Protecting and improving groundwater quality and quantity, DM40 Watercourses and flood defences, DM41 Drainage connections and waste water</b>	
DM66	NPPF sets out when a Flood Risk Assessment (FRA) will be required. DM36 is not an essential policy to have in its own right.	DM36 merged with DM35 along with signpost to NPPF requirements on FRA.
DM67	DM35 should be strengthened to ensure that adequate flood plain compensation is provided.	Policy amended to require that flood storage is provided on-site and only off-site if this cannot be achieved.
DM68	Some allocated sites are not included in the Strategic Flood Risk Assessment (SFRA).	SFRA will be revisited and to ensure all allocated sites are included.
DM69	Sequential Test should be revised to clarify requirements for FRA, to confirm Flood Zones within sites and consider allocated sites in Flood Zone 2 for highly vulnerable uses.	Sequential test will be revisited as recommended.
DM70	DM37 should be strengthened to ensure surface water run-off rates are reduced as much as possible.	Policy amended to require proposals to demonstrate that run-off rate has been reduced as much as possible, where a greenfield run-off rate cannot be achieved.
DM71	DM40 should require applicants to provide justification if they cannot implement river restoration measures where appropriate.	Policy amended as suggested.
DM72	There should be stronger emphasis on improving watercourses in terms of ecology and the Water Framework Directive.	DM40 amended to include further requirements for improving water quality.
DM73	Policy DM41 should clarify requirements between foul and surface water management.	Policy amended to focus only on requirements for managing foul water disposal. Surface water management covered by other DM policies.
DM74	The plan should address need for adequate provision of water supply and sewerage/wastewater infrastructure	Scope of policy DM41 broadened to include provision of water supply with requirement to consult Thames Water on proposals.

**DM42-DM47 (Transport)**

	<b>Summary of Comments Received</b>	<b>Proposed Response</b>
	<b>DM42 Sustainable transport</b>	
DM75	Criteria in the revoked SPG7 on adopting roads should be included in the plan.	Supporting text will signpost relevant legislation and approach on this matter - generally, the Council will not adopt access roads unless they are of sufficient public utility to justify being maintained at public expense.
	<b>DM43 Parking</b>	
DM76	Policy should protect garage courts as they are underused and could provide valuable parking.	Where the garage use has ceased, these site are considered brownfield land and, therefore, are prioritised in national and regional policy for redevelopment for alternative uses to meet local



		needs.
<b>DM44 Crossovers and Vehicle Access</b>		
DM77	There should be a strong ambition to reduce the damage to gardens and streetscapes caused by parking, in the number of crossovers that are granted and also the number of illegal parking spaces created in the borough.	Policy DM44 and Policy DM45 recognise the potential damage to gardens arising from vehicle accesses and front garden parking and these policies seek to minimise this. Management of illegal off street parking can be managed through the Highways Act.
DM78	The need for an effective substitute for SPG1b.	SPG1b was non-adopted guidance and has been replaced by PD rights. Policy DM45 supports retaining at least 50% of front gardens as landscaping where planning permission is required.
DM79	Policy should state that proposals for crossovers on the TfL Road Network will require approval TfL as well as by the borough.	Policy amended as suggested.
<b>DM45 Driveways and Front Gardens</b>		
DM80	Policy wording is misleading and should be clarified to ensure effective implementation.	DM45 amended as follows: The Council will only <del>support</del> permit parking on front gardens where a minimum of 50% of existing soft landscaping area is being retained.
<b>DM46 Cycle Storage in Front Gardens , DM47 Mini Cab Offices – no changes</b>		

**DM42-DM50 & DM52-DM57 (Employment and Economy, including town centres)**

	Summary of Comments Received	Proposed Response
<b>DM48 Safeguarding employment land and sites</b>		
DM81	DM48 a duplication of SP8.	DM48 deleted.
DM82	Developers want non-designated employment sites to be made available for development.	The opportunities for redevelopment of non-designated employment sites, and requirements for protection, are set out in DM40
DM83	Inconsistency between evidence in ELS and policy about need to provide opportunities for redevelopment on some non-designated employment sites.	
<b>DM49 Maximising the use of employment land and sites</b>		
DM84	Concern that policy is ambiguous about “maximising employment floorspace”	Policy reflects both the jobs projections from the London Plan for Haringey and the fact the borough has a legacy of industrial and warehousing sites that should be reconfigured towards the provision of more intensive employment uses to meet local demand for SME and move-on space. Policy amended to confirm the starting point is a presumption in favour of replacement employment floorspace.
DM85	Concern that old stock is being unnecessarily lost	Clarification added that this policy only protects designated employment-only (ie not Regeneration Areas) sites in line with their designated purpose.
DM86	Concern that it is ambiguous whether this	



	policy protects designated and/or non-designated employment sites.	
<b>DM50 Facilitating site regeneration and renewal</b>		
DM87	Opposition to targets for employment as part of a scheme (ie 33%, 50%)	Applicants will be required to submit a viability assessment demonstrating minimum amount of residential floorspace to enable scheme and have this assessment independently appraised.
DM88	Affordable Rents could render schemes unviable.	Affordable workspace is required to support local economic growth
DM89	Affordable Rents need to be defined	
DM90	Developers want PTAL3 sites to be considered suitable for mixed use development	PTAL reference dropped from policy to ensure flexibility. Mixed use schemes in non-designated employment sites will not normally be permitted in areas of low public transport accessibility.
<b>DM52 Loss of employment land and floorspace</b>		
DM91	Developers seeking to relax test for release of employment land/floorspace.	Rejected, any loss will need to be carefully managed.
DM92	Clarification sought to protect employment sites where they are in use, not where there is no possibility of sites coming forward for development.	Need for qualification – assessment of suitability for use if vacant – local agent reports to avoid deliberate vacancy
<b>DM53 Development within town centres</b>		
DM93	Greater flexibility over restriction on change of use from A1 (retail) to other uses such as A3 (café/restaurant) suggested.	Policy is considered to provide sufficient flexibility for change of use whilst ensuring town centre vitality.
<b>DM54 Town centre uses out of centres, DM55 Betting shops, DM56 Hot food takeaways</b>		
DM94	Objections due to lack of evidence provided	Evidence from NHS England has been uploaded.
DM95	400m from schools is too crude	Evidence is sufficient to support the policy.
DM96	Creation of exclusion zone outside primary schools considered to be unnecessary	Evidence is sufficient to support the policy.
DM97	Objection to DM56 due to health of retail centres	Rejected. Policy considered appropriate to allow other uses to thrive.
<b>DM57 Access to jobs and training – no issues.</b>		

**DM51 Warehouse Living**

	<b>Summary of Comments Received</b>	<b>Proposed Response</b>
DM98	Concern over opening up railway arch	Increased accessibility is essential to enabling the full potential of the area and connecting area to strategic cycling/walking routes.
DM99	Warehouse community consider organic growth to be a good thing, are strongly anti comprehensive development and new build.	Noted, provision for retention of the creative community is made for in the Plan, but view is that inaction will lead to the area becoming exclusively residential in longer term.
DM100	Support from residents for the combination of affordable workspace and residences currently available on the site, and against either purely residential or employment designation.	This is supported by the existing policy framework.



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DM101	Opposition to a structural division between work and live in new developments.	Council considers that new, dedicated workspace, in some form is necessary in this area. Provision for commercial opportunities is essential to meeting the wider employment objectives of the plan.
DM102	Objection from landowner and residents to re-providing original employment floorspace, partially on grounds that Lawful Development Certificates for residential use granted.	Consideration of uses benefitting from LDC will be part of the site master planning process as set out in DM51.B.c
DM103	Support for decentralised energy development in this area.	Noted.
DM104	Landowners would like greater heights.	Multi-storey developments are needed to gain mix of uses and create “openness” local residents desire. Indicative building heights removed from the site allocations. Development Management Policies revised to set a clear framework and criteria for assessing proposals for large and tall buildings across the borough.
DM105	Concern about height of 6 storeys across the area	
DM106	Willingness to work with the Council in developing an approach.	It is noted that the Plan will leave a number of issues to be dealt with through a masterplan for the area, and there will be a requirement to work with local residents on and surrounding the site in this process.
DM107	Tentative support for master planning, with residents keen to be involved	
DM108	Concern that development could add traffic to local roads, particularly in light of existing road closures.	Transport considerations will be addressed through the site master planning process, having regard to the nature and scale of development and associated servicing requirements.
DM109	Support for creation of a new centre to the area.	Noted.
DM110	Local residents believe the employment and cultural offer the area exhibits already is strong.	The Council believes the current living arrangements within the area are creating characteristics that can help to create more employment growth in the area.
DM111	Local residents believe innovation and educational benefits are flowing from communal living.	
DM112	Support for opening up the New River embankment.	Noted.
DM113	Support for retention of the “slopes”	Noted, this designation will remain.
DM114	Support for community management of the area	The Council will welcome considerations for community management as part of the site masterplanning process.

**DM58-63 (Community Infrastructure)**

	<b>Summary of Comments Received</b>	<b>Proposed Response</b>
	<b>DM58 Managing the provision of community infrastructure, DM59 Managing the quality of community infrastructure</b>	
DM115	Concern that DM58 will restrict institutional	Policy amended to provide greater flexibility. Loss



	health care providers from managing their estates in a way which best meets existing and future service requirements.	or change of use of facility may be acceptable where it can be demonstrated that the disposal of existing community infrastructure (such as health facility) is part of an agreed programme of social infrastructure re-provision to provide for the continued delivery of the related service.
DM116	New development on site allocations should not lead to any net loss of social infrastructure and should include additional social infrastructure to serve the existing and future residents.	A 'no net loss' approach on all individual site allocations does not provide sufficient flexibility to deliver the spatial strategy. Site allocations will require new or re-provision of existing community facilities where appropriate. DM Policies protect against the loss of community facilities.
DM117	Concern that the Council is not doing enough to ensure sufficient amount of social and community facilities.	Site allocations will assist in delivering social and community infrastructure on individual sites. DM Policies seek to enhance and protect against loss of community facilities. Applicants will be required to engage with the Infrastructure Delivery Plan to ensure development is appropriately supported.
DM118	Policy DM58 should not contain a specific requirement relating to Assets of Community Value.	Policy amended to reflect ACV should be considered as any other community facilities for the purpose of the policy.
DM119	The proposed policy is overly protective, not justified or positive in its approach and contrary to national planning policy.	Local Plan policies seek to ensure an appropriate level of social and community infrastructure. Demand will likely increase and it is prudent to guard against the loss of existing capacity where there is demonstrable need.
<b>DM60 Public Houses</b>		
DM120	The policy is overly protective of pubs. Pubs should not be included in definition of community facilities.	Council considers that public houses are essential community facilities, in line with the NPPF, and will guard against unnecessary loss.
<b>DM61 Provision of day nurseries and child care facilities</b>		
DM121	Policy should be amended to state that proposals will only be granted where they do not result in the loss of playing field land.	This is already covered by existing and proposed DM policies.
<b>DM62 Burial space, DM63 Hotels and visitor accommodation – no representations</b>		

**Appendix C: Summary of Comments Received to the draft Site Allocations: Preferred Option consultation document**

**SA10-SA22 (Sites in Wood Green Metropolitan Town Centre)**

Ref	Summary of Comments Received	Proposed Response
SA11	Provide new traveller accommodation and redevelop the whole Civic Centre site.	Traveller pitches will need to be reprovided before any development is permitted.
SA12	Concern about the height of development in close proximity to existing residences	This will be managed through DM1 and picked up in Site Allocations where necessary.
SA13	Concern as to whether buses entering a new bus garage on Station Rd is feasible.	Flexibility introduced for a new entrance to be provided on the High Rd and/or on Station Rd.
SA14	Strengthen requirement to keep bus	Text strengthened



	garage	
SAII5	Opposition to tall buildings	Further analysis is being undertaken to validate the position on tall buildings and provide robust assessment criteria – including defining their role in place making and housing/employment delivery.
SAII6	Support for bringing back into use the Gaumont theatre, and providing for soundproofing on adjacent sites.	Wording added to that effect.
SAII7	Developable parcel identified on Pelham Rd on the Mall site.	Noted, this will be added in policy.
SAII8	Concern about omission of improving amenity at interface of the Mall and Mayes Rd	Wording added to that effect.
SAII9	Concern about deliverability of Library site due to multiple landowners	The allocation will help to guide development requirements.
SAII10	Retention of the library requested	Use will be reprovided and improved, but the building is considered capable of redevelopment.
SAII11	Belief that the skycafe is a folly	Opportunities to extend the offer of Wood Green and maximise the value from tall buildings to the metro centre will be explored.
SAII12	Landowner at Turnpike Lane corner site seeking greater height.	Rejected, heights are already aspirational compared with UCS evidence. The final design that comes forward will be determined at the detailed design stage (planning application).

**SA23-29 (Haringey Heartlands)**

Ref	Summary of Comments Received	Proposed Response
SAII13	Opposition to targets for employment as part of a scheme (ie 33%, 50%)	Replacement of targets with a methodology to make provision for the maximum amount of employment floorspace, with regards to viability and design.
SAII14	Opposition from developers to providing affordable Rents	Greater flexibility with regards type of affordable workspace offer will be provided (in DMDPD)
SAII15	Developers requesting greater height across the Heartlands area.	Rejected, heights are already aspirational compared with UCS evidence.
SAII16	Opposition to tall building, and multiple tall buildings at entrance to Penstock Tunnel	Additional work is being carried out to confirm approach.
SAII17	Desire for alternative tall building marking cultural quarter, Clarendon Square.	
SAII18	Mixed reaction to extending Clarendon Rd, some support locally for retention of Granta House.	Note that any development should complement Conservation Area, agree to work with landowners to enable this intervention.
SAII19	Landowner support for student housing	Stated that Wood Green town centre is preferred location for this use.
SAII20	Vision requested for the Cultural Quarter	The emerging Wood Green AAP will include further work on the development of the vision for the area.



**1.1 SA30-SA41 (Sites in Harringay)**

Ref	Summary of Comments Received	Proposed Response
SAll21	Desire for a height limit to be placed on St. Ann's site	Heights will be determined at the detailed design stage.
SAll22	Support for new open space on St. Ann's	Noted
SAll23	Support for improved pedestrian and cycling accessibility	Noted
SAll24	Concern over height on Arena Retail site, and impact on properties to the south over the rail line.	Noted, but heights are recommended to be reduce towards this part of the site.
SAll25	Concern over increased traffic from the new development	The aim of this development is to enable roadworks that aim to improve traffic flow along Green Lanes.
SAll26	Concern over impact of new development on existing social infrastructure	This will be managed through the Infrastructure Delivery Plan and CIL

**SA34-SA39 (Harringay Warehouse District): See DM51**

**SA40-SA41 (Finsbury Park)**

Ref	Summary of Comments Received	Proposed Response
SAll27	Objection to 15-storey tower.	Proposal will remove a specific height and replace with criteria based policy in the DMDPD. Site PTAL and location in Finsbury Park supports higher density development subject to fulfilling other policy criteria.
SAll28	Desire to retain leisure use	Requirement to replace existing leisure use will be strengthened.
SAll29	Ambiguity over community/leisure use reprovion	
SAll30	Concern over loss of MOL	Boundary of site allocation to be changed to reduce/remove MOL land. Requirement for no net loss of MOL in the policy, and improvement to the setting and access to the existing MOL.

**SA42- SA47 (Sites in Highgate)**

	Summary of Comments Received	Proposed Response
	<b>General comments</b>	
SAll31	Proposed building heights are too high.	Indicative building heights removed from the site allocations. Development Management Policies revised to set a clear framework and criteria for assessing proposals for large and tall buildings across the borough, informed by UCS and Haringey Spatial Character Analysis.
SAll32	Proposals will have an adverse impact on the conservation areas.	The policies require that new development preserves and enhances the conservation area.



		Development Management Policies set further detailed requirements in this regard.
SA1133	Proposals will have adverse impact on biodiversity.	The policies require that all future proposals for take into account nature conservation designations. Development Management Policies require appropriate consideration of the objective to protect and enhance biodiversity.
SA1134	Proposals will have adverse impact on residential amenity.	Development Management Policies are considered to provide an appropriate means to manage and safeguard residential amenity.
<b>Site specific comments</b>		
SA1135	SA43 - Concern that proposal to open up the tunnels to create a new cycle route linking the Parkland Walk will adversely impact on biodiversity.	This policy is being revisited to recognise the differences between the former Highgate Station land and the Gonnermans/Goldsmiths Court land. Two new site allocations are being created reflecting the objectives for the former station site including safeguarding of biodiversity interests and enhanced access and the need for carefully managed re-development for Gonnermans/Goldsmiths court. on the allocations will also include flexibility to consider alternate routes if opening of tunnels is not possible.
SA1136	SA44 - Highgate School Allocation is unclear on what is proposed.	The allocation states that a master plan will be prepared to guide development through a Supplementary Planning Document. Further details will therefore emerge through the preparation of the SPD (which will be subject to public consultation).
SA1137	SA45 - Concern for loss of Harington scheme including buildings (office and classrooms), open horticultural space and walled garden.	The site specific policy is to be amended to provide recognition of this facility and its long term community value is translated into a requirement for safeguarding of these facilities within any future proposals for development on this land.
SA1138	SA45 – Public access routes through bowl will impact on amenity or residents.	The Council will seek to optimize access to and through the new MOL.
SA1139	SA45 – Object to access from Chomeley Park	Noted, The Council will seek to optimize access to and through the new MOL.
SA1140	SA45 - The green line on the Village side should be the subject of review in particular to reflect the most recent Appeal decision on the Garden Centre.	This boundary will be updated.
SA1141	SA45 - The bowl has been drawn incorrectly and should not include buildings and land to the rear of Dyne House	Noted, This boundary will be updated.
SA1142	SA45 - The Far Field site should be removed from MOL designation given the findings of the Urban Character Study.	Not accepted. There will be no amendments to MOL boundary.



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	Furthermore the site does not fulfil the objectives of MOL	
SAII43	SA45 – Nurseries site owner believes Highgate Bowl should not be designated SLOL	Noted, but the Conservation Area is defined in part by the Bowl, and as such it is appropriate to define this in policy.
SAII44	SA46 - Object to inclusion of Summersby Road estate in the allocation. It was not included in a previous version of the plan.	The site allocation is to be amended to remove the existing residential homes on Summersby Road from the allocation for redevelopment to mixed use employment and residential uses.
SAII45	SA46 - Object to proposal to demolish the estate. The flats are solidly built and viable. Surveys have said the buildings are solid and in good condition.	Site allocation to be amended (see above).
SAII46	SA46 - Object to inclusion of Summersby Road estate when Decent Homes programme is about to begin.	Site allocation to be amended (see above).
SAII47	SA46 - Object to inclusion of South Close car park in the allocation. This is not part of the Summersby Road estate but Southwood Hall	Site allocation to be amended (see above).South Close car park will be removed from the allocation.
SAII48	SA47 – Concern with loss of open space, including children’s play space	There is no designated open space within the proposed site boundary. Future proposals will be required to make appropriate provision for amenity space and children’s play space whilst optimising housing delivery on site.
SAII49	SA47 - Introduction of new buildings, along with the proposed building heights, will adversely impact on residential amenity.	DM Policies require that consideration be given to residential amenity within the design of any development.
SAII50	SA47 - Concern with density and overcrowding on the site.	DM Policies will ensure that site is developed to appropriate density having regard to local context.
SAII51	SA47 - Views from Hillcrest will be lost as a result of the proposals.	The consideration of impacts upon existing properties is a matter for development management policy. Specific private views from properties cannot be protected through planning policy.
SAII52	SA47 - The proposals are contrary to the proposed Highgate Neighbourhood Plan which intends to protect the open spaces at Hillcrest.	A Neighbourhood Plan, once adopted, will form part of Haringey’s statutory Development Plan. The Highgate Neighbourhood Plan is not yet adopted and has not reached as advanced a stage as the site allocations policies. As a lower tier plan it must be in general conformity with the strategic policies of the Local Plan.
SAII53	SA47 - Concern that proposals will result in loss of existing parking provision, which is already very limited. New development will create additional parking demand and stress particularly as roads surrounding site are CPZ.	Any development would be required to address the parking requirements set in the DM Policies. The Council would expect any application to be accompanied by an assessment of transport and parking impacts.



SA1154	SA47 - Many representations make specific reference to site development options identified in the PRP report.	The policy sets out a proposed allocation and principles to guide future proposals for new development on the site. It does not propose in detail any specific proposal. The PRP report was prepared for the Housing team within the Council to consider development options/site capacity .
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**SA48-56 (Sites in the West of the borough)**

Ref	Summary of Comments Received	Proposed Response
<b>SA48: Hornsey Water Treatment Works</b>		
SA1155	Unacceptable impact on MOL, setting of Alexandra Palace, and local heritage of the filter beds Conservation Area	In the absence of a detailed proposal that can evidence how the very specific challenges of the site can be addressed it is proposed that this site is not progressed further at this time.
<b>SA49: No major issues</b>		
<b>SA50: Chettle Court</b>		
SA1156	Concern over loss of play area	Noted, this policy will be removed.
SA1157	Concern over stress on parking	Noted, any development would be required to show how it was meeting parking standards.
<b>SA51: Lynton Rd</b>		
SA1158	Height/effect on amenity	The redevelopment of the site would need to confirm to the design and impact assessment criteria contained in development management policies.
SA1159	Loss of employment	An element of employment will be required to be provided in line with employment policy and the extant planning consent.
SA1160	Loss of local mature trees	These will be protected.
SA1161	Parking	Development would be required to engage with parking and transportation impacts identified through a transport and parking assessment.
<b>SA52: Pinkham Way</b>		
SA1162	Local resident's group feel the site is not suitable for employment	Existing employment/SINC designation is considered to continue to be justified on the basis of continuing need for employment sites in the borough and is subject to requirement for appropriate assessment and consideration of implications of SINC designation.
SA1163	Evidence provided means that the site should be allocated as open space/ biodiversity space.	Evidence provided on biodiversity is not sufficient to demonstrate that



		site is incapable of development for employment purposes.
SAll64	Flood risk on the site will make the site unsuitable for development	A part of the site falls within flood zones 2 and 3. A Flood Risk Assessment will be required to demonstrate development will not have an adverse impact upon flood risk in the locality in line with NPPF
SAll65	Culverted watercourses make the site unsuitable for development.	Specific requirements to consider the impact upon the culverted watercourse are contained within the policy.
SAll66	Opposition to an allocation that allows waste use	Noted. Allocation is not for waste use.
SAll67	View from Friern Barnet Bridge Park to Alexandra Palace could be interrupted.	An impact assessment on long distance views of any development will be required to be undertaken.
<b>SA53: Cranwood &amp; St. James'</b>		
SAll68	Concern over the impact of development on provision of infrastructure.	Infrastructure to meet Haringey's growing population will be managed through the IDP.
SAll69	Objection to demolition of houses from residents on Woodside Avenue.	Noted, however the Council as landowner has a responsibility to make the best use of its land.
SAll70	Concern that the requirement to connect the Parkland Walk through the site will "net off" land which could be used to optimize housing	It is considered that this is a sustainable mix of uses contributing to open space, accessibility, and housing objectives.
SAll71	Consideration that the Care Home site should be considered for expansion of the school.	There is no identified need for expansion of St. James' in the IDP.
<b>SA54: Tunnel Gardens</b>		
SAll72	Objection from local residents to having their homes redeveloped	Noted, this policy is based upon a preliminary assessment that the defective material the houses are constructed from makes restoration uneconomic.
SAll73	Concern from local residents about potential height of development	A 4 storey high is considered low-scale development
SAll74	Concern about local drainage	This will be managed through an FRA on the site.
SAll75	Request to see evidence that the site is not fit for refurbishment	The Council is in the process of preparing a detailed assessment and comparison of the refurbishment and re-development costs to enable a final decision to be made. The site allocation provides for re-development in the event that the assessment concludes that



		refurbishment of the homes is uneconomic.
<b>SA55: Alexandra Palace</b>		
SA1176	Alexandra Palace should be introduced as the centrepiece of the Conservation Area	Agreed
<b>SA56: Coppetts Wood Hospital</b>		
SA1177	Local concern over loss of resident's parking	Noted, this is a detailed design issue, and not strategic enough to prevent the sites inclusion in the Site Allocation. An assessment of parking and transport impacts will be required to be submitted as part of any firm re-development proposals.

**SA57-SA62 & SA64-SA66 (Sites in the East of the borough)**

	<b>Summary of Comments Received</b>	<b>Proposed Response</b>
<b>SA57: Park Grove &amp; Durnsford Rd</b>		
SA1178	Concern from existing residents about the potential for 6 storeys on the site	Policy amended. Appropriate height for development will be driven by design and character assessments together with accessibility criteria. Higher density development than existing will be required to secure delivery of the proposed new residential homes.
SA1179	Support from local residents that the site is widened to include Park Court	Park Court does not share the same issue in terms of construction materials which have informed the decision to re-develop for new homes.
SA1180	Request to see evidence that the site is not fit for refurbishment	The Council is in the process of preparing a detailed assessment and comparison of the refurbishment and re-development costs to enable a final decision to be made. The site allocation provides for re-development in the event that the assessment concludes that refurbishment of the homes is uneconomic.
SA1181	Open spaces can be combined and improved	Agreed, wording to this effect will be included
<b>SA58: Myddleton Rd Local Centre</b>		
SA1182	Objection to support for backland development	Noted. A policy managing back-land development will be introduced into the DM DPD
SA1183	Opposition to "echelon" parking	This is a detailed design consideration that will require testing. Policy



		guidelines revised to make clear the need for review and consultation prior to any changes to parking being implemented.
<b>SA59: Red House</b>		
SAll84	Concern over height on West Green Rd	Noted, this will be managed through consideration of the detailed design of the development on the site at the application stage. It is noted the site is within walking distance of a potential Crossrail 2 station.
SAll85	Support for improvement of the open space	Noted.
<b>SA60: Haringey Professional Development Centre: No major issues</b>		
<b>SA61 – Keston Centre</b>		
SAll86	Object to 5 storey development and capacity on the site	The significant number of objections to this allocation raise issues that relate to detailed design considerations that can be addressed through development managed policies and the normal development process. DM Policies also require careful consideration of the effects of development on MOL (Downhills Park)
SAll87	Concern about constrained access and impact on local roads	
SAll88	Objection on the basis of impact on Downhills Park	
SAll89	Parking/Traffic/Access	The site has a PTAL score of 2 and any development would need to demonstrate a suitable access and through a transport assessment, satisfy Dm policy regarding the impact of the development upon parking and local traffic conditions.
<b>SA62: Barber Wilson</b>		
SAll90	Concern over potential loss of historic Barber Wilson site for heritage and employment reasons	Site allocation will be clarified to ensure that the proposals do not result in loss of employment uses – and presumption in favour of retention/conversion of historic industrial buildings on the site.
<b>SA64: The Selby Centre</b>		
SAll91	Strong support from Selby Trust for retention of the site, and that it can play an important role in meeting the need produced by the high Rd West redevelopment.	Noted. Policy seeks to secure re-provision of community uses on or off site as appropriate prior to re-development.
<b>SA65:</b>		
SAll92	Concern over height and the potential impact on Bruce Castle Park & Museum	Noted. Increase in density of use will be required to enable viable re-development. The design and impact of any new development will be



		carefully assessed in relation to the impacts upon the setting of the adjacent heritage assets.
<b>SA66: No major issues</b>		

**1.2 SA63 (Broadwater Farm)**

<b>BROADWATER FARM</b>		
<b>Theme</b>	<b>Comment</b>	<b>Response</b>
Consultation /Community Issues	Concern that the text in SA63 (improve stock design of the site and routes through the area) is disingenuous and means comprehensive redevelopment	The detailed options to achieve this objective have not been developed at this time and the policy seeks to highlight the need for further work and engagement to determine the appropriate response.
	Concern that community aren't being properly consulted on the area's future	The policy outlines the need for Supplementary Planning Documents and an appropriate masterplan which would be prepared in consultation with residents in line with the Council's Statement of Community Involvement."
	Lack of consideration for residents who back on to the park. Loss of light, privacy and change of character to the surrounding properties.	There are no detailed proposals within this policy as yet, but concern noted.
	Council should work with the community to improve the existing area and facilities	Agreed.
	The plans will destroy what council claims to want to create – vibrant, cohesive and inclusive communities.	The proposal for an SPD/Masterplanning exercise is intended to ensure that opportunities to enhance vibrancy and community cohesion are captured in the process..
	Objects to displacement of and disruption to communities and the undermining of successful efforts to build a strong and stable community and to improve local facilities	Noted. This is not the intention of the policy.
	Community improvements of the Estate and its surroundings. To ignore all that effort and suggest building on such an important open space is outrageous	Noted that there is pride in the local area, the Council will work with local residents on any future detailed plans. Revision of site allocation boundary proposed to omit Lordship Recreation Ground.
	Community in Moira Close provide support networks for each other. Concern separation of residents could lead to mental health illness and depression	Noted. This would be an issue for any masterplanning exercise to address. .
Challenging the rationale	No evidence of structural problems and not contributing to mayors housing targets so why	The detailed options to achieve this objective have not been developed



	demolition?	at this time and the policy seeks to highlight the need for further work and engagement to determine the appropriate response.
	Inefficient use of money. Environmental and social costs can't be justified. Inefficient as laws will have to be overturned in court	Comment noted.
	Estate is only 30 years old and in good condition. Some dwellings have recently had new doors, kitchens etc. Makes no sense to demolish and throw away all the investment in the estate.	Comment noted. The detailed options to achieve this objective have not been developed at this time. Any proposals for re-development will be subject to a financial appraisal to demonstrate value for money.
	Perception that development is unbalanced in favour of the West of the borough.	Development is in line with the spatial strategy set out in the Local Plan: Strategic Policies.
	Council should find alternative sites for new housing such as Tottenham vacant industrial land and other brownfield land	Comment noted. The Local Plan process has explored sites across the Borough and their potential for development to meet forecast housing and employment needs.
Perceptions of loss of affordable housing/ Forced movement of residents	Affordable housing is needed more than ever and people displaced will not be able to afford the new affordable housing	Noted. Affordable housing provision will be in accordance with the affordable housing policy in the Local Plan.
	Concerned mix of tenures will replace low income residents with wealthier ones from outside the borough.	Concern noted. In the event of any re-development of properties on the site the tenure split will be determined by housing need, viability and development management policy considerations informed by the adopted Housing Strategy in place at that time.
	Thousands of council homes are at risk of demolition and there will be a relatively low percentage of social rented housing. Where will people from BWF go?	Concern noted.
	There should be no net loss of social housing.	Noted.
	If redevelopment is necessary those with secure accommodation should be offered to be housed in any new development.	Noted: The Council is developing its approach to re-housing residents in the event that they are displaced by new or redevelopment. This is not a matter for planning policy. The Council is in the process of preparing a detailed assessment and comparison of the refurbishment and re-development costs to enable



		a final decision to be made. The site allocation provides for re-development in the event that the assessment concludes that refurbishment of the homes is uneconomic.
	Afraid new housing will follow places such as Woodberry Down where residents are forced out and given substandard care and attention compared to newcomers.	Noted – see immediately above comment.
Leaseholder Issues	Private house owners should be offered sufficient amount of money to find similar house nearby.	This is a matter for the Council Rehousing strategy and extends beyond the scope of planning policy.
	Private tenants of leaseholders may end up homeless if do not fit one of councils priority need categories.	Concern noted. See above.
Implementation concerns	Considering two dwellings are usually built and sold for one social unit the size would need to be as big as the barbican to rehouse council tenants	Noted. In the absence of a specific option or masterplan/SPD, it is not possible to comment in detail on the quantum of development proposed or required to fulfil the objective because this will depend upon the form of any proposal developed through the masterplan exercise and the means by which implementation of the masterplan is delivered.
	Possibility of social unrest again. Letting young people down by closing youth centre,	Noted. The policy envisages that the local community will be closely involved in the masterplan/SPD process
	Housing associations usually means increases in rent and reduction in tenancy rights	Concern is noted. This is not a matter that planning policy can engage with.
	Congestion and traffic problems will increase if more houses are built	Noted. Any proposals for re-development would require an assessment of the transport impacts to be undertaken.
	Refurbish the estate rather than redevelopment. Continue Decent Homes work.	Noted.
	Council is selling off assets to private developers. More expected of a Labour council.	Comment noted.
	Concerned about height limits of up to 11 storeys Suggest remodelling BWF to accommodate more units by increasing height in some areas	Noted, although the area already has a development typology that includes tall buildings. All designs will be required to conform with the Development Management policies DPD which apply specific criteria to the assessment of taller buildings –
	Council policies such as SP11 suggest tall buildings would be in breach of the plan – development should conform to its local context	



		including the careful consideration of context and the impact upon important local views.
	Has impact assessment been done for noise/dust/pollution from demolition of BWF? Has an environmental assessment been done for social, financial and environmental costs of demolition versus upgrade?	No. This would be a matter for consideration at the planning application stages in the event that proposals for demolition are brought forward following the masterplanning/SPD process.
	More houses will put pressure on local facilities such as schools, doctors surgeries, transport and other amenities	Noted, the provision of infrastructure and community services to support new and existing residents needs will be managed through the Infrastructure Delivery Plan.
	What will happen to the existing facilities on site? The hub, school, children's centre and Harmony Garden	
	Phase development so people can return to the estate after being decanted for a short time and the park is not needed.	Noted, implementation principals will be developed as more detailed plans come forward, but minimising disruption will be a consideration. Lordship Recreation Ground is to be excluded from the site allocation.
	Can car parking go underground so that there are ground floor dwellings? Would make it more welcoming.	This is a detailed design consideration that would be addressed through any masterplan and considered at detailed planning application stages having regard to development viability considerations.
	Concerns for what it means for people needing to move, their plans for their houses etc	Noted, the Council would engage with residents to ensure they are informed of what their options are.
	No explanation for why low rise houses are included in the zone i.e. Moira Close. Site also includes private freeholds on Lordship Lane.	The site allocation seeks to identify all those properties that may have a role to play in the delivery of the objectives of the site allocation.
	Use empty properties to rehouse people for temporary accommodation as you demolish and rebuild each block. i.e. Broadwater Lodge	Noted. This is a matter that extends beyond planning policy.
Limited support	In favour of demolition of Tangmere. Repairs are a problem and never end	Noted.
	Plans to demolish Tangmere should not be a Trojan horse for facilitating demolitions of other blocks.	Noted. The objective of the site allocation is to facilitate a masterplan/SPD in which future development options (including the future of Tangmere) are clearly identified.
<b>LORDSHIP RECREATION GROUND</b>		
Community	Want assurance building on park will only be	The Council's policy requires no net



objection	temporary if it has to happen.	loss of open space over the plan period. This does not rule out a reconfiguration of the open space. The site allocation is proposed to be amended to remove Lordship Recreation Ground.
	Objects to building on the park.	Noted. The site allocation is proposed to be amended to remove Lordship Recreation Ground.
	Threat to Lordship Rec will bring council into conflict with park users' organisations and all the funding bodies which have supported the regeneration	Noted. The site allocation is proposed to be amended to remove Lordship Recreation Ground.
	Building on Lordship Rec leaves little green space in an already built up and deficient area.	
	The football field is an essential facility for young people in Tottenham.	
	Park size will be substantially reduced with more people needing to access it.	The site allocation is proposed to be amended to remove Lordship Recreation Ground.
	Sets a dangerous precedent for other parks to be built on.	
	Council cannot make case for same size of park elsewhere as no empty space or that decreasing its size will not decrease its value as open space.	
	Green space is vital for people's health and well being	
	The park's size improves air quality and its configuration gives a sense of being in the country. The park should remain for people who spent years redeveloping it.	
	Access for visitors for events would be blocked by housing.	Noted. See above
	In terms of its importance in the landscape, the views from Lordship Lane to the south, and from the southern end of the Rec up to Lordship Lane are sightlines of key importance and beauty. This is the landscape on which Luke Howard observed and formulated his new names for clouds.	Noted. See above
	Loss of an award winning cherished amenity. Detrimental to Tottenham's residents.	
	Tottenham suffers from a range of social deprivations, all of which are ameliorated by the presence of the Recreation Ground, and all of which would be inclined to worsen significantly if such a large part of the Rec were to be lost to housing development.	
Valuable green space which should be left alone – or add a playground or other decent attraction in the		



	north	
	Effects of building in north of park on tower gardens residents, reduced access, separating park and estate having negative social and environmental costs	Noted. Consideration of the impacts of development on the south side of Lordship Lane on existing homes as a result of proposals brought forward under this site allocation will be assessed against the other policies (including the development management policies) in the Local Plan.
	Lordship Rec is linked with one of the first garden suburbs. Art deco period cottages and villas form a delightful mix which typifies the area.	
	Main gate is Lordship Lane gate. It is the ceremonial entrance and is of vital importance to the identity of the park.	Noted.
	Land around Moselle river is a flood plain and inappropriate to build on. Green land is required for flood defence	Noted.
	Lordship Rec is linked with one of the first garden suburbs. Art deco period cottages and villas form a delightful mix which typifies the area.	Noted,
Implementation issues	Development would have a detrimental effect on the biodiversity of the area.	Noted
	Deculverted Moselle brook is not included in the plan	Noted. The maps are drawn from OS. Reference will be made to this asset.
	Sport England is after clarification on what is proposed. Will resist allocation of any playing field site unless there is a robust assessment. Expect policy to be explicit on the need to retain in any playing field use and not prejudice the use of the existing playing field.	Noted. Playing pitches are to be removed from site allocation.
	Surface water flooding is an issue; too much open space has been paved. More pollutants in rivers and river more prone to flooding	Noted. This would be a matter for the masterplanning exercise to engage with to determine if any betterment is possible.
	Fix drainage problems if football field is to move into the park	Noted.
	Building on Lordship Rec will further reduce the quality of Moselle River and its watershed	Subject to proper management during construction, there is no evidence to support this conclusion.
Opportunities to optimise space	Rec has become the renewed focus for community activities, volunteering, recreation and engagement for residents	Noted.
	Some people will instinctively hate losing part of the Rec. That part of it is not heavily used even in the summer and it is a big space. Most people congregate around the hub in the south. Even if we lost some of it there would still be plenty of room for the Rec Festival in the autumn.	
	North area is used for events and is only area large	



	enough in Tottenham	
	Council is unable to provide full maintenance of the park, so it makes sense to use some of it for badly needed housing. Redesign of park could provide this. Also suggest redesign could make park and estate more connected without a road inhibiting access.	
	Replace the hedgerow at the Lordship Lane end of the rec.	

## Appendix D: Summary of Comments Received to the draft Tottenham AAP: Preferred Option consultation document

### AAP1-AAP2 & AAP5

	Summary of Comments Received	Proposed Response
AAP1	General comments regarding omissions, invalid links, maps, unfinished sentences and clarification of text used and statistics.	Minor edits made where suggested.
AAP2	Concern that a focus on development in central and south Tottenham means there will be a lack of investment for North Tottenham.	The North Tottenham site allocations (NT1 to NT5) set out what development may be expected in Northumberland Park. Commercial development is expected in the north of Tottenham as well as around Tottenham Hale and in south Tottenham. The new Tottenham Hotspurs stadium will be a catalyst for economic regeneration of the area, including the creation of an improved leisure based local centre.
AAP3	Master planning should be done in consultation with communities.	<b>Amend AAP1 to state that where appropriate master planning should be done in consultation with communities</b>
AAP4	Site allocations contradict general statements in the AAP such as that local independent traders will be supported	<b>Addition of information in the policies regarding how local businesses will be supported in the redevelopment of Tottenham.</b>
	<b>Affordable housing</b>	
AAP5	Affordable housing is not genuinely affordable. Target should be closer to 100%. There is no specific target for social housing. Only genuinely socially rented homes cater for lower income groups.	The Council is setting out a policy to maximise affordable housing in new developments, but this is constrained by viability, and the grants available to provide different types of affordable housing.
AAP6	AAP does not address causes of overcrowding – that private rents are so high people are forced to share to be able to afford total cost.	The Plan seeks to provide more housing to help meet overall housing need.
AAP7	No references to people renting and their needs for affordable rents and decent accommodation	Although there is no specific mention to tenants in the policy they are covered by references to the local community. However, the introductory text has been strengthened to outline that many residents in Tottenham are renting their properties.



		<b>Action: Addition of a paragraph under social demographics which outlines housing tenure within Tottenham</b>
AAP8	There should be no net loss of social housing.	<p>Some housing estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, and poor quality construction. It is, therefore, the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents.</p> <p>When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.</p>
AAP9	Challenge negative depiction of social housing concentrations in Tottenham. Level of social housing is low (only 30%) when it is the only genuinely affordable housing available and there is a London wide affordable housing crisis. People are being priced out by housing costs and the current council strategy will accelerate this. Rent controls could be brought back.	<p>The social housing stock is disproportionately located in Northumberland Park ward. One aim of the AAP is to rebalance levels of social, intermediate, and private stock across the borough to create mixed and balanced communities.</p> <p>Rent controls are outside the scope of planning (apart from affordable rent products through new developments)</p>
	<b>Housing</b>	
AAP10	North Tottenham residential blocks could have been refurbished. They do not need to be demolished	
AAP11	All developments should conform to Lifetime Neighbourhood principles.	The latest alterations to the London Plan propose removing references to Lifetime homes therefore it is not considered necessary to add in references to the AAP.
AAP12	What does a better mix of housing mean? If it means that the total number of social housing units would be reduced, that is a kick in the teeth for people who have been	<p>Noted. The policies outline that there will be no net loss of social housing by habitable room.</p> <p><b>Action: Clarify what is meant by a better mix of</b></p>



	waiting for a place for years.	<b>social housing.</b>
AAP13	The promise to re-house council tenants has not happened in other parts of London. They are not offered a decent alternative in the same locality.	Noted.
AAP14	Anyone displaced whether residential or commercial should be re-housed by the developer in the final site or nearby.	The Council will seek to meet the needs of any residents on housing renewal sites, however this is outside the scope of planning. Efforts will be made where possible to keep existing commercial operators within the borough.
AAP15	Complete decent homes programme	As outlined in paragraph 2.25 the Decent Homes programme is not always the best way to improve housing stock. This is because the programme can not deal with issues of estates which were poorly laid out and constrained in their ability to make further modifications.
AAP16	Compulsory purchase orders should not result in people being priced out of the area	Relocation will be supported where possible, but the CPO legislation allows for financial compensation so that businesses and residents can make their own decisions with regards where they are relocated.
AAP17	Disagree with demolition as a model for estate renewal. No demolition of sound houses in AAP site allocations	<p>Some housing estates are currently configured in such a way that means they experience issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, and poor quality construction. It is, therefore, the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents.</p> <p>When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.</p>
AAP18	Concerns leaseholders will be displaced because they won't be offered full value of their property.	In the case of any compulsory purchase order leaseholders are offered compensation based on the principle of equivalence. This means they will be no worse off in financial terms after acquisition, and no better off.
	<b>Heritage and character</b>	
AAP19	Failure to demonstrate Council's	Much of Tottenham is protected as conservation



	commitment to protect Tottenham's heritage and character	<p>area. Conservation areas can be designated for their special architectural interest that may derive from the setting or features provided by a collection of buildings and spaces.</p> <p><b>Actions:</b>  <b>Amend document to make it clear it is all listed buildings which should be protected.</b>  <b>Addition of information under Tottenham today regarding conservation areas and heritage buildings</b>  <b>Addition of a policy that outlines Haringey's heritage and the council's approach to conservation led development.</b></p>
AAP20	Identify archaeological priority areas within site allocations	<b>Action: Include site requirements stating that the site is in an archaeological priority area for all sites in such an area in both the AAP and site allocations document.</b>
AAP21	AAP is an opportunity to protect conservation led regeneration, encourage investment in historic environment and enhance heritage assets and their settings.	<b>Addition of a policy regarding conservation led development within Tottenham.</b>
AAP22	Opportunities to enhance cultural diversity of Tottenham rather than create another clone town.	<b>Addition of policy which sets out the need to enhance the existing cultural diversity and distinctiveness of Tottenham including its historic character.</b>
<b>Infrastructure provision</b>		
AAP23	How infrastructure will be paid for is not outlined. At least 20% of CIL should be spent on open space and 20% on youth services.	This is outside the scope of the Tottenham area action plan. Council will be undertaking a review of its CIL and will take these comments into account.
AAP24	Concerns about Spurs and their revised planning obligations.	Section 106 planning obligations for large developments are set out in the planning obligations supplementary planning document.
AAP25	Infrastructure to support new development has not been included e.g. education, health, community centres, sports pitches and specifically where new infrastructure will go has not been provided.	The provision of infrastructure including primary care facilities and new schools will be addressed through the infrastructure delivery plan.
<b>Consultation</b>		
AAP26	Issues with previous consultation such as soundings report and how the Strategic Framework has been included in the AAP	The strategic framework has been adopted by council and is not included in this consultation.
AAP27	Summarizing themes of 1.17 and 1.18 (previous consultation outcomes) describe well people's concerns. However AAP will exacerbate these instead of addressing them.	Council believes this AAP will help to address concerns outlined in 1.17. Consultation responses from the community will help to address this further. The objectives and policies are being updated to reflect better some of the concerns



		outlined in sections 1.17 and 1.18. It is considered that much of the existing document in particular the vision and site allocations addresses these concerns
AAP28	Concerns about consultation process including that there is no evidence that concerns from previous consultation has been included in document, numerous documents were released at the same time and that there was confusion about the end date for consultation.	Council fulfilled its statutory requirements for consultation. However, the Council is reviewing its statement of community involvement which will inform how consultation is undertaken in Haringey.
<b>Transport</b>		
AAP29	Make reference to existing projects i.e. cycle super highway and four tracking of West Anglia line	References to current and proposed infrastructure projects have been included.
AAP30	Clarification around cross rail 2 including time scale and make reference to consult the Crossrail 2 team for development nearby.	Amend references to cross rail 2 to make it clear that completion is around 2030 and benefits are in the longer term.
AAP31	Concerns regarding current pedestrian crossings.	Pedestrian crossings will be considered as public realm enhancements along the high street.  Addition of a new policy regarding transport including pedestrian priority
AAP32	Parking is already at a premium	All new developments will be subject to development management policies which manage the provision of car parking and transport for new developments.
<b>Regeneration</b>		
AAP33	Regeneration will cause gentrification displacing people from their homes and neighbourhoods. Development should not be at the expense of existing communities.	The vision for Tottenham is to manage development and regeneration of the area to ensure its transformation benefits existing as well as future residents.
AAP34	Mixed and balanced communities discriminate against local people on the basis of their economic status.	Some housing estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, and poor quality construction. It is, therefore, the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents.  When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects



		financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.
AAP35	The AAP will reinforce inequalities present across Tottenham rather than address them.	The Council is seeking to create a Plan that benefits all local residents.
AAP36	Housing estates should not be considered brownfield land.	The council's local plan definition of brownfield land can include housing estates as well as all other land with buildings on it.
AAP37	East already has highest population densities in the borough. Disagree that Tottenham can accommodate another 10,000 homes. Little development is proposed in the west of the borough.	It is considered Tottenham has the capacity to provide approximately 10,000 new homes due to the availability of developable strategic brownfield sites, its excellent transport connections, and the need for investment and change to bring about the regeneration needed within Tottenham.
AAP38	AAP does not consider stadium led development research which finds little contribution to the economy. New spurs development should not be presented a driver of economic development.	The London Assembly Report concludes that while there is "a lack of firm data about the economic impact of a stadium, our evidence indicates that stadium-led regeneration schemes can act as a catalyst for physical and social regeneration" (London Assembly, March 2015). Therefore it is considered appropriate to present the new Spurs stadium as a driver of economic development in Tottenham.
	<b>Green space</b>	
AAP39	Do not build on green space	Noted, there is a presumption against this in the DMDPD.
AAP40	Build on brownfield before open space	Agreed, this is in line with the NPPF.
AAP41	Opposition to green link, particularly crossing of Down Lane Park	Noted.
AAP42	Haringey is within an area which could benefit from green infrastructure provision.	Provision for green infrastructure in new developments is managed by development management policies DM29 – DM40.
AAP43	Access to Lea Valley Regional Park and vulnerability of special protection areas.	Council will work with Lee Valley Regional Authority on any proposals within or in the vicinity of Special Protection Areas to ensure development does not impact adversely on these sites. A habitat regulations assessment will be undertaken for this plan to assess the impact of the policies on SPAs.
AAP44	London Plan and DM26 provide that development adjacent to open space should protect and enhance the land. AAP does not offer this protection or enhancement.	Noted. The Tottenham area action plan has been developed to be in line with London Plan policy and the development management policies which provide this protection.
AAP45	Development on the edge of parkland would completely dominate the park	Noted. The development management policies provides for this situation by stating that development adjacent to open space should seek



		to protect and enhance the value and visual character of the open land (DM26)
	<b>Employment</b>	
AAP46	Affordable workspace to be included in Chapter 2	<b>addition of information regarding affordable workspace in chapter 2</b>
AAP47	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.	DM48 of the development management policies addresses the council's intention to retain in employment use any non-designated employment floorspace and sites. This will either require replacement, or protect existing employment floorspace.
AAP48	Jobs created should be quality, pay living wage, and have union involvement, and be earmarked for local people.	Apprenticeships are sought already through the Local Plan, and Planning Obligations SPD. Requirements regarding quality of job, and London Living Wage are outside of the scope of the AAP.
AAP49	Accessibility improvements in Tottenham should not lead to a mass conversion of employment land to residential	DM48 of the development management policies addresses the council's intention to retain in employment use any non-designated employment floorspace and sites
	<b>Development design</b>	
AAP50	Requirement for flood risk assessment for the whole of Tottenham AAP area.	<b>Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</b>
AAP51	Building design should encourage time and money to be spent in the area	Noted.
AAP52	Add references to deculverting in site allocations	<b>Ensure all sites which contain Stonebridge or Moselle brooks make reference to deculverting where possible.</b>
AAP53	Encourage use of green roofs.	The provision of green roofs is outlined under 'DM32 Living roofs and green walls' of the development management policies.
AAP54	Water supply and sewage infrastructure text to be added stating that capacity must be demonstrated for development.	Sewage capacity is covered by the development management policies. Water supply has been added to address this.
AAP55	Suggested building heights are too tall. Ground wind speed will detract from physical environment.	Design guidelines in the development management policies will help ensure that any adverse effects of tall buildings on the area are minimised/mitigated. The infrastructure delivery plan will address local amenities including where these should be located in Northumberland Park and Tottenham Hale.
AAP56	Support for the aspiration regarding Tottenham being a place of place of beauty and interest. However this will only be achieved if the poor condition of the environment and quality of new design is	All development will be assessed against the development management policies which seek a high level of design in all new developments.



	addressed.	
	<b>General information in document.</b>	
AAP57	Better articulation of the current state of Tottenham including the economy (relationship with local businesses, current initiatives, large employers, seven sisters market), housing tenure, heritage, faith, ethnic diversity of businesses	The description of Tottenham Today has been expanded to reflect better the current state of Tottenham. The economy section in particular has been expanded.
AAP58	Rewrite objective two to ensure small businesses, markets, affordable workspace, contribution of ethnic retailers, local business and community development groups are included and supported in the policies and objectives.	There will be emphasis added to the AAP in regards creating more, and more flexible, space for local businesses.
AAP59	Concerns regarding use of evidence base in particular environmental issues and opportunities have not been addressed	Addition of environmental challenges in the AAP.
AAP60	Highlight that there are two planning permissions for Wards Corner (paragraph 3.19)	This paragraph states that there will be new landmark buildings around the station as provided in various site allocations for seven sisters. It makes no specific mention of any buildings in particular and so it is not considered necessary to discuss the planning permission here. <b>Amend: "At Seven Sisters and West Green Road, new landmark buildings around the station will help communicate the area's significance as a vibrant district centre, a gateway into Tottenham, and a major transport hub"</b>

**SS1-SS6, TH1-TG3, BG1-BG4, and general comments on the Tottenham High Rd Area**

Ref	Summary of Comments Received	Proposed Response
	<b>Tottenham High Rd General</b>	
AAP61	Need to better recognise historical assets and show how development can enhance them/ their setting.	Agreed, more can be done in this regard, a piece of work exploring additional detail in this regard is underway.
AAP62	Concern that mixed use development including residential will erode employment potential	The Workspace Viability Assessment proves mix of uses is viable, and will ensure overall housing and employment need are met.
AAP63	Need to improve the vision for the area in the introduction to each character area.	Agreed.
	<b>TG1 (Tottenham Leisure Centre Car Park)</b>	
AAP64	Opposition to loss of open space on car park site	Noted, the continuing functioning of the Leisure Centre is a high priority. The
AAP65	Parking should be retained for users of the leisure centre.	



		site will be withdrawn while this issue is addressed.
AAP66	Concern that a 5-storey residential building would not be in keeping with the Conservation Area	It is considered that this scale of development is not inappropriate.
AAP67	Building would sever the Green from the library/leisure centre.	It is considered that legibility would be a key design consideration of any scheme, but that creating a new use while retaining legibility from the Green to the Leisure Centre is possible.
AAP68	Support for higher quality restaurant/café use on Phillip Lane.	Noted.
<b>TG2 (Tottenham Chances)</b>		
AAP69	Opposition to loss of Tottenham Chances	Community Facility will be reprovided on the site.
AAP70	Concern over loss of heritage asset, and view to surrounding listed buildings	Noted, assets will be protected where appropriate, and development will enhance existing assets
AAP71	Concern over 5 storeys	Datum will be taken from existing development, and UCS.
AAP72	Local desire for parking Vs TfL recommending car-free development	Due to the high public transport access, a car-free development would be supported.
<b>TG3 (Tottenham Police Station/ Reynardson Court)</b>		
AAP73	Objection to loss of affordable housing.	This development will not result in a loss of affordable housing (by habitable rooms).
AAP74	Local desire for parking Vs TfL recommending car-free development	Due to the high public transport access, a car-free development would be supported. Existing needs would be addressed through a masterplan on the site.
AAP75	Objection to removal of the Police Station from its current location	No removal of the Police Station unless reprovided locally.
<b>Seven Sisters Generally</b>		
AAP76	Support for a varied retail offer rather than large chain stores.	This issue will be managed through ensuring small footprints for retail units.
AAP77	Desire to ensure affordable retail premises in Seven Sisters.	
AAP78	Need to improve the vision for the area in the introduction to each character area.	Agreed.
AAP79	Objection to increase in retail floorspace.	Agreed, but additional other town centre uses may be



		suitable.
<b>SS1 (Lawrence Rd)</b>		
AAP80	Concern over heights on Lawrence Rd	Datum will be taken from existing development, and UCS.
AAP81	Opportunity to expand open space at north end of Lawrence Rd	Not required to expand, but SLOL designation can be granted.
AAP82	<b>SS2 (Gourley Triangle)</b>	
AAP83	Desire for affordable workspace to be provided.	Agreed.
AAP84	Note that the Stone Bridge Brook runs in a culvert under this site.	This will be picked up in an FRA and noted in the document.
<b>SS3 (Apex House)</b>		
AAP85	Concern over, and objection to, tall building at Apex House site.	The UCS recommends that this is a suitable location marking the Seven Sisters transport interchange.
AAP86	Need for this site to provide affordable housing.	All residential development will contribute to affordable housing targets.
AAP87	The site should make a contribution to the town centre	Noted, an active ground floors use will be required.
AAP88	Concern over the future of Seacole Court.	The allocation includes both sites to ensure any proposals that come forward are in conformity.
<b>SS4 (Helston Court)</b>		
AAP89	Objection from residents to development, including petition.	Noted, following discussions with the Council's regeneration teams, this site will not be considered for inclusion within this plan.
AAP90	Concern that decent homes money would be wasted if a redevelopment happens.	This is outside the scope of the Plan.
AAP91	Objection to loss of affordable housing.	Any redevelopment of housing stock would not be expected to result in a loss of affordable housing (by habitable rooms).
<b>SS5 (Wards Corner)</b>		
AAP92	Concern regarding loss of Seven Sisters Market	Re-state that a market will be reprovided on this site through any development.
AAP93	Desire to keep a Latin Market at the heart of Seven Sisters	
AAP94	Recommendation that potential for either extant permission to be brought forward is maintained.	Wording will be clarified in this regard.
AAP95	Provide a height limit.	The height limit will be determined through a detailed appraisal of design issues upon



		receipt of any future planning application.
AAP96	Recommendation that Apex House site should respond to both/either potential development at Wards Corner, but not vice-versa	Disagreed, both sites should enable one another to come forward.
<b>SS6 (Brunel Walk and Turner Avenue)</b>		
AAP97	Objection to loss of affordable housing.	This development will not result in a loss of affordable housing (by habitable rooms).
<b>Summary of Comments Received</b>		<b>Proposed Response</b>
<b>General</b>		
AAP98	Support for a varied retail offer rather than large chain stores.	This issue will be managed through ensuring small footprints for retail units.
AAP99	Need to improve the vision for the area in the introduction to each character area.	Agreed.
<b>BG1 Bruce Grove Snooker Hall and Banqueting Suite</b>		
AAP100	Concerns about loss of parking	This site is in a high-PTAL area, so car-free development is appropriate.
AAP101	The snooker hall (formerly a cinema) is locally listed and should not be demolished.	Noted, assets will be protected where appropriate, and development will enhance existing assets.
AAP102	Development should not be detrimental to the conservation area.	
AAP103	The site contains viable buildings and usage and should not be subject to site allocation.	Sites will be allocated for their optimum use, not their existing use.
<b>BG 2 Tottenham Delivery Office</b>		
AAP104	Creation of a road will improve access.	Noted.
AAP105	Concern regarding potential effect of development on Bruce Grove Wood.	Bruce Grove Wood will be re-confirmed as SLOL in the Local Plan.
AAP106	Object to loss of viable local businesses and services	Sites will be allocated for their optimum use, not their existing use.
AAP107	Concerns about demolition of 5 Bruce Grove	This is not happening.
AAP108	Development should be restricted to two storeys to prevent overlooking,	Datum will be taken from existing development, and UCS.
AAP109	Development should be mixed tenure and include social housing	All residential development will be expected to make a contribution to affordable housing.
AAP110	Although carless developments are preferred, Sperling Road already has a lack of parking due to people parking who do not live in the street.	Noted, Controlled Parking Zones will be considered separate from this plan.
AAP111	Need to address security concerns for residents affected by the new route including those with gardens which back on to the site.	Noted, development will be back-to-back in this part of the site.
<b>BG3 Bruce Grove Station</b>		



AAP112	Support for improvement to station	Noted.
AAP113	The attractive locally listed building should be unspoilt by development	Noted, assets will be protected where appropriate, and development will enhance existing assets
AAP114	Redesign should include wider pavement and improved public streetscape.	Agreed.
<b>BG4 Moorefield Road</b>		
AAP115	The Mems on site is regularly used and hope it remains on site	Sites will be allocated for their optimum use, not their existing use. It is considered that due to the proximity to Bruce Grove Station, a more intensive use is possible.
AAP116	Development should not impact on use of existing businesses nearby such as the cafe and community centre at 22 Moorefield Road.	Noted, DMDPD policies will have regard to neighbouring uses in new applications.
AAP117	4 storeys is too tall for the site.	Datum will be taken from existing development, and determined through a detailed design approach when a planning permission comes in.
AAP118	Loss of local employment. Modern flexible workspaces do not provide the sort of services currently provided.	It is considered that a redevelopment delivering increased job opportunities helps to meet the objectively identified employment target for the borough.
AAP119	The development should include mixed tenure and social housing.	All residential development will be expected to make a contribution to affordable housing.

**NT1-NT5 and North Tottenham general comments**

	<b>Summary of Comments Received</b>	<b>Proposed Response</b>
AAP120	Objection to redevelopment of estates which are considered to be in good condition	Creation of new housing to meet objectively identified needs on the Council's existing housing land is required to meet the strategic objectives of the Plan.
AAP121	Concern over loss of heritage assets on the High Rd, and consequential effect on the Conservation Area	Note that the overall public benefit of regeneration must be weighed against retention of heritage assets, and agree that new development should be designed to benefit the character of the Conservation Area.
AAP122	Desire from developers for greater retail prominence for the area, and more closely aligned with the football	The quantum of retail should be restricted to the proposed new



	stadium.	square linking the stadium and White Hart Lane Stadium to create a local centre most of the time, that complements other centres in the retail hierarchy.
AAP123	Objection to 21-35 Headcorn Road being included in the High Rd West area	Site boundary will be amended to remove these properties.
AAP124	Concern that local residents will be forced to move out of the area.	Noted that on Love Lane there is a residents charter, and that a paper concerning resident's options is being prepared by the Council's housing team.
AAP125	Concern about loss of local businesses from the area.	In order to meet housing and employment need, there is a requirement to locate higher density uses in higher accessibility locations. Alternative (lower-access) locations will be retained for local businesses to remain in the greater Tottenham area.
AAP126	Recommendation that the relationship between masterplanning document and the Local Plan are clarified.	Agreed, this will be set out clearly.
AAP127	Concern over loss of the Irish Centre.	Noted that the use will be reprovided, but potentially as part of a multi-functional facility.
AAP128	Local desire for public benefit, including through planning gain, is maximised in the development of the new stadium.	Noted.

**TH1-TH10 and Tottenham Hale general comments**

	<b>Summary of Comments Received</b>	<b>Proposed Response</b>
AAP129	Concern over discrepancies between the DCF and UCS, and hence principals upon which the AAP is based.	Agree text should be amended to state that the policy is based upon a range of evidence documents amongst which the UCS is one. The DCF will build on the UCS and can be evidence and an implementation tool to give additional detail to the AAP.
AAP130	Developer aspiration to have tall buildings on their site	The UCS and emerging Tall buildings study will inform the Policy. The DCF will continue as an example of how the policy requirements can be implemented.
AAP131	Opposition to number and clustering of tall buildings from local residents, including fear that a "wall" blocking the LVRP will be created.	
AAP132	Some sites do not have height guidelines	All sites will have the same level of detail in the next version.
AAP133	Opposition to towers along Watermead Way	This is not in the document.
AAP134	Concern over the changing nature of the area, from a	The allocation of Tottenham Hale as



	quiet residential area to something higher density	a Growth Area is supported by the Council's adopted Local Policy and Regional Policy.
AAP135	Concerns about the impact of the green link, and surrounding high density development on Down Lane Park and particularly children's play area	Down Lane Park forms part of the green grid, recognise that this needs to be optimised due to development coming forward. Children's Play is of critical importance, and quality of it will be improved through the development included in the AAP.
AAP136	Concern over impact of new development on the setting of the Lee Valley Regional Park.	Importance of Lea Valley Regional Park, improving connections, access, ecology quality, improving paddocks. Development would have to prove through evidence that the proposals will not adversely impact on ecology/ wildlife/ birds
AAP137	Support for improvement of the Paddocks	
AAP138	Concern with designation of Tottenham Hale as a District Centre and impact on Tottenham High Rd/Bruce Grove/ Seven Sisters' viability	The allocation of Tottenham Hale is supported by the Council's Retail and Town Centres Study, and is in accordance with adopted Local and Regional Policy.
AAP139	Lack of detail over the evening economy and what it's impact will be.	A Retail study is being commissioned to understand the preferred mix of uses in the new centre, and the impact it will have on surrounding centres.
AAP140	Discrepancy between text and District Centre boundary on TH3	TH3 (South Tottenham Employment Area) will be an employment area, not part of the new District Centre.
AAP141	Desire from landowner for Green Link to be centre of the district centre	The station will be the centre of the District Centre.
AAP142	Developers seeking to minimise employment on their sites	Noted, but it is important to establish a mix of uses.
AAP143	Concerns with loss of petrol station	Noted that convenience retail will be enhanced in the new District Centre, and that the petrol station is not consistent with high PTAL future
AAP144	Concern over new development's traffic impact, including calls for a comprehensive CPZ	Development will be as car-free as possible, which should reduce congestion overall. Controlled Parking Zones will be considered separate from this plan.
AAP145	Some support for employment uses, but desire requested for more residential from developers.	Development to provide a mix of uses to compliment the residential.



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		Whether in barges on waterway itself or ground floor. Standard employment matrix. Subject to viability
AAP146	Concern over Council's handling of previous applications.	Outside the scope of the Plan.
AAP147	Concern over development on green space of Monument Way, and loss of "buffer" between Chestnutts Estate and the road.	It is hoped that by introducing front doors onto the existing open space along Monument Way, passive surveillance may be increased, making the space safer.