

**Report for:** Cabinet, 20<sup>th</sup> October 2015

**Item number:** 12

**Title:** Haringey's Local Plan

**Report authorised by:** Lyn Garner, Director, Planning, Regeneration and Development

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**Ward(s) affected:** All

**Report for Key/**

**Non Key Decision:** Key Decision

## **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) and how the comments received have been addressed in preparing the final versions of each document (the pre-submission versions).
- 1.2 It seeks Cabinet's endorsement of the responses to the consultation submissions incorporated into the final draft documents and Cabinet's recommendation that Full Council authorise publication of the documents and submission to the Secretary of State for independent Examination in Public.
- 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 proactively 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 the need to plan for and manage infrastructure delivery; safeguarding heritage and green space; balancing housing delivery alongside retention of employment

land and employment opportunities; 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 The proposed Alterations to Haringey's Local Plan: Strategic Policies are 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.
- 2.4 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 of the borough receive support, and development at odds with the spatial strategy can be resisted.
- 2.5 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.
- 2.6 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 also reflects 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**

- A. Cabinet is asked to:
  - I. Note the comments of the Regulatory Committee at Paragraph at 6.7; and
  - II. Note and, if appropriate, comment on the comments received to consultation on the preferred option draft Local Plan documents (the draft Schedule of 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) and the Council's proposed response to these as set out in the Consultation Statements at Appendices B, D, F and H respectively of this report.
- B. Cabinet is asked to recommend to Full Council that it approve the following:

- I. The Schedule of Alterations to Haringey's Local Plan: Strategic Policies: Pre-submission version;
- II. The draft Development Management DPD: Pre-submission version;
- III. The draft Site Allocations DPD: Pre-submission version; and
- IV. The draft Tottenham Area Action Plan: Pre-submission version

(attached at Appendices A, C, E and G respectively), for publication and submission to the Secretary of State for independent Examination in Public.

#### **4. Reasons for decision**

- 4.1 These four planning policy documents are to form part of 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 influence and determine 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.
- 4.2 Publication and the submission of the Local Plan documents to the Secretary of State for Examination in Public is a statutory requirement in the process of preparing and adopting 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 and, where appropriate and justifiable, addressed through changes to the documents.
- 4.3 This will enable the pre-submission versions of the four documents to be reported to Full Council for its consideration and approval, in accordance with the timetable set out in the Council's adopted Local Development Scheme.

#### **5. Alternative options considered**

- 5.1 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.
- 5.2 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 a number of the existing Strategic Policies out-of-date, and 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 a viable alternative.

- 5.3 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.
- 5.4 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 within 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.

## **6. Background information**

### Consultation

- 6.1 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.
- 6.2 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:
- a. Notification by letter/e-mail on 9 February to over 1,200 individuals and organisations already registered on the planning consultation database;
  - b. A reminder e-mail sent to those on the database on 14 March;
  - c. Notification letters to all landowners and occupiers within the boundary of sites proposed for allocation;
  - d. Public notice placed in the local newspaper on 12 February;
  - e. 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 River Park House, and on the Council's website.
- 6.3 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:
- Turner Avenue Steering Group (22 Jan)
  - Park Grove and Durnsford 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)

6.4 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.

6.5 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 was recently out for public 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 end of the year.

#### Comments Made and Council's Response

6.6 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 responded to each within the Consultation Statements set out at Appendices B, D, F and H of this report.

### Regulatory Committee

- 6.7 At its meeting of 21<sup>st</sup> September, the Regulatory Committee considered the responses received to consultation on the four draft Local Plan documents and Council's proposed response to these. The members noted their support for the removal of the Lordship Recreation Ground from the site allocation for Broadwater Farm and likewise the removal of part of the Finsbury Park Metropolitan Open Land from the Rowans site allocation, the latter being included to improve access through the site into the Park. Members sought clarification on how recent changes to the definition of Travellers would impact on the need for further provision, where it was confirmed that resurveying would be required to finalise the Assessment Study and that existing Traveller sites would still need re-provision if subject to redevelopment.
- 6.8 Members also sought assurance that the inclusion of sites within the Site Allocations SPD did not presuppose the award of planning permission. Officers confirmed that inclusion did not confer any planning consent but did set out clear aspirations for sites. Planning Committee would have to have regard to the Local Plans when determining planning applications coming forward. Lastly, Members asked that the definition of affordable housing, and therein, terms such as social housing, be clearly set out in the glossary.
- 6.9 Having considered the comments received to the draft Local Plan documents the Committee recommended that the four revised Local Plan be forwarded on to Cabinet to approve before proceeding to Full Council.
- 6.10 Below is a summary of the main comments received to each document and how these have been taken into account in preparing the pre-submission version. A brief overview of the purpose of each planning document is also provided.

### Schedule of Alterations to the Strategic Policies DPD

#### *Purpose*

- 6.11 The purpose of the Strategic Policies DPD is to set out the long term vision of how Haringey, and the places within it, should develop by 2026 and to set out the Council's strategy for achieving that vision. In particular, it identifies the broad locations for delivering housing and other strategic development needs such as employment, retail, leisure, community facilities and other land uses. It also sets the context for the other policy documents that make up the Haringey Local Plan.

#### *Consultation responses*

- 6.12 The proposed alterations to the Strategic Policies DPD elicited 52 representations (19 from local residents; 9 from local residents associations and interest groups; 11 from agents on behalf of landowners; and 9 from statutory



bodies or NGOs). In all, 209 individual comments were made and have been taken into consideration in further amending the Schedule.

### *Main Issues Raised*

- 6.13 In respect of the alterations to Strategic Policy SP1: Managing Growth, a large number of comments (24) were received on the **uplift in housing growth** that needs to be managed within the Borough as a result of the updated London Plan (2015). Those representing the development industry and landowners, as well as the statutory bodies, welcomed the fact that the Council had chosen to undertake a partial review of its Strategic Policies DPD to take account of the new housing figure. Conversely, a number of local residents and resident groups were concerned with the ability of the borough to accommodate and manage an additional 19,800 net new homes between 2011 - 2026, and the impact of such growth on infrastructure, amenity, open spaces and the character of the borough. Most requested that the Council reduce this figure.
- 6.14 Unfortunately, the opportunity to challenge Haringey's uplift to its strategic housing requirement was through the consultation and examination into the Further Alterations to the London Plan in 2014. Having now been adopted, the borough housing figures in the 2015 London Plan are a key tenet of the regional spatial strategy for the Capital, and Haringey's Local Plan must give effect to this to be considered 'sound'. As there was no scope to reduce the housing figure, no changes were made in response to the representations received. However, in responding to residents' concerns, attention was drawn to the policy requirements in the other DPDs which seek to ensure adverse impacts from development are avoided or mitigated; that new development is of high quality; and makes a significant contribution to improving the quality of the place and the local environment, as well as to residents wellbeing through delivery of community benefits. It was also noted that the Site Allocations DPD and Tottenham AAP, allocate sufficient sites with capacity to accommodate all of the growth planned, and as part of finalising the Schedule of Alterations, the Council is refreshing its Infrastructure Delivery Plan.
- 6.15 In addition to the amount of growth, several respondents raised concerns with **the spatial distribution**. In particular, that the ability of Tottenham to accommodate an additional 10,000 homes was unrealistic and potentially harmful to the character and environment of the area, and would exacerbate existing problems such as over-crowding and deficiencies in existing infrastructure serving the area.
- 6.16 In response, it was noted that both Tottenham and Haringey Heartland/Wood Green were identified in the 2013 Strategic Policies DPD as areas that can accommodate significant growth & change and have the capacity to do so. These areas are to benefit from significant inwards investment, delivering new jobs, better transports links, and new and improved social infrastructure. As a percentage of land area, growth areas represent a relatively small portion of the borough, the vast majority of existing communities will not be subject to significant change, including communities within Tottenham, and local planning policies are in place to preserve existing character, especially that of value to the local community. It was also noted that the new housing is required to meet local housing needs to address matters such as over-crowding. Without new

housing provision, such issues will remain and are likely to worsen. No changes were therefore proposed to the Alterations as a result of these comments.

- 6.17 The vast bulk of comments received were made in respect of the Alterations to Strategic Policy SP2: Housing. In particular, the key issue raised was in respect of the policies on **affordable housing**. Firstly, there was opposition from local residents and community groups to **reducing the strategic affordable housing target from 50% to 40%**. Most considered affordable housing to be an essential component to maintaining community life, enabling low income households to continue to live in Haringey and contributing to the vibrant and diverse communities that exist. While the development industry broadly supported the reduction, the reason why the affordable housing target has to be reduced remains the fact that current evidence on development viability does not support the retention of the 50% target.
- 6.18 Related to the above, were concerns regarding the **affordability of the affordable housing** to be secured. Most respondents consider 'affordable rent', which can be up to 80% market rent, to not be affordable in a Haringey context. Several respondents requested that social rented affordable housing be prioritised through the policy. In response, it was noted that, while the definition of affordable housing includes both 'affordable rent' and 'social rent', it is only the former that can attract grant. While the Council can negotiate provision of 'social rent', the absence of grant and rents at up to 80% impacts significantly on viability and would result in significantly less affordable housing being secured. It is therefore a trade-off between the level of affordability and the amount of affordable housing to be secured. The revised target of 40% is predicated on securing 'affordable rent and intermediate housing'. If this was to be re-orientated to securing 'social rent', this target would need to be drastically reduced further, which the Council considers unacceptable. Further amendments were therefore made to more clearly set out the definition of 'affordable housing' in the glossary and officers have reviewed all four documents to ensure the affordable housing terminology used across the Local Plan is correct and consistent.
- 6.19 As part of the proposed Alterations, the Council had consulted on whether or not the existing policy seeking an **affordable housing contribution from small development schemes** should be withdrawn in light of a ministerial statement stating that small scheme should be effectively exempt from an affordable housing obligation. The Council had maintained that the existing policy, having been subject to consultation and Examination in Public and, through that process, been found to comply with national policy, should remain in effect. The Council's position was supported by local resident groups but the development industry pushed for its removal on the basis that the ministerial statement was to have the status of planning policy. However, since publication of the proposed alterations, the policy status of the Government's ministerial statement has been successfully challenged in the courts and the policy on not seeking affordable housing from small developers on schemes of 10 or less units has been quashed. Although it should be noted that the Government has been given permission by the Court of Appeal to challenge the High Court's quashing. The Council will need to await the outcome of an appeal but in the interim, the extant policy has been retained unchanged having already been



subject to consultation and Examination in Public, and found to be consistent with the NPPF.

- 6.20 The other key issue that drew significant response and opposition was to the addition of a policy addressing **housing estate renewal**. In particular, there was concern that renewal would result in a significant loss of social rented council housing, privatisation, higher densities impacting on residential amenity, and that there was no clear provision for existing council tenants; specifically no clear information as to whether existing tenants would be offered their tenancy back and/or have the same/similar conditions in regards to their tenancy should they be offered a tenancy. It was felt that these estates should be improved through the Decent Homes programme, and that, if estates were subject to renewal, there should be no net loss of social housing, with tenants offered similar terms as existing.
- 6.21 In response it was noted that the plan does not propose a reduction in the total social rented housing stock as a result of estate renewal. Where estate renewal takes place, the total existing social rented floorspace will be replaced but the opportunity will be given to changing the housing mix, so that the new social rented housing might best meet current local housing needs (i.e. replacing 1 & 2 bedroom social rented homes with 3 or 4+ bed family social rented housing). This may result in a reduced amount of total social homes but should ensure the housing better meets the acute housing needs of the Borough. Replacement with higher density development would only be acceptable where it was proposed to improve the public transport accessibility of the site or where existing densities were significantly below what could be achieved on the site through application of the London Plan density matrix.
- 6.22 It was also noted that the approach to consulting with and engaging, existing residents in any development proposal on these sites will be set out in the Council's Housing Strategy. Further amendments were therefore made to provide clarification to the outcomes sought by estate renewal and to introduce better linkages with the Council's Housing Strategy, which sets out Council's overall proposals for effectively managing its housing stock and the engagement to be undertaken with existing residents.
- 6.23 Comments were also received to the alteration to Strategic Policy 8 and, therein, to the **projections for employment land demand** for B Class uses (Business, Light Industrial, General Industrial, and Storage & Distribution). The alteration responded to the findings of the Haringey Employment Land Study (2015), which projected a decrease in the forecast demand of new industrial floorspace from 137,000 m<sup>2</sup> to 23,000m<sup>2</sup>. The responses perceived this change to mean a loss of employment space and existing businesses, while others queried whether it was counterproductive to reduce the ambition for new employment floorspace at a time when Haringey's population and economy is projected to grow so rapidly, by the London Plan at least.
- 6.24 In response, it was clarified that the figure of 23,000m<sup>2</sup> still represented a demand for additional employment floorspace, above that already provided across the Borough. The updated evidence base therefore continues to support the strategic policy to safeguard existing employment floorspace for employment uses. It was also noted that, floorspace in B8 uses (Storage and

Distribution) will need to be reconfigured over the plan period to meet projected demand for B1a/b (Office and Business floorspace). This change in employment needs is to be realised through reclassification of certain industrial estates to Local Employment Regeneration Areas, providing for employment-led mixed use development that intensifies the employment use of sites, delivering greater job opportunities and job densities.

### Development Management Policies DPD (DMDPD)

- 6.25 This document introduces a set of detailed planning policies which give effect to the Spatial vision for the borough. The DMDPD updates local thematic planning policies for the borough, superseding the 2006 Unitary Development Plan, and a suite of Supplementary Planning Documents and Guidance notes. It will be used in the determination of planning applications in the borough. There are five main chapters in the document, each providing a set of policies covering the topics of Development and Design, Housing, Environmental Sustainability, Employment and the Economy, and Community Infrastructure.

#### *Consultation responses*

- 6.26 In total 148 respondents made representations to the draft Development Management Policies DPD, which contained 749 individual comments. The highest numbers of representations were received to DM51, the Warehouse Living policy with 66 respondents making 196 comments. The next most popular topic was DM26 Open Space with 17 respondents and 32 comments and DM5 Tall Buildings with 22 respondents and 37 comments. The other development management policies generally received up to 27 comments only.

#### *Main Issues Raised*

- 6.27 Comments to **DM1 (Delivering high quality design)** and **DM2 (Design standards and quality of life)** noted that the plan does not include specific guidelines for backland sites. The London Plan provides that boroughs can include such policies within their Local Plans where this is justified by local evidence. The plan has therefore been amended to include a new DM policy on a presumption against garden land development.
- 6.28 There were several comments stating that **DM2 (Design standards and quality of life)** was ambiguous on the protection of amenity, particularly in respect of appropriate levels of daylight and sunlight. The Council's does not intend to set specific standards in this regard as proposals should be considered on a case by case basis. However the supporting text has been updated to refer to good practice guidance that the Council will encourage proposals to have regard to.
- 6.29 Some consultees disagreed with findings of Urban Characterisation Study (UCS). There was particular concern that this evidence would inform the setting of building heights and densities. The UCS applied a consistent methodology to set baseline evidence informing the Local Plan's production, however, character

is but one consideration in determining the appropriate height and density for new development.

- 6.30 There were several objections to the proposed building separation distances in **DM3 (Privacy and protection from overlooking)**. It was argued the policy is overly prescriptive and not deliverable. The policy has been amended to allow a more flexible approach on a case by case basis whilst ensuring a robust basis to ensure amenity is protected from overlooking.
- 6.31 It was suggested that there should be a policy confirming the Council's commitment to Rights to Light on Council estates. Rights to Light are considered through specific legislation separate to the Local Plan. However the DM Policies address day lighting as part of considerations on amenity and layout.
- 6.32 There were a various objections to Policy **DM5 (Siting and design of tall buildings)** and the corresponding Map 2.2. Several consultees argued the policy was too prescriptive, putting a ceiling on building heights and limiting the full development potential of sites. Others expressed concern that the policy would allow the development and clustering of tall buildings across the borough, with adverse impacts on amenity and local character. Some respondents suggested Haringey is not a suitable location for tall buildings.
- 6.33 It is considered that the policy sets a positive framework for managing tall buildings in line with the London Plan. The policy has however been refined to set requirements on proposals for 'tall' as well as 'large' buildings, drawing on baseline from UCS and new technical evidence that will form the basis for a future Tall Buildings Supplementary Planning Document (SPD). The policy and SPD will provide a framework for considering appropriate building heights on a case specific basis having regard to site circumstances and the wider context.
- 6.34 Consultees stated that the Council should clarify the definition of tall buildings. 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. The plan has been amended to reflect this definition consistently throughout.
- 6.35 It was noted that a number of views are included in Conservation Area Management Plans (CAMPs), which are not set out in **DM6 (Locally important views and vistas)** and the corresponding map, and that these should be considered as locally important. The Council notes that not all views within CAMPs were picked up by Urban Characterisation Study and reflected in the map. The policy has been revised to require applications to consider views which are identified in the USC as well as CAMPs.
- 6.36 Some consultees suggested several additional views to be included in the plan. These views require consideration and assessment using the LVMG methodology through an additional evidence base study. Those views that meet the criteria will be promoted for inclusion in any subsequent future update to the plan.

- 6.37 It was noted that **DM7 (Shopfronts, signage and on-street dining)** and **DM8 (Advertisements)** exceed the criteria permitted in the TCP (Control of Advertisements) (England) Regulations 2007 and the advice in national policy and guidance. The DM policies have been revised to be in line with the Regulation and national policy and guidance.
- 6.38 Transport for London noted that it imposes requirements on advertisement boards on the Transport for London Road Network (TLRN). The supporting text to Policy DM8 has therefore been amended to signpost TLRN requirements.
- 6.39 It was suggested that the approach in Policy DM8 on advertisements is overly restrictive and entirely negative in its view on how advertisements contribute to public realm. The proposed policy is considered to provide sufficient basis for controlling this type of development.
- 6.40 Consultees suggested that the wording of **DM9 (Telecommunications)** is ambiguous, potentially overly restrictive on telecoms equipment and not fully supportive of the role of telecoms in supporting sustainable economic development. The Council agrees and the policy has been amended to require that apparatus are limited to the minimum necessary for operational requirements. In addition, DM9 has also been updated to reflect the Council's support for telecoms in delivering economic development.
- 6.41 Consultees stated that **DM10 (Waste management for all development)** needs sufficient flexibility to respond to waste collection arrangements which may change over the course of the plan. However, the policy is considered sufficiently flexible to enable the waste collection authority to change its collection arrangements if required.
- 6.42 There were suggestions for an additional policy for refuse storage in conversions. It was considered that too often there is not enough space in the front amenity areas to accommodate bins. The policy will apply to all development proposals including conversions. Further DM policies will ensure new development is designed to respond to local character and protect amenity.
- 6.43 Following suggestion from consultees, detailed requirements have now been set for flatted development to ensure that there is appropriate provision for waste management and recycling facilities.
- 6.44 Consultees challenged the soundness of the policies on heritage and conservation: **DM12 (Management of the historic environment)**, **DM13 (Heritage led regeneration)**, **DM14 (Facade retention)**, and **DM15 (Archaeology)** on the basis that they are not fully consistent with national policy. The full suite of policies has been reviewed in light of these representations and the plan updated to ensure it is consistent with the statutory requirements, the NPPF and current case law. In particular, ensuring the policies appropriately reflect considerations for heritage assets and their setting, the statutory tests for loss or substantial harm to heritage assets, and considerations for enabling development.

- 6.45 Consultees stated that the cumulative loss of architectural features should be limited if not stopped altogether in all areas in the borough. 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.
- 6.46 It was noted that policy **DM14 (Facade retention)** appears to relate to all buildings regardless of whether they are heritage assets. Following a review of the heritage section, the DM14 has been deleted and its key principles merged with the revised policies. The plan has been amended to clarify the approach applies to buildings where the facade concerns a heritage asset or its setting.
- 6.47 It was suggested that **DM17 (Housing mix)** did not meet the flexibility tests within the NPPF. In particular, it was felt that there should not be restrictions on housing mix as this could create delivery problems, and the policy should therefore include a caveat related to viability. The Council's view is that consideration of viability is inherent across the whole Local Plan whilst it is not referred to in every policy. This does not mean the policy does not meet the flexibility tests within the NPPF.
- 6.48 There were objections to **DM17c** which is considered to be overly restrictive on proposals made up exclusively of 1 and 2 bedroom units. It was argued the policy does not give sufficient weight to site constraints, scheme viability and housing market demand. 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 with the NPPF, in that it will ensure housing needs are met through the provision of a range of housing types and sizes.
- 6.49 It was noted that the 2014 SHMA sets out a shortfall of 1 and 2 bed units, and therefore consultees suggested that 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. The Council considers that DM17c has flexibility to enable such schemes to come forward where they contribute to mixed and balanced communities. The policy approach to meeting 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.
- 6.50 Respondents suggested the word 'affordable' is misleading as it cannot be equated with 'social'. The Council notes that DM17 applies the Government's definition of affordable housing and it is not within the remit of the Local Plan to amend this definition.
- 6.51 Consultees stated that the Local Plan should guarantee no net loss of social housing units and no displacement of existing tenants as part of any plan for estate renewal. The policy for the re-provision of existing council housing is set out in **Strategic Policy SP2** and **DM19 (Affordable Housing)**.
- 6.52 It was suggested that the key consideration for housing should not be density but of residential quality of proposed development, local context and the place it will create. Further, that the Council should not apply the London Plan density matrix prescriptively. The policy recognises the density matrix is but that this is



only 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.

- 6.53 There were comments stating that the internal space standards are too small. In response the Council confirmed that it will continue to apply the London Plan internal space standards, which are recommended minimum standards. These are consistent and acceptable standards applicable across the Capital.
- 6.54 It was suggested that the 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.
- 6.55 Respondents suggested that the Council should develop local standards for play space. In response it was confirmed that the Council will continue to apply the play space standards set in the London Plan Supplementary Planning Guidance, which are considered appropriate for the borough and exceed our old standard of 3m<sup>2</sup> per child set out in the Open Space and Recreational Standards SPG.
- 6.56 Consultation comments suggested that 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. Council's expectations for community engagement in pre-application discussions are set out in the Statement of Community Involvement, which has recently been updated and subject to public comment.
- 6.57 There were concerns that the policy supporting residential extensions will lead to a loss of garden land. In response to these concerns, the Local Plan will include a new DM policy on a presumption against garden land development.
- 6.58 Comment was received that the target of 10% of the total new homes to be wheelchair accessible should be raised to 20%. The Council confirmed that it would continue to apply London Plan policy in this respect. Requirements may however, be subject to change following the Government's transfer of accessibility standards from planning policy to the Building Regulations.
- 6.59 Some consultees objected to the methodology on viability assessments for affordable housing set out in **DM19 (Affordable Housing)**, suggesting that the Council should consider other assessment models (e.g. developer's return value or market value approach). In line with the London Plan's approach, the Council considers that existing / alternative use value is the appropriate benchmark approach for 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 on the current planning land use designation applying to the land.
- 6.60 Respondents stated that the 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 by the Government, against the judgement, has been made. Council will monitor the position over the coming months. For now the policy remains extant and consistent with the NPPF.

- 6.61 There was opposition to the reduction in the affordable housing requirement for development above 10 units from 50% to 40%, with some suggesting that 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’s examination process.
- 6.62 Some consultees stated that the Local Plan should set a separate and clear percentage for social rented housing 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.
- 6.63 In respect of policy **DM20 (Self-build and custom build housing)** a definition of self-build housing has been added to glossary following consultees’ suggestions.
- 6.64 On **DM21 (Specialist housing)**, there were objections to the requirement for all student accommodation proposals to be made available for occupation by members of a specified educational institution(s). The Council considers the policy is in conformity with the London Plan. However, the policy has been revised to clarify that proposals must meet identified needs for student bed spaces.
- 6.65 It was considered by some respondents that 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.
- 6.66 Some consultees suggested that **DM22 (Residential conversions)** should include a gross original floorspace threshold as required for dwellings outside the Family Housing Protection Zone (FHPZ). Policy DM22.B would allow smaller family homes to be converted in the FHPZ, which is not believed to be the intention of the policy. Policy DM22 (b) does include a gross original floorspace threshold as requirement. Outside the FHPZ, the application of the internal space standard will ensure residential conversions result in unacceptable size dwellings and resist over-development.
- 6.67 It was stated that **DM23 (Houses in Multiple Occupation)** 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) reflects the Council commitment to high quality housing for everyone.

- 6.68 It was suggested that the Council, with proposed Policy **DM24 (Basement development and light wells)** should adopt basement policies modelled on those in Kensington and Chelsea and that which Camden is preparing. The Council has therefore made amendments to the Policy to ensure it aligns with Kensington & Chelsea's and Camden's basement policies, as applicable to local circumstances.
- 6.69 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.
- 6.70 **DM25 (Nature conservation)** was considered to have too much emphasis on mitigation. Respondents wanted the focus to be on protection and enhancement of biodiversity in first instance. The Local Plan is clear that priority is for the protection and enhancement of nature assets however, the policy has been revised to provide more detailed guidance on how proposals should respond to this requirement, along with further criteria for mitigation. It was also considered that the Policy was not supported by up-to-date evidence. Haringey's Open Space and Biodiversity study was completed in 2015 and is therefore up-to-date. Findings of an emerging Playing Pitch Strategy will be considered for potential policy implications and taken into account in any subsequent review of the Plan.
- 6.71 Developers thought **DM 26 (Open Space)** to be too restrictive in requiring assessments to justify the loss of undesignated open space. The policy has therefore been amended in light of these comments to clarify the requirement is for designated open space and non-designated where these are or have been recently used for sports or recreation purposes.
- 6.72 It was also considered that the wording in DM26a, on development proposals resulting in loss of open space, was ambiguous. The policy wording has therefore been amended to bring it in line with NPPF (paragraph 74).
- 6.73 Part (d) of Policy DM26 was also considered by some to be 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 placing a definition of this in the glossary. 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. Respondents also felt that the policy should introduce more flexibility to allow for enhancements to educational facilities, such as ancillary facilities for sport, which is a vital part of national curriculum. It was felt that the policy was sufficiently flexible to allow new or enhanced ancillary uses for sport, where these can be justified, irrespective of whether they are linked to education facilities.

- 6.74 The requirement for all new development to provide open space or make financial contributions was not considered consistent with national policy by a number of respondents. The requirement has therefore been 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. In time, the Council may wish to use its CIL receipts toward the provision and improvement in strategic green infrastructure, but would need to amend its current CIL Regulation 123 list to do so. On-site open space will be sought, either by planning obligations or condition, especially on major sites in areas of open space deficiency.
- 6.75 Concern was raised that **some site allocations contradict DM26e**. Where development is proposed for an allocated site, its design will be considered against Policy DM26. 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 the Local Plan approach is to seek to improve access to and quality of existing open space.
- 6.76 Other concerns included that DM26 would preclude the installation of small serviced mooring bollards/posts along the River Lee Navigation and that there was not adequate definition or justification supporting the designation of SLOL. The policy already allows for ancillary uses of the open space, which includes the Blue Ribbon Network. 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.
- 6.77 A final concern raised in respect of **Policy DM26 (Open Space)** was that no consideration was 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 in terms of accessibility, usability and quality. The policy clarifies that there should be no encroachment on or at edges of parks and open spaces.
- 6.78 The policy on establishing a Haringey Green Grid **DM27 (Green Grid)** only gave rise to concerns with impacts from proposals promoting the use of Lee Valley Regional Park for leisure use. Parts of park are European protected sites and therefore are unlikely to be consistent with a wide range of more active leisure uses. Council noted that the Local Plan will be subject to Habitats Regulations Assessment to ensure there are no unacceptable adverse impacts on European sites from the amount and location of growth promoted through the Plan. Individual applications will consider impact upon protected sites/habitats/species. The final say on acceptable uses within the Regional Park sits with the Lea Valley Regional Park Authority.
- 6.79 Concern that **DM28 (Allowable solutions)** does not conform to the new national framework on allowable solutions. The Policy has therefore been amended to focus only on local carbon offset fund rather than allowable solutions.

- 6.80 No major issues were raised in respect of **DM29 (Sustainable refurbishment and retrofitting)**, so the policy remains unchanged.
- 6.81 **DM30 (Decentralised energy)** was not considered to be sufficiently flexible to ensure that development comes forward in a timely and viable manner. Amendments have been made to clarify that requirements are subject to technical feasibility and financial viability. The Council cannot require all major development located near a Decentralised Energy Network to connect that network. DM30 has therefore been amended to 'expect developers to prioritise connection to' rather than 'require', bring it into line with London Plan.
- 6.82 No major issues were raised in respect of **DM31 (Overheating and cooling)**, **DM32 (Living roofs and green walls)**, **DM33 (Improving the sustainability of heritage assets)**, and **DM34 (Environmental protection)**, so these policies remain unchanged.
- 6.83 Comments received noted that the NPPF sets out when a Flood Risk Assessment (FRA) will be required. **DM36 (Flood risk assessment)** is not an essential policy to have in its own right. DM36 merged with **DM35 (Managing and reducing flood risk)** along with signpost to NPPF requirements on FRA. Others considered that DM35 should be strengthened to ensure that adequate flood plain compensation is provided. The Policy has been amended to require that flood storage is provided on-site and only off-site if this cannot be practically achieved. Some allocated sites are not included in the Strategic Flood Risk Assessment (SFRA). SFRA will be revisited to ensure all allocated sites are included. The Sequential Test has been revised to clarify requirements for FRA, and therein, to confirm Flood Zones within sites and consider allocated sites in Flood Zone 2 for highly vulnerable uses. The sequential test will be revisited as recommended.
- 6.84 It was considered that **DM37 (Sustainable drainage systems)**, could be strengthened to ensure surface water run-off rates are reduced as much as possible. The policy has been 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.
- 6.85 No major issues raised were raised in respect of **DM38 (Critical drainage areas)** and **DM39 (Protecting and improving groundwater quality and quantity)** which remain largely unaltered.
- 6.86 Respondents considered that **DM40 (Watercourses and flood defences)** should require applicants to provide justification if they cannot implement river restoration measures where appropriate. The Policy has therefore been amended as suggested. It was also felt there should be stronger emphasis on improving watercourses in terms of ecology and the Water Framework Directive. DM40 has been amended to include further requirements for improving water quality.
- 6.87 It was considered that policy **DM41 (Drainage connections and waste water)** should clarify requirements between foul and surface water management. The Policy has been amended to focus only on requirements for managing foul



- water disposal. Surface water management is adequately covered by other DM policies.
- 6.88 It was recommended that the plan should address need for adequate provision of water supply and sewerage/wastewater infrastructure. The scope of Policy DM41 has therefore been broadened to include provision of water supply with a further requirement to consult Thames Water on identified site allocation proposals.
- 6.89 With respect to **DM42 (Sustainable transport)** it was suggested that the 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.
- 6.90 It was recommended that policy **DM43 (Parking)** 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 other local needs.
- 6.91 It was also felt that 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 (Crossovers and vehicle access)** and Policy **DM45 (Driveways and front gardens)** 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 should be managed through the Highways Act.
- 6.92 It was raised that there is a need for an effective substitute for SPG1b – Parking in Front Gardens. SPG1b was non-adopted guidance and has been replaced by Permitted Development rights. Policy DM45 supports retaining at least 50% of front gardens as landscaping where planning permission is required. TfL requested that the Policy state that proposals for crossovers on the TfL Road Network will require approval TfL as well as by the borough. The Policy has been amended as suggested. Further, it was considered that the Policy wording is misleading and should be clarified to ensure effective implementation. DM45 was therefore amended as follows: The Council will only permit parking on front gardens where a minimum of 50% of existing soft landscaping area is being retained.
- 6.93 No major issues were raised to policies **DM46 (Cycle storage in front gardens)** and **DM47 (Mini cab offices)**, which remain unchanged.
- 6.94 Developers sought to have **DM48 (Safeguarding employment land and sites)** either removed or watered down; as they considered non-designated employment sites should be made available for redevelopment to other land uses. There was also a perceived inconsistency between the evidence in the Employment Land Study (ELS) (2015) and the Policy about the need to provide opportunities for redevelopment on some non-designated employment sites. In light of the comments, DM48 has been deleted. The opportunities for

redevelopment of non-designated employment sites, and requirements for protection, are set out in **DM50 (Facilitating site regeneration and renewal)**.

- 6.95 Concerns were raised that Policy **DM49 (Maximising the use of employment land and sites)** is ambiguous about “maximising employment floorspace”. The 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. The Policy has been amended to confirm the starting point is a presumption in favour of replacement employment floorspace. There were also concerns that old stock is being unnecessarily lost, and that it is ambiguous whether this policy protects designated and/or non-designated employment sites. Clarification has been added that this policy only protects designated employment-only (i.e. not Regeneration Areas) sites in line with their designated purpose.
- 6.96 There was opposition to **DM50 (Facilitating site regeneration and renewal)**, in particular the targets for employment as part of a scheme (i.e. 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. Concern that affordable commercial rents could render schemes unviable. It is recognised that affordable rents need to be defined; however affordable workspace is required to support local economic growth. Developers want PTAL3 sites to be considered suitable for mixed use development. The 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.
- 6.97 Policy **DM51 (Warehouse Living)** gave rise to concerns over opening up railway arch at Ashfield Rd, which forms part of the proposal for site allocation for **Arena Design centre (SA34)**. At this site, increased accessibility is essential to enabling the full potential of the area to be realised and connecting the area to the strategic cycling/walking routes.
- 6.98 The Warehouse community consider organic growth to be a good thing, are strongly anti comprehensive redevelopment and new build. While this is noted, provision for retention of the creative community is made for in the Plan, but the view is that inaction will lead to the area becoming exclusively residential in longer term and some of the existing buildings are not fit for habitation. The existing approach advocated in the Policy is for sites to be masterplanned, which is still consider the most appropriate to address the different existing built characteristics on these variously identified sites.
- 6.99 There is support from existing residents within the Warehousing Living areas for the combination of affordable workspace and residences currently available on the site, and are against either a purely residential or employment designation. This is supported by the existing policy framework. However there is 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.

- 6.100 Objection from landowner and residents to re-providing original employment floorspace stems from the fact that most have established the residential use of the sites through Lawful Development Certificates (LDC). Consideration of floorspace with an existing LDC will be part of the site masterplanning process as set out in **DM51.B.c**.
- 6.101 While a number of landowners made representations seeking greater heights than those suggested as appropriate by the Council in the site allocations, other respondents raised concerns that development at 6 storeys across the area was too much. However, multi-storey developments are needed on these sites to provide for the mix of uses sought and to create the “openness” existing warehouse residents desire. Nevertheless, the indicative building heights has been removed from the site allocations as a result of amendments to **Policy DM5 (Siting and design of tall buildings)** that provides a clear framework and criteria for assessing proposals for large and tall buildings across the borough.
- 6.102 From the responses received, there was conveyed a generally a willingness to work with the Council in developing an approach that sought to formally recognise the existing warehouse living community and the benefits the community makes to the cultural richness of the area. There was tentative support for the requirement for masterplanning, with residents keen to be involved in the development of these for their sites. In response it was noted that the Plan would leave a number of issues to be best addressed through a masterplan for an area, and the policy already requires landowners, or the proponents of warehouse living proposals, to work with local residents on and surrounding the site in this process.
- 6.103 Concern was raised by a number of respondents that warehouse living development could add traffic to local roads; particularly in light of existing road closures. In response it was noted that transport considerations would need to be addressed through the site masterplanning process, having regard to the nature and scale of development and uses, and associated servicing requirements.
- 6.104 Other matters raised by respondents were generally supported by the Council, such as the consideration to community management as part of the site masterplanning process, and proposals to create a new centre to the area and to opening up the New River embankment, but only where the latter retains and enhances the nature conservation status of the “slopes” of the embankment.
- 6.105 Developers requested that Policy DM52 (Loss of employment land and floorspace) be amended to relax the criteria for release of employment land/floorspace. Whereas others sought clarification that the Policy was intended to protect employment sites where they are in use, not where there was no possibility of sites coming forward for development. Both propositions were rejected on the basis that the borough has an evidenced demand for additional employment floorspace over the plan period and, therefore, any loss of existing employment floorspace needs to be carefully managed. The Policy has however been modified to ensure that the assessment of suitability for

continued employment use if vacant, includes local agent reports to avoid deliberate vacancy.

- 6.106 It was suggested that Policy **DM53 (*Development within town centres*)** should provide greater flexibility over restriction on change of use from A1 (retail) to other uses such as A3 (café/restaurant). However, it is considered that the Policy already provides sufficient flexibility for changes of use whilst ensuring town centre vitality is maintained.
- 6.107 No major issues were raised to Policy **DM54 (*Town centre uses out of centres*)** or Policy **DM55 (*Betting shops*)**, which remain unchanged.
- 6.108 Objections were received to Policy **DM56 (*Hot food takeaways*)**, which respondents considered was not sufficiently supported by evidence; that the 400m distance from schools was too crude a threshold; and the creation of an exclusion zone outside primary schools considered to be unnecessary. It was also put forward that the Policy would adversely impact on the health and vitality of town centres. All of these arguments were dismissed as the evidence from NHS England is compelling and sufficiently robust to support the Policy.
- 6.109 Concern was raised that Policy **DM58 (*Managing the provision of community infrastructure*)** would restrict institutional health care providers from managing their estates in a way which best meets existing and future service requirements. The Policy was therefore amended to clarify that the loss or change of use of facility may be acceptable where it can be demonstrated that the disposal of existing community infrastructure (such as a health facility) is part of an agreed programme of social infrastructure re-provision to provide for the continued delivery of the related service.
- 6.110 Other respondents considered that new development should not lead to any net loss of social infrastructure and should rather include a requirement for replacement that provides additional capacity to serve both the existing and future residents. While compelling, a 'no net loss' approach and a requirement for replacement on the same site would not provide sufficient flexibility to deliver the spatial strategy or necessarily best serve needs. DM 58 and **DM59 (*Managing the quality of community infrastructure*)** protect against the loss of community facilities, and therein, it is considered that the exiting requirement for re-provision is sufficient, leaving it for the infrastructure provider to demonstrate that the facility is appropriately located and meets the needs of the existing and future residents, which may involve changing the service delivery model as much as the size of the facility to be re-provided.
- 6.111 A general comment received to these policies was that the Council is not doing enough to ensure sufficient provision of social and community facilities. In response it was noted that the Infrastructure Delivery Plan establishes the level of provision required to meet the needs for different types of social infrastructure; that the site allocations make provision for delivering social and community infrastructure on individual sites; and the DM Policies ensure proposals for new development engage with the Infrastructure Delivery Plan to deliver infrastructure on site or financially through s106 or the Community Infrastructure Levy. However, to strengthen the delivery of infrastructure, **a new Policy has been inserted into the Plan on the use of planning obligations**

for securing affordable housing and infrastructure needs arising as a result of the proposed development.

- 6.112 Lastly it was considered that Policy DM58 should not contain a specific requirement relating to Assets of Community Value. In light of the comments, it was agreed that ACVs should be considered as any other community facilities for the purpose of the Policy, and was therefore amended accordingly.
- 6.113 Developers suggested that Policy **DM60 (Public Houses)** was overly protective of pubs and that pubs should not be included in definition of community facilities. In response it was reaffirmed that public houses are part of the fabric of community facilities serving local communities and are included in the definition of community facilities the NPPF. In line with DM58, the Policy will continue to guard against unnecessary loss of public houses.
- 6.114 Respondents considered that Policy **DM61 (Provision of day nurseries and child care facilities)** 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 the Strategic Policies and DM policies that protect open space.
- 6.115 No representations were received to the policies **DM62 (Burial space)** and **DM63 (Hotels and visitor accommodation)**, which remain unchanged.
- 6.116 In response to comments received, two further policies have been added to the Development Management Policies DPD. Both policies deal with implementation. The **first new Policy concerns regeneration**, ensuring proposal that come forward deliver comprehensive development. The policy recognises that sites allocated for development are often in multiple ownership. In such instances, individual parcels of land should not be prevented from coming forward for development, in the absence of proposals for the neighbouring parcels, but when they do, Council needs to ensure they do not compromise the development potential of the adjacent property or properties. The policy therefore requires the applicant to prepare a masterplan for the entire site allocation, showing how their proposal contributes to meeting the site allocation's objectives and outcomes and would integrate with future development on neighbouring parcels.
- 6.117 The **second additional Policy is related as supports land assembly**, where necessary to facilitate and optimise comprehensive development. The Policy confirms that the Council will use compulsory purchase powers where necessary, and where certain requirements are met.

#### Site Allocations DPD

- 6.118 The purpose of this document is to identify, and set the parameters for delivery of development on, the most strategic sites in the borough. Together with the sites identified in the Tottenham Area Action Plan, these sites will meet the borough's housing need over the plan period to 2026. As well as identifying where growth can be accommodated, this document also creates opportunities for new jobs to be leveraged from mixed use developments, and enables the borough's infrastructure to be planned effectively.



## *Consultation responses*

6.119 In total we received 606 representations, which contained 4,385 individual comments. The highest number of representations were received to the proposed site allocation for Broadwater Farm (293 representations & 1,421 comments), while other sites that generated significant responses included the Keston Centre allocation (80 representations & 1,076 comments); Summersby Road (82 representations & 345 comments); Hillcrest (28 representations & 241 comments); Lynton Road (24 representations & 148 comments); Overbury & Eade Roads (20 representations & 76 comments); Cranwood & St Jame's School site (15 representations & 52 comments); and Tunnel Gardens (14 representations & 52 comments).

## *Main Issues Raised*

- 6.120 There is concern among some respondents that identifying zones around future stations, as set out in **SA1 (Indicative Crossrail 2 Areas)**, is a form of planning blight, however the Council remains committed to support the introduction of Crossrail as important infrastructure to meet the needs of the growing population. To this end the site has been revised to ensure a 1,000 metre radius around potential Crossrail 2 stations to properly safeguard the sites and reflect the appropriate area required based on experiences of impacts from Crossrail1. Additionally the safeguarded route is included in the policy.
- 6.121 Respondents to **SA2 (Designated Employment Areas)** were concerned about the loss of industrial designations and that the release of land is seen as appropriate for the residential needs of the gypsy and traveller community. While Council agrees that the redevelopment of industrial land in less accessible areas is inappropriate, it is considered that in more accessible locations higher density mixed uses can better meet the housing and employment demand. Additionally, it is recognised that these sites have the highest value uplift, and therefore potential to accommodate new pitches. Any sites would need to consider the appropriateness of pitches from a design perspective using SP3 of the Local Plan.
- 6.122 There was also confusion about the status of White Hart Lane - this has been retained as Locally Significant Industrial Land (LSIS) - and concern about Omega Works designation as a Regeneration Area, which Council considers to be a suitable designation for the mix of uses proposed for the site.
- 6.123 **SA 5 – SA9** relate to allocations that have already received planning permission but are yet to be implemented, including Clarendon Square. The comments received to these allocations were fairly minor, due to the fact the parameters for development are already defined through the extant planning permissions.
- 6.124 The main issue for **SA10 (Haringey Civic Centre)** relates to the existing traveller pitch. The existing pitch would need to be re-provided before any development occurs. The site allocation was amended to reflect a comment from Transport for London regarding the requirement to retain a bus stop adjacent to the site.

- 6.125 Concerns for **SA11 (Green Ridings House)** related to the heights proposed, which respondents considered would be detrimental to the amenity of residents on Ringslade Road. They recommended a mews type development would be more in keeping with the characteristics of the area, however this is not considered appropriate on a retained road within a town centre and that the reduced heights along Watson's Road are already to the benefit of Ringslade Road properties.
- 6.126 **SA12 (Wood Green Bus Garage)** has been amended to reflect that the access to the bus garage may not be feasible from just Station Road and that the High Road should also be included. This will ensure flexibility within any future design. Additionally it is noted that access from the High Road should be successfully integrated into the secondary frontage.
- 6.127 **SA13 (Station Road offices)** has been amended to strengthen the policy requirement that temporary reprovision of the bus garage should be secured before any redevelopment, and also to reflect that any development should be aware of the provision of the bus garage on the adjacent site. There is both support for and opposition to tall buildings on this site. One respondent has noted that the justification for tall buildings as a place marker of the station is unnecessary as tens of thousands of people find the station every day. Council remains content that the site is suitable for a tall building but has noted that it is preparing a Tall Buildings SPD to provide additional guidance on the delivery of tall buildings in the borough.
- 6.128 On **SA14 (Mecca Bingo)**, the Environment Agency has suggested an eight metre buffer for development adjacent to Moselle Brook culverts, however this is not consistent with meeting the housing targets. Where de-culverting is viable it will be suggested, but due to the Growth Area location an eight metre buffer would not be acceptable and a smaller buffer area should be negotiated.
- 6.129 **SA15 (Morrison's Wood Green)** has been amended to reflect support for bringing the Gaumont Theatre back into use and providing for soundproofing on adjacent sites.
- 6.130 Respondents to **SA16 (Wood Green Library)** were concerned with the loss of the library building. However, as it is not considered a building of architectural merit and therefore it is only the library use that is required to be retained on the site. A respondent was concerned that the idea of a sky cafe was a folly. However providing public access to viewing platforms on tall buildings remains a policy objective of the London Plan, and would add further opportunities in Wood Green to demonstrate public benefit and value from tall buildings. This allocation was however, amended to reflect the need to be aware of the theatre on the neighbouring site and the need for soundproofing of future buildings on this site.
- 6.131 **SA17 (The Mall)** has been amended to reflect a suggestion for the addition of a development guideline to support upgrading the public realm on the Mayes Road side of the Mall. A requirement has also been included regarding optimizing the developable part of the site to secure a better local cycling and pedestrian network.

- 6.132 There were no major issues raised in respect of SA18 (***Bury Road Car Park***) or SA19 (***16-54 Wood Green High Road***) that would require amendments to the policy.
- 6.133 Concerns to **SA20 (*Westbury and Whymark Avenues*)** related to the proposal of the site as a potential location of a tall building. Council considers this to still be a site suitable for a landmark tall building and therefore does not propose further amendments.
- 6.134 Transport for London has suggested a car free development for **SA21 (*Turnpike Lane Triangle*)**. While this is supported, it is noted that there may be a need for wheelchair accessibility for both residential and town centre uses on site, and amendments to this effect have been made to the allocation.
- 6.135 One respondent commented on the fact that site **SA22 (*North of Hornsey Rail Depot*)** is in two ownerships and there is no realistic prospect of the site coming forward at the same time for development. To optimise development across the two sites, it is considered that comprehensive development is required, even if this means the two parcels of land coming forward for development at different times. It was also suggested that a yield of 70 residential units was too low and that at least 100 new dwellings would be possible. The densities applied to the site allocations are in line with London Plan compliant methodology, and represent a policy compliant minimum. It would be for an applicant to demonstrate how, in urban design terms and in compliance with the other policies of the Local Plan, a scheme in excess of 70 dwellings was appropriate.
- 6.136 **SA23 (*Wood Green Cultural Quarter North*)** has been amended to remove reference to the 33 per cent floor employment space target and instead, replaced this with a requirement for the maximum floor space viable. There is opposition to active frontages, public realm improvements, capped commercial rents, decentralised energy networks and the pedestrian-cycle link. These are all considered matters of relevance to future development on this site and did not result in amendments to the allocation.
- 6.137 There are concerns with the height limits in the allocation - both that they are too tall and too restrictive. Reference to specific heights in the allocation has been deleted and each site will be assessed against the tall and taller buildings policy in the development management policies. A guideline has also been added that development on the site should make a positive contribution to the neighbouring conservation area. A respondent is also concerned about the requirement to follow a Council approved masterplan considering it has not yet been developed. This is currently underway as part of the Wood Green Area Action Plan for which Council approval will be sought in spring 2016.
- 6.138 **SA24 (*Wood Green Cultural Quarter south*)** has been amended to reflect infrastructure requirements and to replace the employment floorspace target with a requirement to provide the maximum viable employment floorspace. There is disagreement with the location of the tall building proposed on site and it is considered by a respondent that a landmark building should be integral to the wider development rather than tucked away by the railway. The location of this building is proposed to mark the entrance to Alexandra Palace from Wood Green and is considered the appropriate location. A respondent also objected

to the 8 storey limit for development considering the site is within a Metropolitan centre and has good transport links. Reference to height limits have been removed from the allocation and any development will be assessed against the development management policy on tall and taller buildings.

- 6.139 The boundary of **SA25 (Wood Green Cultural Quarter east)** has been amended to reflect that a small part of one of the sites has been included in SA23 rather than SA25. It was also amended to remove the 33 percent employment target and the specific height requirement of eight storeys. The landowner supports many of the requirements for the site including the adoption of a masterplan and the possibility of connecting into a decentralised energy network. There is concern however, regarding the need to retain the existing buildings on site. However, council considers the Chocolate Factory building 2 creates a positive active frontage well suited to being part of the future of the site while linking with the past.
- 6.140 There was concern from the developer about the restrictive height in the draft allocation for **SA26 (Clarendon Square Gateway)**. This allocation has been amended to remove reference to the height requirements. Development will be assessed against a new policy on tall and taller buildings in the Development Management Policies DPD, therefore height limits in individual allocations are not considered necessary. The allocation has also been amended to make it clear that a pedestrian cycle link through the site is proposed rather than a road. A respondent has suggested that A1/A3/A4 uses should also be considered for this site, however, as the site does not have a town centre frontage these retail uses are considered inappropriate. There was support for the inclusion of student accommodation in the Policy; however Wood Green High Rd is the preferred location for this use.
- 6.141 **SA27 (Clarendon Road South)** has been amended to reflect the change in employment land space requirements and to remove references to building heights in accordance with reasons set out above. The allocation has also been amended to reflect that residential is appropriate on site in order to subsidise employment floorspace.
- 6.142 There was concern the height limits for **SA28 (NW of Clarendon Square)** were too high and should be amended to reflect heights for the other Clarendon allocations. References to specific heights have been removed as all new development will be assessed against a new development management policy on tall and taller buildings.
- 6.143 Respondents expressed concern with the proposed tall building location within **SA29 (Land Adjacent to Coronation Sidings)** at the entrance to Penstock Tunnel. There is concern a building of such a significant height would have a detrimental effect on Alexandra Park. The specific height of the building has been removed, as development will be assessed against the tall buildings policy in the Development Management Policies DPD. A requirement was added that the building should be slim in appearance to help minimise the impact on the park.
- 6.144 **SA30 (Hawes and Curtis, Green Lanes)** received no comments requiring amendments to the allocation.

- 6.145 **SA31 (Wightman Rd)** received no comments requiring amendments to the allocation.
- 6.146 There have been no major amendments made to **SA32 (St Ann's Hospital Site)**. One residents' association expressed concern with the proposed access to Warwick Gardens. It is considered the use of Secured By Design principles, which are included in the development management design policies, will ensure this is mitigated. There is also support for public open space within the site rather than individual private gardens but this is considered a detailed matter for a planning application to address, having regard to compliance with both amenity standard and open space provision.
- 6.147 There were no major amendments made to **SA33 (Arena Retail Park)**. The respondents brought up concerns relating to the impact of increased traffic on congestion and air quality. It is anticipated that the development set out in the site allocation would result in a reduction in car use and a decrease in congestion and air pollution.
- 6.148 **For comments related to the Haringey Warehouse District sites (SA34-39) refer to responses to DM51**
- 6.149 Amendments were made to **SA40 (Finsbury Park Bowling Alley)** to clarify the requirements regarding the provision of a new link into Finsbury Park and the need to retain/reprovide the existing leisure use in any new development. A number of respondents also expressed concern about the possibility of a 15 storey building on the site and the likelihood that it would overshadow the park. Specific reference to a building height has been removed and any proposed development will be assessed against the development management policies. A respondent also questions the inclusion of Metropolitan Open Land (MOL) in the allocation. The site boundary has been redrawn to exclude MOL from the allocation, which was included only to facilitate the aspiration for better access through the site to the Park.
- 6.150 There were no major issues associated with **SA41 (18-20 Stroud Green Road)** that required a change to the allocation.
- 6.151 There was opposition to specific height limits of up to six storeys on **SA42 (460-470 Archway Road)**, which has been deleted from the allocation in line with the approach adopted in the rest of the Local Plan. All development proposals will be assessed against the tall buildings policy in the Development Management Policies DPD. It is also suggested that the proposals will have an adverse impact on the Conservation Area including on views. This is not accepted, development can benefit the setting of the Conservation Area on this site.
- 6.152 **SA43 (Highgate Station and Gonnermanns)** has been substantially amended. In particular, it has been split into two separate site allocations. The first covers the old Highgate train station and the second, the Gonnermann's site to the east of Shepherd's Hill. The main concern for respondents to this allocation was the opening up of the tunnels to link with Parkland Walk. Respondents were concerned that this would have a detrimental effect on biodiversity. The new site allocations reflect the opportunity to safeguard



biodiversity values on the former station site while enhancing access and the need for carefully managed redevelopment for the Gonnermann site. The new Gonnermann site allocation does not suggest height limits, as appropriate building height will be assessed against the development management policies.

- 6.153 No significant alterations were made to **SA44 (Highgate School)**. A respondent was unclear on what is intended for parts of the site including the sports field, referencing the Urban Characterisation Study. The Local Plan policies constrain the development potential of the site by ensuring that any future development would not result in a net loss of open space unless an assessment indicates such open space is surplus to requirements.
- 6.154 The site boundary of **SA45 (Highgate Bowl)** has been redrawn following comments to better reflect the extent of the Bowl, and exclude the conflicting boundary with the Highgate School Site to the rear of Dyne House. There was concern for the loss of Harington Scheme. The allocation has been amended to provide recognition of the value of a horticultural 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.
- 6.155 There were also concerns that the access through the bowl would impact on the amenity of residents and specific objection to access from Cholmeley Crescent. Council is seeking to increase access to and through this new Significant Local Open Land (SLOL). These accesses will be assessed against the development management policies which seek to address issues of amenity and local character.
- 6.156 The owner of the nurseries site also believes the bowl should not be designated SLOL, however, as the conservation area is defined in part by the Bowl, it is therefore considered appropriate to define it in this policy.
- 6.157 The boundary of **SA46 (Summersby Road)** has been substantially altered to exclude the Summersby Road housing estate and the carparks adjoining South Close. Respondents had concerns about the inclusion of the estate due to the buildings being in a good condition; Decent Homes work commencing; and it that the site had not been included in an earlier version of the Plan. Following further discussion with the Council's Housing team, this site has been removed from the Plan for delivery within this Plan period. The car parks on South Close are part of a different estate and so have also been excluded.
- 6.158 Respondents to **SA47 (Hillcrest)** had many concerns regarding the inclusion of Hillcrest in the Site Allocations document. They made specific mention to the play space that would be lost in the area. Any development would be required to make appropriate provision for amenity and children's play space. They were concerned about proposed heights and the effect this would have on density and overcrowding of the site. Specific height limits have been removed and the development management policies will require consideration is given to residential amenity and density has regard to the local character. Views and parking loss were also issues and these would be addressed through application of the development management policies as well (i.e. through the requirement for a transport and parking assessment to be produced and

submitted as part of any detailed planning application for infill development on the site).

- 6.159 Respondents also suggested the allocation was contrary to the emerging neighbourhood plan which intends to protect open spaces at Hillcrest. The Neighbourhood Plan is not yet adopted, but when it is it will form part of the development plan but as a lower level document it must be in general conformity with Strategic Policies and Site Allocations of the Local Plan. There was also confusion regarding the Council's consultant's report and its relationship to the Local Plan with many respondents referencing development proposed on specific sites within Hillcrest. The Site Allocation sets out principles to guide future development of the site but does not propose specific development. It allows for a range of options to be considered. The consultant's report was prepared for the housing team within Council to consider development options and site capacity.
- 6.160 **SA48 (Hornsey Water Treatment Works)** has been removed from the site allocations document due to the specific challenges associated with the site such as the impact on MOL, setting of Alexandra Palace and heritage of the filter beds and the absence of a detail proposal about how these could be addressed.
- 6.161 There were no major issues identified requiring alterations to the policy on site **SA49 (Cross Lane)**.
- 6.162 Following further discussions with the housing investment team **SA50 (Chettle Court)** was removed from the allocations document due to the likelihood of its not coming forward for development over the plan period.
- 6.163 **SA51 (Lynton Road)** is amended to require the retention, where possible, of mature trees on site and the need to replace jobs in the allocation. Specific height limits and the reference to extending the district centre have been removed in line with responses to the consultation. Respondents also expressed concern regarding the impact of new development on parking. This will be picked up through the transport and parking assessment which would be required at the time of development.
- 6.164 Pinkham Way Alliance feel that **SA52 (Pinkham Way)** is not suitable for employment use. The existing designations, both employment and SINC, are considered to continue on the basis there is a continuing need for employment spaces in the borough. Any development would be required to consider the SINC designation as well. The evidence the group submitted on the biodiversity present on the site is not sufficient to demonstrate that employment couldn't coexist on the site. Flood risk and culverted watercourse were also reasons suggested for why the site is unsuitable for development. Any proposed development would require a flood risk assessment to demonstrate no adverse impact in flood risk while the impact upon the watercourse is already covered by the policy.
- 6.165 There is specific opposition to the use of the site for waste, which is noted by council and the allocation does not specify this is the use that will be on site. Respondents were also concerned about views from Friern Barnet Bridge Park

to Alexandra Paces being disrupted. Any development would require an impact assessment on long distance views to be undertaken.

- 6.166 Respondents concerns to **SA53 (Cranwood and St James' School)** included the impact of development on infrastructure in particular school places. This will be addressed through the update to the infrastructure delivery plan. Due to updated deliverability and school need information, the school is excluded from the Site Allocation. Respondents were also concerned about the potential demolition of houses on the site. The houses have been included to ensure a comprehensive approach to development to make best use of the land. Urban realm concerns included the possibility of housing being demolished to form this new urban realm. Enhanced entrances to Parkland Walk and the school are not considered necessary by residents. However these site requirements help to contribute to the site having a mix of uses helping address open space, accessibility and housing objectives.
- 6.167 Respondents to **SA54 (Tunnel Gardens)** are concerned about plans to redevelop their homes and have expressed an interest in seeing evidence which suggests refurbishment is not an option. The site allocation has been based on a preliminary assessment that found the houses are constructed from a defective material which makes restoration uneconomical. More detailed work is being undertaken to compare the costs of redevelopment and refurbishment. At this stage the site allocation allows for either option to be pursued in the future. Height limits have been removed in line with other allocations. Drainage was also an issue and this will be addressed through a flood risk assessment at the time of detailed design. A number of restrictive covenants have been identified on this site, and a comment made in the document regarding these.
- 6.168 Respondents to **SA55 (Alexandra Palace)** expressed concern that the allocation meant that comprehensive redevelopment of Alexandra Palace and the park could be undertaken, which is not the case. The allocation was amended to highlight that Alexandra Palace is the centrepiece of the conservation area rather than just part of it.
- 6.169 Respondents to **SA56 (Coppetts Wood Hospital)** have expressed concern at the ambiguous wording of the site allocation in particular the requirement for facilities to be deemed surplus to requirement before any development can take place. The site has been amended to make it clear that individual uses must demonstrate it is surplus before permission for change of use is granted. Respondents also expressed concern over the loss of parking. This is a detailed design issue that will be managed using DMDPD policies. A parking and transport assessment will be required as part of any development plans.
- 6.170 The site boundary of **SA57 (Park View & Durnsford Road)** has been amended in line with responses to include the car park and empty site to the south of the existing allocation. Respondents also suggested the inclusion of Park Court however it is not made from the same materials which have informed the decision to allocate the other houses. Respondents also requested to see the evidence which suggests refurbishment is not an option. The site allocation has been based on a preliminary assessment that found the houses are constructed from a defective material which makes restoration uneconomical. More detailed work is being undertaken to compare the costs of redevelopment and

refurbishment. At this stage the site allocation allows for either option to be pursued in the future. Height limits have been removed in line with other allocations.

- 6.171 There was also support for the improvement of the open spaces on site and a suggestion that they could be combined with Springfield Park. Reference has been made in the allocation to the potential for open space improvements with Springfield Park.
- 6.172 Respondents to **SA58 (Myddleton Road Local Centre)** were unhappy about the support for back land development in this allocation. A new policy has been included in the development management policies on back land development. There is also concern about the reference to echelon parking as it is considered the street is too narrow and shared space could be a better option. This is a detailed design issue and the supporting text has been revised to remove reference to specific types of parking so all options can be considered in any proposals for redevelopment.
- 6.173 **SA59 (Red House)** was amended to reflect concerns regarding the proposed height of buildings close to smaller properties. The text is amended to bring it in line with other allocations where the allocation provides that heights will be reduced to respect the amenity of adjacent properties. Additionally specific height requirements were removed from the allocation. Two respondents also supported the policy to improve the adjacent open space in any proposed development.
- 6.174 There were no major issues with **SA60 (Haringey Professional Development Centre)** requiring changes to the Policy.
- 6.175 Respondents had five main concerns regarding **SA61 (Keston Centre)**. These were the building height, the opportunity to retain the Victorian school building, the potential land swap of MOL and the impact on the park, the replacement of the nursery on site and traffic issues. The allocation is amended to remove the specific building heights as any development will be assessed against development management policies which address issues of local character and impact on neighbouring sites. While the Victorian school building has some architectural merit, it is not considered appropriate to retain it as the site could be used more optimally by making use of it for residential use. The use of MOL for a land swap is considered appropriate to improve access and as per strategic policies there would be no net loss of open space. The development management policies will address the issues of the impact on the park and traffic while the re-provision of the nursery will be addressed by the infrastructure delivery plan update.
- 6.176 The main issue associated with **SA62 (Barber Wilson)** included the displacement of a viable business which has been operating on the site for many years. The allocation is amended to clarify that any proposal does not result in a loss of employment uses with the presumption in favour of retention /conversion of historic industrial buildings on site.
- 6.177 As a result of numerous respondents to **SA63 (Broadwater Farm)** the allocation is amended to remove the part of Lordship Recreation Ground which

was in the allocation. Multiple objections were received to building on the park these included specifically the loss of the football pitch which is an essential facility for young people in Tottenham, the park being vital for health and well being, it is award winning and protected by a covenant, there will be less space for events and it is linked with the history of the area. For all these reasons the allocation is being amended to remove the park from the allocation.

- 6.178 Respondents were also concerned about the idea of estate renewal for Broadwater Farm suggesting that it would destroy the vibrant, cohesive and inclusive communities they have worked hard to create. They also suggested that the community hasn't been consulted properly on proposals for the area. The proposal for this area would involve masterplanning which would be undertaken in full consultation with the community and would intend to ensure there were opportunities to enhance the community cohesion and vibrancy already present within the estate. They have suggested there are no structural problems and therefore no reason to suggest demolishing houses. There was also the suggestion that the council shouldn't use the problems with Tangmere block to justify renewal of the entire estate. There was support for demolition of Tangmere block as repairs are ongoing and do not seem to be able to make a difference.
- 6.179 Other concerns with the estate renewal included the potential loss of affordable housing and the suggestions that new affordable housing would not be affordable to many of the community. They were concerned that poorer people would be displaced because they wouldn't be able to afford to live in the new buildings. Affordable housing would be re-provided in any development on the estate to ensure no net loss of affordable housing by habitable room. In the event of any development tenure split would be determined by housing need, viability and development management policies informed by the adopted housing strategy.
- 6.180 There are also other concerns with potential development on site including traffic congestion, pressure on local facilities and the potential loss of community facilities. These issues would be addressed through the development management policies and the update to the infrastructure delivery plan.
- 6.181 Tall buildings were also a concern though they did attract some support with one person suggesting a increasing the heights in some areas could accommodate more units. In line with other allocations, specific heights have been removed from the document as any proposed development will be assessed against development management policies.
- 6.182 There was storing support from The Selby Trust for retention of **SA64 (The Selby Centre)** and the role it can play in meeting the need for community use produced by nearby development. The policy seeks to secure re-provision of the community use before any development can occur.
- 6.183 **SA65 (The Roundway)** is being amended to reflect the changes to the height requirements of the site allocations. This was particularly a concern for The Roundway as a previous inspector's report stated that a building of four storeys would undermine the dominance of Bruce Castle. An increase in density will be



required to ensure redevelopment is viable however the height will be assessed against the development management policies including those relating to heritage buildings.

- 6.184 There were no comments received in relation to **SA66 (Leabank and Lemsford Close)** requiring significant alterations to the policy.

### Tottenham Area Action Plan

- 6.185 The Area Action Plan (AAP) is being prepared in order to ensure that the scale of development and change proposed for Tottenham through to 2026 and beyond is positively managed and guided by an up to date planning policy framework. It also ensures that investment decisions meet the aspirations of the local community and the Council for the area as a whole, as well as specific places and locations within it.
- 6.186 The AAP identifies land capable of delivering 10,000 new homes and 5,000 new jobs. It provides a formal policy underpinning for developments including the establishing of a new retail centre at Tottenham Hale, the intensification and diversification of existing industrial estates, and mixed leisure development around Tottenham Hotspur's stadium.
- 6.187 The AAP seeks to provide clarity and certainty about how the opportunities for improving Tottenham's places will be realised, and its challenges addressed. Specifically, it prescribes a vision for how "neighbourhoods areas" can develop, allocates strategic sites for particular uses and types of development, and sets out Tottenham specific policies aimed at ensuring new development is ambitious, appropriate and sustainable in a Tottenham context. It seeks to ensure that infrastructure matches the development proposed, ensures local access to training and employment, and enables housing choice for both existing and new residents.
- 6.188 The AAP has a strong focus on delivery and implementation. It is intended to alert infrastructure providers and public sector agencies to the growth targets and existing deficiencies present, so that they may schedule service and capacity upgrades accordingly. An updated Infrastructure Delivery Plan will be used in conjunction with the AAP for this purpose. Effective cross-service working, securing the coordinated and timely delivery of social and physical infrastructure improvements, will be essential to support new development and ensure that continued growth across Tottenham is sustainable. The AAP provides further guidance on the appropriate phasing of new development, taking into account the need to ensure positive regeneration occurs which benefits the whole of Tottenham.

### **Consultation responses**

- 6.189 The total representations received to the Tottenham AAP were 118. These representations drew out 1,070 comments that have been taken into account in preparing the pre-submission draft of the AAP.

## **Main Issues Raised: AAP (General)**

### **Regeneration**

- 6.190 There were comments on the distribution of growth across the borough. Some respondents did not agree that Tottenham could accommodate an additional 10,000 new homes and noted there is proportionately less growth planned for the west of the borough. The Borough's spatial strategy establishes areas to accommodate growth based on a wide range of assessments including character, heritage, public transport, investment in infrastructure, land availability and economic regeneration needs, along with other opportunities and constraints. Having regard to these factors the Council considers that Tottenham has the capacity to meet the planned housing growth
- 6.191 Some comments suggested that the AAP does not give equal consideration to the different areas within Tottenham. The AAP is helpfully organised by areas and reflects that there are a range of development and regeneration opportunities across Tottenham, many of which are supported by specific site allocations. The plan has been updated to set out more clearly the vision for each area and how these areas will contribute to the delivery of the spatial strategy.
- 6.192 There were concerns that regeneration will cause gentrification and displace residents from existing homes and neighbourhoods. There were also concerns that the AAP might work to reinforce inequalities present in the area rather than address them. It is considered that the Plan is aimed at positively improving the life chances of those most in need, and that the EQIA and Sustainability Appraisal of the Local Plan Strategic Policies, shows that the Plan supports this. The Council's vision for Tottenham is to manage development and regeneration to deliver a positive transformation of the area that benefits both existing and future residents.
- 6.193 One consultee suggested that the Spurs development should not be presented in the plan as a driver of economic development, pointing to research that suggests stadium-led developments do not make a significant contribution to the economy. The Council notes a London Assembly Report (March, 2015) which indicates that stadium-led regeneration schemes can act as a catalyst for physical and social regeneration. It is therefore considered appropriate to present the new Spurs stadium as a driver for change in the area. The AAP includes a site allocation for the stadium and through this policy will seek to ensure that future development proposals both deliver objectives of the plan and achieve maximum public benefit.

### **Housing**

- 6.194 There were concerns raised with the inclusion of sites within the AAP for estate renewal. Consultees also objected to the demolition of buildings as part of estate renewal, particularly where these are structurally sound. The Council considers the inclusion of these sites is necessary to support delivery of the spatial strategy and meet objectively identified housing needs. Recognising that some housing estates are poorly designed, make inefficient use of land and are in need of repair, the AAP identifies sites where there are opportunities to

improve housing stock and living conditions. This includes interventions to enhance site layout and design for better connectivity and legibility, upgrade buildings and amenity areas and optimise the use of land. The Local Plan has been amended to better clarify the rationale for including sites for estate renewal, as set out above.

- 6.195 There were various representations on future plans for individual estates allocated for estate renewal opportunities. The Local Plan provides a policy basis for estate renewal but does not set specific details for individual schemes. When considering future options for a site, the priority to meet housing need may mean that redevelopment is preferred over refurbishment. In some circumstances, cross subsidy of new affordable housing stock from market housing may be necessary to make schemes viable. The Council is committed to engaging with local residents to identify an approach for estate renewal which meets the needs of both current and future residents, in line with the Council's Housing Investment Strategy and s105 of the Housing Act 1985.
- 6.196 Some consultees questioned why housing estates were included in allocations when the Decent Homes programme is being completed and argued this should be the preferred vehicle for improving housing stock. The Council recognises the importance of the programme in ensuring housing is maintained at the appropriate standard in the short term. Beyond housing repair, the plan identifies opportunities to improve the quality and quantity of housing over the long-term having regard to the strategic plan objectives.
- 6.197 There were concerns that leaseholders might be priced out of and displaced from the local area, including through Compulsory Purchase Orders (CPOs). Comments were received from both residents and businesses in this respect. In the case of compulsory purchase, leaseholders are offered compensation on the principle of equivalence, meaning they will be no better or worse off after acquisition. The Council will support relocation within the area where possible, whilst recognising that CPO legislation allows for financial compensation so that businesses and residents can make their own decisions in this regard.

### **Affordable Housing**

- 6.198 Consultees stated that affordable housing is not genuinely affordable. It was also suggested that that the plan's target for affordable housing should be 100%. The borough wide target for affordable housing is set in the Strategic Policies Local Plan and is informed by a viability assessment. Across the plan, the objectives are to significantly increase housing supply, including affordable housing, to meet local needs. The Council will seek to maximise the amount of affordable housing provided in new development schemes in the Tottenham area, however recognising that delivery on a site basis is influenced by viability and grants available to provide for different types of affordable provision.
- 6.199 There were comments suggesting that the AAP does not sufficiently reflect the large number of residents in rented accommodation and the need for affordable rents. It was also suggested that the Council should consider rent controls as a solution to creating more affordable housing. The introductory text in the AAP has been amended to more clearly reflect the situation with respect to rented accommodation in the Tottenham Area. Rent control for private rented

development is outside the scope of the planning system. The Council will seek provision of affordable rented accommodation in line with Policies SP2 and AAP3.

- 6.200 There was a request for clarification on the Council's aspirations for a better mix of housing. There was concern that this implied the loss of social housing units, which consultees also objected to. The plan has been revised to set out more clearly the plan objectives for housing mix in Tottenham. The policies set out that the Council will seek to ensure no net loss of social housing on a habitable room basis.

### **Employment**

- 6.201 It was suggested that the AAP could better set in context the nature of the local economy, the range of viable employment uses currently in the area, and set clearer objectives for the new affordable and flexible workspace provision to support businesses. Amendments to the introductory and supporting text have been made to this effect. The DM Policies set requirements for affordable workspace.
- 6.202 Consultees expressed concern for the loss of employment land and floorspace, particularly to residential and other uses, with some suggesting that there should be no net loss of floorspace. The Council considers that the Local Plan will ensure a sufficient supply of employment land and premises within the borough (including in Tottenham) to meet identified need however recognising that some reconfiguration, supported by site allocations, may be necessary to deliver the spatial strategy. The DM Policies set out the Council's approach to maximise replacement employment floorspace in appropriate mixed use schemes. It also seeks to protect floorspace in non-designated employment locations.
- 6.203 Respondents stated that new jobs should be catered for local residents, be of good quality and pay the living wage. The Local Plan broadly seeks to increase the number and quality of jobs in Tottenham and residents' access to them, including through requiring planning contributions for skills and training. The living wage is outside the scope of the Local Plan.

### **Infrastructure**

- 6.204 Respondents suggested that the plan does not sufficiently address the infrastructure requirements necessary to support the growth planned in Tottenham, including for health, education and community facilities. The Council considers that this will be dealt with through an updated Infrastructure Delivery Plan. However, the AAP has been revised to provide some narrative on this matter, including by signposting some of the key strategic infrastructure that will be delivered to facilitate growth. Information on the Housing Zone has also been included to set in context the dedicated investment committed to unlock the area's growth potential. Finally, the site allocations set out specific requirements for infrastructure provision where appropriate.
- 6.205 There were specific concerns around the capture and spend of S106 contributions and the Community Infrastructure Levy (CIL). It is recognised S106 and CIL will play a role in funding infrastructure however further details in

this regard are set out in the Council's Planning Obligations Guidance SPD and CIL Charging Schedule respectively. The CIL will be subject to periodic review over the life of the plan.

### **Transport**

- 6.206 It was suggested that the plan should appropriately reflect the timescales for Crossrail 2 and the need to ensure that site allocations enable its delivery. Updates have now been made to this effect. The plan has also been revised to include a new overarching policy on transport which includes requirements for proposals to consult with the appropriate agencies where Crossrail 2 is planned.
- 6.207 In response to consultation comments, the plan has also been amended to signpost current and emerging transport projects including the Cycle Superhighway and four-tracking of the West Anglia rail line.
- 6.208 There were concerns with impact on parking provision, which is considered by many respondents to be a key issue in locations where parking is already limited. A key aim of the Local Plan is to shift the mode by which residents and visitors travel, from car-based to more sustainable modes such as public transport, walking and cycling. Parking will be required in line with the DM Policies and car free development supported where appropriate.

### **Green infrastructure and nature conservation**

- 6.209 Respondents objected to development on open and green space and suggested that the plan should prioritise development on Brownfield land. This is consistent with the plan objectives. In particular, the DM Policies provide for no net loss of designated open space and protection of biodiversity sites.
- 6.210 It was suggested that the AAP should set out more clearly how it will contribute to provision of green infrastructure. The Council considers these are borough wide matters that are more suitably addressed in the Strategic Policies and DM Local Plans, particularly to ensure coordination in managing the network of green infrastructure. However individual site allocations have identified opportunities where future development should seek enhancements in this regard.
- 6.211 There were some objections to the proposed green link, as set out in the responses to the relevant AAP policy and site allocations. The Council considers that the green link is strategic infrastructure which is important to delivering the plan objectives for enhancing access to open space. The site allocation development guidelines, along with DM Policies, will ensure that the principals of establishing the overall Haringey Green Grid in Tottenham are sensitively integrated.
- 6.212 There was support for the plan's recognition of the Lee Valley Regional Park and objectives to improve access to it. Greater recognition of the Lee Valley Regional Park as a Special Protection Area for biodiversity which may be threatened by higher visitor numbers. The Council will work with the Lee Valley Regional Authority to ensure that development does not adversely impact on the environment. A Habitats Regulations Assessment will inform plan production.



6.213 Water management is dealt with principally through the Strategic Policies and DM Policies Local Plans. However following consultation responses received, the AAP has been amended to better highlight local opportunities for sustainable water management. Site allocations have been updated to identify Source Protection Zones for groundwater, Flood Zones and locations where de-culverting should be investigated and implemented if possible. The DM Policies have also been updated to ensure development is adequately supported by water supply infrastructure.

### **Heritage and conservation**

6.214 Some respondents considered that the draft AAP did not suitably demonstrate the Council's commitment to preserving and enhancing Tottenham's historic character, particularly in the context of regeneration. The Council acknowledges the statutory protections in place for both heritage assets and conservation areas. Management of the historic environment is dealt mainly by the Haringey's Strategic Policies Local Plan along with new policies in the DM Policies. However the consultation comments are noted and the Council has revised the plan to set a more positive framework for managing heritage assets. This includes a new policy on conservation and heritage which links to the relevant DM Policies. The site allocations site requirements have also been updated to signpost where there are heritage assets that require appropriate consideration in future proposals, including listed buildings, conservation areas and archaeological priority areas.

### **Design**

6.215 There were a number of responses stating that the AAP should set a more positive framework for good quality design, so as to ensure that new developments reflect local character and identity and further contribute to place making. Design guidelines will be dealt with principally through the DM Policies Local Plan, which includes a new Haringey Development Charter which all development proposals must engage with. The site allocations set out specific requirements and considerations for development design where appropriate.

6.216 Following concerns raised with proposed building heights, the policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set out in a new AAP policy on urban design and character.

6.217 Some consultees stated that the plan does not sufficiently protect the character of parks and open spaces, particularly where development is proposed adjacent to them. Some comments pointed to relevant London Plan policies. The Council considers that the AAP is in general conformity with regional policy. Proposals will be assessed against the DM Policies which set out that development should protect and enhance the value and visual amenity of open space.

### **Consultation**

6.218 Respondents raised several concerns about the consultation process. Overall it was felt that there was insufficient notification of the consultation, that there was insufficient time to comment given the volume of consultation materials and technical evidence published, as well as lack of clarity on consultation dates

and opportunities. The Council considers that it has fulfilled the statutory requirements for the consultation. However, it has since commenced a review of its Statement of Community Involvement to inform future practices in this regard.

6.219 Some consultees noted that the AAP had suitably summarised responses to previous consultations but suggested that the plan would exacerbate rather than positively address issues and challenges raised. All responses received have been considered in the production of the publication versions of the plan.

#### **Other comments**

6.220 There were a number of general comments regarding text omissions, invalid web links, maps, grammar, document references and factual updates for extant planning permissions. Minor edits to the plan have been made to address these comments.

6.221 In response to concerns relating to the involvement of local communities in the delivery of the Plan, the supporting text was amended to include 'local communities' as those consulted by developers along with landowners and other stakeholders.

6.222 There were comments regarding the plan's support for comprehensive development of sites. There were concerns that this approach is not always in the public interest, and in particular, will prohibit incremental and more sensitively designed development from coming forward. The policy does not preclude such incremental development from occurring, but on key strategic sites the Council will require site masterplanning and comprehensive development in order to ensure delivery of the spatial strategy. This is clarified in the supporting text.

6.223 The policy has been amended to provide clarity on the meaning on the term 'positive regeneration'.

6.224 A new policy has been drafted, 'Heritage and Conservation' in response to comments relating to protecting Tottenham's heritage assets.

#### **Policy Specific Comments: AAP2 (Housing)**

6.225 In response to comments relating to the affordability of new housing the Council's response states that the aim of the policy is to maximise affordable housing in new developments, but this is constrained by viability, as set out in the National Planning Policy Framework, and the grants available to provide different types of affordable housing.

6.226 There was concern about the policy's aim to rebalance housing tenure. The Council's response states that the London Plan Policy 3.9 makes clear that a more balanced mix of tenures should be sought in all parts of London, particularly in neighbourhoods where social renting predominates. Accordingly, having regard to the existing balance of residential tenures in Tottenham, the tenure split within draft AAP Housing Policy is in general conformity with the London Plan. It is also acknowledged that, in practice, discussions around the

balance of tenure at any given site will be negotiated and considered on a case by case basis.

### **AAP3 (Tottenham Hale District Centre)**

- 6.227 For clarity, the policy is amended to set the parameters for development in the area, and further detail will be set out in the emerging District Centre Framework.
- 6.228 Consultees noted the draft plan's lack of detail on the evening economy and implications for the new District Centre and other town centres. Further evidence is being prepared in this regard and will help to inform future planning and implementation frameworks for the District Centre.

### **AAP4 (Green Link)**

- 6.229 Many comments required clarification of the role and impacts of the Green Link and objected to its potential impact on the children's play area in Down Hills Park. The policy has been amended in response to comments to reduce the focus on creating a single "Green Link", towards creating a network of green spaces as the Tottenham part of Haringey's Green Grid.

### **AAP5 (Changes to Designated Employment Areas)**

- 6.230 The policy has been amended to demonstrate a clear direction for employment and business growth. To address technical comments and for clarity, the policy and supporting text was amended to include: a full list of designated employment sites; jobs/floorspace assumptions; and updated maps.

### **Tottenham High Road (General comments)**

- 6.231 In response to concerns about the loss of employment floorspace, the policy has been revised to provide further clarity on the re-provision of employment floorspace including support for affordable workspace.
- 6.232 Concerns were raised with proposed building heights. The policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.
- 6.233 A new designation for Locally Significant Open Land will be made following a comment that the green space at the northern end of Lawrence Road should be optimised for public use.

### **SS2 (Gourley Triangle)**

- 6.234 In response to concerns with the loss of employment floorspace, the policy has been revised to provide further clarity on the re-provision of employment floorspace including support for affordable workspace.
- 6.235 It was highlighted that the Stone Bridge Brook runs in a culvert under the site. The policy has been revised to signpost this and require proposals to investigate opportunities for de-culverting.

### **SS3 (Apex House and Seacole Court)**

- 6.236 There were questions as to why Seacole Court was included in the site allocation for Apex House. It is considered that both sites have future development potential and can contribute to delivery of plan objectives. The policy has been revised to make clear that any development should be considered comprehensively, including through phasing if necessary. The policy has also been updated in response to comments suggesting that proposals must take account of the site's relationship with Wards Corner, along with seeking wider public realm and access improvements.
- 6.237 There were concerns raised with proposed building heights including a tall building at Apex House. The policy is supported by local evidence but has been amended slightly to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character. A tall building at Apex House is considered a suitable location marking the Seven Sisters transport interchange.
- 6.238 Following suggestions that the site should make a contribution to town centre uses given its location, the policy has been revised to require active uses on the ground floor of Seven Sisters Road and High Road frontages.

#### **SS4 (Helston Court)**

- 6.239 There were objections to the inclusion of this site in the Local Plan, including a petition from local residents. In light of these representations and following further consideration of scheme deliverability, the site was removed from the Local Plan.

#### **SS5 (Wards Corner and Suffield Road)**

- 6.240 The policy has been amended to clarify the potential for the site to be developed according to either the extant planning permission or the proposed site allocation.
- 6.241 There were particular concerns with the loss of the Seven Sisters Market. Whilst the previous consultation plan requires re-provision of the market on-site as part of any future development, the site allocation has been revised to set this out more clearly.
- 6.242 Following concerns raised with proposed building heights, the policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.

#### **SS6 (Brunel Walk and Turner Avenue)**

- 6.243 There were objections to the inclusion of this site in the plan owing to concerns over loss of existing structurally sound buildings and affordable housing. It is considered that the site should continue to be considered for inclusion as part of the Council's estate renewal programme and to help deliver the borough's spatial strategy. The Local Plan policies will require that development does not result in a net loss of affordable housing on a habitable room basis.

6.244 Taking account of consultee comments a new requirement to provide open space as part of any future redevelopment has been included, in particular, seeking opportunities to link with amenity spaces adjacent to the site.

### **TG1 (Tottenham Leisure Centre Car Park)**

6.245 There were concerns with the loss of the car park and potential impact this would have on accessibility for leisure centre users. It was also considered by many consultees that the proposal would adversely impact on local amenity and open space, both on and adjacent to the site. The allocation has been removed from the plan to allow further consideration for the reconciliation of parking issues only, so that the site can be optimised for public benefit.

### **TG2 (Tottenham Chances)**

6.246 Consultees expressed concern over the loss of the Tottenham Chances community facility. The policy continues to provide for a community use as part of mixed use redevelopment. However the site allocation has been revised slightly to set out more clearly the expectation for an enhanced community facility and appropriate venue for the existing community use.

6.247 In response to concerns raised with impact on the historic environment, the policy has been revised to reinforce the need for proposals to demonstrate how heritage assets and their setting will be considered in any site redevelopment. An additional policy on conservation has now been included in this Local Plan to set a more positive framework for managing heritage assets. This policy draws links to the relevant DM Policies.

6.248 Following concerns raised with proposed building heights, the policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.

6.249 The policy has been amended to allow for appropriate car-free development recognising the site is in an area of high public transport accessibility.

### **TG3 (Tottenham Police Station and Reynardson Court)**

6.250 Addressing concerns with the loss of police facilities, the site allocation has been changed to clearly set out that conversion of the existing station will be subject to re-provision of the police station locally.

6.251 The policy has been amended to allow for appropriate car-free development recognising the site is in an area of high public transport accessibility.

### **BG1 (Bruce Grove Snooker Hall and Banqueting Suite)**

6.252 There were concerns raised with respect to the impact of future development on the historic environment, including the former cinema and conservation area. These assets remain subject to both statutory and policy protection. The allocation has been revised to set a new requirement for site masterplanning which will help to ensure that heritage assets and their setting are properly considered in future proposals. An additional policy on conservation has now been included in this Local Plan to set a more positive framework for managing heritage assets. This policy draws links to the relevant DM Policies.



- 6.253 There were concerns raised regarding parking and access, in particular, the proposal for car-free development and loss of parking at this site. The Council considers that the high public transport accessibility levels at this location justify the approach advocated. Future requirements for specific proposals will be set in line with the relevant DM Policies.
- 6.254 Some consultees objected to the inclusion of this site in the allocations on the basis that there are viable uses in the existing buildings. Having regard to delivery of the spatial strategy, the site is allocated for its optimum future use rather than the existing use. The allocation sets guidelines for use of the site should future proposals come forward.

### **BG2 (Tottenham Delivery Office)**

- 6.255 Respondents noted the presence of Bruce Grove Wood, to the rear of the site, as a valuable open space with ecological value that should not be adversely affected by future development. The Local Plan will designate this as Significant Local Open Land to ensure it is appropriately recognised, protected and enhanced.
- 6.256 There were concerns raised with the loss of the existing business and service provided by the delivery office. Having regard to delivery of the spatial strategy and the need to locate higher density uses in accessible locations, the site is allocated for its optimum future use rather than the existing use. The future of the delivery office is subject to the land owner's aspirations for the site. The allocation has been amended to set out the Council's expectation for replacement employment floorspace as part of any site redevelopment.
- 6.257 Consultees generally supported the proposal for a new access route from Moorefield Road however there were concerns raised with security. There were also concerns with the impact of development on residential amenity. The policy has been amended to set out requirements for passive surveillance and other design features to address security and protection of amenity. The Development Management Policies also sets further requirements in this regard.
- 6.258 There were objections to the demolition of 5 Bruce Grove. There is an extant planning permission for works to refurbish this property along with a planning permission at 7 Bruce Grove. Site redevelopment will be subject to the implementation of these permissions or other requirements as set by the site allocation.

### **BG3 (Bruce Grove Station) and BG4 (Moorefield Road)**

- 6.259 BG3 and BG4 have been incorporated into the allocation for Bruce Grove Station to ensure a more comprehensive approach to redevelopment across the sites. This change has been made, in part, following consultation comments which suggested that the Moorefield Road site requirements should be considered in relation to adjacent sites. There was a further comment suggesting that future development should not impact on nearby uses, such as the cafe and community centre, and this will be managed through the DM Policies.

6.260 There were concerns regarding the loss of existing employment and business uses including the builders' merchants. Having regard to delivery of the spatial strategy and the need to locate higher density uses in accessible locations, the site is allocated for its optimum future use rather than the existing use. The policy does not preclude the continued use of the site for the employment use, but sets guidelines to manage development should the site become available in the future. The policy has been amended to set out the Council's expectation for replacement employment floorspace as part of any mixed-use redevelopment.

**North Tottenham (General comments)**

6.261 These comments did not refer specific policies but addressed topics which are relevant to North Tottenham. The key matter was that of the proposed football stadium and how it is set in the context of the AAP.

6.262 It was suggested that the vision for the AAP is prejudiced by the proposed stadium redevelopment already in the pipeline. The Council considers that the AAP is necessary to help deliver the spatial vision and strategic objectives for the borough, with the adopted Strategic Policies Local Plan providing the context for the AAP. An allocation has been proposed for the Tottenham Hotspur Stadium to ensure any future development both considers and positively contributes to wider local area objectives.

6.263 There were further comments suggesting that the plan should ensure appropriate consideration for the historic environment, particularly with redevelopment of the football stadium. The plan has been revised to include a new policy on conservation and clearer requirements for site masterplanning, which will help to ensure that heritage assets are positively considered in development and regeneration.

**NT1 (Northumberland Park North)**

6.264 There were no significant issues raised with this policy requiring changes to the Policy.

**NT2 (Northumberland Park)**

6.265 A number of respondents expressed concern with, or objected to, the site allocations for a major estate regeneration programme and potential redevelopment of estates in this area, particularly where the housing stock is considered to be in good condition. There was also in-principle support for the site allocations in contributing to the regional spatial development strategy however recognising the need for collaborative engagement with local residents. The Council considers that the allocations are required to help meet the strategic objectives of the Local Plan including delivery of the borough's housing target. In light of responses received, policy AAP1 has been amended to emphasise that future development opportunities and proposals should be considered in consultation with the local community. In addition, the Local Plan has been revised to set out more clearly the requirements for masterplanning to ensure a coordinated approach to future development, including in the Northumberland Park area.

6.266 Some consultation comments suggested provision for types of community facilities and specific design requirements to be set within the allocations. It is considered that these detailed matters can be addressed through future

masterplanning exercises, which the Local Plan has now drawn clearer linkages to.

### **NT3 (High Road West)**

- 6.267 There were concerns with the loss or displacement of the existing community facility within the site allocation. The policy will continue to require that the community use is re-provided. Additional supporting text has now been included to set out that future site development will be subject to the needs of the existing occupants of the Irish Centre being suitably met.
- 6.268 Consultees raised concerns about the potential loss of existing local businesses and employment floorspace. The Council considers that the Local Plan will ensure a sufficient supply of employment land and premises within the borough (including Tottenham) to meet identified need however recognising that some reconfiguration, supported by site allocations, may be necessary to deliver the spatial strategy. There is a need to locate higher density uses in accessible locations and the site is therefore allocated for its optimum future use rather than existing use.

### **NT5 (Tottenham Hotspur Stadium)**

- 6.269 Consultation responses highlighted the desire for maximum public benefit to be derived from the development of the stadium. The Council agrees and through this site allocation will seek to ensure that future development proposals deliver the objectives of the Local Plan.
- 6.270 There were concerns raised with respect to the impact of future development on the historic environment. The policy will continue to require that proposals respond positively to the conservation area. An additional policy on conservation has now been included in this Local Plan to set a more positive framework for managing heritage assets. This policy draws links to the relevant DM Policies.

### **Tottenham Hale (General comments)**

- 6.271 These comments did not refer to specific policies but addressed topics which are relevant to Tottenham Hale. The majority of responses referred to infrastructure. Consultees noted the level of growth that is being planned for Tottenham, including Tottenham Hale, and suggested further information should be included in the plan to set out how this growth will be supported by infrastructure. The introductory section to this set of site allocations has been revised to signpost some of the key strategic infrastructure that will be delivered to facilitate growth. Additional information on the Housing Zone has also been included to set in context the dedicated investment committed to unlock the area's growth potential.

### **TH1 (Station Square West)**

- 6.272 A number of consultation responses were received in respect of proposed building heights. Some responses suggested the policies were too restrictive and would limit the development potential of specific sites, particularly given the context of the Housing Zone, whilst others objected more broadly to tall buildings and their potential clustering within the area. The policy has been amended to reflect that specific heights will be considered in line with the DM

Policies Local Plan along with further requirements set in a new AAP policy on urban design and character. The policy will continue to provide that a tall building may be appropriate at this location, marking the key transport node at Tottenham Hale and the emerging District Centre. The District Centre Framework (DCF) will provide a tool to assist with policy implementation in this respect.

- 6.273 There were some concerns raised with identified discrepancies between the DCF and Haringey's Urban Characterisation Study (UCS). The Council notes that the proposed policy is informed by a range of technical evidence, of which the UCS is one. The DCF will be used as a tool to assist with policy implementation. The policy has been amended to set out more clearly the expectation that proposals should have regard to the DCF or masterplans on development proposals as appropriate.
- 6.274 Consultees expressed concern with the proposal for a new District Centre at Tottenham Hale and the potential impact on the character of the local area, traffic and amenity. The Council considers that the District Centre is consistent with regional policy and supports delivery of the spatial strategy.
- 6.275 There were objections to the Green Link. These were made with specific reference to the Green Link's proposed interface with Down Lane Park. Further information on this matter is set out below in TH2, where the proposal for this Green Link was introduced in the plan, and where similar representations were made.

#### **TH2 (Ashley Road South)**

- 6.276 Some consultees expressed concern with the proposal for a new District Centre at Tottenham Hale and potential impacts on the character of the local area, traffic and amenity. It was also considered the District Centre would adversely affect the retail park and vitality of town centre uses along Tottenham High Road. The Council considers that the District Centre is consistent with regional policy and supports delivery of the spatial strategy.
- 6.277 Respondents suggested that the District Centre would significantly increase traffic within the area. A key aim of the Local Plan is to shift the mode by which residents and visitors reach Tottenham Hale, from car-based to more sustainable modes such as public transport, walking and cycling. Parking will be required in line with the DM Policies and car free development supported where appropriate.
- 6.278 Consultees noted the draft plan's lack of detail on the evening economy and implications for the new District Centre and other town centres. Further evidence is being prepared in this regard and will help to inform future planning and implementation frameworks for the District Centre.
- 6.279 There was a suggestion that new development on the retail park should include creation of new green corridors along the railway and other edges and along any central corridor. This is supported and the policy has been revised to ensure appropriate consideration for this in future proposals.

6.280 Following concerns raised with proposed building heights, the policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.

#### **TH6 (Hale Village Tower)**

6.281 Consultation responses received were mainly with respect to proposed building heights. Some responses suggested the policy was too restrictive and would limit the development potential of the site whilst others objected to a tall building. The policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character. However the policy will continue to provide that a tall building may be appropriate at this location, in particular, acting as a marker for the entrance to the station from Ferry Lane and also reflecting the extant planning permission.

#### **TH7 (Hale Wharf)**

6.282 There were concerns raised with the appropriateness of tall buildings at Hale Wharf. Respondents also pointed to potential impacts of development on the character and setting of the Upper Lea Valley Regional Park. The policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set out in a new AAP policy on urban design and character. Furthermore, the policy will continue to include specific requirements to ensure that development is in compliance with green belt objectives and will not have an adverse impact on local ecology and biodiversity.

6.283 Respondents broadly supported the policy to improve access to and enhance the usability of the Paddocks, and the approach will be carried forward.

6.284 There were comments suggesting that a comprehensive approach to development of the site would be necessary given the site is in multiple landownership. This approach was already advocated, but the policy has been slightly amended slightly to set out more clearly that development will be required to be accompanied by a site-wide masterplan.

6.285 Some comments noted existing employment uses and the potential for the site to continue to support employment. The policy makes provision for replacement employment floorspace as part of future mixed-use redevelopment and further requirements in this regard are set in the DM Policies Local Plan.

#### **TH8 (Welbourne Centre)**

6.286 Consultees expressed concern that the proposals will compromise existing green spaces and landscaping at Monument Way and adjacent Chesnuts estate, which are valued as informal play space and natural buffers protecting residential amenity. The open space at Monument Way has no formal open space or biodiversity designation and the Council considers that this site can contribute more positively to plan objectives, including housing delivery. The policy has been revised to ensure development optimises use of the existing undesignated open space, with new homes opening onto it for the benefit of amenity and passive surveillance. In addition, a new requirement for provision



of public realm has been added which includes consideration for retention and improvements to trees planted along Chesnut Road.

- 6.287 There were also concerns raised with proposed building heights, protection of residential amenity and potential impacts on local character. Design requirements, including for residential amenity and building heights, will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.

#### **TH9 (Fountayne and Markfield Road)**

- 6.288 Some consultees disagreed with the Local Employment Area - Regeneration Area designation and wished to retain the 'live-work' status of the site. The Council considers the approach advocated is necessary to ensure the site supports employment development whilst providing for appropriate complementary uses.
- 6.289 There were objections to the development guidelines requiring that buildings be retained for their industrial value. The policy has been amended to allow a more flexible approach to redevelopment, so that proposals will need to be accompanied by a review of industrial heritage of buildings. This review will inform planning decisions having regard to the statutory protections and a new AAP Policy on conservation along with relevant DM Policies on design
- 6.290 There was an objection to requirement for the re-provision of original employment floorspace, partially on grounds that Lawful Development Certificates for residential use have been granted. The Local Plan will be amended to reflect consideration for LDCs, where appropriate, and continue to seek to maximise employment floorspace through the site masterplanning process.

#### **TH10 (Herbert Road and Constable Road)**

- 6.291 There were concerns regarding the loss of existing business uses and employment floorspace. Having regard to delivery of the spatial strategy and the need to locate higher density uses in accessible locations, the site is allocated for its optimum future use rather than the existing use. The policy does not preclude the continued use of the site for the employment use, but sets guidelines to manage development should the site become available in the future. The policy has been amended to set out the Council's expectation for the maximum amount of dedicated employment floorspace to be re-provided in any future development.
- 6.292 Whilst both sites will be designated Local Employment Area – Regeneration Area, the site allocation has been amended to provide for warehouse living to be introduced at Constable Crescent.

#### Next steps

- 6.293 Following Cabinet's consideration it is intended that the four local plan documents will be reported to Full Council on 23<sup>rd</sup> November for approval for publication and submission to the Secretary of State.

- 6.294 Publication is part of the statutory process and will run concurrently for the four documents. It is expected that this will start on 1<sup>st</sup> December and run not less than 6 weeks. However, due to the Christmas a period of publication until the 29<sup>th</sup> January is proposed, making it approximately 8.5 weeks overall, including Christmas.
- 6.295 The Regulation 19 stage is a formal stage and focuses on the legality and soundness of the documents. Following the close of the publication period, 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.
- 6.296 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.
- 6.297 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
- 6.298 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.
- 6.299 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. Contribution to strategic outcomes**

- 7.1 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; and

**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

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

## **8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)**

### **Finance and Procurement**

8.1 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.

### **Legal**

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 it is important that these development plan documents are put in place formally at the earliest opportunity in order to be able to deliver the identified local development needs of the borough. A failure to put in place relevant and up to date policy will undermine the Council's ability (as local planning authority) to manage the process and deliver these needs. 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 Regulation 19 pre-submission consultation documents. The proposed responses to the consultation submissions received are dealt with in this report and its appendices and the Cabinet will clearly want to demonstrate proper consideration thereto.
- 8.7 Following consideration by Cabinet and, on the recommendation from Cabinet, the documents 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.

### **Equality**

- 8.10 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.
- 8.11 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.
- 8.12 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.
- 8.13 The report is seeking Cabinet endorsement of the final draft documents, and their associated supporting information, which includes a full Sustainability Appraisal that includes EqIA. This ensures the final policies have been considered for their potential impact on all sections of Haringey communities, but in particular, those with protected characteristics.
- 8.14 On the whole, the draft DPDs will not materially disadvantage any section of the Haringey communities.

## **9. Use of Appendices**

- 9.1 Appendix A: The draft Schedule of Alterations to the Local Plan: Strategic Policies: Pre-submission version; This is included at pages 119-214 of this agenda pack.
- 9.2 Appendix B: Consultation Statement to the draft Schedule of Alterations to the Local Plan: Strategic Policies: Preferred Option; This is available on <http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=7300&Ver=4>
- 9.3 Appendix C: The draft Development Management Policies: Pre-submission version; This is included at pages 215-350 of this report pack.
- 9.4 Appendix D: Statement to the draft Development Management Policies: Preferred Option consultation document; This is available on <http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=7300&Ver=4>
- 9.5 Appendix E: The draft Site Allocations: Pre-submission version; This is included at pages 351-574 of the report pack.
- 9.6 Appendix F: Consultation Statement to the draft Site Allocations: Preferred Option consultation document; This is available on <http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=7300&Ver=4>



- 9.7 Appendix G: The draft Tottenham AAP: Pre-submission version; This is included at pages 575-762 of this agenda pack.
- 9.8 Appendix H: Consultation Statement to the draft Tottenham AAP: Preferred Option consultation document; This is available on <http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=7300&Ver=4>
- 9.9 Appendix I: The draft Framework for Sustainability Appraisal, including Equalities Impact Assessment, Habitats Assessment and Health Impact Assessment of the four draft Development Plan Documents: Pre-submission versions. This is available on <http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=7300&Ver=4>

## 10. Local Government (Access to Information) Act 1985

10.1 The following documents have been used in the preparation of this report:

- a) *Haringey Local Plan: Strategic Policies (2013)*
- b) *Draft Proposed Amendments to the Haringey Local Plan: Strategic Policies (January 2015);*
- c) *Haringey draft Site Allocations DPD: Preferred Option consultation document (January 2015);*
- d) *Haringey draft Development Management Policies DPD: Preferred Options consultation document (January 2015);*
- e) *The draft Tottenham AAP: Preferred Option consultation document (January 2015);*
- f) *Haringey Statement of Community Involvement (Updated 2011);*
- g) *Haringey Revised Statement of Community Involvement (draft 2015);*
- h) *The London Strategic Housing Land Availability Assessment (2013);*
- i) *Haringey Unitary Development Plan (2006) with Saved Policies (2009);*
- j) *Haringey Strategic Housing Market Assessment (2014);*
- k) *Urban Characterisation Study (February 2015), including Supplementary addendum (October 2015);*
- l) *Haringey Employment Land Review Update (February 2015);*
- m) *Open Spaces and Biodiversity Study (October 2014);*
- n) *Haringey Retail & Town Centres Study (April 2013) & Updated Retail Assessment (October 2015).*
- o) *The Planning and Compulsory Purchase Act 2004;*  
<http://www.legislation.gov.uk/ukpga/2004/5/contents>
- p) *The Town and Country Planning (Local Planning) (England) Regulations 2012;*  
<http://www.legislation.gov.uk/uksi/2012/767/made>
- q) *National Planning Policy Framework 2012;*  
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- r) *The London Plan 2015;* <http://www.london.gov.uk/priorities/planning/london-plan>

10.2 Documents a) to n) are available on the planning policy pages Council's website which can be accessed via the following link:

<http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-development-framework-ldf/local-plan-consultation>

- 10.3 With respect to external links – Haringey Council is not responsible for the contents or reliability of linked web sites and does not necessarily endorse any views expressed within them. Listing should not be taken as endorsement of any kind. It is your responsibility to check the terms and conditions of any other web sites you may visit.
- 10.4 We cannot guarantee that the above links will work all of the time and we have no control over the availability of the linked pages.'