

Appendix 2.2 Comments on SA1-SA4 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Comments on SA1 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
574	SA1	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Support	Wood Green Investments Ltd supports this policy to protect sites required for the construction of Crossrail 2 and ensuring that a mix of uses and potentially enhanced infrastructure are required from future proposals in these areas.	Support is noted.
414	SA2	GLA	Support	The proposed approach to Crossrail 2 safeguarding and impact assessment in draft SA1 is strongly supported in principle. However, TfL recommends that the 'wider impact area' (currently an 800 metre radius) is extended to a 1km radius from Crossrail 2 stations. This would reflect the expected zone of influence of Crossrail 2, based on experience with impacts associated with Crossrail 1.	Noted. Action Amend 800m radius to 1km.
415	SA3	Transport for London	Crossrail	Draft SA1 (Indicative Crossrail 2 Areas) the approach to safeguarding here is strongly welcomed however, it is requested that the wider impact area (currently 800m) is extended to 1km from Crossrail 2 stations. This would reflect the expected zone of influence from Crossrail 2 around the stations as evidenced by impacts associated with Crossrail 1 which has been evidenced by GVA.	Noted. Action Amend 800m radius to 1km.
410	SA4	North London Waste Authority	Crossrail 2	NLWA has a Re-use and Recycling Centre (RRC) at Western Road in Wood Green and is within 400-800 radius of the proposed Alexandra Park Crossrail station. NLWA would be pleased to be involved in the scrutiny of sites as proposed in the DPD to ensure redevelopment of the former Haringey Heartlands area is conducive to the RRC being able to continue to serve local residents as it does now.	Agreed. The Council has identified the premises as licensed waste capacity, and has allocated it in a subsequent policy,
818	SA5	Our Tottenham	Map	A proper title and legend for the map should be included, explaining what the colours correspond to.	We recognise improvements could be made to our map and image resolutions, and we will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future.
268	SA6	Colin Kerr and Simon Fedida	Size	The draft SA1 proposes two circular areas of 400m and 800m radii around Alexandra Palace Railway Station to be subject to enhanced scrutiny and unspecified extra infrastructure and access requirements. These areas represent 0.5 km ² and 2.0 km ² around the Station. The SA1 areas are much larger than the 'safeguarded route' requirements and 'area of surface interest' for the Alexandra Palace area, as indicated by Sheet 42 of the Crossrail 2 consultation November 2014 to January 2015. The SA1 areas are also much larger than the proposed Draft AP1 site allocation in the earlier (2014) consultation of this Site Allocations DPD. The area of the earlier site allocation was a single 250m radius circle centred on Alexandra Palace Railway Station. No specific reason is given for the unprecedented scale and increase	This site allocation seeks to optimize development around future Crossrail stations. The 400m radius and 800m radius represent approximations of 5 and 10 minute walking distances to each potential future Crossrail station. The Council considers that there should be a policy that aims to ensure that any development parcels coming forward in these areas should ensure that opportunities to locate uses that would benefit from good access to a Crossrail Station are exploited.

				in size of the SA1 allocation. It is vastly greater than the safeguarded areas requested by Crossrail 2. Only the most general of reasoning has been given to justify the expansion of this site allocation.	
268	SA7	Colin Kerr and Simon Fedida	Site characteristics	The character of the Draft Site is exceptional. The site includes the valuable green space of Avenue Gardens and Alexandra Palace Park. The special nature of these community facilities cannot be over-emphasised. The Draft Site is substantially within the Wood Green Common Conservation Area and the Alexandra Palace & Park Conservation Area. The proposed Site includes two Statutorily Listed Grade II buildings and many residential dwellings.	Noted. There are specific policies regarding the management of conservation, open space, and existing residential assets in the borough. This policy will complement, not override these policies.
268	SA8	Colin Kerr and Simon Fedida	PTAL	Further, the PTAL rating of most of the SA1 area is already in the 5-6 range, and subject to density and access policies to the transport infrastructure, not least in the Draft DM-DPD and Local Plan Strategic Policies and its proposed alterations.	Noted.
268	SA9	Colin Kerr and Simon Fedida	Size	The SA1 site allocation is unreasonable. There exists substantial railway land just north of Alexandra Palace Railway Station at the Palace Gates servicing yards, and to the sides of the railway north and south for enhanced infrastructure. It is incumbent upon Crossrail to make their intent known, so that sensible policies may be made.	Crossrail is an emerging infrastructure investment which not only requires land for operational use, but will also bring enhanced property values to areas in which stations are located. It is therefore necessary that a policy is created which facilitates both the construction, and manages development in station-proximate areas to ensure that all new development is optimized for the future increased accessibility.
268	SA10	Colin Kerr and Simon Fedida	Planning	Planning blight on this scale is administrative overreach and an unacceptable burden on residents who live in the zone.	Crossrail is an emerging infrastructure investment which not only requires land for operational use, but will also bring enhanced property values to areas in which stations are located. It is therefore necessary that a policy is created which facilitates both the construction, and manages development in station-proximate areas to ensure that all new development is optimized for the future increased accessibility.
268	SA11	Colin Kerr and Simon Fedida	Size	Recommendation: These concerns could be addressed if the Borough were to put forward a site proposal with a new, smaller and properly considered site boundary, and which envisages a more intensive use of existing railway land.	Noted.

Comments on SA2 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
609	SA12	Apcar Smith Planning on behalf of Wedge Investments Ltd	LSIS17	The deletion of White Hart Lane as a locally significant industrial site is supported.	Noted. This was not identified in this policy, but was stated in the Alterations to the Local Plan. As the ELS recommends that this be retained as employment stock, the Alteration to the Strategic Policies will be corrected. Action: Reinstate LSIS17 in the Alterations to the Local Plan: Strategic Policies.
568	SA13	CgMs on behalf of LB Barnet	Incorrect referencing	It will be noted here that the reference to the site under draft Policy SA2 is incorrect in that it refers to site SA49 that is Cross Lane. It should read SA52 Pinkham Way.	Noted. Action: Amend LEA6 reference to site SA52 instead of SA49
268	SA14	Colin Kerr and Simon Fedida	Employment	The text states that the anticipated new employment premises stock will accommodate employment at higher densities, giving office uses as an example. It is questioned whether such higher density employment will	Noted, the Site Allocations make provision for targeted regeneration within Wood Green, linked to the introduction of Crossrail. The workspace viability study sets out the relative values of different types of workspace, and the site-specific requirements that occupants would need to fill workspace in the Wood Green/

				<p>materialise. There is a limit to how many retail jobs can be created, no matter how aggressively the Wood Green Town Centre is re-developed. The Borough's own Retail and Town Centres Study 2013 warns specifically against over-reliance on the projected retail floor space projections (p89).</p> <p>Further, it is understood from the 'Alterations to Strategic Policies', page 11, bullet 4, that the London Plan has downgraded the WGTC proposition in the office market on the basis of the London Office Policy review 2012.</p> <p>Given the importance of a viable employment base to Haringey, and its apparently weak and failing position, an element of caution should be adopted in the wholesale redevelopment of employment areas with high density employment space. It may not be taken up</p>	<p>Haringey Heartlands area.</p> <p>While that assertion that there is not a market for large-scale office development in Wood Green, there is potential for a number of employment uses, which will be occupied if high levels of access and amenity can be created through new developments.</p>
268	SA15	Colin Kerr and Simon Fedida	Employment	<p>The Haringey Employment Land Study 2015 is equivocal on the growth of high intensity B1a/b versus other uses, B8 in particular. It is only the 'Business as Usual' scenario that shows decline in B1c/B2/B8 floorspace requirements and growth in high intensity B1a/b uses (HELS, table 6.9 and table 7.2). The two other scenarios investigated, including the GLA Economics employment projections for the London Plan Further Alterations (HELS, page 40, para 6.3), show as much need for extra B8 (storage and distribution) floorspace as for B1a/b (HELS, tables 6.3, 6.6, 7.2).</p>	<p>The ELS shows that there is a need for identifying growth in employment stock in Haringey. The approach taken is to locate new knowledge-based (B1a-b) employment floorspace in highly accessible, high amenity areas, to give it the best chance of being filled. This aligns with both the ELS and Workspace Viability Study.</p>
268	SA16	Colin Kerr and Simon Fedida	Mixed use	<p>The effectiveness of the mixed use planning policies in force in recent years needs to be assessed and related to the proposed policy. Have they delivered employment as expected? For example, it has been shown that the 'Live/Work' policies, much in favour in recent years and in Haringey, are an employment failure (Haringey Employment Land Study 2015, page 51, para 8.20-8.27).</p>	<p>The criticism of live/work development is that the work element often becomes ancillary, or lost, to the live function, due to the significant imbalance in values between residential and employment in Haringey. This can be observed as an erosion of employment stock. The Council is allocating "warehouse living" in targeted areas, but not live/work.</p>
268	SA17	Colin Kerr and Simon Fedida	London Plan targets	<p>The site allocation proposals seem to be planning for the London Plan Haringey population projections, but not the London Plan Haringey job projections. On this basis, the indicated plans may be unsound.</p>	<p>The site allocations consulted on (excluding Tottenham), if developed, would create a potential for 100,000+m2 of new employment space.</p> <p>The Council has a target for all objectively identified need, including employment, and allocations will be provided that accommodate development to meet them.</p>
268	SA18	Colin Kerr and Simon Fedida	Employment	<p>Recommendation: The Council should put forward a more subtle and nuanced set of site allocations and accompanying policy that could accommodate the retention or creation of more spacious employment premises, if needed.</p>	<p>It is considered that the proposed policy protects lower density employment uses in suitable locations.</p>
430	SA19	Derek Horne & Associates for Majorlink Ltd	SP policy	<p>Changes to Designated Employment Areas are proposed to include SSP29 (Omega Works) within LSIS1 (Crusader Industrial Estate). This proposal conflicts with figure 5.1 and policy SP2 which specifically exclude Omega Works from all of their employment designations. No justification is given for the intended inclusion of Omega Works within SA2. If this amendment were to go ahead it</p>	<p>Omega's future designation as a part of a mixed use area with employment, and warehouse living elements mean that the only suitable designation is as a Regeneration Area. SP2 will be updated to conform to this.</p> <p>The two sites will be separately identified as Site Allocations due to</p>

				would be in direct contradiction to the Council's recently published Local Plan: Strategic Policies. The exclusion of Omega Works from SA2 within the strategic policies by the Council was, no doubt, carefully considered and should not be changed without detailed justification. The omission from SA2 of Omega Works would not have any material impact upon the other sites listed within the proposed policy, given the previous planning history of the site, which includes planning permission for a mixed use development, which is separately identified under SA36 from Crusader Industrial Estate SA35. Moreover, it is noted that whilst Crusader Industrial Estate was identified as being within a Defined Employment Area, Omega Works was not. We believe that the two industrial areas should remain separately identified as per figure 5.1 of the Local Plan.	their separate existing uses and ownerships.
430	SA20	Derek Horne & Associates for Majorlink Ltd	Vision	The Council states that it will work with local land owners and residents to produce master plans and potentially a SPD to help guide development in the area, Our client owns the Freehold of a substantial area of commercial land within the Haringey Warehouse District and Also within Tottenham action plan area. The client's properties have been subject of planning applications and appeals and are, therefore, well known to officers. Yet, to date, we are not aware of our client having been invited to be involved in any dialogue with officers. It is regretted that the council has failed to engage with client in preparation of local Plan documents. Clients only became aware of them because of tenants.	<p>It is noted that this opportunity to engage has been taken. The Council will expect any development on Omega Works, or Crusader to be masterplanned, identifying how the development of one would affect the other.</p> <p>The consultation letter was sent to occupants with specific note to inform the landowner.</p>
400	SA21	Derek Horne & Associates OBO Ms J Hancher (owner, part of Omega Works)	DEA changes	<p>Changes to DEA are proposed to include SSP29 within LSIS. This proposal conflicts with figure 5.1 and policy SP2 of Strategic Policies Local Plan, which specifically exclude Omega Works from all employment designations. No justification is given for intended inclusion of Omega Works within SA2.</p> <p>The exclusion of Omega Works from SA2 within the Strategic Policies by the Council was, no doubt, carefully considered and should not be changed without detailed justification.</p>	<p>Omega Works is proposed to be allocated as a Regeneration Area in the draft document. This is to ensure a balanced approach to providing warehouse living and employment uses in the future can be achieved, as set out in the ELS. It is noted that additional justification can be provided. Omega Works is not mentioned in the Strategic Policies amendments.</p> <p>Action: Make clear that the Site Allocations map on page 16 of the Site Allocations draft document replaces Figure 5.1 of the Local Plan: Strategic Policies 2013.</p>
414	SA22	GLA	SA2	The Council proposes revisions to a number of areas of employment land in the borough (outside the Tottenham AAP area). The overarching approach is set out within the Council's alterations to the Strategic Policies DPD and draft policies DM48-52 of the draft Development Policies DPD, with the strategy feeding through into the site allocations within this draft plan. Broadly the revisions seek to: identify new employment-led 'Regeneration Areas' to create new jobs as part of mixed use development; pragmatically respond to instances of 'warehouse living' by rationalising/intensifying employment areas whilst jointly supporting creative live/work communities; and, encourage existing industrial sites to modernise for greater efficiencies and economic output. Having regard to the conclusions of the 2015 Haringey employment land review, the proposed allocations are supported in principle. Nevertheless, in line with overarching comments made in respect to the Council's alterations to the Strategic Policies DPD, GLA officers would welcome further discussion on how, at a borough-wide level, the proposals for employment land management relate to the strategic benchmarks for industrial land release within the Mayor's Land for	Noted, the Council will continue to consult with GLA in regard this matter.

				Industry and Transport SPG.	
685	SA23	London Gypsy & Traveller Unit	Gypsy pitch provision	<p>Firstly, as a site allocations policy it is included under SA2 'Changes to designated employment areas'. This is not appropriate because Traveller sites are a type of accommodation and should be considered as such in policy terms.</p> <p>At the moment, the policy approach to Traveller provision seems to be that only industrial sites which are being released will be considered for meeting the needs of this community. We would argue this is not sufficiently robust and the Local Plan should provide a range of options to ensure greater flexibility. We are aware that other community organisations in Haringey are opposing the release of industrial land as this threatens the livelihood of the borough's local economy. Policy SA2 does not clearly state which industrial sites might be considered for Gypsy and Traveller provision and how pitch provision might be incorporated on these sites in a balanced way which protects existing employment.</p>	This is not the case. It is recognised that these sites have the highest value uplift, and therefore potential to accommodate new pitches. Any sites such as this on which redevelopment for higher value uses are acceptable would need to consider the appropriateness for pitches from a design-led basis using SP3 of the Local Plan.
400	SA24	Ms J Hancher		The omission from SA2 of Omega Works would not have any material impact upon the other sites listed within the proposed policy, given the previous planning history of the site, which includes planning permission for a mixed use development, which is separately identified under SA36 from the Crusader Industrial Estate SA35.	Noted.
565	SA25	Nick	Save industrial land	The council should also acknowledge its local business community and keep the industrial sites it craves to kill for the quest of housing and the fat cats. Support your local businesses, support local people that are employed by these local businesses. You have not considered any businesses and tried to save any, you just want to wipe us all out in the high road west regen	The regeneration of lower density employment uses within growth areas is required in order to fulfil the spatial vision of the plan, and to meet objectively identified housing and employment needs in the borough.
818	SA26	Our Tottenham	Employment; employment floorspace;	<p>See our comment with regard to Policy SP8 in the overall response to the Alterations to Strategic Policies. We have serious concerns about the evidence based presented in the Employment Land Study.</p> <p>Besides, It is unsound and damaging to Tottenham's economy to be reducing targets for industrial floorspace and downgrading protected industrial areas while another part of Haringey Council is promoting the borough as being at 'the centre of the British manufacturing boom' (Haringey Council Press Release, Thursday 26 March). As this press release noted, employment in fashion and textiles manufacturing went up by 15% between 2009 and 2012, while it fell by 13% in London during the same period.</p>	A carefully managed combination of release and protection of industrial land is required in order to fulfil the spatial vision for the borough and meet the objectively identified needs for jobs and housing set out in the London Plan.
818	SA27	Our Tottenham	Haringey Warehouse District; employment	<p>See comments made in our response to the Alternations to Strategic Policies in relation to Employment Land.</p> <p>We strongly disagree with the proposed downgrading of the employment land status of Crusader Industrial Estate N15; part of Vale Road/Tewksbury Road N15.</p> <p>Crusader Industrial Estate is the site of Haringey Council's</p>	As recognised in the consultation report for the Strategic Policies Alterations, a balanced approach to providing for the needs of industry, other employment, and the existing warehouse community. The only suitable designation to achieve this is RA.

				investment in fashion and textiles; both sectors requiring industrial workspace. [Elsewhere, it is mentioned that 'some industrial estates are at risk of being converted to alternative uses. This is evidenced with Crusader Industrial Premises not providing leases of more than 5 years, which indicates that the landowner may have other intentions for the site's future use' (p.18). Retaining this site as employment space will therefore require strong planning policy protection to prevent owners driving out existing uses and preventing investment through the use of short term leases.]	
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Comments on SA3 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
616	SA28	CgMs on behalf of Parkstock Ltd	Primary/Secondary frontage query	Appendix C and SA3 confirms the primary frontage and secondary frontages within the proposed Finsbury Park District Centre. We are very supportive of the primary designation from the corner of Seven Sisters Road (no. 263) to 10 Stroud Green Road. We also note that a secondary frontage is proposed along 263 to 271 Seven Sisters Road and along the new route proposed through the Finsbury Park Bowling Alley site to the Park. We welcome these frontage designations although question why 263 to 271 is a secondary, rather than primary, frontage given the level of activity and footfall along this part of Seven Sisters Road. Further explanation for this rationale would be welcomed.	When developed, the Stroud Green Road frontage will create a strong sense of place, enclosing a precinct focused around Finsbury Park station. It is not considered that this is the same for the Seven Sisters Rd element of the site, which is on the edge, while remaining inside, the town centre boundary.
414	SA29	GLA	Support	The Council's proposed changes to town centre boundaries are pragmatic and supported.	Support is noted.
574	SA30	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Supports policy	Wood Green Investments Ltd welcomes the Town Centre boundary to Wood Green and the extent of the Primary Shopping Frontage. The extension of the Primary Shopping Frontage is critical in bringing forward a viable and successful Town Centre.	Support is noted.

Comments on SA4 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
628	SA31	DP9 on behalf of Tottenham Hotspur Football Club	Licensed waste capacity	Objects to the safeguarding of 44 White Hart Lane as licensed waste capacity. Willing to work with the Council on this issue.	The principle that waste capacity is to be retained is in line with London Plan policy and must be upheld. The Council will work with developers where there are wider strategic benefits to be delivered from sites with an existing waste capacity.
629	SA32	DP9 on behalf of undisclosed	Licensed waste capacity	Objects to the safeguarding of 44 White Hart Lane as licensed waste capacity.	The principle that waste capacity is to be retained is in line with London Plan policy and must be upheld. The Council will work with developers where there are wider strategic benefits to be delivered from sites with an existing waste capacity.

Appendix F (6) Site Allocations consultation report

414	SA33	GLA	SA4	The safeguarding of Western Road Depot, 81 Garman Road, 100a Markfield Road, 44 White Hart Lane, 175 Willoughby Lane, 82 Markfield Road and Civic Amenity Site (Park View Road) is supported in line with London Plan Policy 5.17.	Support is noted.
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