

Appendix 2.3 Comments on SA10-SA22 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Comments on SA10 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
562	SA71	Cllr John Bevan	Include travellers site	<p>I am concerned as to the future development of this site and my concerns are focussed on the issue of the travellers site and the need to have a comprehensive development of both the travellers site and the Civic Centre site. I note that the travellers site has not been improved to today's expected standards and needs substantial investment to do so. I am aware that the Councils other travellers site does also not meet today's expected standards'.</p> <p>As this site is geographically part of the Civic Centre site I would request that the opportunity is taken to achieve a uniform development over the whole of this site including the travellers site. The travellers to be given priority in the allocation of the new housing built on the combined site.</p> <p>If needed I would suggest that the combination of the two Haringey travellers sites, the other site being at Clyde Road, at a new location would better enable the Council to provide a site that could comply with the current guidelines / facilities now expected for travellers sites.</p>	Noted. The existing housing needs of travellers on this site will need to be met through any development affecting the existing pitches. Reprovision from the Council's perspective could be in bricks and mortar on the site, new pitches on the site (subject to design considerations), or off-site, on a new fit-for-purpose traveller site. At present the identification of a site which is more suitable for travellers than conventional housing is challenging due to the high need for conventional housing.
697	SA72	Savills on behalf of Thames Water	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted.
697	SA73	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	<p>Noted.</p> <p>Action: Include reference to a piling statement being needed prior to any piling taking place.</p>
415	SA74	Transport for London	Bus Stop	This site accommodates a bus stop outside the entrance; the accessibility of this bus stop would be expected to be maintained if not improved.	<p>Noted.</p> <p>Action: Include reference to retention of the bus stop.</p>
422	SA75	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:	<p>Noted.</p> <p>Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</p>

				<p><i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	
422	SA76	Environment Agency	Potentially contaminated sites	<p>National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken</p>	<p>Noted.</p> <p>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</p>

Comments on SA11 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA77	Savills on behalf of Thames Water	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted.
697	SA78	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	<p>Noted.</p> <p>Action: Include reference to a piling statement being needed prior to any piling taking place.</p>
268	SA79	Colin Kerr and Simon Fedida	Height	The height recommendation (Development Guideline bullet 1) for this site is 4-5 storeys along Watsons Rd, and 6 storeys elsewhere. There are concerns for the amenity of the residents in 2 storey Ringslade Road, which runs up to the site, some of whom will be directly at the sharp point of the site.	It is considered that the reference to reduced height along Watsons Rd is to the benefit of the properties on Ringslade Rd.
268	SA80	Colin Kerr and Simon Fedida	Height	Recommendation: An additional Development Guideline is required to safeguard the amenity of the closest residents, such as that for SA12 (development guidelines bullets 3 and 4) – mews style development separating the higher bulk and residents, or such as that for SA25 (development guidelines bullets 1) – 3 storeys facing residential properties.	The provision of a mews-typology on an existing, and retained road within a metropolitan town centre is not appropriate.
422	SA81	Environment	Potentially	National Planning Practice Guide paragraph 005 states that Local	Noted.

		Agency	contaminated sites	Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.
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Comments on SA12 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA82	Savills on behalf of Thames Water	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted.
697	SA83	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted. Action: Include reference to a piling statement being needed prior to any piling taking place.
415	SA84	Transport for London	Comp Dev	It can be seen that inclusion of the Arriva bus garage in the wider area for regeneration would be attractive in any masterplan proposals. There is no evidence that Haringey or other stakeholders have started any master planning process for the site.	Noted.
415	SA85	Transport for London	Bus Garage Capacity	London Plan policy is that bus garage capacity for bus routes in London should be retained, and planning applications involving bus garages are referable to the Mayor. Retaining bus use seems to be inherent in the text, and we welcome the bullet that development cannot commence until adequate temporary reprovision of the bus stabling and maintenance has been secured, however TfL would request that an additional bullet point is included stating " <i>Any redevelopment of the Bus Garage site must retain or enhance the capacity for buses and associated facilities on site, or alternatively identify a similar well located site in the vicinity of this site.</i> "	Noted, text will be strengthened. Action: Strengthen text to reflect comment.
268	SA86	Colin Kerr and Simon Fedida	Access	It is questioned whether a bus access from Station Road to the bus garage (Development Guidelines bullet 1) is feasible. There is no right turn from the High Road into Station Road, and despite intensive lobbying of TfL, apparently no likelihood of such a turn being possible. In the absence of such a turn, buses using the garage may have to undertake substantial detours off the High Road, traversing sensitive residential streets, to reach the garage. This would be undesirable.	Noted. This development will need to consider how the 4-way junction on the High Rd/Lordship Lane/ Station Rd operates.
268	SA87	Colin Kerr and Simon Fedida	Access	Recommendation: It is suggested that the access to the underground garage from the High Road is retained, and planned to successfully integrate with the proposed secondary frontage on the High Road (SA12, Site Requirements bullet 5).	Noted, it is agreed that this should be looked into. At the present time it is appropriate to ensure flexibility into any potential design.

					Action: Add “or from the High Rd” into the first bullet of the development guidelines.
422	SA88	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	<p>The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey’s Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:</p> <p><i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	<p>Noted.</p> <p>Action: Addition of a development guideline noting that a flood risk assessment is required. Council’s Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</p>
422	SA89	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	<p>Noted.</p> <p>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</p>

Comments on SA13 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA90	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	<p>Noted.</p> <p>Action: Include reference to a piling statement being needed prior to any piling taking place.</p>
697	SA91	Savills on behalf of Thames Water	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a ‘Build over or near to’ Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer’s request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted.

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572	SA92	Beatrice Murray, resident	Supports tall buildings	If there are to be tall buildings, believes the three points along Wood Green High Rd are the most suitable for taller buildings.	Support is noted.
580	SA93	The Exilarch's Foundation	Pro Residential	We are the owners of Alexandra House in Station Road which is let to Haringey Council for the next 6 years. We have been advised on a number of occasions that there is little demand for offices in that location other than from Haringey Council. As a result the rent level that we receive from the Council is such that at lease expiry we would want to develop our building for residential. This can be done on our building alone without demolition or with a new building as part of a scheme for the whole block.	Noted.
580	SA94	The Exilarch's Foundation	Work with Council	We would like to be involved in any discussions about a larger scheme that includes our building.	Noted.
415	SA95	Transport for London	Bus garage	It can be seen that inclusion of the Arriva bus garage in the wider area for regeneration would be attractive in any masterplan proposals. There is no evidence that Haringey or other stakeholders have started any master planning process for the site.	Noted.
415	SA96	Transport for London	Bus Garage Capacity	London Plan policy is that bus garage capacity for bus routes in London should be retained, and planning applications involving bus garages are referable to the Mayor. Retaining bus use seems to be inherent in the text, and we welcome the bullet that development cannot commence until adequate temporary reprovision of the bus stabling and maintenance has been secured, however TfL would request that an additional bullet point is included stating “ <i>Any redevelopment of the Bus Garage site must retain or enhance the capacity for buses and associated facilities on site, or alternatively identify a similar well located site in the vicinity of this site.</i> ”	Noted. Action: Strengthen text to reflect comment.
415	SA97	Transport for London	Bus facility	TfL would request that an additional bullet point is included stating: “ <i>Any development on this site should be aware of the provision of a bus facility on the adjacent site.</i> ”	Agreed. Action: Amend site requirement to reflect comments
268	SA98	Colin Kerr and Simon Fedida	Height	The proposal for development to 25 storeys at this location is not justifiable. The given rationale ‘to mark the location of Wood Green Underground station’ is precisely an example of the specious and imaginary logic that infests planning for tall buildings. It is undeniable that 10,000s of people succeed in finding Wood Green Underground station every day. Its location is not in doubt. 25 storeys is double the height of anything else proposed elsewhere on the site or currently extant locally. Recommendation: It is suggested that the Site Requirements bullet 5 should be amended to read heights up to 12 storeys may be acceptable at the junction, and 6-10 elsewhere.	The height proposed was justified by evidence provided in the Urban Characterisation Strategy, and helps to meet the spatial vision for the borough, reinforcing the role of Wood Green as a metropolitan centre. Following this consultation, further work is being carried out to establish the most appropriate locations for tall buildings.
268	SA99	Colin Kerr and Simon Fedida	Access	It is questioned whether a bus access from Station Road to the bus garage (Site Requirements bullet 7, Development Guidelines bullet 4) is feasible. There is no right turn from the High Road into Station Road, and despite intensive lobbying of TfL, apparently no likelihood of such a turn being possible. In the absence of such a turn, buses using the garage may have to undertake substantial detours off the High Road, traversing sensitive residential streets, to reach the garage. This would be undesirable.	Noted. This development will need to consider how the 4-way junction on the High Rd/Lordship Lane/ Station Rd operates.
268	SA100	Colin Kerr and Simon	Access	Recommendation: It is suggested that the access to the underground garage from the High Road is retained, and planned to successfully	Noted, it is agreed that this should be looked into. At the present time it is appropriate to ensure flexibility into any potential

		Fedida		integrate with the proposed secondary frontage on the High Road (SA12, Site Requirements bullet 5).	design. Action: Add “or from the High Rd” into the last bullet of the site requirements.
422	SA101	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.

Comments on SA14 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA102	Savills on behalf of Thames Water	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted.
697	SA103	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted. Action: Include reference to a piling statement being needed prior to any piling taking place.
422	SA104	Environment Agency	De- culverting	We are supportive of the recognition of the Moselle Brook culvert in DPD site allocations (site requirements section). However, the wording could be strengthened as it does not give criteria for suitability of future use or any fallback position if it discovered that the river cannot be de-culverted here. Provision for not building on top of the culvert in the event that de-culverting is not possible allows the culvert to be opened up in the future and means repair and maintenance works can be done to it more easily. To rectify this we suggest the following additional wording: <i>The Moselle Brook runs in a culvert under the site, and has been identified as being in a poor condition. Development proposals must explore opportunities to de-culvert the Moselle Brook, with clear and robust justification provided if considered unachievable. No new buildings will be permitted within 8m of the edge of the culvert and it's condition must be commensurate with the lifetime of the development.</i> This site does not appear to have been identified with the SFRA.	Haringey Council do not believe that an 8m buffer zone on culverts is consistent with meeting the borough's housing targets. Where deculverting is considered viable as part of a development, an 8m buffer zone to the open watercourse could be acceptable.
422	SA105	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.

				be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	
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Comments on SA15 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA106	Savills on behalf of Thames Water	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</p>
697	SA107	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</p>
697	SA108	Savills on behalf of Thames	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order	Noted.

		Water		to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	
697	SA109	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted. Action: Include reference to a piling statement being needed prior to any piling taking place.
697	SA110	Savills on behalf of Thames Water	Cumulative impact	We are concerned about the cumulative impact of development in this area.	Noted. This is an issue to be addressed through the IDP.
603	SA111	The Theatres Trust	Gaumont Theatre	<p>The Trust supports the in principle redevelopment of these two sites adjoining the Gaumont Cinema, a grade II listed building that was built with a full stage and dressing rooms to enable it to be used for live performances. However, we are keen to ensure that any redevelopment does not prevent the Gaumont from being reused. A revitalised theatre/ cinema, or other cultural use such as a music venue, could also be a catalyst for wider regeneration with in Wood Green.</p> <p>Cinemas and theatres use amplification, however the Gaumont was not built to modern standards of noise insulation, and given its listed status, it would be difficult to install insulation without affecting its historic fabric. Therefore new residential development permitted directly along the boundary wall while the building is unused, may create issues in the future when the building is reused. It is also important that vehicle access to the stage door for the delivery of sets and equipment is maintained. We therefore request the following addition to the Development Guidelines for both sites to safeguard the potential reuse of this cultural facility:</p> <p><i>The Gaumont Cinema to the north of the site has listed status, and has an excellent interior, but the use as a boundary wall will be permitted so long as the historic fabric is not affected. <u>Adequate sound and vibration mitigation measures must be incorporated, reflecting its desired reuse as a theatre, cinema or other cultural venue, and vehicle access to the stage house must be maintained.</u></i></p> <p>This would reflect guidance at Item 123 of the NPPF in relation to new development and noise from existing facilities, and Item 70 which states that planning policy should protect and enhance community and cultural assets.</p>	<p>Agreed.</p> <p>Action: Add “Adequate sound and vibration mitigation measures must be incorporated, reflecting its desired reuse as a theatre, cinema or other cultural venue, and vehicle access to the stage house must be maintained.” To the Development Guidelines.</p>
422	SA112	Environment Agency	Flood Risk Assessment of Sites of 1ha or	The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework	Noted. Action: Addition of a development guideline noting that a flood

			more	<p>paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:</p> <p><i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	<p>risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</p>
422	SA113	Environment Agency	Potentially contaminated sites	<p>National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken</p>	<p>Noted.</p> <p>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</p>

Comments on SA16 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA114	Savills on behalf of Thames Water	Cumulative impact	<p>We are concerned about the cumulative impact of development in this area.</p>	<p>Noted, this will be an issue for the IDP.</p>
422	SA115	Environment Agency	De-culverting	<p>The SFRA correctly identifies the culvert (Moselle Brook) on this site and says that a FRA will be required to show development can remain safe. We are also pleased to see that the development guidelines for the allocated site recognise the culvert and encourages the investigation of de-culverting. We recommend the following wording to make the allocation more robust and ensure that the aims of the Thames River Basin Management Plan and WFD are taken into account:</p> <p><i>The Moselle Brook runs in a culvert under the site, and has been identified as being in a potentially poor condition. Development proposals must explore opportunities to de-culvert the Moselle Brook, with clear and robust justification provided if considered unachievable. A deculverted river may be a possible focal point for the new urban square. No new buildings will be permitted within 8m</i></p>	<p>The Council supports deculverting in principle, where viable.</p> <p>Haringey Council do not believe that an 8m buffer zone on culverts is consistent with meeting the borough's housing targets. Where deculverting is considered viable as part of a development, an 8m buffer zone to the open watercourse could be acceptable.</p>

				<i>of the edge of the culvert and it's condition must be commensurate with the lifetime of the development.</i>	
572	SA116	Beatrice Murray, resident	Design principles	This site offers a really useful space for development, especially the retail arcade area, which is only one-storey, and various car parks, could support a much higher density of use. Some parking facilities should be provided, but they should be under croft or basement so that the footprint can be fully used. This site offers the opportunity for developing a real community hub, not just the urban space, but even more important a really modern library, information, and communications building, with all the many functions the library now has, plus the offices that provide an interface between the council and the public, consultation services like the CAB, spaces for community groups to meet, and so on. A square with a cafe, some play space, the Post Office and Coop Bank fit all fit into this concept. This could become the 'the place to go' for any resident with questions about services and activities. There is enough room on this site to have a considerable amount of housing too. Design principles: The design should be really imaginative and inviting, with lots of green and very light.	<p>Noted.</p> <p>Parking will be limited due to the high public transport access.</p> <p>Note that there is potential for a Council customer service centre as part of the development, but that adding this as a site requirement may be overly prescriptive.</p>
566	SA117	Capita on behalf of Capital & Regional plc, partial landowner	Evidence	We are concerned that the policy is setting design parameters that are not supported by the evidence base. Matters such as the height of buildings, their location and particularly the location of a landmark building, are issues that can only be addressed as part of a detailed design analysis. At this stage, the evidence base would only support the broad parameters in respect of building height and not specific limits.	While a more detailed design process will be required as part of a planning application, a Site Allocation is the appropriate planning tool for ensuring that the correct issues are addressed as part of this work.
422	SA118	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	<p>The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:</p> <p><i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	<p>Noted.</p> <p>Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</p>

603	SA119	The Theatres Trust	Gaumont Theatre	<p>The Trust supports the in principle redevelopment of these two sites adjoining the Gaumont Cinema, a grade II listed building that was built with a full stage and dressing rooms to enable it to be used for live performances. However, we are keen to ensure that any redevelopment does not prevent the Gaumont from being reused. A revitalised theatre/ cinema, or other cultural use such as a music venue, could also be a catalyst for wider regeneration with in Wood Green.</p> <p>Cinemas and theatres use amplification, however the Gaumont was not built to modern standards of noise insulation, and given its listed status, it would be difficult to install insulation without affecting its historic fabric. Therefore new residential development permitted directly along the boundary wall while the building is unused, may create issues in the future when the building is reused. It is also important that vehicle access to the stage door for the delivery of sets and equipment is maintained. We therefore request the following addition to the Development Guidelines for both sites to safeguard the potential reuse of this cultural facility:</p> <p><i>The Gaumont Cinema to the north of the site has listed status, and has an excellent interior, but the use as a boundary wall will be permitted so long as the historic fabric is not affected. <u>Adequate sound and vibration mitigation measures must be incorporated, reflecting its desired reuse as a theatre, cinema or other cultural venue, and vehicle access to the stage house must be maintained.</u></i></p> <p>This would reflect guidance at Item 123 of the NPPF in relation to new development and noise from existing facilities, and Item 70 which states that planning policy should protect and enhance community and cultural assets.</p>	<p>Agreed.</p> <p>Action: Add “Adequate sound and vibration mitigation measures must be incorporated, reflecting its desired reuse as a theatre, cinema or other cultural venue, and vehicle access to the stage house must be maintained.” To the Development Guidelines.</p>
268	SA120	Colin Kerr and Simon Fedida	Height	<p>The Site Requirement bullet 4 and Development Guideline bullet 3 indicate that a 15 storey tower is acceptable at this location. No justification is put forward for this development height. It is an arbitrary, out-of-the-area idea. The Site Requirement elsewhere on the site is 8 storeys. This height limit should not be exceeded.</p> <p>Recommendation: The Site Requirement bullet 4 and Development Guideline bullet 3 should be amended to remove the presumption of a landmark tower of up to 15 storeys.</p>	<p>The site is identified in the Urban Characterisation Study as a location that can contribute to a legible network of taller buildings in the Wood Green area. The Council will commission further work to understand the most suitable locations for tall buildings in the context of responses to this consultaion.</p>
268	SA121	Colin Kerr and Simon Fedida	Library	<p>The Site Requirement bullet 1 suggests that the existing library building should be demolished. The Library is a fine building described in Pevsner’s ‘Buildings of England, London North’. The Council’s previous plans for this site (the Heartlands Development Framework 2005) envisaged refurbishment of the Library building. No rationale has been offered for the change in policy. Much loved and well used landmarks should not be swept away in this proposed tide of destruction. The Library has a very high footfall and usage, and is well located. Recommendation: The Site Requirement bullet 1 should be amended to specify the retention of the Library building.</p>	<p>It is agreed that the Library is well used, and that any redevelopment should reprovide and improve the experience that the current library offers.</p> <p>The library is not a building of merit either on the national or local list of buildings of merit. As such there is no requirement to specifically retain it in an allocation.</p>

Appendix F (7) Site Allocations consultation report

566	SA122	Capita on behalf of Capital & Regional plc, partial landowner	Multiple landowners	There is no detail of how delivery of these aspirations would be coordinated or financed in a comprehensive and equitable way.	It is noted that there are multiple landowners, but it is not considered that this makes the site undeliverable.
697	SA123	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted. Action: Include reference to a piling statement being needed prior to any piling taking place.
422	SA124	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.
697	SA125	Savills on behalf of Thames Water	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted.
268	SA126	Colin Kerr and Simon Fedida	Sky cafe	The Development Guideline bullet 10 suggests the provision of a 'sky café/restaurant'. This idea should join similar fatuous cliches of futurism such as 'walkways in the air', the previous big idea put forward and partially implemented in Wood Green; result, abortive waste. There are enough white elephants in Wood Green already. Excellent views of Alexandra Palace are available from many existing buildings in the Town Centre, including the Mall. Recommendation: The Development Guideline bullet 10 should be deleted	Although agreed that this bullet point can be less prescriptive, the Council feels strongly that opportunities to enable Wood Green to perform its metropolitan centre function, and enabling the top floor of a tall building here to perform a function such as a sky café is prudent.
572	SA127	Beatrice Murray, resident	Supports tall buildings	Believes the three points along Wood Green High Rd are probably the most suitable for taller buildings if there are to be such buildings.	Support is noted.
566	SA128	Capita on behalf of Capital & Regional plc, partial landowner	UCS	Document does not provide maximum parameters in respect of the tallest buildings, suggesting simply that such structures could be '11 plus storeys'. Similarly, other heights are provided as a range rather than a specific maximum.	Noted, the document will be modified to ensure that height limits are removed. Applications for development will be required to justify their heights in terms of the surrounding context.
697	SA129	Savills on behalf of Thames Water	Waste water	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and	Noted, reference will be included in this site allocation. Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.

				<p>no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	
697	SA130	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</p>

Comments on SA17 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
566	SA131	Capita on behalf of Capital & Regional plc, partial landowner	Town C=centre uses	The policy needs to recognise the changing context of town centres in the face of competition from online retailers and the increase in residential uses in town centre locations. There is a growing emphasis on leisure uses in town centres, which serve to complement and support the retail offer. The policy should reflect this and provide for further complementary uses such as residential and hotel as part of the retail offer. In this regard, there is an opportunity to provide for hotel and/or residential development above The Mall's existing service yard site fronting Pelham Road and we would ask that this is acknowledged within the site allocation	<p>Issues dealing with mixes of uses in town centres will be picked up in the DMDPD.</p> <p>It is considered that there is a developable site on Pelham Road, with the potential to optimize the connection from the Wood green Library site through to Noel Park, and improving Gladstone Mews.</p> <p>Action: Insert requirement for the developable part of the site on Pelham Rd to optimize the local cycling and pedestrian transport network.</p>
572	SA132	Beatrice Murray,	Bridge	It is useful to have the bridge, but it is very wide and dominant and the shade cast on the area below gives the feeling of a tunnel rather	Noted. Reference to a single, lighter, bridge will be retained.

		resident		than an open high rd. Rather than remove the bridge, it would be useful to consider whether it would be possible to have a narrower glass sided connection. This might lead to some lack of retail space along the bridge, maybe this could be compensated elsewhere? A cafe along the south side of (a narrower?) bridge with glass windows to the road and a glassed pedestrian way along the north side would also help to lighten the whole structure and bind it into the High Street. The other possibility might be replacing with two narrower glass walled bridges.	
422	SA133	Environment Agency	De-culverting	<p>We are pleased to see that the culverted Moselle Brook has been recognised in this site allocation. Although the supporting text doesn't mention opening up the culvert this is considered acceptable as buildings are to be retained for this allocation. The culvert would need to be shown to be safe throughout the lifetime of the development and developers should be made aware that this may require some work to the culvert.</p> <p>We suggest you change the text in your development guidelines to: <i>The Moselle Brook runs in a culvert under this site. The condition of the culvert must be commensurate with the lifetime of the development. A condition survey will need to be undertaken and repair works identified carried out. No new buildings will be permitted within 8m of the culvert.</i></p> <p>This site has not been included in your SFRA and should be included in Appendix A.</p>	<p>The Council supports deculverting in principle, where viable.</p> <p>Haringey Council does not believe that an 8m buffer zone on culverts is consistent with meeting the borough's housing targets. Where deculverting is considered viable as part of a development, an 8m buffer zone to the open watercourse could be acceptable.</p>
268	SA134	Colin Kerr and Simon Fedida	Public realm	<p>The Site Requirement bullet 2 suggests making the site less dominating to its surrounds, focussing on the High Road. While this is welcomed, it is also the other side of the Mall facing into Mayes Road that is in desperate need for improvement to the public realm. For too long it has been considered the 'back side' of the Mall development. The opportunity should be taken to upgrade the public realm on this side of the Mall.</p> <p>Recommendation: A Development Guideline bullet should be included to support upgrading the public realm on the Mayes Road facing edge of the Mall.</p>	<p>Noted, reference will be added to improving amenity on the Mayes Rd side of the Mall where feasible.</p> <p>Action: Add reference to improving the amenity on the Mayes Rd side of the Mall where feasible.</p>
422	SA135	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	<p>The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording: <i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the</p>	<p>Noted.</p> <p>Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</p>

				design of the development. We suggest the following additional wording as a minimum: <i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i>	
422	SA136	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.

Comments on SA18 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA137	Savills on behalf of Thames Water	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</p>
697	SA138	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</p>

				take around 18 months to 3 years to design and deliver.	
697	SA139	Savills on behalf of Thames Water	Cumulative impact	We are concerned about the cumulative impact of development in this area.	Noted, this will be addressed through the IDP.
697	SA140	Savills on behalf of Thames Water	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted.
697	SA141	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted. Action: Include reference to a piling statement being needed prior to any piling taking place.
422	SA142	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	<p>The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:</p> <p><i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	Noted. Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.
422	SA143	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA144	Savills on behalf of Thames Water	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</p>
697	SA145	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</p>
697	SA146	Savills on behalf of Thames Water	Cumulative impact	<p>We are concerned about the cumulative impact of development in this area.</p>	<p>Noted. This will be dealt with through the IDP.</p>
697	SA147	Savills on behalf of Thames Water	Sewers	<p>There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of</p>	<p>Noted.</p>

				the Water Act 1989.	
697	SA148	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted. Action: Include reference to a piling statement being needed prior to any piling taking place.
422	SA149	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	<p>The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:</p> <p><i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	Noted. Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.
422	SA150	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.

Comments on SA20 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
633	SA151	Anne Gray, Local Resident	Affordable retail premises	Any demolition in the High Road area will displace small shops and their proprietors may not be able to afford the higher rents in new buildings. Provision needs to be made for them to have CHEAP premises. It would surely be possible to build a small-business mall (similarly to the large covered market in Edmonton) over the bus	Turnpike Lane station is a listed structure, and building above it will not be permissible. It is noted that smaller cheaper units will be to the benefit of some traders. It is considered that this policy increases the opportunity for town centre floorspace to be provided, thereby creating trading opportunities. The upcoming Wood Green AAP

				station and offer cheap small units there.	will look in greater detail about the spatial requirements of businesses within Wood Green town centre.
574	SA152	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Comprehensive approach	<p>Through conversations with the Council it was understood that they were looking for a more comprehensive approach. However due to the complex land ownership, especially on Westbury Avenue, this would result in a comprehensive delivery being unlikely. Therefore the delivery of this site should be encouraged to come forward in a phased approach over the time period of 2015 and onwards.</p> <p>In recognition of the above, Wood Green Investments Ltd seeks to work together with LB Haringey to progress a comprehensive strategy for the site however not a comprehensive delivery. Prescriptive policy is inappropriate in this instance and likely to restrict and unduly delay future development proposals.</p> <p>The importance of viability is enshrined in para.173 of the NPPF which states: <i>“Plans should be deliverable. Therefore the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”</i></p>	<p>The Council will consider planning applications as they come forward. On Site Allocations any permissions coming forward for part of an allocation must demonstrate that the strategic objectives of the rest of the site will be secured before consent is granted.</p> <p>In terms of this site, a masterplan for the whole of the site which identifies how the rest of the site can be developed will be required alongside any planning application.</p>
697	SA153	Savills on behalf of Thames Water	Cumulative impact	We are concerned about the cumulative impact of development in this area.	Noted, this will be addressed through the IDP.
574	SA154	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Height	<p>Within this section of the allocation our client welcomes and supports the proposed requirement of ground and first floor town centre uses fronting the High Road as well as the accommodating Turnpike Lane tall buildings cluster facing the High Road.</p> <p>It has however also been noted that <i>“Development of a slim tower of up to 15 storeys could be achievable here”</i>. Our client considers that this requirement to be too prescriptive, and therefore likely to stifle the viability of future development proposals.</p> <p>Although our client would like to encourage the prospect of providing a tall building(s) on this site height is a matter for design and layout and therefore specifying a number of storeys at this stage is considered to be unsound and likely to have an impact on future development. Accordingly our client proposes the following revised wording: <i>“Development of a slim landmark tower as part of a cluster of tall buildings of up to 15 storeys could be achievable here”</i></p>	Noted. The Council will not be setting prescriptive building heights in Site Allocations; instead developments must justify their height in terms of surrounding context. Further evidence examining the most suitable locations for tall buildings and their design requirements will be included at publication stage.
574	SA155	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Height	<p>It is however noted that in relation to the heights of buildings it has been assessed that height should fall away from its peak at the frontage to Wood Green High Road along Whymark Avenue and that the datum of development at the eastern end should be limited to 6 storeys.</p> <p>Again, although our client would seek to encourage and bring forward development of varied heights and scale across the site, the wording of this policy is extremely restrictive and would also stifle the viability of future development proposals. The suggestion of stating</p>	<p>While the Council is promoting growth within Wood Green town centre, it is important that consistency is achieved between sites that are adjacent to each other. Additionally it is essential that the new developments complement the plots around the sites.</p> <p>The purple star represents the preferred point of a tall building, as set out in the key at the end of the consultation document. The tall building location is to mark Turnpike Lane station, and as such this is the most appropriate point on the site to identify an opportunity for taller development.</p>

				<p>where the tallest building should be located and then limiting height at the eastern end to 6 storeys is again a matter for design and layout and should not be restricted in such a way at this stage. Accordingly our client proposes the following guideline to be removed: "Height should fall away from its peak at the frontage to Wood Green High Road along Whymark Avenue. The datum of development at the eastern end should be limited to 6 storeys".</p> <p>Furthermore, it is noted that there is a purple star marked on the site towards the south west edge of the site. Although unclear what this star represents, however it is presumed that the star marks where the greatest height should be located. Our client again feels that this is too prescriptive and should not be marked on the plan as it could stifle future development coming forward.</p>	Further evidence examining the most suitable locations for tall buildings and their design requirements will be included at publication stage.
178	SA156	Dan Rosenberg	Height	We object to the 25 storey tower proposed for turnpike lane station. A tower that size is completely out of character with the local area, and will dominate it. This is a low rise area, and a tower that size does not belong here.	Objection is noted. The decision to allocate a taller building at Turnpike Lane is to mark the location of Turnpike Lane station, creating a network of taller buildings within Wood Green. Wood Green is identified as an Intensification Area in the London Plan, and a Growth Area in the Local Plan: Strategic Policies. As such higher levels of development are required to meet the spatial vision for the borough.
697	SA157	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	<p>Noted.</p> <p>Action: Include reference to a piling statement being needed prior to any piling taking place.</p>
422	SA158	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	<p>Noted.</p> <p>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</p>
633	SA159	Anne Gray, Local Resident	Regeneration creating uncertainty	I am also most disturbed that at the public consultation about Crossrail 2 I was told that the new station at Turnpike Lane would be within the area of land currently owned by London Transport. Now we are being told something completely different and fears must arise how much demolition and disruption there will be anywhere along the Crossrail 2 route.	<p>The requirements for land to be used for the construction of Crossrail 2 will be brought forward as certainty is increased around the project. At present there is a draft alignment, but as the planning for Crossrail moves on, we will update the Plan to reflect it.</p> <p>The sites identified here seek to maximise the public benefit of Crossrail 2 by linking development with improving public transport access.</p>
633	SA160	Anne Gray, Local Resident	Retain new buildings	The proposals for this area say there are no buildings worth preserving in this area. I cannot imagine why however wrote this has failed to notice a new, large retail unit on the High Road frontage where Bennie Dee's and the small indoor mall used to be. This was built in the last 3 years. Likewise the Chinese food store with new flats above in Whymark Avenue which was built in the last 3 years. Total rebuilding in this area would be very wasteful of recent investment and would set an undesirable precedent. If the overall Haringey plan is to encourage investment, there can be no worse	It is noted that some more recent developments have occurred on this site. The Plan sets out the allocation of the land for the period up to 2026 however. This will provide certainty around what will need to be developed in the future in order to meet the spatial vision for the borough.

				way to do it than to pull down buildings which have recently been constructed by private parties – this will place a blight over the whole borough because it will appear that nothing is secure.	
697	SA161	Savills on behalf of Thames Water	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted.
574	SA162	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Supports policy	Wood Green Investments Ltd ('the client') has an investment in relation to properties 8, 10, 12 and 14 High Road within the proposed site allocation area 'SA 20: Westbury & Whymark Aves' and therefore has an aspiration to bring forward and encourage the development of this area. Haringey's vision for SA 20, as an area for <i>"Redevelopment of existing town centre buildings to create a landmark building marking Turnpike Lane Crossrail Station, with town centre uses and residential above"</i> is welcomed and supported by Wood Green Investments Ltd.	Support is noted.
572	SA163	Beatrice Murray, resident	Supports tall buildings	Believes the three points along Wood Green High Rd are the most suitable for taller buildings.	Support is noted.
574	SA164	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Timescales	<p>However, although welcomed, the policy has been identified for comprehensive redevelopment due to Crossrail 2 potentially coming through Turnpike Lane Station. While it is understood that this proposal is clearly a strong instigator for development our client would look to ensure that development is encouraged on this site regardless of whether Crossrail 2 is formally announced to be aligned with Turnpike Lane Station. Re-development in this area would significantly regenerate the area positively irrespective of whether Crossrail 2 does come through this station.</p> <p>In recognition of the above our client proposes the following new wording for the 'Proposed Site Allocation' text: <i>"Redevelopment of existing town centre buildings to create a landmark building marking Turnpike Lane Crossrail Station, with town centre uses and residential above."</i></p> <p>In addition, it is noted in the introduction to the allocation that the timeframe of delivery is marked for 2020 onwards, this is also clearly in relation to the delivery of the potential Crossrail 2 alignment with Turnpike Lane. As stated before it is believed that this site should come forward for redevelopment irrespective of the proposed Crossrail 2.</p>	As the site lies within the Crossrail 2 safeguarding, development of this site will be consented only with approval from TfL. It is considered appropriate that reference to Crossrail is made in this policy.
697	SA165	Savills on behalf of Thames Water	Waste water	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</p>

				<p>no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	
697	SA166	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</p>
574	SA167	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Work with Council	<p>Our client would like to work collaboratively with LB Haringey to ensure a strategy is adopted for the site that ensures a viable and successful area within an appropriate timetable</p>	<p>Noted. The Council looks forward to working with landowners to achieve this.</p>

Comments on SA21 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA168	Savills on behalf of Thames	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation</p>

		Water		<p>likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	of a planning application.
697	SA169	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</p>
697	SA170	Savills on behalf of Thames Water	Cumulative impact	We are concerned about the cumulative impact of development in this area.	Noted. This will be managed through the IDP.
697	SA171	Savills on behalf of Thames Water	Sewers	There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	Noted.
697	SA172	Savills on behalf of Thames	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	<p>Noted.</p> <p>Action: Include reference to a piling statement being</p>

		Water			needed prior to any piling taking place.
415	SA173	Transport for London	Public realm	The site is located at a busy interchange and potential future Crossrail 2 station, therefore TfL would support a scheme which seeks improvements to the public realm and improves accessibility to transport facilities. TfL would also expect a car-free development here due the very high PTAL and therefore recommends changing “ <i>parking should be minimised</i> ” to “ <i>A car-free development would be expected on this site</i> ”.	Noted. There may be a requirement for wheelchair access, for both residential and town centre uses however.

Comments on SA22 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
594	SA174	L R Stewart and Sons, majority landowner	Bridge improvements	The development guidelines are generally supported. It is noted that the deliverability of an improved railway bridge is, however, questionable and cannot be made a requirement of the development. To improve this bridge would require agreement of Network Rail and has considerable financial implications that would undermine the viability of development. The deliverability of such an improvement could be undermined by the need for complex legal agreements and track possessions. This guideline should be amended to read that the opportunities for improving this bridge should be positively explored.	Noted. The implementation considerations for improvements to the bridge will be addressed in the IDP.
426	SA175	Thames Water	Drainage	Proposed allocations SA22; SA37 and SA38 include within the Development Guidelines an aspiration to open up access to the New River. The New River is an operational asset used for water supply and maintaining security and operational safety are Thames Water's key priority. However, Thames Water is willing to work with the Council to explore the opportunity of improving access.	Noted, this will be addressed through the IDP.
624	SA176	Tottenham & Wood Green Friends of the Earth	Ecological Corridor	It is important that the development does really widen and enhance the ecological corridor of the New River	The ecological corridor abounds the railway line, not the New River. It is considered not to be a significant asset at the present time, and that development can make an improved ecological offer on this site.
594	SA177	L R Stewart and Sons, majority landowner	Employment floorspace	The site requirements are generally supported. However, in relation to the final bullet point it is noted that financial compensation arising from the net loss of employment floorspace would need to be considered within the context of the overall viability of the scheme. It may be feasible to provide some employment or retail floorspace as part of the desire to enhance the activity in Hampden Road and this should be recognised within the site requirements as an option.	The requirement for compensation for loss of employment will be sought if necessary in line with SP9 of the Local Plan. Retail will not be considered in this location as it is not within a town centre. Some employment floorspace would be in line with draft policy DM50 of the Local Plan.
594	SA178	L R Stewart and Sons, majority landowner	Higher densities	The suggested yield of 70 residential units on the allocation as a whole would not result in the effective use of the site. Circa 70 units or more is possible on the L R Stewart land. The yield from the entire allocation is difficult to assess without further design work, but we consider that a notional yield of 100 units would be appropriate. This reflects the development guidelines which allow for development on up to 10 stories and densities above the current London Plan guideline. This high density approach is supported.	It is considered that the capacity identified in the document is consistent with the London Plan-compliant methodology set out in Appendix A. The capacity of the site will be determined through detailed design proposals at the planning application stage.

594	SA179	L R Stewart and Sons, majority landowner	Multiple ownerships	<p>The proposed allocation is in two ownerships and there is no realistic prospect of bringing the entire site forward as one at the present time as the adjoining land includes revenue generating office accommodation. The owner of the adjoining land does not, at present, wish to proceed with development on a comprehensive basis.</p> <p>The policy should therefore reflect the fact that there are two land parcels. The development guidelines may include a comment to the effect that development on either land parcel should not prejudice the long term residential development of the entire allocation. The proposals that have been prepared for the L R Stewart's land ensure that this objective will be met.</p>	<p>The Council will consider planning applications as they come forward. On Site Allocations any permissions coming forward for part of an allocation must demonstrate that the strategic objectives of the rest of the site will be secured before consent is granted.</p> <p>In terms of this site, a masterplan for the whole of the site which identifies how the rest of the site can be developed will be required alongside any planning application.</p>
422	SA180	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	<p>Noted.</p> <p>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</p>
594	SA181	L R Stewart and Sons, majority landowner	PTAL	Is 4 not 3	<p>Noted, this will be updated in the document.</p> <p>Action: Update PTAL in the allocation.</p>
594	SA182	L R Stewart and Sons, majority landowner	Supports allocation in principle	The Company supports the allocation of the land and considers that the site represents a significant opportunity to regenerate land in a sustainable location in close proximity to Hornsey Railway Station.	Support is noted.
697	SA183	Savills on behalf of Thames Water	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</p>
697	SA184	Savills on behalf of	Water	We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is	<p>Noted, reference will be included in this site allocation.</p> <p>Action: Make reference to the need to consult with Thames</p>

		Thames Water		<p>unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Water with regards water supply upon preparation of a planning application.</p>
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