

## Appendix2.4 - Comments on SA23-SA29 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

## Comments on SA23 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
584	SA185	Rapleys on behalf of Lasalle Investment Management, long leaseholders	33% Employment use target	<p>We object to the criterion setting a target of 33% employment floor space as part of mixed use redevelopment, as there is no evidence demonstrating that this percentage target is necessary to meet the strategic growth and LES objectives. Such a target would undermine the viability and deliverability of a mixed use regeneration scheme. Depending on the mix and the quantum of the development, it may not be feasible or viable to provide 33% of the floorspace as employment floorspace. Furthermore, a target based on a percentage of floorspace does not take account of type and quality of employment generating uses. The target based on a percentage of floorspace is not properly justified by evidence, and when considering a viability of the site's redevelopment options and mix of uses, such a policy requirement will be a barrier for site owners/developers to promote their sites for redevelopment.</p> <p>Furthermore, we consider that the requirement for the provision of "employment floorspace" does not provide sufficient flexibility. The NPPF states that the Local Plan should allocate sites to promote development and flexible use of land. Therefore, all employment generating uses and economic development, as defined by the NPPF, should be considered for an appropriate mix of uses to deliver a viable regeneration scheme, subject to occupier interest and market demand at that time.</p>	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to replace the entire previous stock of employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the particularities of the site will be appropriate.
584	SA186	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Active frontages	We agree that there is an opportunity to enhance the public realm of Haringey Heartland in general. However, as drafted, it is considered too prescriptive to "require" active frontages on to all sites of Clarendon Road, as it would depend on the design, land uses, and adjoining developments. This point therefore should be identified as an opportunity rather than a site requirement.	The aspiration to create an interactive cultural quarter and new east-west links within this area means that active frontages are appropriate.
584	SA187	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Air quality	We object to this guideline as it is an onerous requirement to seek mitigation of and improvement to the development's impact over and above the identified impact arising from the development proposals, taking into account the existing operation.	Noted. This is a requirement for all sites, and the policy requirement is covered under the development management policies.
268	SA188	Colin Kerr and Simon Fedida	Alexandra Primary School	<p>The site is adjacent to Alexandra Primary School, a fine example of a London Board School. New development next to the school should respect the context and high quality of the school building. Its setting next to Wood Green Common and views to it across the Common are positive elements of the public realm and should be preserved.</p> <p><b>Recommendation: A Development Guideline bullet should be included requiring that new development next to the Alexandra Primary School should respect the context and high quality of the school building.</b></p>	<p>Agree, a requirement to making a positive contribution to the Conservation Area will be added.</p> <p><b>Action: Include reference to development making a positive contribution to the Conservation Area.</b></p>
584	SA189	Rapleys on behalf of Lasalle Investment	Boundary amendment	the eastern boundary of SA23 appears to include a small section of the adjoining ownership allocated within SA25. We request that allocation maps are amended to reflect the correct ownership	<p>Noted.</p> <p><b>Action: The site boundary will be amended.</b></p>

		Management, long leaseholders		boundaries in each site allocation.	
584	SA190	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Broadly support allocation	We support the principle of the redevelopment of the site as a long term opportunity. We agree that the existing buildings at Guillemot Place are of limited architectural quality, and the redevelopment of the site is necessary to increase the development capacity of the site (to meet the strategic development needs), and to contribute to the regeneration of the site and the wider area.	Support is noted.
584	SA191	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Capped rents	We strongly object to the requirement of “capped commercial rents” as such a requirement would, fundamentally, constrain the deliverability of the regeneration scheme. There is no definition of and justification (including viability evidence) for the requirement to cap commercial rents. In principle, the requirement for capping the commercial rents goes beyond the purpose of the Local Plan, and it is a concern as there is no clear policy objective and justification is stated. Fundamentally, this requirement, as currently drafted, will make the scheme unviable, as not only it is unrealistic to “cap” rents commercially, but it will act as an impediment to securing the necessary inward investment towards the regeneration of the area, particularly where there are substantial costs associated with redevelopment.	The Council considers the provision of affordable workspace to be an important factor in encouraging economic development in Haringey. The Council also recognises that there are a number of methods of providing affordable workspace. The council is cognisant of the need for developments to be viable, and welcomes a range of approaches to delivering workspace that enables economic growth in Haringey.
697	SA192	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.
584	SA193	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Decentralised energy	we would comment that any requirement for the site to provide an easement for the work should be deleted, where an existing network does not exist or it is not practically feasible or financially viable. This point is supported by the London Plan Policy 5.5 which states that boroughs should require developers to prioritise connection to existing or planned decentralised energy network, where feasible	We will consider all decentralised energy requirements in line with the Council’s emerging decentralised energy masterplan.
584	SA194	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Explicit referencing of residential use	it is considered necessary to allocate the site for “mixed use development to include residential use”, in order to ensure the effectiveness of the Local Plan as a whole, and to be consistent with the draft Development Management Policy DM16 (A) states that <i>“proposals for new housing will be supported and directed to sites allocated for residential development including mixed use residential development within the Site Allocations Local Plan”</i> .	It is considered likely that an element of residential use will be required in order to cross subsidise new workspace within this site. This is consistent with draft policy DM50, and the site’s proposed Regeneration Area designation.  <b>Action: Add residential to the suitable range of uses on this site.</b>
268	SA195	Colin Kerr and Simon Fedida	Granta House	The Site Requirement bullet 1 suggests that Wood Green job centre at Granta House should be demolished. Granta House is a good building that gently matches and complements Alexandra Primary School, a fine example of a London Board School next door. It successfully mediates between the monumental architecture of Cambridge House to the charming and village like Alexandra Primary School, dropping from three to two storeys. It is a well considered Local Authority building carefully related to its site; in a way a neutral model for a sensitive site in a Conservation Area. The building should be retained.  <b>Recommendation: The Site Requirement bullet 1 should be</b>	It is not considered that Granta House provides a significant benefit to the Conservation Area. It is however appropriate that any future development enhances the Conservation Area. This will also facilitate vital east-west links from the town centre to the new mixed-use sites and on to Alexandra Palace and Park  <b>Action: Include reference to development making a positive contribution to the Conservation Area.</b>

				<b>amended to allow for the retention of Granta House.</b>	
268	SA196	Colin Kerr and Simon Fedida	Height	<p>The frontage of this site on Western Road and facing into the Wood Green Common Rose Garden is on a narrow road way with pedestrian traffic crossing from Western Rd into Wood Green Common. Building heights should be 3-4 storeys as at present so as to step back from the Common, and make the narrow roadway more open and pleasant for pedestrians.</p> <p><b>Recommendation: A Development Guideline bullet should be included recommending 3-4 storey frontage to Western Rod and Wood Green Common.</b></p>	<p>It is appropriate that any new development respects the presence of the neighbouring properties, and the Conservation Area as a whole.</p> <p><b>Action: Include reference to development making a positive contribution to the Conservation Area.</b></p>
584	SA197	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Height	<p>The third bullet point (tall buildings): In general, we support the principle of tall buildings on the site. However, we object to the wording of the policy which limits the height of the building to 8 storeys. The site's strategic designation is for growth and intensification, and the consented Clarendon Site redevelopment scheme established the principle of tall buildings in the area. In order to increase the development capacity by making efficient use of the site, and to ensure viability, it is necessary to provide taller buildings subject to design and assessment of key views. Therefore, a site allocation policy should not look to place a restriction on building heights.</p> <p>It should also be noted that the site is already surrounded by 3-5 storey existing buildings. Therefore, the restriction of the height up to 8 storeys may not be considered to maximise the site's potential, and could unnecessarily prejudices the future redevelopment opportunity. Therefore, we consider that the height restriction is contrary to the NPPF, which seeks to ensure sufficient flexibility, and the general heights should be identified as a guide, rather than a requirement.</p>	<p>Support is noted. The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.</p>
584	SA198	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Individual scheme	on the basis that the allocated site is in two separate ownerships, we request that the allocation policy is sufficiently flexible to secure the redevelopment and regeneration of the area without delay. Whilst we do not object to the aspiration to deliver a comprehensive site wide scheme, we consider that the policy should be sufficiently flexible to allow an individual plot to be brought forward independently, in the event that a comprehensive redevelopment is not deliverable, due to unforeseen circumstances in the future, particularly as the allocated site is identified as long term potential	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.
584	SA199	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Job Centre site	Whilst we support an aspiration to create a pedestrian/cycle link through the site, it may not be feasible to deliver such a pedestrian/cycle link in terms of viability and it is not clear whether the job centre site (which will be required to provide a link) will become available for redevelopment over the lifetime of this Plan. Therefore, such an aspiration should not be identified as a "requirement," and we request that this is identified as <i>"an opportunity, where practically feasible, subject to viability"</i> . As such, this should be listed as an opportunity rather than a site requirement.	It is considered that Granta House is developable and presents the preferred route through the site. This will enable creation of a new north-south route linking the development area with Wood Green Common and Alexandra Palace Station.
584	SA200	Rapleys on behalf of Lasalle Investment Management, long	Masterplan	We object to the requirement to follow the principles set out in the future Council approved Masterplan for the area. This is difficult when the Masterplan has not been prepared. In addition, there appears to be no timescale or indication whether it is to be prepared as an informal Masterplan or to be incorporated in the Site Allocations. At	The Wood Green Investment Framework and associated Area Action Plan are currently being prepared. Following public consultation, Cabinet approval will be sought in spring 2016, following which the AAP will require Secretary of State approval. If the Council approves an additional AAP, any applications

		leaseholders		<p>this stage, the site allocation should not “require” the site’s redevelopment to follow the principles of a yet to be prepared Masterplan. Any aspiration, which has the potential to delay the redevelopment, should not be included in the site allocation as a requirement.</p> <p>If the Council considers it necessary to prepare a Masterplan, it should be an informal Masterplan, and the landowners/developers should be engaged in the preparation from the early stages.</p>	permitted will be in line with it.
584	SA201	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Overall ask too high	<p>Given that there are other aspirations such as the improvement of the public realm is also identified as a “requirement” to contribute to the enhancement of the cultural quarter. We are concerned with a number of “requirements” for the improvement and enhancement of the cultural quarter, as such combined requirements will inevitably affect the developer’s viability to deliver a regeneration scheme. It should be noted that redevelopment comprising cultural uses which generally have lower commercial value, such as artist studios/workspace, is unlikely to make a regeneration scheme viable on previously developed land, where costs associated with redevelopment is generally high, and the Mayor and the Council’s CILs are already in place. In this context, residential development is necessary to ensure viability of the regeneration scheme, not least because the site is designated in an area of growth and intensification to increase a housing capacity. As such, we request that the site requirements are reviewed allow sufficient flexibility, as follows: <i>“as part of mixed use redevelopment, uses that contribute to the regeneration of the cultural quarter will be supported, where appropriate, and subject to feasibility and viability.”</i></p>	It is considered that the “cultural” offer that this site can make is of a value approximately equal with affordable workspace, which the Council expects the residential development to cross-subsidise. As all development is necessarily subject to viability considerations in the NPPF, the amended wording is not considered necessary.
697	SA202	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><b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b></p>
584	SA203	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Reg 123 addition	<p>Furthermore, such a pedestrian/cycle link will be for the benefit of the wider public and the regeneration of Haringey Heartland/Wood Green, rather than to serve the development of the allocated site alone. As such, the developers of the site should not be expected to fund the provision of the link, and such infrastructure should be funded by the CIL, as otherwise the regeneration of the site may become undeliverable due to viability issues. Accordingly, the provision of a new pedestrian and cycle network should be designed in as part of any masterplan for the wider area, or in the future Wood Green Area Action Plan, for including in the Council’s Infrastructure Delivery Plan, and the Regulation 123 list, to secure the delivery of the provision.</p>	The link will fall under infrastructure included in the Council’s Regulation 123 list to be funded from CIL. The requirement on the site will be to accommodate the section that runs through the site. This is in line with the Council’s Planning Obligations SPD. The Investment Framework and AAP will include recommendations and viability implications of new east-west links.
697	SA204	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 the Water Act 1989.</p>	Noted.

584	SA205	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Student Housing potential	The site is also considered appropriate for student accommodation if a requirement for further student accommodation is identified in the future. It is noted in paragraph 3.25 of the Preferred Options Development Management document that Haringey has a role to play in fostering relationship with existing higher education institutions and in meeting the needs for purpose built student accommodation. In this respect, Policy DM2 specifically refers to Haringey Growth Areas and Areas of Change as being suitable locations for future student accommodation, where required. The policy states that provision of further student accommodation will be supported as part of new major development schemes these locations. As the site's redevelopment is a long term opportunity, we consider it appropriate to include student accommodation in the allocation, in line with Policy DM2	It is considered that the most suitable locations for student housing in this area are within Wood Green town centre, and as such a preference for the proposed use over conventional housing will not be made in this policy.
584	SA206	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Support redevelopment	On behalf of our client, we confirm our client's aspiration to promote both sites for residential-led mixed-use development, and the inclusion of these sites in the Site Allocation document. In particular, we consider that both sites have the potential to contribute significantly to meeting the identified development needs, including housing and employment generating uses, and to the regeneration of the area.	Support is noted.
603	SA207	The Theatres Trust	Supports Policy	The Trust supports the promotion of a cultural quarter and is pleased that there are safeguards for the Mountview Academy site, until they have successfully relocated	Support is noted.
584	SA208	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Type of new route	We strongly object to the provision of a road through the allocated site, as it is in separate ownerships, and such a requirement would seriously undermine the viability of the future redevelopment opportunity, as it will take up a significant proportion of the development land, and there are normally substantial costs associated with the construction of roads. We consider that such an onerous requirement, which is unnecessary and unlikely to be feasible or deliverable, should not be included in the allocation as a policy requirement, as it would threaten the future redevelopment opportunity	The proposal is for an extension of Clarendon Rd as a pedestrian/ cycling route, not a road as stated. The strategic objective of making this connection is to link the New River path to the north with the east-west link connecting Alexandra Palace and Wood Green/Tottenham. It is considered that inclusion of this connection as a site requirement at an early stage enables development to be brought forward in such a way that it can deliver this strategic objective.
584	SA209	Rapleys on behalf of Lasalle Investment Management, long leaseholders	UCS	It is noted that Haringey's Urban Character Study (2015) ('UCS') identifies that there is an opportunity to substantially increase the general building height in Haringey Heartland, as part of intensification and regeneration plans. However, it recommends that heights should be greatest along the railway line (mid to high rise) stepping down to mid-rise towards the existing 2-3 storey building and terraces that line Hornsey Park Road and Mayes Road. We are concerned with this approach, as there are no development sites available or allocated along the railway embankment when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. The USC's recommendation, which is reflected in the draft allocation SA23, will significantly constrain the redevelopment opportunity of the area, particularly the strategic objective to intensify and to increase the development capacity for growth.	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.
697	SA210	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.  <b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b>

				<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	SA211	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><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>

## Comments on SA24 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
525	SA212	Barton Willmore on behalf of Workspace	Capped rents	Workspace does not support the provision of capped commercial rents both in policy SA24 or the Development Management DPD. There is no supporting evidence looking at viability and we also consider that its inclusion goes beyond the spectrum of planning and would be particularly hard to enforce.	The Council considers the provision of affordable workspace to be an important factor in encouraging economic development in Haringey. The Council also recognises that there are a number of methods of providing affordable workspace. The council is cognisant of the need for developments to be viable, and welcomes a range of approaches to deliver workspace that enables economic growth and local employment opportunities in Haringey.
525	SA213	Barton Willmore on behalf of Workspace	Cultural Quarter	We require further clarification of the term 'Cultural Quarter'. The term is widely used within the supporting policy, but at no point is there a clear and concise definition. The inclusion at this stage will help stakeholders clearly understand the aspirations for the site.	Cultural quarter is defined in the glossary as an area where a critical mass of cultural activities and related uses are emerging, usually in a historic or interesting environment.

525	SA214	Barton Willmore on behalf of Workspace	Height	Workspace objects to the maximum height being set at eight storeys. The site is within a Metropolitan Town Centre with good public transport links and should be a location for intensification of uses. Each site should be appraised on its own merits and a detailed scheme will have to take account of landscape and visual matters, as well as protecting important strategic views. Rather than restricting height, the policy should focus on ensuring good quality design that sits within the existing urban landscape	<p>The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.</p>
525	SA215	Barton Willmore on behalf of Workspace	Landmark building	In respect of tall buildings, we note the comments provided in the Urban Characterisation Study which advise that a tall building could be located beyond the south west boundary of the site, adjacent to the railway line. We disagree with this analysis and consider that a landmark building should be integral to the wider development area rather than tucked away next to railway sidings. We look forward to discussing this in more detail with the LBH Conservation and Design officers.	<p>The tall building was identified in the UCS to mark the entrance to Alexandra Palace Park from Wood Green (and vice-versa). This is part of a wayfinding strategy that will contribute to the regeneration of Wood Green and create new links from the town centre to the new mixed-use sites, the cultural quarter and Alexandra Park and Palace to create new public spaces and open out the current linear nature of the town centre.</p> <p>Further evidence identifying the suitability of areas for tall buildings will be provide alongside the next version of the Plan.</p>
525	SA216	Barton Willmore on behalf of Workspace	London Plan	In the context of the status of Wood Green, it should also be noted that the broad location is earmarked by the Mayor as an 'Intensification Area' capable of delivering 1,000 new homes.	Noted.
697	SA217	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><b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b></p>
525	SA218	Barton Willmore on behalf of Workspace	Quantity of employment land	The policy requires a minimum of 50% employment floorspace across this site. It is explained that such space should include uses that positively support the enhancement of the cultural quarter. Whilst supporting this element, Workspace raises concern with a quantative approach. Instead there should be a qualitative test applied to each site. At present the 50% figure is not supported by evidence and is simply an aspiration. It is our view that this element could in fact stifle development coming forward and create viability issues to delivery.	<p>The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.</p> <p><b>Action: replace the 50 per cent target with a requirement to provide the maximum quantum of employment floorspace viable.</b></p>
697	SA219	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.
525	SA220	Barton Willmore on behalf of Workspace	Supports overall principle of development	Supports the broad principles of redevelopment included within the policy. Given the existing public transport links and the likelihood of CrossRail 2 coming in the future, this is considered an important site that can provide new houses and commercial space over the next plan period. Furthermore, the site and surrounds form a significant part of the wider regeneration strategy for Wood Green and will help to deliver important new routes towards Alexandra Palace and beyond	Support is noted.



603	SA221	The Theatres Trust	Supports policy	The Trust supports the promotion of a cultural quarter and is pleased that there are safeguards for the Mountview Academy site, until they have successfully relocated	Support is noted.
697	SA222	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><b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b></p>
697	SA223	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><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>

## Comments on SA25 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
262	SA224	Safestore (Bilfinger GVA)	Employment floorspace	We support the principle of providing a mix of uses across the site. However it is likely to be extremely difficult to ensure each building contains a mixture of uses which complies with the suggested	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is



				employment target of 33%. We therefore suggest that sufficient flexibility is given to each planning application to ensure the most appropriate type of development is supported and delivered. The London Plan (Para.4.52) outlines that the viability is a consideration, including its bearing on development costs and other priority planning obligations. Where relevant, the number and size of units should be determined on the merits of each case. It is considered that flexibility is suitably worded into the proposed Site Allocation DPD and Development Management Policies documents.	noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.  <b>Action: Revise the requirement for 33% of floorspace with a viability-based principal, as set out in the DMDPD.</b>
262	SA225	Safestore (Bilfinger GVA)	Access	The site allocation proposes that a new connection linking Clarendon Road and Coburg Road should be established, including access for businesses. We support the provision of improved accessibility within the proposed site allocation. However, we wish to fully engage with the Council regarding the potential of any proposed route through the Safestore site. A route through the Safestore site could have a significant impact upon the operations of the business.	Noted. The Council will continue to engage with landowners in regard this issue.
262	SA226	Safestore (Bilfinger GVA)	Allocation boundary	A minor part of the Safestore site is also located within SA23 an ownership plan (attached to this letter) demonstrates this. We requested that for completeness the entire Safestore site is allocated entirely SA25.	Noted.  <b>Action: The site boundary will be amended.</b>
262	SA227	Safestore (Bilfinger GVA)	Building height	We consider that the inclusion of a limit to the maximum height of buildings (8 storeys) on the site is inflexible and unreasonable. We suggest that there should be sufficient flexibility within the policy to ensure that the most appropriate type of development is delivered for the location. The policy should seek to ensure that any future planning application is accompanied by a detailed townscape assessment justifying storey heights rather than imposing an arbitrary policy requirement which could burden development sites from optimising their potential in line with the NPPF and London Plan.	Noted. All proposals for development in the area will be assessed against a new development management policy on tall and taller buildings. This means the allocation specific height limits are no longer considered necessary.  <b>Action: Remove reference to specific heights in the allocation.</b>
262	SA228	Safestore (Bilfinger GVA)	Commercial rents	Capped commercial rents are considered contrary to the London Plan (Para. 4.51) which states that boroughs may impose planning obligations, where appropriate, feasible and viable, to provide or support affordable shop units suitable for small or independent traders. Capping commercial rents could result in a reduction in the provision of employment workspace generated through new developments as well as resulting in the optimum scheme for the site not being delivered. In order to accord with the London Plan, viability considerations should be incorporated within the proposed Site Allocation DPD and Development Management Policies documents to ensure they are sound and legally compliant.	The Council considers the provision of affordable workspace to be an important factor in encouraging economic development in Haringey. The Council also recognises that there are a number of methods of providing affordable workspace. The council is cognisant of the need for developments to be viable, and welcomes a range of approaches to delivering workspace that enables economic growth in Haringey.
697	SA229	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.
262	SA230	Safestore (Bilfinger GVA)	Decentralised energy network	We support the proposal to connect into the de-centralised energy network, however the policy should consider the costs of connecting into a de-centralised energy network, and the impact this could have upon the viability of the scheme. It is suggested that the policy remains flexible to ensure that where viable and reasonable the developer is encouraged to connect in to the de-centralised energy network.	We will consider all decentralised energy requirements in line with the Council's emerging decentralised energy masterplan.

262	SA231	Safestore (Bilfinger GVA)	Existing buildings	We support the principle of allocating the site for mixed use development. We do not agree however that the existing buildings must be retained as they are not considered to be of any particular building merit. It is considered that in order to improve the townscape and optimise the existing site, the policy should remove the stipulation that the existing buildings should be retained. It is not appropriate or reasonable for the policy to seek the retention of buildings that have little townscape or heritage merit and could compromise the optimisation of the site, contrary to the London Plan and NPPF.	It is considered that the Chocolate Factory 2 building creates a positive active frontage to Coburg Road, and that the building typology is well suited to being part of the future of this area, while providing a link to the past.
262	SA232	Safestore (Bilfinger GVA)	Masterplan	We support the principle of adopting a Masterplan. It should optimise development potential of the area and Safestore should be fully engaged in its development.	Support is noted. The Council will continue to engage with landowners in regard this issue.
697	SA233	Savills on behalf of Thames Water	<b>Piling</b>	No impact piling shall take place until a piling method statement is submitted and approved.	Noted.  <b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b>
697	SA234	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.
603	SA235	The Theatres Trust	Supports Policy	The Trust supports the promotion of a cultural quarter and is pleased that there are safeguards for the Mountview Academy site, until they have successfully relocated	Support is noted.
697	SA236	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 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.  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.	Noted, reference will be included in this site allocation.  <b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b>
697	SA237	Savills on behalf of Thames Water	Water	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.	Noted, reference will be included in this site allocation.  <b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a</b>

				<p>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><b>planning application.</b></p>
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## Comments on SA26 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
584	SA238	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Employment floorspace	Having reviewed the published evidence base documents, these requirements are not sufficiently justified and have potential to undermine the redevelopment potential, particularly in the context of the site being brownfield and its location within the Metropolitan Town Centre. Appropriate employment generating uses and their quantum should be brought forward as part of a mixed use redevelopment scheme, subject to market signals at the time, to ensure that the redevelopment of the site is deliverable	<p>The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.</p> <p><b>Action: Revise the requirement for 33% of floorspace with a site specific approach, as set out in the DMDPD.</b></p>
584	SA239	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Air quality	The guideline suggests that mitigation of and improvement to local air quality and noise pollution should be made on site. We object to this guideline as it is an onerous requirement to seek mitigation of and improvement to the development's impact over and above the identified impact arising from the development proposals, taking into account the existing operation	<p>Noted. This is a requirement for all sites, and the policy requirement will be moved into the DMDPD.</p> <p><b>Action: Move the air quality/ noise pollution requirement into the DMDPD.</b></p>
584	SA240	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Pedestrian cycle link	We consider that a pedestrian/cycle link between Wood Green and Clarendon Square could utilise existing Brook Road, rather than create a "new" link, particularly in the event that the individual plots in different ownership come forward independently.	It is the Council's view that in order to optimize land patterns in the area, that a high quality route linking Wood Green and the Penstock foot tunnel should be created. It is considered that inclusion of this connection as a site requirement at an early stage enables development to be brought forward in such a way that it can deliver this strategic objective. The Investment Framework and AAP will provide the evidence for any proposed new links and options will be consulted on locally before being approved.
584	SA241	Rapleys on behalf of Lasalle Investment Management, long	Capped commercial rents	We strongly object to the requirement of "capped commercial rents" as such a requirement would, fundamentally, constrain the deliverability of the regeneration scheme.	The Council considers the provision of affordable workspace to be an important factor in encouraging economic development in Haringey. The Council also recognises that there are a number of methods of providing affordable workspace. The council is cognisant of the need for developments to be viable, and

		leaseholders			welcomes a range of approaches to delivering workspace that enables economic growth in Haringey.
584	SA242	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Pedestrian cycle link	We understand from the diagram on page 38 of the consultation document, the Council's aspiration is to provide a cycle network within Wood Green. The reference to the "avenue" is ambiguous, and it is subject to interpretation. We would request that the avenue is amended to clarify that it is a pedestrian/cycle avenue.	Noted.  <b>Action: Amend 2<sup>nd</sup> bullet point to make clear that a cycling/pedestrian link is proposed.</b>
697	SA243	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.
422	SA244	Environment Agency	De-culverting	We are pleased to see that the culverted Moselle Brook has been recognised in this site allocation. The culvert is on the edge of the site. There should be scope to de culvert and this must be thoroughly explored. To amend this we suggest you change the text in your development guidelines to: <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 of the edge of the culvert and it's condition must be commensurate with the lifetime of the development.</i> This site has not been included in your SFRA and should be included in Appendix A.	The Council supports deculverting in principal, where viable.  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.
584	SA245	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Decentralised energy	It is understood that the Council is preparing further evidence on the delivery of decentralised energy networks in the Borough. In advance of the publication of this evidence, we would comment that any requirement for the site to provide an easement for the work should be deleted, where an existing network does not exist or it is not practically feasible or financially viable. This point is supported by the London Plan Policy 5.5 which states that boroughs should require developers to prioritise connection to existing or planned decentralised energy network, where feasible.	We will consider all decentralised energy requirements in line with the Council's emerging decentralised energy masterplan.
584	SA246	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Residential use	This allocation site lies within a Regeneration Area of the Local Employment Area ('LEA') (which permits a wide range of uses including residential), and the Wood Green Metropolitan Town Centre. As such, a wide range of uses, including residential development, which contribute to the strategic development needs, should be considered appropriate for this allocation site.	Support is noted.
724	SA247	DP9 on behalf of Oceanwave Estate Ltd	Height	Height should not be limited to 7 storey, instead should promote a range of heights. It is wrong to arbitrarily introduce such a restriction through a specific planning policy without thorough analysis to ascertain the capacity of the site.	The height requirements set out in the policy are drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area. Detailed design will be required on all sites to gain planning permission, but the heights set out in the document are considered appropriate to enable development that brings change while having an acceptable impact on the rest of the borough.
724	SA248	DP9 on behalf of Oceanwave Estate Ltd	Height	The scheme must be considered in the context of the former gas works site. At the end of Brook Road and properties on Hornsey Park Rod the minimum proposed height is 13-14m rising to 16-17m (4-7 storeys) we consider this to be low. The approved height is equivalent	The gas collector gives a false datum. It is not envisaged to be included as part of the future of the area and as such does not create an appropriate height reference. The heights have considered the future scheme granted permission on Clarendon

				to 8-9 storeys.	Square however.
724	SA249	DP9 on behalf of Oceanwave Estate Ltd	Height	Feasibility studies taken by our client on the 'Iceland site' suggest height of 9 storeys could be accommodated without impact on the existing townscape. Therefore, the proposed redevelopment of our client's site and the adjacent gas works site is uncharacteristically low.	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.
584	SA250	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Height	In general, we support the principle of tall buildings on the site. However, we object to the wording of the policy which limits the height of the building to 7 storeys. The site's strategic designation is for growth and intensification, and the consented Clarendon Site redevelopment scheme established the principle of tall buildings in the area. In order to increase the development capacity by making efficient use of the site, and to ensure viability, it is necessary to provide taller buildings subject to design and assessment of key views. Therefore, a site allocation policy should not look to place a restriction on building heights.	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.
584	SA251	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Hornsey Park Road	The guideline states that height will be restricted where they back onto the residential properties. The wording goes beyond the purpose of a guideline and it does not effectively protect the residential amenity. We request that this guideline is amended as follows: <i>"Height of new buildings where they back onto the residential properties on Hornsey Park Road should be considered carefully to respect their residential amenity."</i>	Agreed.  <b>Action: Amend to Height of new buildings where they back onto the residential properties on Hornsey Park Road should be considered carefully to respect their residential amenity</b>
724	SA252	DP9 on behalf of Oceanwave Estate Ltd	Land use	The suitability of provisions for light industry on the ground floor of this site is questionable. We would recommend that uses such as A1/ A3/ A4 are also included.	This area, while being inside the designated metropolitan town centre, does not have a town centre frontage, and therefore there is no requirement for retail use. Indeed retail is better located in the town centre itself, with other active uses, such as employment, provided here.
724	SA253	DP9 on behalf of Oceanwave Estate Ltd	Land use	The redevelopment of this site offers an opportunity to create an area which becomes a destination with retail units to increase footfall for all times of day and make a safe pedestrian route.	The vision for this site is to link the town centre, which is a destination, with the area to the west of the High Road, which has a weaker destination status as an employment location. This site complements these destinations, but will not be considered a destination in its own right.
584	SA254	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Layout	we are concerned with the requirements under the 5th and 6th bullets points, as they prescribe the form of the development and the east and west linkage (i.e. the avenue). We consider that it is premature and unnecessary to prescribe the form of the development, and fundamentally, the policy does not allow sufficient flexibility. We therefore object to these requirements	It is the Council's view that in order to optimize land patterns in the area, that a high quality route linking Wood Green and the Penstock foot tunnel should be created. It is considered that inclusion of this connection as a site requirement at an early stage enables development to be brought forward in such a way that it can deliver this strategic objective.
584	SA255	Rapleys on behalf of Lasalle Investment Management, long leaseholders	New link viability	The provision of a new link will take up a significant proportion of the development site, which could affect the development viability, affecting the deliverability. Whilst we do not necessarily object to the aspiration to provide an avenue connecting Wood Green and Clarendon Square, we are concerned with the deliverability of such an avenue, as currently shown on the proposed allocation plan, cuts through the Bittern Place site. A pedestrian/cycle link of this kind is not necessary to serve the allocated development site, rather it will serve the wider regeneration of the area. Therefore, this should not be identified as a requirement and its provision should be secured subject	The link will fall under infrastructure included in the Council's Regulation 123 list to be funded from CIL. The requirement on the site will be to accommodate the section that runs through the site. This is in line with the Council's Planning Obligations SPD. Improved links to and from the High Road to adjacent areas to the west and creation of attractive public spaces is likely to improve the commercial viability of development in this area.

				to feasibility and viability.	
697	SA256	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted.  <b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b>
724	SA257	DP9 on behalf of Oceanwave Estate Ltd	Plan approval	Mixed use development is welcomed by client who owns the land off Brook Road (occupied by Iceland). Opportunity to create a new high quality avenue linking Wood Green and Clarendon. However the site requirements will need to be reviewed – height & ground floor use	Support is noted.
697	SA258	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.
584	SA259	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Student accommodation	The site is also considered appropriate for student accommodation if a requirement for further student accommodation is identified in the future. It is noted in paragraph 3.25 of the Preferred Options Development Management document that Haringey has a role to play in fostering relationship with existing higher education institutions and in meeting the needs for purpose built student accommodation. In this respect, Policy DM2 specifically refers to Haringey Growth Areas and Areas of Change as being suitable locations for future student accommodation, where required. The policy states that provision of further student accommodation will be supported as part of new major development schemes these locations. As the site's redevelopment is a long term opportunity, we consider appropriate to include student accommodation in the allocation, in line with Policy DM2.	It is considered that the most suitable locations for student housing in this area are within Wood Green town centre, and as such a preference for the proposed use over conventional housing will not be made in this policy.
584	SA260	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Support redevelopment	On behalf of our client, we confirm our client's aspiration to promote both sites for residential-led mixed-use development, and the inclusion of these sites in the Site Allocation document. In particular, we consider that both sites have the potential to contribute significantly to meeting the identified development needs, including housing and employment generating uses, and to the regeneration of the area.	Support is noted.
584	SA261	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Supports development	We support the principle of the allocation of the Bittern Place site for a mixed use redevelopment, which is consistent with Haringey's Strategic Policies for Haringey Heartland/Wood Green Metropolitan Town Centre as a Growth Area, and an Intensification Area in the London Plan. We agree that the existing buildings at Bittern Place are of limited architectural value, and when the opportunity arises in the future (during the Plan period), they should be demolished for redevelopment.	Support is noted.
584	SA262	Rapleys on behalf of Lasalle Investment Management, long leaseholders	UCS	It is noted that Haringey's Urban Character Study (2015) ('UCS') identifies that there is an opportunity to substantially increase the general building height in Haringey Heartland, as part of intensification and regeneration plans. However, it recommends that heights should be greatest along the railway line (mid to high rise) stepping down to mid-rise towards the existing 2-3 storey building and terraces that line Hornsey Park Road and Mayes Road. We are concerned with this	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond



				<p>approach, as there are no development sites available or allocated along the railway embankment when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. The USC's recommendation, which is reflected in the draft allocation SA23, will significantly constrain the redevelopment opportunity of the area, particularly the strategic objective to intensify and to increase the development capacity for growth.</p> <p>It should also be noted that the site is already surrounded by 3-5 storey existing buildings. Therefore, the restriction of the height up to 7 storeys may not be considered to maximise the site's potential, and could unnecessarily prejudices the future redevelopment opportunity.</p>	appropriately to their context.
697	SA263	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><b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b></p>
697	SA264	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><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>

## Comments on SA27 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
726	SA265	Cassidy + Ashton - Alban P Cassidy / Matliwala Darul Ulloom Charitable Trust	Overly Prescriptive	Mix use development is supported by our client, but the proposed allocation is overly prescriptive which may restrict development coming forward.	<p>The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.</p> <p><b>Action: Revise the requirement for 33% of floorspace with a site specific model, as set out in the DMDPD.</b></p>
726	SA266	Cassidy + Ashton - Alban P Cassidy / Matliwala Darul Ulloom Charitable Trust	Height; Residential	No mention of residential use but given the support for development of up to 8 storeys. The allocation should emphasise that development will be residential led;	<p>It is considered likely that an element of residential use will be required in order to cross subsidise new workspace within this site. This is consistent with draft policy DM50, and the site's proposed Regeneration Area designation.</p> <p><b>Action: Add residential to the suitable range of uses on this site.</b></p>
726	SA267	Cassidy + Ashton - Alban P Cassidy / Matliwala Darul Ulloom Charitable Trust	Floor use	Restricting ground floor use to employment generating uses under Use Class B1a or B1c is overly restrictive. The location is not ideal for such uses. The need for servicing and car parking is more prominent than B1(c) resulting in inefficient use of land.	The future employment uses in this area are proposed to be of a high density, knowledge-based typology. This will mean a minimal requirement for car parking, although some servicing for deliveries will be required for uses of a B1© nature.
726	SA268	Cassidy + Ashton - Alban P Cassidy / Matliwala Darul Ulloom Charitable Trust	Height	<p>Development should be encouraged up to 8-9 storeys to reflect the approved development to the north;</p> <p>2-3 storeys of employment uses on one side of Clarendon Road and 1-2 storeys of employment uses on the other side of Clarendon Road. This is simply unrealistic and overly prescriptive.</p>	<p>The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.</p>
726	SA269	Cassidy + Ashton - Alban P Cassidy / Matliwala Darul Ulloom Charitable Trust	Floor use; employment land	Appropriate ground uses should be more flexible and support should be for up to 33% employment uses [including other appropriate uses in addition to B1]	<p>The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.</p> <p><b>Action: Revise the requirement for 33% of floorspace with a site specific model, as set out in the DMDPD.</b></p>
726	SA270	Cassidy + Ashton - Alban P Cassidy / Matliwala Darul Ulloom	Time scale	<p>There are concerns in respect to the timescale for development. There should be support to allow the northern area of the allocation to come forward in advance of the rest;</p>	It is recognised that the northern part of Clarendon Road will come forward before the southern end, and this is reflected in the document.

		Charitable Trust			
726	SA271	Cassidy + Ashton - Alban P Cassidy / Matliwala Darul Ulloom Charitable Trust	Design	Reference should be made to the opportunity to provide linkages and complimentary design with Clarendon Square to the north.	Noted.
422	SA272	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.  <b>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.</b>
697	SA273	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 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.  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.	Noted, reference will be included in this site allocation.  <b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b>
697	SA274	Savills on behalf of Thames Water	Water	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.	Noted, reference will be included in this site allocation.  <b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b>

				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.	
697	SA275	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.

## Comments on SA28 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA276	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><b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b></p>
697	SA277	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</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>

				<p>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	SA278	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 and is being addressed in the emerging Investment Framework and Area Action Plan.
697	SA279	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	SA280	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><b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b></p>
268	SA281	Colin Kerr and Simon Fedida	Height	<p>The Site Requirement bullet 1 and Development Guideline bullet 5 suggest building heights rising to 12 storeys on the site, supposedly to form part of a group of buildings to reflect the allocated tower in SA29. Only one tower has been allocated to this part of the Western Heartlands Area (page 44). It is on site SA29 and of height 12 storeys. Another site (SA28) developed to 12 storeys clearly represents a surplus of at least one additional tall building over the requirements of the plan. This is clearly not justified by the Council's own policy.</p> <p>Recommendation: The Site Requirement bullet 1 and Development Guideline bullet 5 should be modified to specify 8 storeys, to match neighbouring sites SA23, SA24, SA25 which are also to 8 storeys. Without this lower bound the tower on site SA29 will be in danger of being lost in the sea of hi-rise concrete.</p>	<p>This inconsistency is noted. The provision of a tall building to mark the entrance to Alexandra Park from Wood Green would only be proposed on SA29. It is the Council's intention to remove height limits from Site Allocations in any regard, and commission further work identifying the most suitable locations for tall buildings.</p> <p><b>Action: Remove height limits on this site.</b></p>

## Comments on SA29 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
740	SA282	Hornsey Historical Society – David Frith	Height	Concerned by the proposal to erect a “high building” on the east side of the railway at Penstock Path. (SA29) Although separated by the railway line, the effect of a building of up to 25 storeys, which seems to be the scale envisaged, would be disastrous on Alexandra Park and the views therefrom.	<p>The height requirements set out in the policy are drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area. Detailed design will be required on all sites to gain planning permission, but the heights set out in the document are considered appropriate to enable development that brings change while having an acceptable impact on the rest of the borough.</p> <p>Additionally the Council is commissioning additional evidence to identify the most suitable locations for taller buildings to be</p>

					included within the next version of the document.
742	SA283	Friends of Alexandra Park – Gordon Hutchinson	Height	<p>We consider the height limit of 12 storeys on this site is excessive highly detrimental effect on the currently open aspect to the east of Alexandra Park. The lower area of the Park is a large area of open grassland, surrounded by low rise buildings. The encroachment of high buildings would "close in" the Park, dominate it and destroy the feeling of space which is so essential for the health and well-being of park users who increasingly live in an urban environment which is more densely built. We would recommend a height limit comparable or slightly higher than the buildings immediately to the west of this site, on the other side of the railway line.</p>	<p>Noted. The aspiration for a tall building on this piece of land is to help facilitate greater use of Alexandra Park by current and future occupants of Wood Green. The aspiration is for this building to act as a wayfinding point, rather than enclosing the Park. It is agreed that the text can be clearer that this should be a slim structure.</p> <p>Further evidence will be provided to identify the most suitable locations for tall buildings in the borough.</p>
697	SA284	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><b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b></p>
697	SA285	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><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>
697	SA286	Savills on behalf	Cumulative impact	<p>We are concerned about the cumulative impact of development in this</p>	<p>Noted, this will be managed through the IDP and is being addressed in the emerging Investment Framework and Area</p>



		of Thames Water		area.	Action Plan.
697	SA287	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted.  <b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b>
572	SA288	Beatrice Murray, resident	Tall building	I do not think that this site should be developed as high density residential. Given the steep embankment slope, the dense growth, and the designation as an ecological corridor it would be preferable to develop this area as a natural recreational space to balance the intense development of the remainder of Haringey heartlands. To live up the roadside, a strip of relatively low level retail and workshop buildings possibly with flats above, two to three storeys maximum height, could be built along the road with the natural area behind, part not accessible, part accessible. It would completely change the feel of the whole area and would ruin both the view from, and the relaxed recreational feeling of, the lower fields area of Alexandra Park, a major local amenity. It would also impact on the planned Clarendon square development, towering over the residential development and giving it a pressurised feel.	Objection is noted. This area is identified as an area of change, and higher densities are required to bring change to the area and to deliver on targets for enabling new housing to meet high levels of demand . DM1 of the draft DMDPD will manage the relationship between this site and the Clarendon Rd site.  The aspiration for a tall building on this piece of land is to help facilitate greater use of Alexandra Park by current and future occupants of Wood Green. The aspiration is for this building to act as a wayfinding point, rather than enclosing the Park. It is agreed that the text can be clearer that this should be a slim structure.  The height requirements set out in the policy are drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area. Detailed design will be required on all sites to gain planning permission, but the heights set out in the document are considered appropriate to enable development that brings change while having an acceptable impact on the rest of the borough.  Further evidence will be provided to identify the most suitable locations for tall buildings in the borough.
615	SA289	Colin Marr on behalf of the Alexandra Park And Palace Conservation Area Advisory Committee	Tall building	The CAAC considers that any tall building on this site would be intrusive in the view from the Alexandra Park and Palace Conservation Area. It would be prominently in view from the lower flat field area of the Park, where it would compromise the horizon. We question the real need for tall buildings in Wood Green, but the one proposed for this location is objectionable. The idea that it would "signal the connection between Wood Green and AP" is illusory.	Objection is noted. The aspiration for a tall building on this piece of land is to help facilitate greater use of Alexandra Park by current and future occupants of Wood Green. The aspiration is for this building to act as a wayfinding point, rather than enclosing the Park. It is agreed that the text can be clearer that this should be a slim structure.  Further evidence will be provided to identify the most suitable locations for tall buildings in the borough.
615	SA290	Colin Marr on behalf of the Alexandra Park And Palace Conservation Area Advisory Committee	Objection	The APPCAAC objects to a tall building at the Penstock tunnel location	Objection is noted. Further evidence will be provided to identify the most suitable locations for tall buildings in the borough.