

Appendix 2.5 - Comments on SA30-SA 33 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Comments on SA30 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
738	SA291	Ellie Harries	Height	Hawes and Curtis site, the guidelines are clearer should be "reduced in height to respect the amenity of properties" where this is close to smaller properties. Why do the same rules not apply to West Green Road and Stanley Road where the width of the roads are less and the heights of the buildings low?	Noted. We will aim to make it equally clear in both documents.
697	SA292	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	SA293	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	SA294	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 in the IDP.
697	SA295	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	SA296	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	SA297	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 SA31 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
422	SA298	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	SA299	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	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>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	SA300	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 SA32 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
264	SA301	Gardens Residents' Association	Access	During 2013 consultation it was proposed that there would be an access from the southwest corner of the site through Haringey homes car park into Warwick Gardens. The GRA and in particular local residents who live next to the proposed access route have not been adequately consulted. Concerns the access will increase crime such as muggings, burglary, and theft from vehicles and create a perfect escape route from either the new development or from the Gardens/ Green Lanes. Met Police also oppose proposal due to its secluded location and lack of surveillance from neighbouring properties.	Any potential development, including access into Warwick Gardens, will be subject to the development management policies which aim to reduce crime by incorporating Secured by Design principles in new development.
572	SA302	Beatrice Murray, resident	Access	Supports improving access by foot, and bike.	Support is noted.
264	SA303	Gardens Residents' Association	Cell towers	Oppose the removal of Mobile phone transmitter masts from the site and recommend that these masts should be incorporated into the proposed Green space within the development keeping them away from residential properties. The proposal for the existing masts to be relocated in the Gardens and various other nearby locations have been and will be opposed due to being unacceptable locations.	The removal of mobile phone transmitters is outside the scope of the site allocations document.

419	SA304	Haringey Liberal Democrat Group	Community facilities	On the St Ann's Hospital site the Labour-run Council are saying that a mixture of homes and community facilities would be acceptable. We welcome the proposals for community facilities but are concerned that little details have been provided about the nature of these facilities. We are also concerned about the loss of beds at St Ann's.	A full list of infrastructure projects will be included in the IDP.
697	SA305	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	SA306	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>
818	SA307	Our Tottenham	Health	<p>We support the position expressed by the Haringey Needs St Ann's Hospital (HaNSAH) campaign group with regard to the proposed development and planning application for the site. There is evidence locally for provision of much needed enhanced health services and facilities at the St Ann's Site including, but not limited to, the following:</p> <ul style="list-style-type: none"> • An Urgent Care Centre. • Additional GP Surgeries on the St Ann's Site. • An integrated Child Health Centre. • Expanded acute mental health facilities with integrated primary care and 'step down' services <p>HaNSAH is calling for a halt to the plans to sell off NHS land at St Ann's Hospital to property developers and for improved and integrated healthcare facilities that will meet the needs of the people in Haringey now and for the foreseeable future.</p>	Noted.
572	SA308	Beatrice Murray,	Height	There don't appear to be any height recommendations for this site. It should be retained as a 'peaceful' residential area, with relatively low density. Development should be maximum five storey, preferable only	Height will be determined at the detailed design stage on any proposed development. Therefore it is not considered necessary to add a height limit to the allocation.

		resident		four.	
264	SA309	Gardens Residents' Association	Height	The Gardens Residents Association (GRA) has been involved from the outset and has successfully campaigned to reduce heights to an acceptable level, and taking these reassurances into account the GRA accepts this development. It has been agreed that the height of residential buildings on the site would be in keeping with the surrounding area: no higher than 2 storeys opposite the houses on Warwick Gardens and rising across the site towards the East no higher than 4 storeys to suit adjacent buildings.	Noted.
697	SA310	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	SA311	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.
572	SA312	Beatrice Murray, resident	Private gardens	There should be no private gardens, although a small space the size of a large balcony or small terrace, edged by bushes or low fences could be allocated for access and use by ground floor flats. This should increase the amount of public green space and allow lower heights overall to the buildings.	Noted, at present there is not any publically accessible open space, so this will be increased in the new development.
697	SA313	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.
572	SA314	Beatrice Murray, resident	SINC	The impact of using a SINC which has been left undisturbed for a long time as a green amenity space should be carefully considered. The area along the railway line is probably better left fenced off and thickly vegetated to act as a screen for the railway line.	Noted.
572	SA315	Beatrice Murray, resident	Tenure	There should be a mix of affordable rented accommodation (council/housing association), full price rental accommodation, and private flats	Noted. This is a requirement for all new housing developments, and will be dealt with in the DMDPD/ Strategic Policies documents.
642	SA316	Barnet, Enfield and Haringey Mental Health Trust	Wall	The draft document says that the existing boundary wall along St Ann's Road is to be preserved wherever possible. As you know, this has been a contentious issue. We included the future of the wall in our public consultation a year or so ago and the overall conclusion was that we should retain parts of it, but remove the top half in places and replace it with traditional railings, to allow visual permeability. We discussed the conclusions of the public consultation with the Leader and Lyn at the	Noted, the extant planning permission will be retained in this regard.

				time and they were strongly supportive of a compromise approach, which is what has been included in the current planning application. I am concerned though that there may be the potential for someone seeking to preserve the whole wall as it is citing the Site Allocations DPD	
697	SA317	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	SA318	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 SA33 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
264	SA319	Gardens	Access	Opposes the Councils new proposal of opening up an access route	Objection noted, this reference will be removed.

		Residents' Association		from Harringay Green Lanes Station to Portland Gardens. This will cause serious problems with vandalism, trespassing, and crime, providing an escape route for muggers and other activity from the station into Portland Gardens and vice versa.	Action: Remove reference to improving access to Harringay Green Lanes Station from Portland Gardens.
660	SA320	Anonymous local resident	Air quality	Transport proposals on p 9 are unrealistic and insufficient to take account of all the extra vehicle journeys that will be needed. The reference to a 'comprehensive transport assessment' p 95 for Arena Retail Park is much too vague. Green Lanes and other roads are already at capacity and already the air pollution is very bad in side roads between Green lanes and Wightman Road especially on still days. These side roads in Harringay Ward are the largest area with a very high NO2 level away from main roads. On these two main roads there is no monitor to count PM2.5 or PM10. It is likely that the particulates are as bad as those measured on Tottenham High Road which is a much wider road and which are often just as high as central London.	Noted air quality is poor. It is hoped that the reduction in car patronage to this site will help ease congestion, and therefore air quality.
258	SA321	Ladder Community Safety Partnership	Air quality	Local Plan (p138) notes the area is an Air Quality Management Area. This problem is particularly relevant to Green Lanes. Any major developments will further deteriorate air quality. Haringey borough is already 88% higher than European approved levels. Monitor in Priory Park lowers this average but measurements in the east are often as high as or higher than central London. A modelled map in the Air Quality Action Plan shows throughout Harringay Ward the <i>annual</i> mean NO2 ug/m3 does not drop below 44 (40 is the EC annual limit). Harringay ward is by far the largest residential area in the borough with such a high NO2 away from main roads. A PM10 map shows Green Lanes/High Road to be worse than any roads except Seven Sisters and Parts of Tottenham High Road.	Noted air quality is poor. It is hoped that the reduction in car patronage to this site will help ease congestion, and therefore air quality.
697	SA322	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.
258	SA323	Ladder Community Safety Partnership	Cumulative impact	Views are the same as before strengthened by council's unwillingness to listen to local residents. The sheer scale and cumulative impact of developments in a small and already overcrowded area of the borough is primary concern especially when funding for infrastructure seems unlikely.	Noted.
258	SA324	Ladder Community Safety Partnership	Flood risk	The site is in a Critical Drainage Area, which is self-evident given that the corner of Green Lanes and Williamson Road is already prone to sizable areas of water accumulation owing to poor drainage. The effects of a proposed underground car park are potentially very alarming with an unknown impact on the water table over the surrounding area.	The requirements for developments to conform with the Council's drainage strategy are included in the DMDPD.
422	SA325	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:	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.

				<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>	
264	SA326	Gardens Residents' Association	Height	<p>Opposes the scale of the proposed development and its relationship to the surrounding buildings. The increase from 8 to 9 storeys is completely disproportionate to the site and totally unacceptable. Residents will only accept a maximum of four storeys. This would be in keeping with the tallest buildings that front the site on the west of Green Lanes. The height of the buildings should be reduced towards the north, east and south boundaries where the site adjoins housing estates of the same scale.</p> <p>The two storey houses within the Gardens are just 20m from the edge of the site, separated only by a railway line. Therefore the proposed scale of the development would compromise the private amenity of hundreds of dwellings within the Gardens - creating serious overlooking issues.</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> <p>Action: Remove height limits from the allocation.</p>
258	SA327	Ladder Community Safety Partnership	Height	<p>Site is unacceptable for high density / high rises. 8 storeys would have an impact on amenity. The Local Plan makes it clear (p112) that it is not acceptable to have tall buildings substantially taller than their neighbours. Haringey is predominantly 2-3 residential or 3-4 in town centres. There are no 8 storey buildings in the immediate area in Haringey.</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> <p>Action: Remove height limits from the allocation.</p>
264	SA328	Gardens Residents' Association	Light	<p>There could be severe loss of natural light to houses in the Gardens, with the overbearing nine storey buildings to the south casting shadows to the north over the Gardens houses.</p>	<p>Amenity of development on all sites</p>
258	SA329	Ladder Community Safety Partnership	Medical services	<p>GP surgeries are already overstretched. Difficult to see a doctor has lead to overcrowding and lengthy waits at A&Es. NHS revealed the number of emergency vehicles waiting for longer than 30mins at N Middlesex has increased dramatically to an average of 88/week. Proposals also to downgrade facilities at nearest major hospital The Whittington and St Ann's is not a general hospital and two thirds of site will be housing (S1)</p>	<p>Noted. The IDP will address opportunities to improve infrastructure. It is considered that this site, due to its size, if comprehensively redeveloped, may be an opportunity to create some new community infrastructure.</p>
258	SA330	Ladder Community Safety Partnership	Open space	<p>It is disgraceful to imply that because Finsbury Park is nearby, there is no need to be concerned about private open space in proposed future development on the site. This is a particularly cynical justification for a densely packed and unattractive development.</p>	<p>No such reference is made in the document.</p>
419	SA331	Haringey Liberal Democrat	Open space	<p>On the Arena site the council are saying there should be the same number of shops and new homes. They have also said the buildings could be up to 8 storeys high in this area. We believe that buildings of</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>

		Group		this height are not acceptable in this area and that more housing would be difficult to accommodate. We noted that the proposals include the loss of one of the few green spaces in this area, the community garden on the bridge. This is very worrying and we hope the council will look at this again.	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	SA332	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	SA333	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.
258	SA334	Ladder Community Safety Partnership	Previous consultation	Views of LCSP seem to have been ignored: Concern was expressed about the over-development of the site. The reply is to increase the number of residential units and create new retail frontages/town centre uses along Green Lanes towards Hermitage Road.	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.
258	SA335	Ladder Community Safety Partnership	Previous consultation	All concerns regarding Arena retail Park were raised in previous submission in March 2104 which since the first draft has emerged as the second largest housing provider in the whole document. Infrastructure issues are repeated below as pp9-12 deals with them in such broad and general terms.	Noted.
258	SA336	Ladder Community Safety Partnership	Previous consultation	Views of LCSP seem to have been ignored: Concern was expressed about the inappropriate proposal of “heights up to 8 storeys”. The reply is to increase the height to 9 storeys.	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.
258	SA337	Ladder Community Safety Partnership	Previous consultation	Views of LCSP seem to have been ignored: Concern was expressed about the existing very heavy levels of traffic in and around Green Lanes. The reply is to suggest that, following a “comprehensive transport assessment”, “traffic impacts on Green Lanes from this site should be reduced through this development”. Are we seriously meant to believe that some 1400 new residents on site and a new primary commercial frontage will reduce traffic impact? This sort of assertion makes it very difficult to take seriously any of the other claims regarding noise pollution and air quality, made about the site in the Development Guidelines (p95).	The site will be designed in such a way that it will help to keep shopping traffic local, and accessed primarily by foot. Additionally pedestrian access to the park, as well as to Manor House and Harringay Green Lanes stations will be improved. Additionally, the reduced congestion from cars accessing the site for car-borne shopping trips will help to improve bus efficiency.
258	SA338	Ladder Community Safety Partnership	Public transport	Buses and tubes are already extremely busy. Large residential development near Manor House in Hackney which is already underway will add to these problems. Weekends are extremely busy for transport system in Green Lanes area with buses in nose to tail congestion between the railway bridge and St Ann’s junction.	Noted. The IDP will address opportunities to improve infrastructure. The site will be designed in such a way that it will help to keep shopping traffic local, and accessed primarily by foot. Additionally pedestrian access to the park, as well as to Manor House and Harringay Green Lanes stations will be

					improved. Additionally, the reduced congestion from cars accessing the site for car-borne shopping trips will help to improve bus efficiency.
415	SA339	Transport for London	Public transport	The site requirements should also refer to improving facilities for buses. Service W5 currently runs into the site to serve the food store, and revising the access within this site and on Green Lanes should allow enhancements to the bus network and stops.	Noted. The allocation includes provision for the superstore to no longer operate.
258	SA340	Ladder Community Safety Partnership	Schools	Already a shortage of school places for under 8s. South Harringay Junior School has to extend to 3 form entry and similar pressure on infants school. If this is the situation already the problems from proposed developments can be imagined. School cannot continue to expand on demand.	Noted. The IDP will address opportunities to improve infrastructure.
697	SA341	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.
264	SA342	Gardens Residents' Association	Site design	The existing design of the Arena Development is not suited to its location or context. It has been lead by vehicle access and is very unsuccessful. Improvements would be welcomed to the design to create an appropriate density of building and carefully designed pedestrian access. As would a thorough redesign of the overground station, access and embankment which would be a positive for the area as a whole.	Support for change is noted.
264	SA343	Gardens Residents' Association	Support	Thanks to supporters and Council for dropping the proposal of opening up the Railway arch no: 2018 at Doncaster Gardens, N4 which was proposed in the first draft report.	Noted.
264	SA344	Gardens Residents' Association	Traffic	Concern over traffic and traffic management in the Arena Development as these have been major problems for this site. The development as it stands has one junction for traffic, which causes extreme congestion at peak times.	Agreed.
258	SA345	Ladder Community Safety Partnership	Traffic	Green Lanes cannot cope with more traffic in its present configuration. Williamson Road has staff to deal with traffic problems and they have been threatened and assaulted on occasions when congestion is bad. New development will bring greater traffic and further stress. This was acknowledged in Strategic Policies on p107.	Disagree. Alleviation of current traffic issues is one of the key reasons for allocating this site. Initial transport modelling has shown that the supermarket is the single largest draw for car-borne traffic, which is then compounded by the other car-compatible uses on the retail park. By replacing these uses with more walk-up retail, congestion at this point can be alleviated.
697	SA346	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	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>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	SA347	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>