

Appendix2.10 - Comments on SA57-SA60, SA62, and SA64-66 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Comments on SA57 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
398	SA1724	Durnsford Road and Park Grove Steering Group	Density	If required additional density could be provided through the addition of storeys on already flattened developments, such as Park Court.	The two sites will be considered separately. The Council is looking at all opportunities for housing investment, and this suggestion is noted.
398	SA1725	Durnsford Road and Park Grove Steering Group	Estate renewal	Also note that such homes have been successfully refurbished across the country and received certificates that effectively exclude them from the Act. Accordingly, we would want this to remain an option in the forthcoming masterplanning for the area and be reflected in planning policy. This would then give any potential developer the flexibility of 3 options to consider and model – refurbishment option, mixed option and demolition / renewal option.	Noted, surveys will be presented upon completion.
818	SA1726	Our Tottenham	Estate renewal	The presumption in favour of demolition is opposed.	<p>In the face of challenging housing (including affordable housing) and employment needs, there is a requirement to consider a number of approaches to meet these, and thus fulfil the spatial objectives for the borough through the Local Plan. This includes making the best use of land, including the Council's existing stock of land for housing.</p> <p>Some estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity, low socioeconomic indicators, and poor quality construction. It is therefore the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents.</p> <p>When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.</p>
818	SA1727	Our Tottenham	Estate renewal	See our comment in the overall response about the SA DPD, about the Housing Estate Renewal approach taken by the Council in the SA DPD, Tottenham AAP and Alterations to Strategic Policies. We contest the 'red lining' of housing estates for future redevelopment into 'mixed communities' on the grounds explained in our comment.	Noted, this estate has been identified for future development in consultation with residents due to the current state of the houses including that they are considered defective.
818	SA1728	Our Tottenham	Estate renewal	<p>For the sites SA57 (Park View and Durnsford Road), SA63 (Broadwater Farm), SA66 (Leabank and Lemsford Close), this means that we demand the inclusion of the following principles in the SA DPD:</p> <ul style="list-style-type: none"> - No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes. - Such programmes should prioritize improvements to the existing housing 	<p>The Local Plan: Strategic Policies sets out that there will be no net loss of affordable housing by habitable room.</p> <p>It is considered that consultation with local residents is important as part of a housing investment strategy. The Council will follow appropriate protocols on the determination of redevelopment of its housing estates. The details of this are outside the scope of the plan.</p>

				<p>estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.</p> <ul style="list-style-type: none"> - There should be no demolition of structurally sound housing - There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. 	
398	SA1729	Julia Demetriou, Chair – Resident Steering Group OBO Durnsford Road and Park Grove Steering Group	Evidence	Note that the draft plan suggests that no existing building be retained due to defective materials. Whilst we recognise that our homes are considered to be defective under 1984 Housing Defects Act, we would wish to see any surveys, including structural surveys that indicate these homes are defective, as we note that previously Haringey Council intended to refurbish these properties.	Noted, surveys will be published as evidence becomes available.
422	SA1730	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>
398	SA1731	Durnsford Road and Park Grove Steering Group	Height	Agree with proposal that height be limited on Durnsford Road to 2 storeys, but contend that the maximum height should be less than 6 storeys and preferably no higher than 3 storeys across the site. This would be more than adequate to provide the family sized accommodation required by Haringey, 3 and 4 bedrooms, without the need for blocks of flats.	<p>Specific heights will be removed from the document as building height will be assessed against the development management policies which consider the impact on amenity and local character.</p> <p>Action: Remove reference to specific height limits.</p>
398	SA1732	Durnsford Road and Park Grove Steering Group	Housing need	Request Council to confirm the housing need for the area and where else options are being considered in N11 area.	Only a small part of N11 falls within London Borough of Haringey. Tunnel Gardens & Blake Road is also an allocated site in N11. Myddleton Road in Bounds Green N22 is the closest of the allocated sites outside of N11.
398	SA1733	Durnsford Road and Park Grove Steering Group	Housing tenure	Any new housing should be tenure blind and mixed tenure with at least 50% affordable to local families.	Housing tenure will be managed by the development management policies particularly DM19 Affordable Housing.
398	SA1734	Durnsford Road and Park Grove	Local facilities	Concerns that such a density will have an adverse impact on facilities in the area, including schools, health and leisure.	Noted, school places, healthcare and leisure facilities will be provided for in the infrastructure delivery plan.

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		Steering Group			
398	SA1735	Durnsford Road and Park Grove Steering Group	Open space	Agree that the central open space within the area could be reconfigured.	Support noted.
398	SA1736	Durnsford Road and Park Grove Steering Group	Open space	Need for an ecological area and want no overall reduction in public open green space once any development is completed.	It is noted that there is an existing ecological corridor to the south west of the site is identified for preservation/enhancement in the current draft.
398	SA1737	Durnsford Road and Park Grove Steering Group	Parking	Also want the planning policy to provide adequate parking spaces to be provided for all existing residents including driveways and dropped kerbs as well as on street parking. We recognise any additional homes could be provided without parking.	Parking provision for the site will be managed through the development management policies.
697	SA1738	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.
414	SA1739	GLA	Regeneration	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this area as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.	Support is noted.
398	SA1740	Durnsford Road and Park Grove Steering Group	Secure tenancy	All existing Council secure tenancies should be re-provided along with freehold properties for current residents.	Housing tenure will be managed by the development management policies particularly DM19 Affordable Housing.
697	SA1741	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.
398	SA1742	Durnsford Road and Park Grove Steering Group	Site boundary	We would look for the potential development area to be extended to include the Springfield Community Park, the Railway Land and a small site on Aneurin Bevan Estate. (See Plan attached with consultation).	The railway land is ecological corridor and protected therefore it is not considered appropriate to include it in the allocation. The small site on Aneurin Bevan estate will be included in the allocation. Action: Include reference to Springfield Park and amend boundary to include site in Aneurin Bevan Estate
398	SA1743	Durnsford Road and Park Grove Steering Group	Site boundary	Including the Park within the development area would provide flexibility to a) maintain existing community and improve decant by providing a site that could be developed through phased Masterplan, b) enable a traditional street pattern with natural surveillance to be modelled, c) potentially deal with issues of antisocial behaviour in the park, and abutting alleyways through remodelling that provide more natural surveillance.	Noted. Action: Update site allocation map to include reference to Springfield Park.
697	SA1744	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,	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>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	SA1745	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 SA58 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
682	SA1746	Caroline Whittington, local resident	Back land development	<p>However I do not in any way support your support of ‘back-land development’. It is back-land development that has created the poor housing mess that we see today on much of the road.</p> <p>Only this year an unauthorised bungalow was demolished following the Inspectors report at no 97. Please do not approve any more back-land development.</p> <p>Over the last few years the council and community have encouraged the creation or retention of housing units that can accommodate families, and families need amenity space or a garden. To build over this ‘back-land’ would, in my view, be totally wrong.</p>	<p>Any back-land development would be subject to development management policies which focus on high quality design led developments. A new policy on backland development has been included in the DMDPD. These design principles should ensure any future back land development is of high quality. Gardens themselves are protected under SP13 which states that where open space has identifiable valuable Council will resist development which results in a net loss of this open space.</p> <p>By definition the unauthorised bungalow was not permitted for development by council and as such was developed without meeting the development management principles which ensure high quality design.</p>
677	SA1747	Bowes Park Community Association	Backland development	<p>We do not in any way agree with your support of ‘back-land development’. It is back-land development that has created the poor housing mess that we see today on much of the road.</p> <p>Only this year an unauthorised bungalow was demolished following the Inspector’s report at no 97.</p>	<p>Any back-land development would be subject to development management policies which focus on high quality design led developments. A new policy on backland development has been included in the DMDPD. These design principles should ensure any future back land development is of high quality. Gardens themselves are protected under SP13 which states that where open space has identifiable valuable Council will resist development which results in a</p>

				Please do not approve any more back-land development.	net loss of this open space. By definition the unauthorised bungalow was not permitted for development by council and as such was developed without meeting the development management principles which ensure high quality design.
680	SA1748	Doris Leonfellner, local resident	Backland development	Back-land development that respects neighbouring amenity while increasing the local population density and therefore local centre vitality will be supported. " I would like to point out that specifically Myddelton Road has suffered from too high density and low quality overdevelopment in recent years. I can not support your suggestion on further back-land development for this specific stretch of road. Bowes Park is an area searched out by families and there is urgent need for further family sized housing. Decent and good sized family sized accommodation requires adequate green and amenity space. Any further encroachment of such would be detrimental.	Any back-land development would be subject to development management policies which focus on high quality design led developments. A new policy on backland development has been included in the DMDPD. These design principles should ensure any future back land development is of high quality. Gardens themselves are protected under SP13 which states that where open space has identifiable valuable Council will resist development which results in a net loss of this open space.
422	SA1749	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: <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> 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: <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>	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.
677	SA1750	Bowes Park Community Association	Parking	While we support your idea for widening the southern pavement and losing that car parking, we believe that the road is not wide enough to safely have 'echelon' parking. If the aim is to encourage more people to use the street happily and in safety, and to sit in street cafes etc, then it must be a safe and pleasant street. There are many families with young children who use the street and such parking on such a narrow road cannot possibly be encouraged. People will have to learn to walk, take buses, or trains. The wonderful thing about Bowes Park is its excellent public transport services. Do not pander to the unnecessary use of cars. It would be great to see Myddleton Road (or part of it) car free. However, if this is a step too far for the Council the road could be resurfaced as a Dutch	This is a detailed design consideration that will require testing. Policy guidelines revised to make clear the need for review and consultation prior to any changes to parking being implemented.

				style 'shared surface' to shift the emphasis away from vehicles and towards pedestrians.	
422	SA1751	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.
677	SA1752	Bowes Park Community Association	Shop fronts	We would also like to see another phase of the recent shop-front upgrades at the top of Myddleton. This is an absolute triumph and has had a big impact on the street. It has set a great precedent.	Noted. Policy will support this, but the implementation will be limited by funding.
682	SA1753	Caroline Whittington, local resident	Support	I am very glad to see that Myddleton Road is highlighted for improvements.	Council welcomes support for this policy.

Comments on SA59 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
575	SA1754	Amir Aramfar, local resident	Frontage	The frontage on both the Red House and Church building poorly address West Green Road (WGR). At the rear both buildings offer no visual interest or natural surveillance to the open space. These issues should be addressed by any future redevelopment to ensure significant improvement and regeneration.	Any future development of this site will be subject to the principles for high quality design in the development management policies.
119	SA1755	Ceri Williams (local resident)	Height	Strongly object to proposals over 3 storeys on West Green Rd between Page Green and West Green. The recently built flats above Tescos on the corner of Langham Road show what a negative effect these buildings create in a residential area.	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. Any new development will be guided by the development management policies including DM1 which seeks to deliver high quality design in all proposed developments.
229	SA1756	Woodlands Park Residents Association	Height	Do not support the proposal to build up to 6 storeys on the site. This is out of scale with surrounding buildings, and height should be restricted to no more than three storeys	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.
575	SA1757	Amir Aramfar, local resident	Height	The suggested 6 storey height is concern in a generally low rise area and in a location which is not a 'gateway' or corner site there is no justification for 6 storeys on the site. The area requires a truly architecturally led building and	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

				<p>there is a clear opportunity for this.</p> <p>Good design and tall buildings can go hand in hand, but obviously one is not a pre-requisite for the other. WGR is generally 2-3 storeys therefore an appropriate height on this site along WGR would be 3 storeys with potential for a setback 3rd floor (ground + 3 in total).</p> <p>Along Stanley Road the scheme should respect the residential scale of buildings and no more than 3 storeys in total should be the maximum. As already stated the site is not a gateway or an important corner location where a tall building might be suitable or desirable in urban design terms.</p>	<p>document are considered appropriate to enable development that brings change while having an acceptable impact on the rest of the borough.</p> <p>The site is not a gateway location however it is located in an area with a very good PTAL rating (5). Development is encouraged in high PTAL areas to take advantage of the existing transport connections.</p> <p>Therefore 6 storey buildings on this site are considered appropriate.</p>
738	SA1758	Ellie Harries	Height	<p>Hawes and Curtis site (SA30), 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?</p>	<p>The wording has been amended in SA59 to bring it in line with the wording in SA30.</p> <p>Amend SA59 to be consistent with wording in SA30</p>
738	SA1759	Ellie Harries	Height	<p>I am concerned about the proposed re-development of the Red House (SA 59). The guidelines say that height should be "restricted to six storeys"! This is completely inconsistent with the height of buildings in the area. Nothing along West Green road is more than three storeys and building a block of flats this high would completely change the character of the road.</p>	<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>
738	SA1760	Ellie Harries	Height	<p>Take into account the existing facades, Victorian buildings and character of West Green Road. There is great potential for the area to develop, but not if the character of the road is ruined by unsympathetic developments.</p>	<p>Any potential developments will be required to conform with the development management principles. DM2 Delivering High Quality Design and DM12 Management of the Historic Environment will ensure these are taken into account.</p>
229	SA1761	Woodlands Park Residents Association	Housing	<p>The site should be retained for its present use as accommodation for elderly residents</p>	<p>Provision of the needs of existing residents will be required to be met before any development is permitted.</p> <p>Action: Add a site requirement that all existing uses have been appropriately reprovided where necessary.</p>
575	SA1762	Amir Aramfar, local resident	Nursery places	<p>That said, there is a critical need for nursery places in the area.</p> <p>Whilst the rainbow is rundown and the provision of care is very poor compared to other centres in the area, it provides an essential overspill for the already over capacity local centres. Any proposal must ensure that the nursery is not only re-provided but increases the D1 floorspace offering.</p> <p>Educational/nursery facilities appear to be severely lacking in most recent developments that have come forward in Haringey and along West Green Road in particular. Another A3 or A1 unit (Tesco/Sainsbury) is not what the community requires this time.</p>	<p>Early years education places will be considered as part of the infrastructure delivery plan.</p>
229	SA1763	Woodlands Park Residents Association	Open space	<p>Support the proposals to retain and preferably enhance the existing open space.</p>	<p>Council welcomes support for this site requirement.</p>
575	SA1764	Amir Aramfar, local resident	Open space	<p>The adjoining open space is run down and poorly lit at night time. The same applies for Anstey Walk. The area would benefit from LED lighting.</p>	<p>Specific open space improvements are out of scope of this plan. However, any proposed development should take into account how it can enhance the open space.</p>

				<p>The open space is well used and children who frequently play football on the uneven surface. The grass is worn and looks unattractive. A decent surface for football/sports would be welcomed and undoubtedly well used. This could be easily secured though section 106. The children in the area deserve better than a crap bit of grass that is used by dogs and foxes as a toilet.</p> <p>The playground has seen recent investment and this should be continued as it is convenient for many people and well used.</p>	
697	SA1765	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	<p>Noted.</p> <p>Action: Include reference to a piling statement being needed prior to any piling taking place.</p>
697	SA1766	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.
575	SA1767	Amir Aramfar, local resident	Support	The church building is used Monday- Friday as by the Rainbow nursery. This building is an eyesore and has provides no visual interest or active frontage with WGR. It is a tired looking building inside and out	Any future development of this site will be subject to the principles for high quality design in the development management policies.
697	SA1768	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	SA1769	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</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>

				infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.	
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Comments on SA60 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA1770	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	SA1771	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.
818	SA1772	Our Tottenham	Social infrastructure	In line of the acute need for social infrastructure of all kinds in the Eastern part of the Borough, this publically owned site should be prioritized for such uses.	The infrastructure delivery plan will inform whether this site could be used for social infrastructure.
422	SA1773	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 SA62 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
827	SA2850	Lucy Rogers, non-local resident	Inappropriate development	I am totally against the scope of the Site Allocations and many of them are completely inappropriate and out of control. For example, Site 62 Barber Wilson, the location of an important and viable business; Site 61 the Keston daycare centre; the Selby Centre SA 64, to name a few. Why is Haringey looking at its assets and seeing them simply land that is fair game for developers to build housing stock? This approach is short-termist and wrong.	Many of the buildings on this site do not make the best use of land, and could be better utilised to provide new housing developments, including incorporation of the strategic aim to produce a strong pedestrian and cycling link from Tottenham to Wood Green. With regard to Barber Wilson, the Council is prepared to provide flexibility to protect this valued and historical use. Action: Include reference to enabling the retention of Barber Wilson & Sons tap makers building for its current use.
697	SA2851	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	Noted.

				accordance with Section 185 of the Water Act 1989.	
697	SA2852	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.
178	SA2853	Dan Rosenberg	Height	I object to site allocation 62 (Barber Willson/ Land near Crawley Rd). I have no particularly strong views on whether residential or business use is best. There is a need for jobs, and there is also a need for houses. However, a five storey building in that location is inappropriate. It will be over twice the height of all the surrounding houses, and will dwarf them, block out light, and overlook all the gardens. It would be out of character with the area. I understand that there have been a number of previous planning applications of a similar nature, all previously rejected for tall buildings of various descriptions on this site. Nothing has changed and a tall building out of character with the area remains inappropriate.	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.
624	SA2854	Tottenham & Wood Green Friends of the Earth	Deculverting	We welcome the proposed deculverting of Moselle	Council welcomes support of this policy.
422	SA2855	Environment Agency	De- culverting	We support the reference to the exploration of deculverting the Moselle Brook. For consistency with other sites with culverted main river we suggest the following wording, to ensure that if deculverting is not possible, appropriate mitigation is put in place: <i>The Moselle Brook runs in a culvert under the site. Development proposals must explore opportunities to de-culvert the Moselle Brook, with clear and robust justification provided if considered unachievable. No new buildings will be permitted within 8m of the edge of the culvert and it's condition must be commensurate with the lifetime of the development.</i> This site has not been included in your SFRA and should be included in Appendix A.	Haringey Council does not believe that an 8m buffer zone on culverts is consistent with meeting the borough's housing targets. Where deculverting is considered viable as part of a development, an 8m buffer zone to the open watercourse could be acceptable.
818	SA2856	Our Tottenham	Employment	No mention is made here of the fact that this is the site of Barber Wilson, the major UK tap manufacturer with over 100 years experience. How many jobs will be lost from Tottenham if this company is displaced? How many other businesses will be affected?	Many of the buildings on this site do not make the best use of land, and could be better utilised to provide new housing developments, including incorporation of the strategic aim to produce a strong pedestrian and cycling link from Tottenham to Wood Green. With regard to Barber Wilson, the Council is prepared to provide flexibility to protect this valued and historical use. Action: Include reference to enabling the retention of Barber Wilson & Sons tap makers building for its current use.
818	SA2857	Our Tottenham	employment	Where will Barber Wilson go and how will they be compensated? The site allocation gives no indication that any of these issues have been considered.	Many of the buildings on this site do not make the best use of land, and could be better utilised to provide new housing developments, including incorporation of the strategic aim to produce a strong pedestrian and cycling link from Tottenham to Wood Green. With regard to Barber Wilson, the Council is prepared to provide flexibility to protect this valued and historical use.

					Action: Include reference to enabling the retention of Barber Wilson & Sons tap makers building for its current use.
422	SA2858	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	<p>The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:</p> <p><i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	<p>Noted.</p> <p>Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</p>
422	SA2859	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	<p>Noted.</p> <p>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</p>

Comments on SA64 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
814	SA4281	Sona Mahtani – Selby Trust	Accessibility	Need accessible locations – so clients area able to access businesses, and businesses are able to access core market areas.	This site is not located in either an accessible, or a particularly “central” location, in that it is well outside of any sort of designated centre.
814	SA4282	Sona Mahtani – Selby Trust	Amenity	Seek to benefit from wider service and amenity provision – therefore tend to be close to town centres or larger business parks where a critical mass supports wider offer;	This site is not located in either an accessible, or a particularly “central” location, in that it is well outside of any sort of designated centre.
814	SA4283	Sona Mahtani – Selby Trust	Change of use	If a change of use is being proposed for the site, then it should be made transparent Proposed Site Allocation is for “consolidation of community uses” and reference in Site Requirements for “future reprovision of all existing community uses should be secured before redevelopment can occur” implies relocation, rather than re-provision onsite. What is being proposed should be made explicit.	This Site Allocation makes provision for redevelopment as long as the future of the community use is secured. This covers potential for redevelopment with residential cross subsidising improved facilities. As such it provides a flexible position enabling a range of outcomes for this site, while protecting the existing use.
814	SA4284	Sona Mahtani – Selby Trust	Community	The Localism Act 2011 We would like to build on the council's ratification of our status as an asset of community value, which has been verified in the Community Matters Social Value process in 2014. Neighbourhood planning	<p>Noted.</p> <p>Action: Include mention that this site is identified as an Asset of</p>

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				can also contribute, but it should be recognised that Selby Centre services reach more than simply the local neighbourhood.	Community Value.
818	SA4285	Our Tottenham	Community	Such provision to be ensured on site	It is considered that this amendment could restrict options being developed that ensure the best use of this site.
814	SA4286	Sona Mahtani – Selby Trust	Community use	Consolidation of community uses on existing site Haringey 6 th Form, North Middlesex Hospital, Devonshire Hill Primary School are located in and around the Selby Centre Road area. Such a hub would bring a Selby Centre redevelopment, in line with the DECC's Community Energy Strategy.	Noted.
814	SA4287	Sona Mahtani – Selby Trust	Community use	Renew and upgrade existing community facilities not duplicate existing provision It is also not clear why when existing Centres like the Selby Centre exist nearby what is the purpose of building a community hub on the High Road. This implies that strategies regarding community buildings have already been decided upon rather and plans already incorporated in site allocations.	It is noted that a new community hub is proposed in the High Rd West masterplan framework. The Council is keen to see new facilities perform multifunctional roles, and the scope for the new hub to do this will be explored through the IDP.
579	SA4288	Laura Harrison, resident	Community Value	Despite appearances, this site provides a huge number of very valuable community services and activities, which should be protected and safeguarded at all costs. Investment to renew the premises whilst retaining and supporting the existing uses would be very beneficial.	Noted.
814	SA4289	Sona Mahtani – Selby Trust	Contamination	Studies are mentioned to understand potential contamination prior to site redevelopment. We would like to confirm that the Centre has been assessed for asbestos.	Noted.
814	SA4290	Sona Mahtani – Selby Trust	Content	Gaps in Research: We would also like to highlight that there are aspects of the facilities we have at the Selby Centre that are not reflected in the mix of what is available nor what is needed in the London Workplace Study, that may warrant further research in this regard. Examples given.	Noted.
814	SA4291	Sona Mahtani – Selby Trust	Content	We do not believe that as it stands the framework can deliver this ambition. We would like to support the desire for the assertion in Tottenham Strategic Framework (March 2014) but find that Selby Centre was somehow overlooked is the framework, despite its size, achievements, sustainability, scope and contribution.	Noted.
814	SA4292	Sona Mahtani – Selby Trust	Decentralised energy	Decentralised community energy hub. We welcome the site being identified as part of a decentralised energy network that could bring real community benefit to the area. It builds on our establishment of a Community Energy Lab project in 2009 that the Council has previously funded through Haringey 40:20, as part of transforming the Selby Centre into a Green Hub that contributes to the local green social enterprise economy, resilience and job creation programmes. In this regard, this fits with our Green Hub developments in the last 5 years at the Selby Centre we have explored the potential contribution that combined heat and power units, solar panels, wood pellet systems and others can contribute to reducing the energy costs for the area.	Support is noted.
814	SA4293	Sona Mahtani – Selby Trust	Employment space	Spaces that provide a high quality working environment – with a professional central core, reception, naturally lit units and spaces;	Noted.
827	SA4294	Lucy Rogers, non-local resident	Inappropriate development	I am totally against the scope of the Site Allocations and many of them are completely inappropriate and out of control. For example, Site 62 Barber Wilson, the location of an important and viable business; Site 61 the Keston	This site allocation is the 'consolidation of community uses' and requires that the reprovision of all community uses should be secured before any redevelopment can occur.

				daycare centre; the Selby Centre SA 64, to name a few. Why is Haringey looking at its assets and seeing them simply land that is fair game for developers to build housing stock? This approach is short-termist and wrong.	
814	SA4295	Sona Mahtani – Selby Trust	Local business	Require locations which have established economic activity – business seek to ‘colocate’ so proximity helps the centre attract occupiers and become commercially viable;	This site is not located in either an accessible, or a particularly “central” location, in that it is well outside of any sort of designated centre.
814	SA4296	Sona Mahtani – Selby Trust	Mixed use	What makes suitable mixed use workplaces: The Council’s research demonstrates the suitability of appropriate workplaces in the London Workplace Study (2014) that would make Selby Centre particularly suitable as a mixed use development with workspaces and housing, and therefore we assert that it needs to be reconsidered in this light, rather than simply a site for “residential educational and leisure uses”.	The Council doesn’t recognise the London Workspace Study as being a Council document. The Council’s Workspace Viability Study shows that north Tottenham is at present not a location into which mixed use development including a mix of workspace and residential is particularly viable. As such any scheme developed in this area is likely to need to be overwhelmingly residential in order to be considered viable.
814	SA4297	Sona Mahtani – Selby Trust	Mixed use	Work within refurbished spaces – but this needs to be of good quality, be sub-divisible and able to provide a good specification fit out; This is achievable in an appropriate site mixed use redevelopment.	Noted.
814	SA4298	Sona Mahtani – Selby Trust	New build	New build in established locations – providers deliver bespoke spaces in locations where demand is highest to maximise viability; Selby Centre is an established location.	Noted.
818	SA4299	Our Tottenham	Ownership	The Selby Centre must be protected and given a new long-term lease.	It is considered that protection of the function, in preference to the provider or location is preferential. The management of leases is outside the scope of the plan.
422	SA4300	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.
814	SA4301	Sona Mahtani – Selby Trust	Site description	Seeking clarification on description of Selby Centre as a site for redevelopment Fundamentally, the site should be described accurately in the description of “Current/Previous Uses” as it was “a former school site with community, employment and educational uses in its role as a multi-purpose community centre for 29 years which the Council has accepted is a recognised asset of community value in line with the Localism Act 2013 (Part 5, Ch 3)”.	Noted that the existing use can be improved. Action: Change Current/Previous Use to “Multi-purpose community centre”. Action: Include mention that this site is identified as an Asset of Community Value.
814	SA4302	Sona Mahtani – Selby Trust	Site description	The site description identifies 1.2 hectares, whereas the Haringey Prospectus says 1.53 hectares. Which one is correct?	The site as defined on the map of page 164 contains 1.2Ha.
814	SA4303	Sona Mahtani – Selby Trust	Site use	The Selby Centre is fully taken up by over 100+ social action organisations. Collectively we attract 1500+ local residents daily, in a charitable and affordable business model that generates 70% of its own income, despite being located in an area of high deprivation.	Noted.
814	SA4304	Sona Mahtani – Selby Trust	Site use	The Selby Centre addresses the needs and co-produces solutions of local residents from many cultures drawn from disadvantaged backgrounds, facing the challenges of poverty and unemployment. Economically, the Centre employs at the very least 217 FTE staff, and brings in c£3.5m of extra grants and funding, attracts considerable social capital and support from volunteering and citizenship.	Noted.
814	SA4305	Sona Mahtani – Selby Trust	Social mix	Can be located within mixed use neighbourhoods – particularly in dense urban areas such as Haringey.	Noted.

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814	SA4306	Sona Mahtani – Selby Trust	White Hart Lane	<p>Ward of White Hart Lane is invisible</p> <p>It is not clear why existing uses are not reflected, nor why the High Road West excluded the Selby Centre by stopping at White Hart Lane Station. We expressed our concern at this tight geographical approach during previous consultations.</p>	It is considered that the map scale is appropriate for the purposes of a Site Allocations document. For wider strategic context, the start of the section should be referenced.
814	SA4307	Sona Mahtani – Selby Trust	White Hart Lane	<p>White Hart Lane area has not had a proper focused master plan of its own, a fact identified in 2009 by the Council, therefore, aspects of it are being considered as an adjunct if at all to the High Road West area. This invisibility is reflected again in the Urban Character Study, for “North Tottenham / Northumberland Park” does not mention the words “White Hart Lane” once. Its predominant focus is on an analysis of housing types, rather than a holistic urban character study. Importantly, it does not reflect on how areas are being used.</p>	<p>The White Hart Lane area is not a designated area for growth, and as such there isn’t an indication that there will be masterplanning of the area.</p> <p>The Urban Characterisation Study looks at all areas of the borough in an equal amount of detail.</p>

Comments on SA65 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
587	SA4308	Carol Sykes	Eyesore	Current buildings are an eyesore	The wording of the site allocation states that the current buildings do not need to be retained.
587	SA4309	Carol Sykes	Height	<p>From previous Inspectors reports: "the leafy, semi rural character" of the northern part of the site near All Hallows Church", "the high quality of the built environment in the surrounding area"</p> <p>In particular the Inspector noted that the (4 storey) buildings would significantly exceed all the surrounding residential buildings in height and would disturb the balance and undermine the dominance of Bruce Castle.</p> <p>The character of the area has not changed since that appeal decision. Accordingly a height limit of 5 storeys would be completely inappropriate for this site. I would suggest a height limit of 2 storeys consistent with the Peabody Cottages Conservation Area and to avoid adversely affecting the historic setting of the Borough's only grade1 listed building.</p>	<p>Specific heights will be removed from the document as building height will be assessed against the development management policies which consider the impact on amenity and local character.</p> <p>Action: Remove reference to specific height limits.</p>
587	SA4310	Carol Sykes	Height	To propose a 5 story height limit is not acceptable for this very sensitive site. Two applications for housing on this site (HGY/2005/1992 and 0274) were only 4 storeys high and they were refused on appeal on 19 September 2006. The inspector mentioned specifically the proximity to the Peabody and Bruce Castle Conservation Areas	<p>Specific heights will be removed from the document as building height will be assessed against the development management policies which consider the impact on amenity and local character.</p> <p>Action: Remove reference to specific height limits.</p>
623	SA4311	Cllr Felicia Opoku, and separate identical response as local resident	Height	The height limit of the development should be reduced as not only will it cast a shadow over Bruce Castle as well as potentially block natural light from nearby residents.	<p>Specific heights will be removed from the document as building height will be assessed against the development management policies which consider the impact on amenity and local character.</p> <p>Action: Remove reference to specific height limits.</p>
590	SA4312	Joseph Nicholas, Chair, Friends of	Height	There has been no change in the character of the area since that appeal decision, and it therefore follows that a building of 5 storeys in height would	Specific heights will be removed from the document as building height will be assessed against the development management policies which

		Bruce Castle		be just as inappropriate. On behalf of the Friends of Bruce Castle, therefore, I would request that the draft site allocation for SA65: The Roundway should be amended to state that the height of any development on this site should be limited to two storeys, consistent with the surrounding residential buildings and to avoid an adverse impact on the setting of the borough's only Grade 1 listed building.	consider the impact on amenity and local character. Action: Remove reference to specific height limits.
590	SA4313	Joseph Nicholas, Chair, Friends of Bruce Castle	Height	The height limit on this site will be 5 storeys". However, this conflicts with the earlier rejection of two development applications for housing on this site -- HGY/2005/0274 and HGY/2005/1992 -- for buildings of four storeys in height, which were refused on appeal on 19 September 2006. The inspector who then refused the appeal mentioned specifically the proximity to the Peabody Cottages and Bruce Castle Conservation Areas, the Grade 1 listed Bruce Castle, Round Tower and boundary wall along Church Lane and Philip Lane, the "leafy, semi-rural character" of the northern part of the site near All Hallows Church, and "the high quality of the built environment in the surrounding area". The inspector further noted that 4-storey buildings would exceed the height of all the surrounding residential buildings, disturbing the balance of the area and "undermining the dominance" of Bruce Castle.	Specific heights will be removed from the document as building height will be assessed against the development management policies which consider the impact on amenity and local character. Action: Remove reference to specific height limits.
571	SA4314	Matthew Bradby, Chair, Tottenham Civic Society	Height	Objects to 5 storeys, should not compete with Bruce Castle,	Specific heights will be removed from the document as building height will be assessed against the development management policies which consider the impact on amenity and local character. Action: Remove reference to specific height limits.
695	SA4315	Russell Dove, local resident	Height	<i>I object to any building proposal above 3 storeys on this site.</i> <i>This is a critically important site adjacent to Bruce Castle, which is one of the most important buildings and parks in the borough, as well as other significant heritage buildings in Church Lane. The document recognises this, but a development of 5 storeys is unacceptable here as it would be out of proportion to all local buildings and dominate Bruce Castle. All the buildings adjacent to his site, including Bruce Castle itself, are no more than 3 storeys high, most are 2 storeys. The same limits must be observed in any future development here. A development any higher than this will not "enhance the setting of Bruce Castle, and the Bruce Castle Park" but overwhelm it.</i> <i>The proposals above contradict the aims stated at section 4.22 Tottenham Action Plan - AAP6 "The Council will ensure the height of new buildings respond (sic) and help to define the surrounding character..."</i>	Specific heights will be removed from the document as building height will be assessed against the development management policies which consider the impact on amenity and local character. Action: Remove reference to specific height limits.
697	SA4316	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	SA4317	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	SA4318	Savills on behalf	Sewers	There may be existing public sewers crossing the site. If building over or close	Noted.

		of Thames Water		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.	
571	SA4319	Matthew Bradby, Chair, Tottenham Civic Society	Support development	Regarding the site of 315 Roundway (numbered SA 65 or 66) we are in favour of redevelopment here.	Support noted.

Comments on SA66 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
422	SA4320	Environment Agency	De-culverting	The River Lee lies to the East of this site, however appears to be greater than 8m from the edge of the site.	Noted.
818	SA4321	Our Tottenham	Estate renewal	See our comment in the overall response about the SA DPD, about the Housing Estate Renewal approach taken by the Council in the SA DPD, Tottenham AAP and Alterations to Strategic Policies. We contest the 'red lining' of housing estates for future redevelopment into 'mixed communities' on the grounds explained in our comment.	Noted. It is considered that the redevelopment of housing estates could have an important role to play in the delivery of housing to meet the Council's objectively identified housing need.
414	SA4322	GLA	Estate renewal	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this area as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.	Support noted.
422	SA4323	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>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>

				<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>	
818	SA4324	Our Tottenham	Housing	<p>For the sites SA57 (Park View and Durnsford Road), SA63 (Broadwater Farm), SA66 (Leabank and Lemsford Close), this means that we demand the inclusion of the following principles in the SA DPD:</p> <ul style="list-style-type: none"> • No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes. • Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants. • There should be no demolition of structurally sound housing • There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. 	<p>The Local Plan: Strategic Policies sets out that there will be no net loss of affordable housing by habitable room.</p> <p>The Council will follow appropriate protocols on the determination of redevelopment of its housing estates. The details of this are outside the scope of the plan.</p>
697	SA4325	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	<p>Noted.</p> <p>Action: Include reference to a piling statement being needed prior to any piling taking place.</p>
422	SA4326	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	
697	SA4327	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.
422	SA4328	Environment Agency	Sites in Flood Zone 2	<p>Where sites are in Flood Zone 2 this should be noted explicitly in the explaining what this means for the design guidelines of the development. Where there is more than one flood zone (e.g. in Flood Zones 1 & 2) this should also be noted and the development should follow the sequential approach to steer the development to the parts of the site at lowest risk of flooding. We suggest the following additional wording is added to the development guidelines for the above sites:</p> <p><i>This site is in Flood Zone 2, classified by the National Planning Practice Guidance as having a medium risk of flooding from rivers. Development of this site must be supported by a Flood Risk Assessment. For development on this site to be acceptable the FRA must show there will be no increase in flood risk on or off site and that the development will be safe for future users. Development should be focussed in areas of Flood Zone 1 and no highly vulnerable uses will be permitted in areas of Flood Zone 2 without passing the sequential test.</i></p> <p>For sites where there is more than one Flood Zone (AAP: NT2, NT3, NT4; SA:</p>	<p>Action: Add <i>"This site is in Flood Zones 1 & 2 & 3 [delete as applicable], classified by the National Planning Practice Guidance as having a low/medium/high [delete as applicable] risk of flooding from rivers. Development of this site must be supported by a Flood Risk Assessment. The FRA must show there will be no increase in flood risk on or off site and that the development will be safe for future users. Development must be steered to the areas within the red line boundary that are at lowest risk of flooding. Development should be focussed in areas of Flood Zone 1 and no highly vulnerable uses will be permitted in areas of Flood Zone 2 without passing the sequential test."</i></p>

				SA52, SA63, SA66) we suggest the following additional wording: <i>This site is in Flood Zones 1 & 2 & 3 [delete as applicable], classified by the National Planning Practice Guidance as having a low/medium/high [delete as applicable] risk of flooding from rivers. Development of this site must be supported by a Flood Risk Assessment. The FRA must show there will be no increase in flood risk on or off site and that the development will be safe for future users. Development must be steered to the areas within the red line boundary that are at lowest risk of flooding. Development should be focussed in areas of Flood Zone 1 and no highly vulnerable uses will be permitted in areas of Flood Zone 2 without passing the sequential test.</i>	
697	SA4329	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	SA4330	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>