

## **London Borough of Haringey**

### **Haringey Local Plan Preferred Option consultation of 4 Local Plan Documents held Feb-Mar 2015:**

#### **Tottenham AAP**

#### **Regulation 22(1)(c) Consultation Statement**

**October 2015**

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## **1. Introduction**

### **The Consultation**

1.1 Consultation on the Preferred Option of four Haringey Local Plan Documents took place between 5<sup>th</sup> February and 27<sup>th</sup> March 2015. These were:

- Amendments to the Local Plan: Strategic Policies (Adopted 2013);
- Development Management Policies,
- Site Allocations, and
- Tottenham Area Action Plan.

1.2 The consultation was undertaken in accordance with the Council's Statement of Community Involvement and in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. These regulations required the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken in the course of preparing the local plan document, a summary of the main issues raised to consultation, and to detail how the Council's took account of the comments received in preparing the subsequent version of the plan - the Preferred Option version.

### **This Document**

1.3 The details of the consultation undertaken are included in the next section, which includes reference to the consultation documentation, who was contacted seeking consultation responses, and a summary of respondents.

### **Process & next steps**

1.4 This consultation report was submitted to Cabinet in October 2015. It builds upon the recommendations of Regulatory Committee on a summary version of this document in September 2015.

1.5 Following decisions on amendments to the documents, the next stage will be to conduct a Proposed Submission consultation, seeking comments on soundness and legality, prior to submission to the Secretary of State for Examination in Public of the planning documents by an independent Planning Inspector. The exact dates for the submission, and length of time taken to examine the documents will depend on the number of issues arising from the proposed submission consultation. It is planned that the Proposed Submission consultation will take place in December 2015-January 2016, with Submission and Examination taking place in 2016. Following the Examination, the Inspector will issue an Examination Report on the soundness of the plan. It is expected that should he decide the Plan is sound, the Council will adopt the plan in mid-late 2016.

## **2. Summary of consultation undertaken on the Tottenham Area Action Plan Preferred Option consultation document**

### **Summary of consultation undertaken on the Site Allocations Reg 18 consultation document**

- 2.1 Following Cabinet approval in January 2015, the alterations to the Strategic Policies and the 'preferred option' drafts of three local plan documents, were published for public consultation from 9<sup>th</sup> February to 27<sup>th</sup> March 2015.
- 2.2 Public consultation on the four Local Plan documents was carried out in accordance with the Council's adopted Statement of Community Involvement (2011) and statutory requirements, this included:
- Notification by letter/e-mail on 9 February to over 1,200 individuals and organisations already registered on the planning consultation database;
  - A reminder e-mail sent to those on the database on 14 March;
  - Notification letters to all landowners and occupiers within the boundary of sites proposed for allocation;
  - Public notice placed in the local newspaper on 12 February;
  - Reference and loan copies of each document and the accompanying sustainability appraisals were made available in each of the Borough libraries, at the Civic Centre & Planning Reception at Riverpark House, and on the Council's website.
- 2.3 In addition to the above, and in an effort to engage the wider public in the consideration of the draft local plan documents, articles were placed in the February editions of the Haringey People Magazine (which is delivered to all households in the Borough) and the Tottenham News. The following series of drop in sessions and public meetings were also held:
- Turner Avenue Steering Group (22 Jan)
  - Park Grove and Dunsford Road Steering Group (29 Jan)
  - St Ann's & Haringey Area Forum Meeting (3 Feb)
  - Northumberland Park Area Forum (5 Feb)
  - Tunnel Gardens / Blake Estate Residents Meeting (5 Feb)
  - Highgate & Muswell Hill Area Forum (5 Feb)
  - Tamar Residents Meeting (12 Feb)
  - Reynardson Residents Meeting (12 Feb)
  - River Park House drop in session (16 Feb)
  - Tangmere Steering Group (18 Feb)
  - Broad Water Farm RA (18 Feb)
  - Turner Avenue Drop in Session (Sat 21 Feb)
  - High Road West / Love Lane RA (25 Feb)
  - Wood Green Library drop in session (25 Feb)
  - River Park House Member drop in session (4 Mar)
  - Hillcrest RA (9 Mar)

- West Green & Bruce Grove Area Forum (9 Mar)
- Muswell Hill Library Drop in Session (10 Mar)
- Stellar House, Altair Close, The Lindales and Bennetts Close Residents and Community Association (10 Mar)
- 163 Park Lane Drop in Session (11 Mar)
- Northumberland Park and Park Lane Residents and Community Association (12 Mar)
- All Ward Member drop in session (18 Mar)
- Headcorn & Tenterden Residents Association (24 Mar)
- Summersby Road RA (26 Mar)

2.4 The aim of the consultation was to invite public and stakeholder views and comments on the proposed policies or sites being put forward for consideration, and to enable consultees to offer up further information, to enable the preparation of the next iterations of the documents – the pre-submission versions.

2.5 Notwithstanding the above, criticism was received on the extent and adequacy of the consultation process. Whilst meeting the obligations within the Council's adopted Statement of Community Involvement (2011), officers have subsequently met with some of the concerned parties representing some of the residents groups to see how consultation on the documents could be improved, and where feasible, these new techniques and standards have been incorporated in the update to the Council's Statement of Community Involvement (which is currently out for consultation). Officers will also be seeking to ensure that the lessons learnt and feedback received on the earlier consultation process can be incorporated into the next round of consultation on these documents planned for later in the year.

### **3. Who responded and number of representations received**

- 3.1 In total 118 individuals, businesses, community groups and government departments responded to the consultation. Between them they raised 1,070 individual representations on various issues and policies.
- 3.2 There were a large number of general representations received that did not refer specific policies but raised concerns more broadly with the future of Tottenham and how development and change will or should be managed. Many comments were set in the context of the proposed Area Action Plan objectives. These responses have been collated in the first subsection below, arranged by key topic or issue.
- 3.3 Many of the general comments raised were reiterated having regard to specific development management policies or site allocations. Whilst comments were received on all policies, there was a significant variance in the number of respondents and representations received. Details in this respect are accompanied by each policy summarised in this report.

### **4. Summary of Issues Raised During the Consultation**

- 4.1 The following comments addressed topics included in the introductory chapters and sections of the Area Action Plan, including: Chapter 1 – Introduction; Chapter 2 - Key issues, challenges and opportunities; Chapter 3 - Vision and strategic objectives; and Chapter 6 - Implementation, delivery and monitoring. Whilst these general comments

did not refer specific policies they often reiterated the concerns and issues raised on the individual policies and site allocations, which are also summarised later in this report.

## **GENERAL COMMENTS**

### **Chapters 1-3 & 6 and all chapter introductions**

Respondents: 14

Responses: 131

### **AAP (General)**

Respondents: 29

Responses: 116

### **Regeneration**

- 4.2 There were comments on the distribution of growth across the borough. Some respondents did not agree that Tottenham could accommodate an additional 10,000 new homes and noted there is proportionately less growth planned for the west of the borough. The Borough's spatial strategy establishes areas to accommodate growth based on a wide range of assessments including character, heritage, public transport, investment in infrastructure, land availability and economic regeneration needs, along with other opportunities and constraints. Having regard to these factors the Council considers that Tottenham has the capacity to meet the planned housing growth.
- 4.3 Some comments suggested that the AAP does not give equal consideration to the different areas within Tottenham. The AAP is helpfully organised by areas and reflects that there are a range of development and regeneration opportunities across Tottenham, many of which are supported by specific site allocations. The plan has been updated to set out more clearly the vision for each area and how these areas will contribute to the delivery of the spatial strategy.
- 4.4 There were concerns that regeneration will cause gentrification and displace residents from existing homes and neighbourhoods. There were also concerns that the AAP might work to reinforce inequalities present in the area rather than address them. These comments are noted. The Council's vision for Tottenham is to manage development and regeneration to deliver a positive transformation of the area that benefits both existing and future residents.
- 4.5 One consultee suggested that the Spurs development should not be presented in the plan as a driver of economic development, pointing to research that suggests stadium-led developments do not make a significant contribution to the economy. The Council notes a London Assembly Report (March, 2015) which indicates that stadium-led regeneration schemes can act as a catalyst for physical and social regeneration. It is therefore considered appropriate to present the new Spurs stadium as a driver for change in the area. The AAP includes a site allocation for the stadium and through this policy will seek to ensure that future development proposals both deliver objectives of the plan and achieve maximum public benefit.

### **Housing**

- 4.6 There were concerns raised with the inclusion of sites within the AAP for estate renewal. Consultees also objected to the demolition of buildings as part of estate renewal, particularly where these are structurally sound. The Council considers the inclusion of these sites is necessary to support delivery of the spatial strategy and

meet objectively identified housing needs. Recognising that some housing estates are poorly designed, make inefficient use of land and are in need of repair, the AAP identifies sites where there are opportunities to improve housing stock and living conditions. This includes interventions to enhance site layout and design for better connectivity and legibility, upgrade buildings and amenity areas and optimise the use of land. The Local Plan has been amended to better clarify the rationale for including sites for estate renewal, as set out above.

- 4.7 There were various representations on future plans for individual estates allocated for estate renewal opportunities. The Local Plan provides a policy basis for estate renewal but does not set specific details for individual schemes. When considering future options for a site, the priority to meet housing need may mean that redevelopment is preferred over refurbishment. In some circumstances, cross subsidy of new affordable housing stock from market housing may be necessary to make schemes viable. The Council is committed to engaging with local residents to identify an approach for estate renewal which meets the needs of both current and future residents, in line with the Council's Housing Investment Strategy and s105 of the Housing Act 1985.
- 4.8 Some consultees questioned why housing estates were included in allocations when the Decent Homes programme is being completed and argued this should be the preferred vehicle for improving housing stock. The Council recognises the importance of the programme in ensuring housing is maintained at the appropriate standard in the short term. Beyond housing repair, the plan identifies opportunities to improve the quality and quantity of housing over the long-term having regard to the strategic plan objectives.
- 4.9 There were concerns that leaseholders might be priced out of and displaced from the local area, including through Compulsory Purchase Orders (CPOs). Comments were received from both residents and businesses in this respect. In the case of compulsory purchase, leaseholders are offered compensation on the principle of equivalence, meaning they will be no better or worse off after acquisition. The Council will support relocation within the area where possible, whilst recognising that CPO legislation allows for financial compensation so that businesses and residents can make their own decisions in this regard.

#### Affordable Housing

- 4.10 Consultees stated that affordable housing is not genuinely affordable. It was also suggested that the plan's target for affordable housing should be 100%. The borough wide target for affordable housing is set in the Strategic Policies Local Plan and is informed by a viability assessment. Across the plan, the objectives are to significantly increase housing supply, including affordable housing, to meet local needs. The Council will seek to maximise the amount of affordable housing provided in new development schemes in the Tottenham area, however recognising that delivery on a site basis is influenced by viability and grants available to provide for different types of affordable provision.
- 4.11 There were comments suggesting that the AAP does not sufficiently reflect the large number of residents in rented accommodation and the need for affordable rents. It was also suggested that the Council should consider rent controls as a solution to creating more affordable housing. The introductory text in the AAP has been amended to more clearly reflect the situation with respect to rented accommodation in the Tottenham Area. Rent control for private rented development is outside the scope of the planning system. The Council will seek provision of affordable rented accommodation in line with Policies SP2 and AAP3.

- 4.12 There was a request for clarification on the Council's aspirations for a better mix of housing. There was concern that this implied the loss of social housing units, which consultees also objected to. The plan has been revised to set out more clearly the plan objectives for housing mix in Tottenham. The policies set out that the Council will seek to ensure no net loss of social housing on a habitable room basis.

#### Employment

- 4.13 It was suggested that the AAP could better set in context the nature of the local economy, the range of viable employment uses currently in the area, and set clearer objectives for the new affordable and flexible workspace provision to support businesses. Amendments to the introductory and supporting text have been made to this effect. The DM Policies set requirements for affordable workspace.
- 4.14 Consultees expressed concern for the loss of employment land and floorspace, particularly to residential and other uses, with some suggesting that there should be no net loss of floorspace. The Council considers that the Local Plan will ensure a sufficient supply of employment land and premises within the borough (including in Tottenham) to meet identified need however recognising that some reconfiguration, supported by site allocations, may be necessary to deliver the spatial strategy. The DM Policies set out the Council's approach to maximise replacement employment floorspace in appropriate mixed use schemes. It also seeks to protect floorspace in non-designated employment locations.
- 4.15 Respondents stated that new jobs should be catered for local residents, be of good quality and pay the living wage. The Local Plan broadly seeks to increase the number and quality of jobs in Tottenham and residents' access to them, including through requiring planning contributions for skills and training. The living wage is outside the scope of the Local Plan.

#### Infrastructure

- 4.16 Respondents suggested that the plan does not sufficiently address the infrastructure requirements necessary to support the growth planned in Tottenham, including for health, education and community facilities. The Council considers that this will be dealt with through the Infrastructure Delivery Plan. However, the AAP has been revised to provide some narrative on this matter, including by signposting some of the key strategic infrastructure that will be delivered to facilitate growth. Information on the Housing Zone has also been included to set in context the dedicated investment committed to unlock the area's growth potential. Finally, the site allocations set out specific requirements for infrastructure provision where appropriate.
- 4.17 There were specific concerns around the capture and spend of S106 contributions and the Community Infrastructure Levy (CIL). It is recognised S106 and CIL will play a role in funding infrastructure however further details in this regard are set out in the Council's Planning Obligations Guidance SPD and CIL Charging Schedule respectively. The CIL will be subject to periodic review over the life of the plan.

#### Transport

- 4.18 It was suggested that the plan should appropriately reflect the timescales for Crossrail 2 and the need to ensure that site allocations enable its delivery. Updates have now been made to this effect. The plan has also been revised to include a new overarching policy on transport which includes requirements for proposals to consult with the appropriate agencies where Crossrail 2 is planned.
- 4.19 In response to consultation comments, the plan has also been amended to signpost current and emerging transport projects including the Cycle Superhighway and four-tracking of the West Anglia rail line.



- 4.20 There were concerns with impact on parking provision, which is considered by many respondents to be a key issue in locations where parking is already limited. A key aim of the Local Plan is to shift the mode by which residents and visitors travel, from car-based to more sustainable modes such as public transport, walking and cycling. Parking will be required in line with the DM Policies and car free development supported where appropriate.

Green infrastructure and nature conservation

- 4.21 Respondents objected to development on open and green space and suggested that the plan should prioritise development on brownfield land. This is consistent with the plan objectives. In particular, the DM Policies provide for no net loss of designated open space and protection of biodiversity sites.
- 4.22 It was suggested that the AAP should set out more clearly how it will contribute to provision of green infrastructure. The Council considers these are borough wide matters that are more suitably addressed in the Strategic Policies and DM Local Plans, particularly to ensure coordination in managing the network of green infrastructure. However individual site allocations have identified opportunities where future development should seek enhancements in this regard.
- 4.23 There were some objections to the proposed green link, as set out in the responses to the relevant AAP policy and site allocations. The Council considers that the green link is strategic infrastructure which is important to delivering the plan objectives for enhancing access to open space. The site allocation development guidelines, along with DM Policies, will ensure it is sensitively integrated within the borough.
- 4.24 There was support for the plan's recognition of the Lee Valley Regional Park and objectives to improve access to it. However, it was noted that the park is a recognised Special Protection Area for biodiversity which may be threatened by higher visitor numbers. The Council will work with the Lee Valley Regional Authority to ensure that development does not adversely impact on the environment. A Habitats Regulations Assessment will be completed to inform plan production.
- 4.25 Water management is dealt with principally through the Strategic Policies and DM Policies Local Plans. However following consultation feedback, the AAP has been amended to better highlight local opportunities for sustainable water management. Site allocations have been updated to identify Source Protection Zones for groundwater, Flood Zones and locations where de-culverting should be investigated and implemented if possible. The DM Policies have also been updated to ensure development is adequately supported by water supply infrastructure.

Historic environment

- 4.26 Some respondents considered that the draft AAP did not suitably demonstrate the Council's commitment to preserving and enhancing Tottenham's historic character, particularly in the context of regeneration. Management of the historic environment is dealt mainly by the Haringey's Strategic Policies Local Plan along with new policies in the DM Policies. However the consultation comments are noted and the Council has revised the plan to set a more positive framework for managing heritage assets. This includes a new policy on conservation and heritage which links to the relevant DM Policies.
- 4.27 The site allocations site requirements have also been updated to signpost where there are heritage assets that require appropriate consideration in future proposals, including listed buildings, conservation areas and archaeological priority areas.

Design

- 4.28 There were a number of responses stating that the AAP should set a more positive framework for good quality design, so as to ensure that new developments reflect local character and identity and further contribute to place making. Design guidelines will be dealt with principally through the DM Policies Local Plan, which includes a new Haringey Development Charter which all development proposals must engage with. The site allocations set out specific requirements and considerations for development design where appropriate.
- 4.29 Following concerns raised with proposed building heights, the policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.
- 4.30 Some consultees stated that the plan does not sufficiently protect the character of parks and open spaces, particularly where development is proposed adjacent to them. Some comments pointed to relevant London Plan policies. The Council considers that the AAP is in general conformity with regional policy. Proposals will be assessed against the DM Policies which set out that development should protect and enhance the value and visual amenity of open space.

#### Consultation

- 4.31 Respondents raised several concerns about the consultation process. Overall it was felt that feedback from previous consultations had not been properly taken into account, that there was insufficient time to comment given the volume of consultation materials and technical evidence published, as well as lack of clarity on consultation dates and opportunities. The Council considers that it fulfilled the statutory requirements for the consultation. However, it has since commenced a review of its Statement of Community Involvement to inform future practices in this regard.
- 4.32 Some consultees noted that the AAP had suitably summarised feedback from previous consultations but suggested that the plan would exacerbate rather than positively address issues and challenges raised. All responses received will be considered in the next iteration of the plan.

#### Other comments

- 4.33 There were a number of general comments regarding text omissions, invalid web links, maps, grammar, document references and factual updates for extant planning permissions. Minor edits to the plan have been made in respect of these comments.

### **POLICY COMMENTS**

- 4.34 The following comments were made with specific reference to individual policies AAP1-AAP5 and the draft site allocations.

#### **AAP1 (Regeneration)**

Respondents: 10

Responses: 20

- 4.35 In response to concerns relating to the involvement of local communities in the delivery of the Plan, the supporting text was amended to include 'local communities' as those consulted by developers along with landowners and other stakeholders.
- 4.36 There were comments regarding the plan's support for comprehensive development of sites. There were concerns that this approach is not always in the public interest,

and in particular, will prohibit incremental and more sensitively designed development from coming forward. The policy does not preclude such incremental development from occurring, but on key strategic sites the Council will require site masterplanning and comprehensive development in order to ensure delivery of the spatial strategy. This is clarified in the supporting text.

4.37 The policy has been amended to provide clarity on the meaning on the term 'positive regeneration'.

4.38 A new policy has been drafted, 'Heritage and Conservation' in response to comments relating to protecting Tottenham's heritage assets.

### **AAP2 (Housing)**

Respondents: 8

Responses: 26

4.39 In response to comments relating to the affordability of new housing the Council's response states that the aim of the policy is to maximise affordable housing in new developments, but this is constrained by viability and the grants available to provide different types of affordable housing.

4.40 The affordable housing target for the Tottenham AAP area has been nuanced to ensure the new homes in Tottenham better reflect housing needs in the area and provide choice and diversity to support communities in Tottenham.

4.41 There was concern about the policy's aim to rebalance housing tenure. The Council's response states that the London Plan Policy 3.9 makes clear that a more balanced mix of tenures should be sought in all parts of London, particularly in neighbourhoods where social renting predominates. Accordingly, having regard to the existing balance of residential tenures in Tottenham, the tenure split within draft AAP Housing Policy is in general conformity with the London Plan. It is also acknowledged that, in practice, discussions around the balance of tenure at any given site will be negotiated and considered on a case by case basis.

### **AAP3 (Tottenham Hale District Centre)**

Respondents: 11

Responses: 17

4.42 For clarity, the policy was amended to set the parameters for development in the area, and further detail will be set out in the District Centre Framework.

4.43 For clarity, the principles for a Primary Shopping Area will be defined in the policy.

4.44 Consultees noted the draft plan's lack of detail on the evening economy and implications for the new District Centre and other town centres. Further evidence is being prepared in this regard and will help to inform future planning and implementation frameworks for the District Centre.

### **AAP4 (Green Link)**

Respondents: 11

Responses: 26

4.45 Many comments required clarification of the role and impacts of the Green Link.

- 4.46 The policy has been amended in response to comments to include reference to nature conservation. Where relevant, the Blue Ribbon Network is highlighted as a planning designation in specific site allocations.

**AAP5 (Changes to Designated Employment Areas)**

Respondents: 5

Responses: 7

- 4.47 The policy has been amended to demonstrate a clear direction for employment and business growth.
- 4.48 To address technical comments and for clarity, the policy and supporting text will be amended to include: a full list of designated employment sites; jobs/floorspace assumptions; and updated maps.

***Seven Sisters /Tottenham Green/Bruce Grove***

**Tottenham High Road (General comments)**

Respondents: 12

Responses: 41

- 4.49 These comments addressed topics relevant to Tottenham High Road. In some instances specific policies were referred but comments generally concerned the introductory sections to site allocations, such as neighbourhood area objectives.
- 4.50 Consultees suggested that the plan should provide more detail on how new development can preserve and enhance heritage assets and their setting, particularly along the High Road. The plan has been revised to include a new policy on conservation and clearer requirements for site masterplanning, which will help to ensure that heritage assets are positively considered in development and regeneration.
- 4.51 There were concerns that the plan's encouragement of mixed use development would compromise employment sites adjacent to the High Road. In particular, it was considered that the introduction of residential uses would erode the functional integrity of employment sites. The Council's technical evidence provides that mixed use is necessary to make employment development viable. The AAP seeks to protect employment land in suitable areas but in highly accessible locations, such as Tottenham High Road, the provision of a mixed use typology is necessary to meet objectively identified housing and employment needs. The DM Policies will set further requirements for mixed use proposals.
- 4.52 A number of respondents suggested that the Seven Sisters Market should be given more prominence in the plan. This has been reflected in a new Policy SS1, as well as in the relevant site allocation.
- 4.53 The plan has also been amended to include more background information and policy to focus on public realm improvements along the High Road, with the aim of enhancing local character and supporting town centre viability.

**SS1 (Lawrence Road)**

Respondents: 5

Responses: 8

- 4.54 In response to concerns with the loss of employment floorspace, the policy has been revised to provide further clarity on the re-provision of employment floorspace including support for affordable workspace.
- 4.55 Concerns were raised with proposed building heights. The policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.
- 4.56 A new designation for Locally Significant Open Land will be made following a comment that the green space at the northern end of Lawrence Road should be optimised for public use.

**SS2 (Gourley Triangle)**

Respondents: 5

Responses: 8

- 4.57 In response to concerns with the loss of employment floorspace, the policy has been revised to provide further clarity on the re-provision of employment floorspace including support for affordable workspace.
- 4.58 It was highlighted that the Stone Bridge Brook runs in a culvert under the site. The policy has been revised to signpost this and require proposals to investigate opportunities for deculverting.

**SS3 (Apex House and Seacole Court)**

Respondents: 19

Responses: 39

- 4.59 There were questions as to why Seacole Court was included in the site allocation for Apex House. It is considered that both sites have future development potential and can contribute to delivery of plan objectives. The policy has been revised to make clear that any development should be considered comprehensively, including through phasing if necessary. The policy has also been updated in response to comments suggesting that proposals must take account of the site's relationship with Wards Corner, along with seeking wider public realm and access improvements.
- 4.60 There were concerns raised with proposed building heights including a tall building at Apex House. The policy is supported by local evidence but has been amended slightly to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character. A tall building at Apex House is considered a suitable location marking the Seven Sisters transport interchange.
- 4.61 Following suggestions that the site should make a contribution to town centre uses given its location, the policy has been revised to require active uses on the ground floor of Seven Sisters Road and High Road frontages.

**SS4 (Helston Court)**

Respondents: 9

Responses: 20

- 4.62 There were objections to the inclusion of this site in the Local Plan, including a petition from local residents. In light of these representations and following further

consideration of scheme deliverability, the site will not be taken forward in the Local Plan.

**SS5 (Wards Corner and Suffield Road)**

Respondents: 13

Responses: 51

- 4.63 The policy has been amended to clarify the potential for the site to be developed according to either the extant planning permission or the proposed site allocation.
- 4.64 There were particular concerns with the loss of the Seven Sisters Market. Whilst the previous consultation plan required re-provision of the market on-site as part of any future development, the site allocation has been revised to set this out more clearly.
- 4.65 Following concerns raised with proposed building heights, the policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.

**SS6 (Brunel Walk and Turner Avenue)**

Respondents: 5

Responses: 8

- 4.66 There were objections to the inclusion of this site in the plan owing to concerns over loss of existing structurally sound buildings and affordable housing. It is considered that the site should continue to be considered for inclusion as part of the Council's estate renewal programme and to help deliver the borough's spatial strategy. The Local Plan policies will require that development does not result in a net loss of affordable housing on a habitable room basis.
- 4.67 Taking account of consultee comments a new requirement to provide open space as part of any future redevelopment has been included, in particular, seeking opportunities to link with amenity spaces adjacent to the site.

**TG1 (Tottenham Leisure Centre Car Park)**

Respondents: 21

Responses: 50

- 4.68 There were concerns with the loss of the car park and potential impact this would have on accessibility for leisure centre users. It was also considered by many consultees that the proposal would adversely impact on local amenity and open space, both on and adjacent to the site. The allocation has been withdrawn from the plan to allow further consideration for the reconciliation of parking issues, along with other design matters, so that the site can be optimised for public benefit.

**TG2 (Tottenham Chances)**

Respondents: 11

Responses: 16

- 4.69 Consultees expressed concern over the loss of the Tottenham Chances community facility. The policy will continue to provide for a community use as part of mixed use redevelopment. However the site allocation has been revised slightly to set out more

clearly the expectation for an enhanced community facility and appropriate venue for the existing community use.

- 4.70 In response to concerns raised with impact on the historic environment, the policy has been revised to reinforce the need for proposals to demonstrate how heritage assets and their setting will be considered in any site redevelopment. An additional policy on conservation has now been included in this Local Plan to set a more positive framework for managing heritage assets. This policy draws links to the relevant DM Policies.
- 4.71 Following concerns raised with proposed building heights, the policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.
- 4.72 The policy has been amended to allow for appropriate car-free development recognising the site is in an area of high public transport accessibility.

**TG3 (Tottenham Police Station and Reynardson Court)**

Respondents: 7

Responses: 10

- 4.73 Addressing concerns with the loss of police facilities, the site allocation has been changed to clearly set out that conversion of the existing station will be subject to re-provision of the police station locally.
- 4.74 The policy has been amended to allow for appropriate car-free development recognising the site is in an area of high public transport accessibility.

**BG1 (Bruce Grove Snooker Hall and Banqueting Suite)**

Respondents: 5

Responses: 5

- 4.75 There were concerns raised with respect to the impact of future development on the historic environment, including the former cinema and conservation area. These assets will continue to be protected and enhanced as appropriate. The allocation has been revised to set a new requirement for site masterplanning which will help to ensure that heritage assets and their setting are suitably considered in future proposals. An additional policy on conservation has now been included in this Local Plan to set a more positive framework for managing heritage assets. This policy draws links to the relevant DM Policies.
- 4.76 There were concerns raised regarding parking and access, in particular, the proposal for car-free development and loss of parking at this site. The Council considers that the high public transport accessibility levels at this location justify the approach. Future requirements for specific proposals will be set in line with the relevant DM Policies.
- 4.77 Some consultees objected to the inclusion of this site in the allocations on the basis that there are viable uses in the existing buildings. Having regard to delivery of the spatial strategy, the site is allocated for its optimum future use rather than the existing use. The allocation sets guidelines for use of the site should future proposals come forward.

**BG2 (Tottenham Delivery Office)**

Respondents: 12

Responses: 21

- 4.78 Respondents noted the presence of Bruce Grove Wood, to the rear of the site, as a valuable open space with ecological value that should not be adversely affected by future development. The Local Plan will designate this as Significant Local Open Land to ensure it is appropriately recognised, protected and enhanced.
- 4.79 There were concerns raised with the loss of the existing business and service provided by the delivery office. Having regard to delivery of the spatial strategy and the need to locate higher density uses in accessible locations, the site is allocated for its optimum future use rather than the existing use. The future of the delivery office is subject to the land owner's aspirations for the site. The allocation has been amended to set out the Council's expectation for replacement employment floorspace as part of any site redevelopment.
- 4.80 Consultees generally supported the proposal for a new access route from Moorefield Road however there were concerns raised with security. There were also concerns with the impact of development on residential amenity. The policy has been amended to set out requirements for passive surveillance and other design features to address security and protection of amenity. The Development Management policies will also set further requirements in this regard.
- 4.81 There were objections to the demolition of 5 Bruce Grove. There is an extant planning permission for works to this property along with a planning permission at 7 Bruce Grove. Site redevelopment will be subject to the implementation of these permissions or other requirements as set by the site allocation.

**BG3 (Bruce Grove Station)**

Respondents: 8

Responses: 8

- 4.82 The proposals were broadly supported by respondents although it was suggested the policy could be strengthened by setting more detailed design requirements. The policy has therefore been amended, in particular, focusing on the need to enhance the locally listed station building, improve accessibility for station users and require high quality public realm that appropriately interfaces with the station and town centre.

**BG4 (Moorefield Road)**

Respondents: 9

Responses: 12

- 4.83 This site has been incorporated into the allocation for Bruce Grove Station to ensure a more comprehensive approach to redevelopment across the sites. This change has been made, in part, following consultation comments which suggested that the Moorefield Road site requirements should be considered in relation to adjacent sites. There was a further comment suggesting that future development should not impact on nearby uses, such as the cafe and community centre, and this will be managed through the DM Policies.
- 4.84 There were concerns regarding the loss of existing employment and business uses including the builders' merchants. Having regard to delivery of the spatial strategy and the need to locate higher density uses in accessible locations, the site is



allocated for its optimum future use rather than the existing use. The policy does not preclude the continued use of the site for the employment use, but sets guidelines to manage development should the site become available in the future. The policy has been amended to set out the Council's expectation for replacement employment floorspace as part of any mixed-use redevelopment.

### ***North Tottenham***

#### **North Tottenham (General comments)**

Respondents: 5

Responses: 7

- 4.85 These comments did not refer specific policies but addressed topics which are relevant to North Tottenham. The key matter was that of the proposed football stadium and how it is set in the context of the AAP.
- 4.86 It was suggested that the vision for the AAP is prejudiced by the proposed stadium redevelopment already in the pipeline. The Council considers that the AAP is necessary to help deliver the spatial vision and strategic objectives for the borough, with the adopted Strategic Policies Local Plan providing the context for the AAP. An allocation has been proposed for the Tottenham Hotspur Stadium to ensure any future development both considers and positively contributes to wider local area objectives.
- 4.87 There were further comments suggesting that the plan should ensure appropriate consideration for the historic environment, particularly with redevelopment of the football stadium. The plan has been revised to include a new policy on conservation and clearer requirements for site masterplanning, which will help to ensure that heritage assets are positively considered in development and regeneration.

#### **NT1 (Northumberland Park North)**

Respondents: 3

Responses: 3

#### **NT2 (Northumberland Park)**

Respondents: 10

Responses: 18

- 4.88 A number of respondents expressed concern with, or objected to, the site allocations for a major estate regeneration programme and potential redevelopment of estates in this area, particularly where the housing stock is considered to be in good condition. There was also in-principle support for the site allocations in contributing to the regional spatial development strategy however recognising the need for collaborative engagement with local residents. The Council considers that the allocations are required to help meet the strategic objectives of the Local Plan including delivery of the borough's housing target. In light of responses received, policy AAP1 has been amended to emphasise that future development opportunities and proposals should be considered in consultation with the local community. In addition, the Local Plan has been revised to set out more clearly the requirements for masterplanning to ensure a coordinated approach to future development, including in the Northumberland Park area.

- 4.89 Some consultation comments suggested provision for types of community facilities and specific design requirements to be set within the allocations. It is considered that these detailed matters can be addressed through future masterplanning exercises, which the Local Plan has now drawn clearer linkages to.

**NT3 (High Road West)**

Respondents: 13

Responses: 39

- 4.90 Consultees raised concerns about the impact of future development on local character including the historic environment. The policy will continue to require that new development proposals have regard to heritage assets and their setting; however future proposals must also be weighed against the wider public benefits of regeneration. An additional policy on conservation has now been included in this Local Plan to set a more positive framework for managing heritage assets. This policy draws links to the relevant DM Policies.
- 4.91 It was suggested that the allocation should be changed to allow for a significantly greater amount of retail and leisure floorspace in the High Road West area. This suggestion has not been taken forward as the Council considers that an increase of this scale would adversely impact on the existing town centre hierarchy. The policy will continue to seek to manage new retail and leisure uses in a way that complements the new stadium and square without compromising the viability and vitality of other centres.
- 4.92 Consultees raised concerns about the potential loss of existing local businesses and employment floorspace. The Council considers that the Local Plan will ensure a sufficient supply of employment land and premises within the borough (including in Tottenham) to meet identified need however recognising that some reconfiguration, supported by site allocations, may be necessary to deliver the spatial strategy. There is a need to locate higher density uses in accessible locations and the site is therefore allocated for its optimum future use rather than existing use. The policy will continue state the Council's expectation for the re-provision of employment floorspace as part of any future development.
- 4.93 There were concerns from local residents at Love Lane that the plan proposals do not appropriately reflect the Resident Charter and Tenant Guide agreed with the Council. Comments have been noted and future matters in this respect will be addressed through relevant work the Council's housing team is preparing on resident's options.
- 4.94 There were objections to the inclusion of 21-35 Headcorn Road in the site allocation. These properties were added erroneously and the site boundary has been amended, so that these properties are removed the allocation.

**NT4 (North of White Hart Lane)**

Respondents: 3

Responses: 3

- 4.95 There were concerns with the loss or displacement of the existing community facility within the site allocation. The policy will continue to require that the community use is re-provided. Additional supporting text has now been included to set out that future site development will be subject to the needs of the existing occupants of the Irish Centre being suitably met.

- 4.96 Consultees raised concerns about the potential loss of existing local businesses and employment floorspace. The Council considers that the Local Plan will ensure a sufficient supply of employment land and premises within the borough (including Tottenham) to meet identified need however recognising that some reconfiguration, supported by site allocations, may be necessary to deliver the spatial strategy. There is a need to locate higher density uses in accessible locations and the site is therefore allocated for its optimum future use rather than existing use.

**NT5 (Tottenham Hotspur Stadium)**

Respondents: 8

Responses: 15

- 4.97 Consultation responses highlighted the desire for maximum public benefit to be derived from the development of the stadium. The Council agrees and through this site allocation will seek to ensure that future development proposals deliver the objectives of the Local Plan.
- 4.98 There were concerns raised with respect to the impact of future development on the historic environment. The policy will continue to require that proposals respond positively to the conservation area. An additional policy on conservation has now been included in this Local Plan to set a more positive framework for managing heritage assets. This policy draws links to the relevant DM Policies.

***Tottenham Hale***

**TH (General)**

Respondents: 11

Responses: 28

- 4.99 These comments did not refer specific policies but addressed topics which are relevant to Tottenham Hale. The majority of responses referred to infrastructure. Consultees noted the level of growth that is being planned for Tottenham, including Tottenham Hale, and suggested further information should be included in the plan to set out how this growth will be supported by infrastructure. The introductory section to this set of site allocations has been revised to signpost some of the key strategic infrastructure that will be delivered to facilitate growth. Additional information on the Housing Zone has also been included to set in context the dedicated investment committed to unlock the area's growth potential.

**TH1 (Station Square West)**

Respondents: 9

Responses: 40

- 4.100 A range of feedback was received in respect of proposed building heights. Some responses suggested the policies were too restrictive and would limit the development potential of specific sites, particularly given the context of the Housing Zone, whilst others objected more broadly to tall buildings and their potential clustering within the area. The policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character. The policy will continue to provide that a tall building may be appropriate at this location, marking

the key transport node at Tottenham Hale and the emerging District Centre. The District Centre Framework (DCF) will provide a tool to assist with policy implementation in this respect.

- 4.101 There were some concerns raised with identified discrepancies between the DCF and Haringey's Urban Characterisation Study (UCS). The Council notes that the proposed policy is informed by a range of technical evidence, of which the UCS is one. The DCF builds on the UCS and, as set out above, will provide a tool to assist with policy implementation. The policy has been amended to set out more clearly the expectation that proposals should have regard to the DCF or masterplans as appropriate.
- 4.102 Consultees expressed concern with the proposal for a new District Centre at Tottenham Hale and the potential impact on character of the local area, traffic and amenity. The Council considers that the District Centre is consistent with regional policy and supports delivery of the spatial strategy.
- 4.103 There were objections to the Green Link made on this draft policy. These were made with specific reference to the Green Link's proposed interface with Down Lane Park. Further information on this matter is set out in below in TH2, where the proposal for this Green Link was introduced in the plan, and where similar representations were made.

### **TH2 (Ashley Road South)**

Respondents: 7

Responses: 22

- 4.104 There were objections to the Green Link, particularly where it is proposed to interface with Down Lane Park, on the basis that this would adversely impact on amenity and local character. Down Lane Park forms part of Haringey's Green Grid and the Council is committed to ensuring the park, including its children's play facilities, are enhanced where opportunities arise through new development. The Green Link is strategic infrastructure which is important to delivering the plan objectives for enhancing access to open space. The development guidelines, along with DM Policies, will ensure it is sensitively integrated within the borough.
- 4.105 There were further concerns with the proposed building heights and adverse impacts this could potentially have on residential amenity, the character and setting of Down Lane Park and Upper Lea Valley Regional Park. The AAP has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.
- 4.106 The boundaries of the site allocations have been amended to appropriately reflect that the Green Link is situated at the northernmost point of the District Centre.
- 4.107 Consultees suggested that the site allocation should be changed to allow a wider range of uses to be permitted at this location, including through de-designation of the employment land. The Council considers that this site has an important role in supporting economic growth and the Local Employment Area – Regeneration Area designation will provide sufficient flexibility for a range of employment generating uses to be introduced.

### **TH3 (Ashley Road North)**

Respondents: 9

Responses: 16

- 4.108 As with comments received on TH2 (Ashley Road South) there were concerns with the proposed building heights and potential adverse impacts on residential amenity, the character and setting of Down Lane Park and Upper Lea Valley Regional Park. The policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.
- 4.109 It was suggested that the site offers potential for an improved link from the northern end of Ashley Road through to the Lee Valley Regional Park. This was already addressed in the draft policy, in particular through the creation of a link through to Park View Road, and will continue to be reflected in the site allocation.
- 4.110 There were comments made on the future use of open space at Down Lane Park, in particular the games area. The specific use of this protected space is not considered to be within the remit of the Local Plan.

#### **TH4 (Station Interchange)**

Respondents: 5

Responses: 14

- 4.111 Some consultees expressed concern with the proposal for a new District Centre at Tottenham Hale and potential impacts on character of the local area, traffic and amenity. It was also considered this District Centre would adversely affect the retail park and vitality of town centre uses along Tottenham High Road. The Council considers that the District Centre is consistent with regional policy and supports delivery of the spatial strategy.
- 4.112 Following consultation feedback, the policy has been refined slightly to clarify opportunities for the station to function as a focal point for the new District Centre. This includes details to support active ground floor frontages around the station, a public square and a pedestrian network which links to and interfaces with other sites within the new centre.
- 4.113 It was noted by respondents that much work has already been undertaken on re-modelling the bus station and square, and therefore challenged the need for the site allocation. The Council considers that the allocation is necessary to deliver the spatial strategy, including further sustainable transport improvements and the new District Centre over the medium to long-term. The District Centre Framework will provide a tool to assist with policy implementation in this respect.

#### **TH5 (Tottenham Hale Retail Park)**

Respondents: 11

Responses: 25

- 4.114 Some consultees expressed concern with the proposal for a new District Centre at Tottenham Hale and potential impacts on character of the local area, traffic and amenity. It was also considered the District Centre would adversely affect the retail park and vitality of town centre uses along Tottenham High Road. The Council considers that the District Centre is consistent with regional policy and supports delivery of the spatial strategy.
- 4.115 Respondents suggested that the District Centre would significantly increase traffic within the area. A key aim of the Local Plan is to shift the mode by which residents and visitors reach Tottenham Hale, from car-based to more sustainable

modes such as public transport, walking and cycling. Parking will be required in line with the DM Policies and car free development supported where appropriate.

4.116 Consultees noted the draft plan's lack of detail on the evening economy and implications for the new District Centre and other town centres. Further evidence is being prepared in this regard and will help to inform future planning and implementation frameworks for the District Centre.

4.117 There was a suggestion that new development on the retail park should include creation of new green corridors along the railway and other edges and along any central corridor. This is supported and the policy has been revised to ensure appropriate consideration for this in future proposals.

4.118 Following concerns raised with proposed building heights, the policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.

### **TH6 (Hale Village Tower)**

Respondents: 10

Responses: 20

4.119 Feedback received was mainly with respect to proposed building heights. Some responses suggested the policy was too restrictive and would limit the development potential of the site whilst others objected to a tall building. The policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character. However the policy will continue to provide that a tall building may be appropriate at this location, in particular, acting as a marker for the entrance to the station from Ferry Lane and also reflecting the extant planning permission.

### **TH7 (Hale Wharf)**

Respondents: 15

Responses: 25

4.120 There were concerns raised with the appropriateness of tall buildings at Hale Wharf. Respondents also pointed to potential impacts of development on the character and setting of the Upper Lea Valley Regional Park. The policy has been amended to reflect that specific heights will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character. Furthermore, the policy will continue to include specific requirements to ensure that development is in compliance with green belt objectives and will not have an adverse impact on local ecology and biodiversity.

4.121 Respondents broadly supported the policy to improve access to and enhance usability of the Paddocks, and the approach will be carried forward.

4.122 There were comments suggesting that a comprehensive approach to development of the site would be necessary given the site is in multiple landownership. This approach was already advocated, but the policy has been slightly amended slightly to set out more clearly that development will be required to be accompanied by a site-wide masterplan.

4.123 Some comments noted existing employment uses and the potential for the site to continue to support employment. The policy makes provision for replacement

employment floorspace as part of future mixed-use redevelopment and further requirements in this regard are set in the DM Policies Local Plan.

**TH8 (Welbourne Centre)**

Respondents: 15

Responses: 27

4.124 Consultees expressed concern that the proposals will compromise existing green spaces and landscaping at Monument Way and adjacent Chesnuts estate, which are valued as informal play space and natural buffers protecting residential amenity. The open space at Monument Way has no formal open space or biodiversity designation and the Council considers that this site can contribute more positively to plan objectives, including housing delivery. The policy has been revised to ensure development optimises use of the existing undesignated open space, with new homes opening onto it for the benefit of amenity and passive surveillance. In addition, a new requirement for provision of public realm has been added which includes consideration for retention and improvements to trees planted along Chesnut Road.

4.125 There were also concerns raised with proposed building heights, protection of residential amenity and potential impacts on local character. Design requirements, including for residential amenity and building heights, will be considered in line with the DM Policies Local Plan along with further requirements set in a new AAP policy on urban design and character.

**TH9 (Fountayne and Markfield Road)**

Respondents: 35

Responses: 112

4.126 Consultation responses broadly reflected support for the concept of warehouse living and a framework to facilitate this type of development, recognising the existing community and established uses in the area. Some consultees disagreed with the Local Employment Area - Regeneration Area designation and wished to retain the 'live-work' status of the site. The Council considers the approach is necessary to ensure the site supports employment development whilst providing for appropriate complementary uses.

4.127 There were objections to the development guidelines requiring that buildings be retained for their industrial value. The policy has been amended to allow a more flexible approach to redevelopment, so that proposals will need to be accompanied by a review of industrial heritage of buildings. This review will inform planning decisions having regard to a new AAP Policy on conservation along with relevant DM Policies on design.

4.128 There was an objection to requirement for the re-provision of original employment floorspace, partially on grounds that Lawful Development Certificates for residential use have been granted. The Local Plan will be amended to reflect consideration for LDCs, where appropriate, and continue to seek to maximise employment floorspace through the site masterplanning process.

**TH10 (Herbert Road and Constable Road)**

Respondents: 2

Responses: 2

- 4.129 There were concerns regarding the loss of existing business uses and employment floorspace. Having regard to delivery of the spatial strategy and the need to locate higher density uses in accessible locations, the site is allocated for its optimum future use rather than the existing use. The policy does not preclude the continued use of the site for the employment use, but sets guidelines to manage development should the site become available in the future. The policy has been amended to set out the Council's expectation for the maximum amount of dedicated employment floorspace to be re-provided in any future development.
- 4.130 Whilst both sites will be designated Local Employment Area – Regeneration Area, the site allocation has been amended to provide for warehouse living to be introduced at Constable Crescent.

### **OTHER COMMENTS**

- 4.131 The following comments were made with specific reference to the Annexes and Sustainability Appraisal.

#### **Annex A (Housing Trajectory and Employment Targets)**

Respondents: 4

Responses: 4

- 4.132 Consultees suggested that the development capacities on selected site allocations should be amended. These capacities are indicative and have been established using a standardised methodology. Further consideration of site development capacities will be made at the planning application stage, having regard to the nature of individual proposals and the DM Policies Local Plan.

#### **Annex B (Evidence Base)**

Respondents: 2

Responses: 6

- 4.133 A respondent noted that they did not have sufficient time to review the technical evidence along with the consultation plans. The consultation was carried out in line with statutory requirements and the Council is not required to consult on technical evidence. However the Council has now commenced a review of its Statement of Community Involvement to consider how it will consult with the local community in the future.

#### **Annex E (Glossary)**

Respondents: 1

Responses: 2

- 4.134 Several new terms have been added to the glossary on request of consultees.

#### **Sustainability Appraisal**

Respondents: 2

Responses: 2



## Appendix H (1) Tottenham AAP Consultation Statement

- 4.135 A consultee noted that there is little reference within the Sustainability Appraisals to how the plan will improve water quality across the borough. The Council notes that Section 17.15 in the Interim SA Report for the AAP covers water resources including a discussion on water quality. However, the Council will consider how the SA can further raise the profile of water quality issues.