

Appendix 2.1 - General comments on the Tottenham AAP Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Policy Ref	Council Response
648	AAP941.	Jennifer Williams, local resident	Access	<p>Re access to Chesnut Estate and roads up to Dowsett Rd.</p> <p>I am in favour of encouraging people not to have cars but sometimes you need to especially if you have a disability or are carrying a load.</p> <p>This has not been an easy place to get access to by car, and it has got worse since the new road system was introduced. To come into from the High road, you can either get to the area by weaving in and out of the busy traffic of Dowsett Road and around Ladysmith / Kimberely Road to Holcombe / Scales Road to Park View Road (convoluted!). Alternatively from Monument Way to Park View Road, there is no right turn out of this road onto Monument Way and, worse, no right turn into the road from the junction with Hale Road. Its is very difficult to get from Tottenham Hale to this estate. You either have to go all around the old Gryratory 'island' which includes a right turn into the traffic on the High Road by Tesco's, or go up Monument Way, right to the High Road and then double back the way you came via Rycroft Way. We have to think ahead about our next journey and decide whether we might as well just park in the Rycroft Way Car park (if there is any room) and just walk to our house.</p>	AAP	Noted. The addition of a policy on transport will look to address transport issues in Tottenham.
802	AAP942.	Michael Hodges	Affordable housing	I could not find for Tottenham Hale, any references to many families living in private rented and temporary accommodation and how the plan will address their needs for affordable rents and decent accommodation; the corners adjacent to Tottenham High Road are crowded with people forced to "hot bed."	AAP	Although there is no specific mention of tenants in the policy they are covered by references to the local community. However, the introductory text has been strengthened to outline that many residents in Tottenham are renting their properties.
806	AAP943.	Candida Amsden	Affordable housing	The housing provided is not for social rent and the prices are out of the reach of the ordinary person. how can any of this building solve the existing housing problems here in Tottenham. Lawrence Rd is being marketed in China. How can these potential property owners possibly be of benefit to those in Tottenham who are in urgent need of housing. The price is way beyond the reach of ordinary Londoners and I expect the rents will be the same.	AAP	Noted. The Council is setting out a policy to maximise affordable housing in new developments, but this is constrained by viability and the grants available to provide different types of affordable housing.
818	AAP944.	Our Tottenham	Affordable housing	<p>We demand that the new housing to be built in Tottenham should be high quality and genuinely affordable. An affordable home is one that is affordable to any tenant earning the London Living Wage.</p> <p>'Affordable' is not 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. 70% of such new build affordable housing should be social housing. There should a mix of unit sizes and types to suit local needs, based on evidence – e.g. more provision for large family dwellings, no over-provision of small flats.</p>	AAP	<p>All development in Tottenham will be assessed against the development management policies which require housing to be of a high quality design.</p> <p>Affordable rent is defined as 80 per cent by both the NPPF and London Plan. The Local Plan is required to be in general conformity with both of these documents.</p>
818	AAP945.	Our Tottenham	Affordable housing	<p>All new housing on the site should be high quality and genuinely affordable: -</p> <p>An affordable home is one that is affordable to any tenant earning the London Living Wage. 70% of such housing should be social housing.</p>	AAP	The Council's target for affordable housing is 40% across all new development in the borough. There is no grant and therefore no deliverable way of meeting the 70% social housing target suggested.
422	AAP946.	Environment Agency	Allocations	For clarity and to avoid repetition where possible we have commented on all the sites which have been allocation in both the	SA & AAP	Noted.

				Site Allocations DPD and Tottenham AAP within the next section. Thank you for providing shape files for us to check the environmental constraints of the allocated sites more efficiently. The revised layout of the allocated sites in both documents is clearer and much easier to navigate. We welcome the implementation of site requirements and development guidelines sections and offer site specific comments in the next section. Where necessary we have proposed additional or alternative wording to improve the robustness, supported by the recommendations of the Sustainability Appraisals.		
818	AAP947.	Our Tottenham	Amenities	We recommend to <i>develop additional pitches and ancillary facilities in the east of Haringey where quality facilities and provision are most needed'</i>	AAP	The provision of additional pitches will be addressed in the infrastructure delivery plan.
810	AAP948.	Margaret Fowler	Amenities	I very much appreciate receiving Tottenham News to keep up to date with progress but I am very disheartened that it does not include any news of the area where I live. St Ann's and Haringay Wards are very desolate places. Great park but nothing else and just dissatisfaction about St Ann's hospital site. Where are our new houses and shopping areas and new ideas in the park? Thank heavens for the easy transport out of the area I say.	AAP; site allocations	The areas for growth are identified in the Local Plan: Strategic Policies and the majority of development will be located there. Sites within St Ann's and Haringay wards include the Hawes and Curtis site and Wightman Road.
818	AAP949.	Our Tottenham	Best practice	Under site requirements proposals for each site should: Conform to best practice for similar sites around the UK and Europe	AAP	An overall design statement will be included in the DMDPD.
798	AAP950.	Nora Kirkwood	Brownfield	Building on any 'green' site is a harmful and unhelpful for the area. There are numerous empty building falling into greater disrepair without any explanation or action from the Council, as well as sites that are clearly 'brown sites' unfit-for-purpose buildings are an eye-sore and health hazard that should be developed first, before any parkland or green spaces are utilised for anything other than as simple open free spaces for Haringey residents.	AAP	Noted, there is a clear expectation that brownfield sites will be developed, and green/open spaces protected, enhanced, and their accessibility improved.
818	AAP951.	Our Tottenham	Business	No mention of how existing businesses will be involved in and benefit from changes rather than be displaced by them. No mention of how the plan will ensure new jobs are quality jobs and can be accessed by local people. The Our Tottenham Local Economy section of the Charter (Appendix A) should be considered and incorporated. This should be re-written to ensure small businesses, markets, affordable workspace, the contribution of ethnic retailers, local business and community development groups are included and supported within the objective and the policies of the AAP.	AAP	Noted.
818	AAP952.	Our Tottenham	Change of use	Change of use of a site will only be allowed in exceptional circumstances (such as the current usage proven to be unviable), subject to the criteria set out here being fully adopted.	AAP	It is not considered that this approach would be sound under the NPPF. The NPPF requires Local Plans to plan positively for growth. While the Council's aim is not to disrupt existing viable businesses for the sake of it, in growth areas there will be examples of sites which can yield greater public benefit despite the presence of a viable business. In this case, the Council will seek to relocate the business to a more suitable location.
810	AAP953.	Tynemouth Area Residents Association (TARA)	Community	The effect of these plans will cause social damage that will far outstrip that caused by the riots of 2010. It is shocking that Haringey Council, which is supposed to represent its residents, is facilitating this process. It is bringing in outsiders to overshadow, and in some cases destroy, our homes and communities for financial gain.	AAP	Noted.
818	AAP954.	Our Tottenham	Community	Under site requirements proposals for each site should: Conform to Lifetime Neighbourhoods criteria (as set out in the London Plan)	AAP	It is proposed that references to lifetime requirements are taken out of the London Plan. It is therefore not considered appropriate for these to be added to the Local Plan.

818	AAP955.	Our Tottenham	Community	Under site requirements proposals for each site should: In Tottenham, conform to the Community Charter for Tottenham	AAP	The Community Charter has no legal basis, and as such is not suited to being used as a checklist in Site Allocations in the way suggested. It is more suitable that the principles of the charter, where appropriate, are included in thematic policies which the Site Allocations then deliver.
818	AAP956.	Our Tottenham	Community	A Social and Community Impact Assessment outlining how it conforms to the above principles is to be produced for each proposed development.	AAP	A sustainability assessment will be carried out for all Local Plan policies.
818	AAP957.	Our Tottenham	Community	Any prospective developer must demonstrate an active and genuine local community partner involved in the decision-making around the design and management of the future site.	AAP	The planning system ensures local involvement in planning decisions. Feedback is sought at the pre application and application stages, and the decision is ultimately taken by democratically elected members.
818	AAP958.	Our Tottenham	Community	If there is an expression of interest for a Community Plan for the site a minimum period of 12 months shall be set aside to enable such a Plan to be developed before any further action is taken	AAP	It is considered that this could lead to unacceptable delay in delivering development in the borough, and the Plan being found unsound. Community involvement in the planning process is important, but a potential 12 month delay on any proposal is not realistic.
818	AAP959.	Our Tottenham	Community centres	There should be a strict policy of protection of existing community centres	AAP	Community centres will be addressed in the infrastructure delivery plan.
419	AAP960.	Haringey Liberal Democrat Group	Community engagement	We believe that more must be done to engage residents in the regeneration proposals and to ensure that the regeneration of the area is done for the community that is there and not to them. Efforts must be made to ensure people living in Tottenham benefits from the regeneration and are not forced out by high rents and house prices. Likewise for local businesses and traders.	AAP	Noted. Community engagement will continue to be undertaken for all developments proposed for Tottenham.
818	AAP961.	Our Tottenham	Community protection	The aim of attracting new investments, new residents, new businesses and new development to Haringey which underpins the SA DPD should not be done at the expense of the existing community	AAP	Noted. The aim of the document is to improve the opportunities for all Tottenham residents.
810	AAP962.	Tynemouth Area Residents Association (TARA)	Compulsory Purchase Orders	Compulsory Purchase Orders of residential or business properties must not result in owners being priced out of the opportunity to remain living and/or trading in the area. They must be offered equal or improved facilities on or near to their original location by developers.	AAP	Noted. Relocation will be supported where possible, but the CPO legislation allows for financial compensation so that businesses and residents can make their own decisions with regards where they are relocated.
818	AAP963.	Our Tottenham	Consultation	The conclusions of the Soundings report were watered down and partially selected. The SRF does not represent a fair picture of the results of the consultation – for example the strong support for Council housing and for more genuinely affordable housing. This was demonstrated in a FoI request / answer about email exchanges between the consultants and Council, which revealed that Haringey Council attempted to have the findings of the consultation watered-down.	AAP Foreword	Noted. The strategic framework has been adopted by council and is not included in this consultation.
798	AAP964.	Nora Kirkwood	Consultation	I am very aware of the need for good quality; financially accessible and sustainable housing in the area and am generally delighted that after many decades of under-funding, Tottenham will have large scale development; however the Council's plans are being pushed through too speedily and without opportunity for people to be heard sufficiently.	AAP	Support is noted.
798	AAP965.	Nora Kirkwood	Consultation	I have ensured that those people without access to the internet, and those who feel unable to access some of the public events regarding the plans, are able to understand the ideas that Haringey Council have adopted for the future of Tottenham. As a director of a DPULO I	AAP	Noted. Council welcomes the opportunity to work together to improve ways of consulting with the community.

				would be keen to support Haringey Council to reach their disabled population and assist disabled residents to voice their individual responses.		
818	AAP966.	Our Tottenham	Consultation	Absolutely no indication or evidence of how, whether and to what extent any of the comments, feedback and objections received by the Council during that previous consultation was posted on the official web page of the consultation http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/tottenham-area-action-plans-aaps . It is impossible to know whether any comment made by any resident or community group in Tottenham were taken on board. As far as the response submitted by the OT Planning Policy Working Group in March 2014 is concerned, most comments, suggestions, objections and requests were ignored.	AAP Foreword	A consultation report regarding this consultation is available on the Council's website.
408	AAP967.	Mario Petrou	Consultation	Is the basis of the consultation to determine a preferred option a misnomer? Concerned decisions to destroy areas have already been made.	AAP	All responses to the consultation will be analysed and considered in full. Changes will be made to these documents where appropriate before the submission document is submitted to the planning inspectorate.
802	AAP968.	Michael Hodges	Consultation	The requirement to link objections to specific paragraphs also makes it difficult to address omissions from the plan.	AAP	Noted. There was no requirement for comments to be linked to specific paragraphs.
810	AAP969.	Tynemouth Area Residents Association (TARA)	Consultation	The Council frequently uses the terms <i>key stakeholders and strategic partners</i> when referring to developers and architectural firms. The Council needs to be reminded that local people are key stakeholders too, not extraneous to the process. The people who are at the heart of the proposed changes are treated with contempt with highly skewed consultations which effectively exclude them from the process.	AAP	Noted, the Council regards local residents as key stakeholders.
815	AAP970.	Zena Brabazon	Consultation	The Haringey Local Plan Site Allocations DPD states that 'Other consultation events will be publicised during the consultation period', yet this has not materialised for the residents living in Tottenham Hale especially those living within or adjacent to the many sites listed in the AAP. Yet, in his introduction to the Tottenham Area Action Plan, Cllr Demlrci confirmed the commitment to consultation	AAP Foreword	The Local Plan consultation was carried out in line with the Council's adopted Statement of Community Involvement, Local Development Scheme (LDS) and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
415	AAP971.	Transport for London	Crossrail 2	The allowance made in the AAP for reorientation, renewal and mixed use of industrial areas within the South Tottenham and Tottenham Hale areas is welcomed. Further consideration could be given to expanding such support to other industrial areas which are situated within the area of influence of Crossrail 2.	AAP	Support noted.
415	AAP972.	Transport for London	Crossrail 2	Crossrail 2 is not expected to be completed until around 2030. There are numerous instances in the plan where this date is stated as 2026 (such as 2.30) so that it falls within the timeframe of this plan. If Crossrail 2 is to be included in this AAP, it needs to make explicit that this will bring benefits in the longer term, not during this plan period.	AAP	Noted.
415	AAP973.	Transport for London	Crossrail 2	A number of the sites identified within the AAP are likely to be within the zone of influence of Crossrail 2. Whilst it is acknowledged that Crossrail 2 is not yet a committed scheme, should it become so, it is likely to result in a number of changes to certain site characteristics which could impact upon its development potential. For example, Crossrail 2 could have a positive impact on the PTAL level or site viability which could increase development potential of certain sites. Further consideration of how the AAP could take account of these	AAP	Noted.

				changes could be beneficial – particularly for those sites where delivery is expected from 2020 onwards. It should also be noted that a number of sites may fall within the Crossrail 2 safeguarding areas following the issue of a safeguarding directive (which were recently issued by DfT on 24 March 2015). This will require the Crossrail 2 project team to be consulted on any development proposals within the safeguarding limits to ensure that they would not adversely affect the delivery of Crossrail 2.		
415	AAP974.	Transport for London	Crossrail 2	The advice set out in Guidance Note 1 is strongly welcomed and is an exemplary, proactive and pragmatic approach to ensuring opportunities from Crossrail 2 can be maximised, and one which all local authorities who will be impacted by Crossrail 2 should seek to follow (subject to suggested changes suggested for Draft Policy SA1). However, it is not clear what material weight could be afforded to the approach in its current form as a Guidance Note within the AAP. Whilst the same approach is intended as Policy SA1 in the Site Allocations DPD, we would like to work with LB Haringey to identify what opportunities may exist to strengthen these requirements as part of the AAP.	AAP Ch 4 Guidance Note 1	Noted. Council welcomes the opportunity to work with Transport for London on guidance for Crossrail 2.
818	AAP975.	Our Tottenham	Crossrail 2	If Crossrail 2 is to be supported the chosen sites should not threaten existing housing, communities or neighbourhoods.	AAP Guidance note 1	Noted.
665	AAP976.	Friends of the Earth	Cultural diversity	We would make a general point that the opportunities and advantages of cultural diversity should be a key part of any strategy for future development rather than attempting to create another 'clone town'. National planning policy sets out the "the desirability of new development making a positive contribution to local character and distinctiveness;" (paragraph 126). In addition 'improvement' should not mean loss of small businesses, low cost premises and cultural diversity, and should not focus simply on quantity of employment and retail floorspace but also the type and accessibility level of that space. National planning policy particularly points towards the need to "promote [...] a diverse retail offer and which reflect the individuality of town centres; retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;" (paragraph 23).	AAP	Noted.
665	AAP977.	Friends of the Earth	Cultural diversity	We would urge the council to consider the possibility of disconnect between standard approaches to local urban policy and small migrant ethnic economies. Tottenham has amazing ethnic diversity which should positively shape its regeneration initiatives. To reflect this, instead of putting volume housebuilders or major development corporations in charge of bringing forward proposals, the look, feel and provision of developments should be led by community visions. The AAP records (paragraph 1.17) community concerns on these issues however the policy on regeneration (AAP1) says that masterplanning should be "prepared with the council" and makes no mention of the community, and does not mention that regeneration proposals will be supported not just when they are positive, but when they respect the cultural, heritage and ethnic diversity of Tottenham. On compulsory purchase there is no condition that there is a clear and proven community input into the scheme proposed.	AAP	Noted.

421	AAP978.	Historic England	Cycle highway	In addition, we are aware that consultations in respect of a co-ordinated super cycle highway from North Tottenham to the City are under discussion which may provide opportunities for associated public realm works (potentially including integration with the High Road West Masterplan). This is does not appear to be identified in the AAP.	AAP	Noted. Action: Addition of a paragraph referring to the cycle superhighway and the opportunities for associated public realm works.
422	AAP979.	Environment Agency	De-culverting	The Moselle Brook and Stonebridge brook are both heavily modified waterbodies, which are largely in culvert. They are both tributaries of the Lower Lee River, classified as 'poor' ecological status and failing to meet 'Good ecological potential' under the Water Framework Directive. The allocated sites should support objectives within the River Basin Management Plan to re-open existing culverts within these areas, where feasible, as supported by strategic policy SP5 of Haringey's Local Plan which encourages all development to restore and enhance the Blue Ribbon Network.	SA & AAP Site Allocations	Noted. Action: Ensure all sites which contain Stonebridge or Moselle brooks make reference to deculverting where possible.
422	AAP980.	Environment Agency	De-culverting	All development on sites with culverted watercourses will be expected to investigate the feasibility of deculverting. Deculverting not only provides opportunities to reduce sewage pollution through rectification of misconnections but can also deliver the following wider benefits to the area: <ul style="list-style-type: none"> • Enhancing the Blue Ribbon Network by providing valuable aquatic habitat, aiding fish passage, and significantly adding to the visual attractions of an area. • Offering educational and play opportunities for children, enhancing pedestrian and cycle routes and giving people a touch of the countryside and its seasons in the town. • Using water in motion to mask city noise and provide an atmosphere of quiet and calm. • Complementing other urban regeneration initiatives, giving a place a sense of identity and bringing commercial benefits such as enhanced image for properties and up to 20% increase in land values or rents. • Reducing maintenance and construction costs by using natural bioengineering techniques rather than concrete constructions. • Reducing flood risk, and creating balancing ponds to help reduce flooding downstream. 	SA & AAP Site Allocations	Noted. Action: Ensure all sites which contain Stonebridge or Moselle brooks make reference to deculverting where possible.
422	AAP981.	Environment Agency	De-culverting	Where it is adequately demonstrated that deculverting will be unachievable, the design principles should include a robust SuDS scheme to secure alternative environmental enhancements that provide multiple benefits. Water quality improvement is a primary aim of WFD and should be acknowledged and prioritised in all plans. This can be addressed in the AAP through greater reference to need for SUDS and dealing with misconnections. This is supported by Sustainability Appraisal paragraph 17.15.7.	SA & AAP Site Allocations	Noted. Development management policy DM25 covers the requirement for developments to incorporate sustainable drainage systems.
419	AAP982.	Haringey Liberal Democrat Group	Design	The design of buildings and new residential areas should encourage residents to spend time and money in the local area.	AAP	Noted.
801	AAP983.	Sam Davies	Development locations	It seems the Haringey plan concentrates mostly on using Tottenham to provide new housing, with very little development proposed in the more affluent areas of the borough such as the Hornsey/Crouch End area. Is this a deliberate attempt to force out the poor? If not, why not	AAP	It is considered Tottenham has the capacity to provide approximately 10,000 new homes due to the availability of developable strategic brownfield sites, its excellent transport connections, and the need for investment and change to bring

				spread the development evenly throughout the borough?		about the regeneration needed within Tottenham.
426	AAP984.	Thames Water	Drainage	<p>To accord with the NPPF, NPPG and the London Plan text along the lines of the following should be added to the AAP:</p> <p>“Water Supply & Sewerage Infrastructure</p> <p><i>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.</i></p> <p><i>Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at:</i> http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm</p> <p><i>Or contact can be made with Thames Water Developer Services by post at:</i> <i>Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;</i> <i>By telephone on: 0845 850 2777;</i> <i>Or by email: developer.services@thameswater.co.uk”</i></p> <p>It may be possible for public sewers or water mains to be moved at a developer’s request so as to accommodate development in accordance with Section 185 of the Water Act 1989. The developer would be required to pay for any mains diversions. Thames Water must also be consulted regarding proposals involving building over or close to a public sewer. If building over or close to a public sewer is agreed by Thames Water it will need to be regulated by an Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers or water mains to be moved at a developer’s request so as to accommodate development in accordance with Section 185 of the Water Act 1989.</p>	AAP	<p>Noted. The development management policies already state all proposals for new development will be required to demonstrate that the local public sewer network has adequate capacity to serve the proposed and existing developments; and where such capacity does not exist, provide for suitable alternative arrangements for discharging water.</p> <p>Action: Amend development management policies by adding water supply requirements.</p>
818	AAP985.	Our Tottenham	Economy	<p>Our concerns:</p> <ul style="list-style-type: none"> - The depiction of the existing local economy and approach to local economic development, existing SMEs and businesses 	AAP	<p>Noted.</p> <p>Action: The description of Tottenham will be amended to reflect better the current local Tottenham economy.</p>
818	AAP986.	Our Tottenham	Edit	Site SS6 is missing from the table of content	AAP contents	<p>Noted.</p> <p>Action: amend table of contents to add SS6</p>
419	AAP987.	Haringey Liberal Democrat Group	Employment	Employment and retails spaces should be retained and added to appropriately so that local businesses and traders have spaces suitable for a wide range of needs.	AAP	The development management policies address the council’s intention to retain in employment use any non-designated employment floorspace and sites
818	AAP988.	Our Tottenham	Employment	No net loss of employment land and facilities unless the existing site can be demonstrated to have been unviable for a clear 3 year period.	AAP	The development management policies address the council’s intention to retain in employment use any non-designated employment floorspace and sites. This will either require

						replacement, or protect existing employment floorspace.
818	AAP989.	Our Tottenham	Employment	All jobs created during and following the development to be quality jobs, above the London Living Wage, with local trade union branch involvement, and earmarked for local people as far as possible, and to include local apprenticeships	AAP	Noted. Apprenticeships are sought already through the Local Plan, and Planning Obligations SPD. Requirements regarding quality of jobs and London Living Wage are outside of the scope of the AAP.
818	AAP990.	Our Tottenham	Employment land	The improvements in accessibility in Tottenham should not lead to a mass conversion of employment land into housing land for the purpose of capturing increasing land values for private developers. Any loss must be exceptional, minor, justified and unviable for a clear 3 year period.	AAP	DM37 of the development management policies addresses the council's intention to retain in employment use any non-designated employment floorspace and sites
818	AAP991.	Our Tottenham	Estate regeneration	For the Northumberland Park area and for the rest of Tottenham, this means that: <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. 	AAP	Some housing estates are currently configured in such a way that means they experience issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, 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. 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.
818	AAP992.	Our Tottenham	Estate renewal	Our concerns: - The approach to housing provision and to 'housing estate renewal' which permeates the AAP.	AAP	Noted.
818	AAP993.	Our Tottenham	Estate renewal	Refurbishment and renewal is preferred to demolition and re-build, unless this is impossible	AAP	Noted.
640	AAP994.	George Soteris, owner 6-8 Peacock Estate	Evidence	A new review of Tottenham's industrial businesses should be carried out so that the borough knows more about the businesses operating here.	AAP	The employment land study provides an appropriate basis for reviewing the borough's employment designations.
421	AAP995.	Historic England	Evidence Base	We strongly advise that the evidence base identified for the AAP needs to be strengthened in line with paragraph 169 of the NPPF. A number of the documents require updating and we have raised concerns in respect of the guidance set out in the High Road West Masterplan, potentially conflicting with the NPPF in respect of harm to heritage assets. We were not consulted on a number of the other strategies and cannot therefore comment at this stage on their approach to the historic environment. The Council's Conservation Area Appraisals are omitted and would benefit from inclusion. Although these would benefit from updating their omission from the Evidence Base Studies is of concern as these provide detailed advice which is supplemented by the Haringey Urban Characterisation Study. We would also recommend reference to the Heritage at Risk Register 2014.	AAP	Noted. Council will strengthen the heritage and conservation requirements in the AAP. The conservation area appraisals have been used as evidence for this plan however it is not felt necessary to include all of the evidence based documents in the plan. Therefore the appendix has been deleted. Action: Strengthen heritage and conservation policy Action: Remove appendix on evidence based studies
577	AAP996.	Jane Clossick, PhD	Existing uses	There is no clear evidence presented in the documentation showing an understanding of what is really on the sites proposed for development in terms of number of existing businesses or jobs.	SS1 SS2 SS3 SS5	Council is not proposing to displace businesses currently operating on sites identified in site allocations. The plan sets parameters for development should a site be identified for future

		researcher		There is a great social, cultural, civic and economic value to locally run businesses which cannot easily be replicated. Businesses take a long time to grow, and are deeply embedded in local place and people, for their suppliers and their customers. In Scott's study of the High Road connecting Uxbridge to Romford, they found 80,000 jobs and 6,500 businesses (more than Canary Wharf) and that small plots behind the frontage contained 60% of uses (Adaptable Suburbs & Vaughan, 2014). These are frequently mutually supportive (Ferm & Jones, n.d., p. 15). Standard use class surveys cannot capture this range; more fine grained methods are needed to reveal the mix of uses (Harris et al., 2012, p. 1). Haringey needs to carry out such analysis before proposing destruction of what already exists on the following sites	TG3 NT1 NT3 NT4 NT5 BG1 BG2 BG4 TH2 TH3 NT2 TH8 TH10 TH6	development.
810	AAP997.	Tynemouth Area Residents Association (TARA)	Flooding	Most sites are situated on the Flood Plain, and are at medium/high level threats of flooding and with some Critical Drainage Areas. No sites should be designated for development before an independent Flood Risk Assessment to the whole Tottenham Action Plan Area is carried out.	AAP	Noted. A requirement is being added to sites in critical drainage areas to outline that a flood risk assessment is required. Action: Addition of a development guideline noting that a flood risk assessment is required.
413	AAP998.	Natural England	Green roofs	One way of providing enhanced green infrastructure and biodiversity in such an environment can be through the provision of green roofs. Natural England is supportive of the inclusion of green roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding, reducing the requirement for heating and air-conditioning and providing habitat for wildlife. We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to http://livingroofs.org/ for a range of innovative solutions and http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf (London GLA 2008) regarding the fit with the London Plan policy.	AAP	Noted, the provision of green roofs is outlined under DM21 of the development management policies. Applicants are referred to the 2014 green roof code for good practice guidance.
801	AAP999.	Sam Davies	Green Space	While I accept that there is a need to provide more affordable housing within London, this cannot be at the expense of our existing green space. If population density increases, more green space is needed, not less. Once community land has been sold to a developer we will never get it back. You don't have the right to deprive future generations of our community land.	AAP	Noted, open space will be protected through the Local Plan.
798	AAP1000.	Nora Kirkwood	Green space	I write to object to plans to build on green sites within Tottenham: 1. Lordship Recreation parkland 2. Keston Road Centre 3. Tottenham Green 4. Bruce Castle 5. 'West Tottenham' proposals Tottenham's parkland and open spaces are important to us as they offer a rural retreat, an ambience of peace and tranquillity that is sought after so dearly in stressful times. Please, clearly hear this objection from local disabled people who cannot make their own case to the Council planners and members.	AAP	Noted. There are no plans to build on green sites in the borough.
798	AAP1001.	Nora Kirkwood	Green space	Any development on the edge of parkland would completely dominate the parkland it is planned to be built on – even if the plan is	AAP	Noted. The development management policies provides for this situation by stating that development adjacent to open space

				'temporary'. It would set a precedent that future Council members, officers and residents would be unable to challenge if more development is suggested for our green open spaces.		should seek to protect and enhance the value and visual character of the open land.
798	AAP1002.	Nora Kirkwood	Green space	London Plan Policy identifying MOL (point 7.17) and Draft Policy DM26 quoted regarding protection of MOL and that development adjacent to sites should protect and enhance value of the land. However, in my opinion, the whole of the Tottenham Plan does not offer this protection or enhancement to the green spaces that are so needed in Tottenham and by Tottenham residents.	AAP	Noted. The Tottenham area action plan has been developed to be in line with London Plan policy and the development management policies which provide this protection.
413	AAP1003.	Natural England	Green spaces	We support Haringey Council's proposal to incorporate "village green" spaces into new developments and to add new public spaces and improve existing spaces so that Tottenham has a quality network of green and accessible spaces (page 20). Haringey is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. As such, Natural England would encourage the incorporation of GI into developments in this area. GI can be designed to maximise the benefits needed for this area, for example it can be used to promote opportunities for recreation, improve links between communities and enhance flood-water management to protect surrounding homes and businesses. It can also be used to improve connectivity to other green spaces and to improve conservation and biodiversity.	AAP	Provision for green infrastructure in new developments is managed by the development management policies.
810	AAP1004.	Tynemouth Area Residents Association (TARA)	Guiding principles	In addition to the above we confirm our commitment to the application of the Guiding Principles of the Our Tottenham Planning Policy Working Group (Appendix 1) for all sites in the Tottenham AAP.	AAP	Noted.
810	AAP1005.	Tynemouth Area Residents Association (TARA)	Gyratory system	Tottenham Gyratory System Almost 1 year after completion, the Council has failed to address with TfL the unsatisfactory work carried out.	AAP	This issue is outside the scope of the Plan.
818	AAP1006.	Our Tottenham	Health	Tottenham is short of over one fifth of the GPs it needs even before we have an extra 10,000 or so homes as envisaged in the Tottenham regeneration plans. A further 16 GPs are needed to reduce the patient/doctor ratio for the <i>existing</i> registered patients to the London average. This makes a total of 31 doctors needed for the N15/N17 areas. It is unrealistic to think these can be accommodated within the premises of the 25 existing practices	AAP	Provision of GP practices will be addressed in the infrastructure delivery plan.
810	AAP1007.	Tynemouth Area Residents Association (TARA)	Health	Tottenham health needs are acknowledged to be some of the highest in the country. Plans do not address the infrastructure required to meet the current needs as well as the needs of an additional 20000+ residents in Tottenham. Recent developments at Hale Village and the Newlon estate at Tottenham Town Hall have substantially increased the population levels without commensurate capacity in health infrastructure	TH6; AAP	Provision of health facilities will be addressed in the infrastructure delivery plan.
419	AAP1008.	Haringey Liberal Democrat Group	Health	We are also concerned that not enough is being done to ensure facilities are in place to ensure local services can cope with more residents. It is particularly worrying that the lack of GP services available in areas of Tottenham has not been tackled and the site	AAP	Provision of GP services will be addressed in the infrastructure delivery plan.

				allocation policy does not provide enough reassurance that solving this problem is a priority.		
810	AAP1009.	Tynemouth Area Residents Association (TARA)	Height	The Potential Development Capacity and Design Principles of sites are excessive, overwhelming and dense; residential buildings are too high and do not offer the opportunity to develop viable local communities. Residential blocks should not exceed 6 storeys, and then only where this does not overwhelm the character and architecture of existing local neighbourhoods.	AAP	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. Specific height limits will not be included in Site Allocations as all developments will be expected to respond appropriately to their context
805	AAP1010.	Ilona Tofahrn-Flint	Height	Development of tower block in our local community is a vital local amenity and surrounding it with extremely tall buildings will destroy this. A tower block will cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community. These blocks will not provide homes for local families, and these proposals include no plans for key service such as GPs and health centres.	AAP (doesn't state which SA)	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. Specific height limits will not be included in Site Allocations as all developments will be expected to respond appropriately to their context.
818	AAP1011.	Our Tottenham	Heritage	Preserve the heritage and positive characteristics of the surrounding area and of Tottenham as a whole. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list	AAP	Local listing of buildings is out of scope of this Tottenham AAP.
810	AAP1012.	Tynemouth Area Residents Association (TARA)	Heritage	Tottenham has a large number of high quality existing houses and buildings which form a substantial part of neighbourhood character. Any heritage or high standard buildings must be preserved within the new plans. Buildings that are of significant local merit should be retained and added to a list of such buildings.	AAP	Tottenham contains a number of conservation areas and listed buildings. All developments will be assessed against development management policies which seek to protect the historic environment. The local listing of buildings is out of scope of the Tottenham AAP.
421	AAP1013.	Historic England	Heritage	The AAP is also an important opportunity to protect conservation-led regeneration that has already been carried out in the area, and to help encourage the momentum of investment into the area's historic environment, alongside the broader aims for economic and housing regeneration. We would therefore urge the Council to better integrate this aim into the AAP.	AAP	Noted. Action: Strengthen conservation-led regeneration within the plan
421	AAP1014.	Historic England	Heritage	English Heritage would strongly advise that the Borough's own conservation staff are closely involved throughout the preparation and implementation of the Area Action Plans, as they are often best placed to advise on local historic environment issues and priorities, sources of data and consideration of options relating to the historic environment.	AAP	Noted. Conservation staff are involved in the drafting of all Local Plan documents.
421	AAP1015.	Historic England	Heritage	We would be keen to continue working constructively with the Council to achieve these aims and would welcome the opportunity to discuss the above suggestions and how the AAP can better achieve its future vision for Tottenham.	AAP	Noted, Council welcomes the opportunity to continue working with Historic England.
421	AAP1016.	Historic England	Heritage	When English Heritage's London Advisory Committee visited Tottenham in September 2014 they set out a number of recommendations. These included. 1.The need to reflect the smaller character based neighbourhoods and develop local level strategies; 2. Develop clear vision and prioritised aims for local neighbourhoods; The need to pro-actively seek out opportunities to reinforce local identity 3. Set clear policies for strengthening the High Road as the centre of	AAP	Noted. Action: Include further information from the urban characterisation study within the text introducing each neighbourhood. Action: Create visions for each neighbourhood. Action: Addition of a policy on development along the high road

				activity through a better contextual design approach, with investment in design skills at officer and member level. 4. Develop new approaches to build understanding and interest in local character with local communities.		
806	AAP1017.	Candida Amsden	Housing	The plans for Tottenham do not address the housing problems that we have at present in this area. It appears that these building projects only benefit the property developers who stand to make a lot of profit from these sites.	AAP	The plan aims to provide approximately 10,000 new homes in Haringey to help contribute to issues in the borough such as overcrowding and to provide housing choice for current and future residents. The AAP aims to manage development to benefit both current and future residents of Tottenham.
818	AAP1018.	Our Tottenham	Housing	Our concerns: - The overall scale of housing growth (+10,000 homes) planned for Tottenham and the implications this has for existing and future social infrastructure	AAP	Social infrastructure to cater for the increased population will be addressed by the infrastructure delivery plan.
818	AAP1019.	Our Tottenham	Housing	For the Northumberland Park area and for the rest of Tottenham, this means that: <ul style="list-style-type: none"> There should be no demolition of structurally sound homes, absolutely NO NET LOSS of social housing unit and no displacement of existing tenants and residents as part of any plan for the area. The approved development of the Tottenham Hotspur's FC has been done at the expense of the surrounding population's needs and the retreat of the Council with regard to S106 contributions (in particular affordable/social housing, but also the £17m contribution for local community infrastructure) from the developer in Feb. 2012 is a grave mistake that should be renegotiated and not be repeated in any future development in Tottenham. 	AAP	Some housing estates are currently configured in such a way that means they experience issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, 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. 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.
634	AAP1020.	Alan Stanton, local resident	Housing mix	The housing proposed in the plans is largely high rise tower blocks 'with the emphasis being on the more affordable end of the spectrum'. (para 5.34). It goes on to say ' the delivery of 1 and 2 bed units will be prioritised in keeping with Tottenham Hale's urban character'. Yet the great need here in Tottenham Hale, as in the rest of Tottenham is for genuinely affordable public housing for families. Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise. Tottenham Hale has a high proportion of families living in private rented and temporary accommodation. There is no mention of tenants and their needs in Haringey's "Local Plan Preferred Option Development Management Policies Consultation Document February 2015. The AAP for Tottenham Hale similarly does not mention tenants once, whilst making 46 references to owners. Yet the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments.	DMDDPD General, AAP General	It is noted that there is a need for affordable family housing, amongst a range of needs for housing in the borough. The approach put forward in the document seeks to enable a portfolio approach to sites, where the delivery of higher densities in some areas can create uplift in affordable and family housing on others.
818	AAP1021.	Our Tottenham	Industrial land	Industrial land designation is important to safeguard the sites and their usage.	AAP	DM37 of the development management policies addresses the council's intention to safeguard industrial land and retain in employment use any non-designated employment floorspace and sites
646	AAP1022.	the Headorn Tenderden	Lack of investment	We are concerned that Tottenham Hale and South Tottenham will become the commercial centres of Tottenham, isolating our	AAP	Commercial development is expected in the north of Tottenham as well as around Tottenham Hale and in south Tottenham. The

		Beaufoy Gretton Residents Association		residents who suffer from a predominance of fast food shops and betting shops in our neighbourhood.		new Tottenham Hotspurs stadium will be a catalyst for economic regeneration of the area, including the creation of an improved leisure based local centre.
810	AAP1023.	Tynemouth Area Residents Association (TARA)	Land ownership	The land issues noted in the <i>Built Environment Snapshot</i> are of major concern. Development benefits from <i>high public land ownership and low land values</i> must accrue to existing/future local residents and communities rather than excessive profits to developers.	AAP	Noted. The AAPs vision is that Tottenham's transformation will benefit existing as well as future residents of Tottenham.
804	AAP1024.	Lesley Reeves Costi	Leaseholders	The dangers of demolishing buildings and losing value is unfair because we bought our flat in order to get in the housing market, which is has certainly helped us to do but we need it to remain there. For those who own property, it is their lifeline and the loss of this would result in further deprivation.	AAP	In the case of any compulsory purchase order leaseholders are offered compensation based on the principle of equivalence. This means they will be no worse off in financial terms after acquisition, and no better off.
806	AAP1025.	Candida Amsden	Leaseholders	Leaseholders are not given the full value of their property and therefore are removed from London, thus breaking up families and causing mental health problems.	AAP	In the case of any compulsory purchase order leaseholders are offered compensation based on the principle of equivalence. This means they will be no worse off in financial terms after acquisition, and no better off.
413	AAP1026.	Natural England	Lee Valley Regional Park	We note that Haringey Council considers that access to the Lee Valley Regional Park is poor at present and that it is considering providing enhanced connections to the Park, including creating better pedestrian and cycle links into the Park and a new Green Link leading into the Park. We would emphasise however that parts of the Park are Special Protection Areas (SPAs) and as such are strictly protected sites under European legislation, classified for rare and vulnerable birds and for regularly occurring migratory species. The following link on our website provides access to details of individual SSSIs - http://www.sssi.naturalengland.org.uk/Special/sssi/search.cfm . The impacts of such connections and links on the protected areas of the Park should be taken into account when considering such proposals.	AAP	Noted. Council will work with Lee Valley Regional Park Authority on any proposals within, or in the vicinity of, Special Protection Areas to ensure development does not impact adversely on these sites. A habitat regulations assessment will be undertaken for this plan to assess the impact of the policies on SPAs.
810	AAP1027.	Tynemouth Area Residents Association (TARA)	Health	The Kings Fund Report, General Practice in London, Dec. 2012, shows that Tottenham GP's have 22.2 percent more patients on their lists, on average, than London GPs in general. who is responsible for ensuring that sufficient GPs are set up in areas of major new housing developments?	AAP	GP provision will be addressed in the infrastructure delivery plan.
810	AAP1028.	Tynemouth Area Residents Association (TARA)	Parking	Most parking in South Tottenham is on the street so parking spaces are already at a premium. Such a large influx of people will put huge strain on this. It would also introduce a large number of new cars and heavy vehicles to an area that already suffers from high traffic congestion and the associated pollution and noise problems.	AAP	All new developments will be subject to development management policies which manage the provision of car parking and transport for new developments.
648	AAP1029.	Jennifer Williams, local resident	Pedestrian accessibility	Also the road crossings for pedestrians are more difficult. (And many at each junction) Particularly at the Monument. 1. There is a phase crossing the High Road bus lane on the North side which is perfectly safe for pedestrians, currently the busses are on a red light but so are they, as north bound traffic turns left into Monument Way.	AAP	Noted. Pedestrian crossings will be considered as public realm enhancements along the high street. Action: Addition of a new policy regarding transport

				2. There is no safe pedestrian crossing diagonally from the Chestnuts Estate Area to Tottenham Green / Leisure Centre, as there is no Pedestrian phase by the old well at the lights across the top of Philip Lane, or the adjacent lights across the high road at the south of the junction.		
818	AAP1030.	Our Tottenham	Planning contributions	How these amenities and services would be provided and funded – in particular through Section 106 agreements and the CIL – is not explored convincingly in the AAP.	AAP	This will be addressed through the infrastructure delivery plan.
818	AAP1031.	Our Tottenham	Planning contributions	For Site Allocations, s106 and CIL to be paid towards community benefit to be calculated as all the development profit/surplus expected less 7% for the developer (which we understand is the approx.. European average profit margin). The current CIL to be recalibrated at much higher rate to reflect this figure. At least 20% of the total to be paid shall go to local green space improvements, and at least 20% shall go to youth services and facilities in the area.	AAP	This is outside the scope of the Tottenham area action plan. Council will be undertaking a review of its CIL and will take these comments into account.
418	AAP1032.	Sport England	Playing pitches	<p>Further clarity is required around existing playing field sites within the AAP area. It is unclear from the AAP whether existing playing field site are intended to be protected or whether it is intended that they will be lost to development. Sport England is concerned regarding the lack of specific reference to this and would like to see the AAP amended to include text which is explicit on this point on way or another. In particular, the Down Lane Park Fredrick Knight Sports Group and Power league site need to be protected in accordance with Para 74 of the NPPF.</p> <p>Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future. We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local plan policies, and applied in development management.</p> <p>The Government's National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and well-being. Sport England, working with the provisions of the NPPF, wishes to see direct reference to sport in local planning policy to protect, enhance and provide sports facilities, as well as helping to realise the wider benefits that participation in sport can bring.</p> <p>Sound policy can only be developed in the context of objectively assessed needs, in turn used to inform the development of a strategy for sport and recreation. Policies which protect, enhance and provide for sports facilities should reflect this work, and be the basis for consistent application through development management. Sport England is not prescriptive on the precise form and wording of policies, but advises that a stronger plan will result from attention to taking a clearly justified and positive approach to planning for sport.</p>	AAP	As per SP13 of the Local Plan: Strategic Policies sports facilities (including playing fields) are protected open spaces. All fields are protected from development. In exceptional circumstances where it may be necessary to build on playing pitches this is identified and any playing field would be reprovided to ensure no net loss of pitches.

				<p>Policies could be included in a separate chapter on sport and recreation or, following the NPPF, be part of a chapter on health and well-being. In all cases, however, policies for sport and active recreation must be properly justified, include criteria against which development proposals will be judged and be based on a robust and up-to-date assessment of need as required by paragraph 73 of the NPPF.</p> <p>In this way, planning authorities will be able to demonstrate that their plan has been positively prepared (based on objectively assessed needs), is consistent with national policy (reflecting the NPPF), is justified (having considered alternatives) and effective (being deliverable). Without such attention there is a risk that a local plan or other policy document could be considered unsound.</p> <p>The NPPF clearly recognises the role of sport and recreation as a fundamental part of sustainable development, and expects local authorities to plan positively for these needs and demands accordingly. The protection and provision of opportunities to participate in sport is seen as fundamental to the health and well-being of communities (NPPF, section 8), meaning that local authorities must plan and provide accordingly through policy and development management. Without a robust and up-to-date assessment of need (as required by paragraph 73 of the NPPF), there is a risk that a local plan document could be considered unsound.</p> <p>Sport England will resist the allocation of any playing field site for development unless there is a robust assessment (Playing Pitch Strategy to Sport England methodology: https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/) in place at the point of allocation which has clearly shown the open space, buildings or land to be surplus to requirements.</p> <p>Sport England would expect any policy in the APP to be very explicit on the need to retain (in playing field use) and not prejudice the use of the existing playing field.</p>		
815	AAP1033.	Zena Brabazon	Portfolio approach	<p>The entire thrust of these plans is to create a forest of tower blocks which will impact on our local physical environment; our park; and on local families who need proper affordable homes. Little account is taken of these matters in these proposals which give a green light to developers to build over 15 stories and with high densities. I oppose this approach since it will change the character of the area, pays no regard to the quality of life of existing residents and has very scant provision for social housing. Phrases such as 'the Council will take a portfolio approach to housing, using the delivery tools at its disposal to make flexible arrangements for certain uses in key areas of Tottenham Hale' needs unpicking. What does this really mean, what are the implications for local residents, and what are the Council's intentions?</p>	AAP	<p>The development management policies will manage the design of buildings to ensure their impact on the existing area is minimised. Design also takes into account privacy and light concerns which aim to protect the amenity of existing residents. Affordable housing in developments is also managed by the development management policies.</p> <p>Action: Amend the wording to make it clear what is being proposed and minimise use of jargon.</p>
638	AAP1034.	Fiona Scott, local resident	Provision of new floorspace	<p>The AAP document refers to the delivery of new workspace to replace existing employment floorspace lost (especially in relation to High Road West). However this is discussed in the context of the</p>	AAP	Noted.

				delivery of 'residential-led mixed use development'. There is very little or no recent precedent of meaningful or viable workspace being delivered by residential-led development. Workspace must be delivered in the context of workspace-led development if it is to be meaningful. If left to the market, the outcome will either be A. small quantities or inadequate and largely un-lettable ground floor units the design of which have not been led by the needs of businesses, or B. residential developers gradually reducing amount of workspace provided because of their viability concerns (as residential developers).		
818	AAP1035.	Our Tottenham	Public realm	For each development, all interfaces with streets, public areas or back gardens should enhance the view and contribute positively to local community experience of the site.	AAP	Noted. Interface with the public realm will be addressed through the development management policies.
414	AAP1036.	GLA	Public transport	The draft AAP references various planned and forthcoming connectivity improvements (including the introduction of Crossrail 2 and the delivery of three-tracking along the West Anglia Main Line), and recognises that these improvements would further contribute to the potential for future housing and economic growth in Tottenham. This is supported; however, it is also recommended that the potential four-tracking of the West Anglia line is also referenced within the draft plan.	AAP	Noted. Action: Reference will be made to potential four tracking of West Anglia Line
645	AAP1037.	Keith Dobie, local resident	Regeneration	As a lifelong Tottenham resident I am extremely concerned, as are many other 'locals', at the scale and complexity of the plans to "regenerate" Tottenham. Whilst these are presented as just proposals, it seems clear that the commercial interests of the private developers, now in consultation with council officers, will be a major driving force behind any future decisions. It must be questionable if their interests and the those of the wider Tottenham population are compatible.	AAP	The plans for Tottenham are intended to benefit the lives of existing residents as well as new ones.
810	AAP1038.	Tynemouth Area Residents Association (TARA)	Regeneration	The overall extent of the AAP would be to condemn Tottenham to years of upheaval and uncertainty, and large swathes of the area will be relegated to the condition of a building site.	AAP	Development is required across London to ensure there is sufficient housing for the current and future residents of London. Haringey is required to build approximately 19,820 new homes between 2015 and 2026. Development will be undertaken to ensure the impact of construction on neighbouring properties and the area in general is minimised.
589	AAP1039.	Anonymous Local resident	Retail	Build new bigger shopping market stores in Tottenham	AAP	Noted. Site allocations within Tottenham provide for the provision of retail development.
818	AAP1040.	Our Tottenham	Planning contributions	We recommend to develop the use of section 106 agreements to create or improve local sports and leisure facilities. The population in Haringey is set to rise.... Haringey Council is responsible for providing the growing community with sport and recreation facilities that are accessible and inclusive to meet the demand of an increasing population'.	AAP	Noted. This is outside the scope of the Tottenham AAP. This would be addressed in an update to the planning obligations supplementary planning document.
422	AAP1041.	Environment Agency	Sequential testing	We previously highlighted that any sites allocated within the Area Action Plan would need to be sequentially tested in addition to the Site Allocations. We are pleased to see that a sequential test has now been undertaken to support the Site Allocations and Area Action Plan.	AAP	Support noted.
818	AAP1042.	Our Tottenham	Service Level Agreements	We recommend to develop Service Level Agreements with a number of schools to extend community access to school facilities and to implement dual use'	AAP	This is out of scope of the Tottenham AAP however it will be addressed within the infrastructure delivery plan.

818	AAP1043.	Our Tottenham	Site allocations	Relate to sites that are mostly vacant or derelict. Any site consisting of mostly viable buildings and usage should not be subject to a Site Allocation or earmarked for demolition or change of use, except in very exceptional circumstances (such as those buildings and activities not contributing to any of the agreed goals for Tottenham and Haringey, or being predominantly vacant or derelict). No housing that is structurally sound should be demolished. It should be recognised that a Site Allocation for development is likely to create huge uncertainty, stress and blight for the current occupants of the site – this is unnecessary and unacceptable except in the most exceptional circumstances. Local Plan policies already allow for refurbishment and renewal of existing buildings, improvements to social infrastructure and the streetscape etc.	AAP	Noted.
806	AAP1044.	Candida Amsden	Social housing	The promise to rehouse existing council tenants once these developments are built has not actually happened in other parts of London. They have not been offered a decent alternative in the same locality and they do not enjoy similar security. Housing associations do not offer the same security that council tenants enjoy and their rents are higher.	AAP	Noted.
818	AAP1045.	Our Tottenham	Social housing	Anyone displaced by the development (whether residential or commercial tenant) must be rehoused by the developer in an equivalent or improved arrangement in the final site or nearby	AAP	The Council will seek to meet the needs of any residents on housing renewal sites; however this is outside the scope of planning. Efforts will be made where possible to keep existing commercial operators within the borough.
810	AAP1046.	Tynemouth Area Residents Association (TARA)	Social infrastructure	The AAP gives no indication of the effect of 10000 new homes on the already deficient social infrastructure needed to sustain additional 20000+ residents (our own calculations suggest that this figure could be substantially higher).	AAP	Social infrastructure provision will be addressed in the infrastructure delivery plan.
818	AAP1047.	Our Tottenham	Social infrastructure	Development to include additional social infrastructure, including adequate levels of quality, public open space (including major new spaces to address areas of deficiency as set out in the London Plan), play areas/equipment, and a range of other social infrastructure and amenity infrastructure, to serve the residents in and near the site. No net loss of social infrastructure.	AAP	Where possible in new developments in areas of open space deficiency, new public open space will be sought in new developments. Action: Add requirement for any new development in an area of open space deficiency over 1Ha to seek to provide new publically accessible open space.
818	AAP1048.	Our Tottenham	Stakeholders	These 'delivery partners' are by and large not known to the public, although in many cases prospective developers have already been in contact with the Council for proposals regarding specific sites.	AAP Foreword	Noted.
676	AAP1049.	Lee Valley Regional Park Authority	Support	The Authority supports the Green Link concept which seeks a new east-west landscaped pedestrian and cycle route between Tottenham High Road and the Regional Park through the Tottenham Hale area. Officers from the Authority are currently involved in a working party to deliver this. Policy AAP4 'Green Link' (page 37) and the outline provision as part of the site requirements included within the Allocated Sites to safeguard the route are supported. The Authority would expect the Green Link to form part of the Infrastructure Delivery Plan (Chapter 6 para 6.11).	AAP	Support noted. The green link will be included in the infrastructure delivery plan.
620	AAP1050.	Anna Gurdaniec, local resident	Support Tottenham Civic Society	Support Tottenham Civic Society response	AAP	Noted.
421	AAP1051.	Historic	Sustainability	The Interim Sustainability Appraisal (SA) which has been published	AAP	Noted.

		England	appraisal	alongside the AAP sets out two strategic options for growth. Section 17.13 of the Sustainability Appraisal (SA) for the Draft AAP states that the proposed policies are likely to have a relatively small impact on townscape and cultural heritage issues (consummate with a “no plan” baseline impact). Therefore reliance is placed upon existing Development Management policies to manage change. We would advise that this approach does not reflect the need in the NPPF to set out a positive strategy for the conservation and enjoyment of the historic environment. In our view failure to appropriately identify and plan for the conservation and enhancement of the historic environment within the AAP may result in development which does not address all 12 principles for sustainable development. The SA in weighing both options considers similar unclear outcomes for both options and does not appear to be based on accurate information, identifying only North Tottenham as “at risk” on English Heritage’s Register of Heritage Assets at Risk, and referring rather opaquely to “several” high quality listed and local buildings.		Action: Strengthen text in document related to heritage and conservation.
815	AAP1052.	Zena Brabazon	Tenants	There is no mention of tenants and their needs in Haringey’s “Local Plan Preferred Option Development Management Policies Consultation Document February 2015. The AAP for Tottenham Hale similarly does not mention tenants once, whilst making 46 references to owners. Yet the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments.	AAP	Although there is no specific mention to tenants in the policy they are covered by references to the local community. However, the introductory text has been strengthened to outline that many residents in Tottenham are renting their properties. Action: Addition of a paragraph under social demographics which outlines housing tenure within Tottenham
419	AAP1053.	Haringey Liberal Democrat Group	Consultation	The future townscape must be presented to local people in a variety of forms, so that there can be meaningful consultation and dialogue. It is highly questionable whether the plethora of policy and strategy documents currently available from the council’s website are known to more than a small proportion of Tottenham residents.	AAP	Noted. Council’s consultation approach is outlined in its Statement of Community Involvement.
422	AAP1054.	Environment Agency	Water Resources	Haringey is located in the Thames Water supply zone and in an area of serious water stress, which does not appear to have been identified in the plan. With such a significant increase in the number of houses, we would expect the AAP and DM DPD to include a policy reflecting the requirements of London Plan policy 5.15 water use and supplies, for residential development to be designed so that water consumption would be at 105 litres or less per head per day. This is supported by the AAP Sustainability Appraisal paragraph 17.15.7. It is Thames Water’s responsibility to manage the demand for water. Every five years, Thames Water publishes a Water Resources Management Plan in which they assess future water demand over the next 25 year period. We review and discuss any proposals to meet additional water requirements. The plan put forward by Thames Water has a strong emphasis on demand management and water efficiency to help meet future water supply requirements. The Environment Agency does support this approach but it will require others to contribute for these aims to be achieved.	DM & AAP	The Council recognises the importance of water conservation in delivering sustainable development. Information regarding Thames Water responsibility to manage demand for water is noted. The Council will continue to work with key stakeholders to ensure that growth is appropriately supported by essential infrastructure. Haringey’s adopted Local Plan: Strategic Policies Policy SP5 (Water Management and Flooding) requires all development in Haringey to be water efficient and paragraph 4.2.3 states that the Council will require the incorporation of water saving measures and equipment in all new development in order to meet London Plan water consumption standard of 105 litres or less per head per day. Further guidance on water conservation is also included in the Council’s Sustainable Design and Construction Guidance SPD.
805	AAP1055.	Ilona Tofahrn-Flint	Work with community	The Area Action Plan and draft local plan is unacceptable & should be withdrawn immediately. Instead the Council must work with the community to protect, support & improve all the existing homes, estates, facilities & communities in the area.	AAP	Noted.
818	AAP1056.	Our Tottenham	Youth services	An expansion of youth services and facilities and nurseries is absolutely vital across Tottenham.	AAP	Noted. Youth facilities and nurseries will be addressed in the infrastructure delivery plan.

AAP Chapter 1

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Policy Ref	Council Response
408	AAP1.	Mario Petrou	Gentrification	Objection to the change which will bring in new people looking for a stepping stone which would change the character of areas. Concerned what will happen to the existing residents who may no longer fit in with the 'New Tottenham', will they have to relocate?	AAP 1.1	Noted. The vision for Tottenham is to manage development and regeneration of the area to ensure its transformation benefits existing as well as future residents.
818	AAP2.	Our Tottenham	Edit	See our concerns and objection to these objectives in the response to the Core Strategy alterations.	AAP 1.3	Noted, please see our response in the consultation report for the Alterations to the Strategic Policies.
818	AAP3.	Our Tottenham	Estate renewal	Demolition is not 'renewal'. A policy of applying 'balance' only to social housing estates is discrimination, possibly unlawful discrimination. We strongly contest the type of 'estate renewal' proposed here. Behind the word 'a more balanced mix of housing tenure and greater housing choice' is in effect a strategy of demolition of existing social housing units and blocks, with a net loss of the total Council and social housing stock, and without input for the affected residents. We want the following principle to be including in the Tottenham AAP: No urban renewal or regeneration scheme should entail ANY demolition of structurally sound homes, or any net loss of Council or socially rented housing units.	AAP 1.4	Some housing 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 and legibility, socioeconomic disadvantage for existing residents, 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. 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.
818	AAP4.	Our Tottenham	Social infrastructure	How and where these will be provided to accompany the planned 10,000 new homes is NOT demonstrated in this AAP. There is a chronic lack of community infrastructure already (see our cover letter).	AAP 1.5	An updated infrastructure delivery plan will outline where new or improved infrastructure is required to support population growth.
818	AAP5.	Our Tottenham	Inequality	We welcome all these objectives. However, at present the AAP proposal will not only NOT address the inequalities present across Tottenham but will reinforce and make them worse, through processes of displacement of homes and businesses at particular sites.	AAP 1.6	Support for the objectives is noted.
818	AAP6.	Our Tottenham	Consultation	[Clarity and increased certainty] cannot be the case if the broad public does not know about the interests, preliminary proposals and stakeholders who have already held discussions with the Council about potential development at particular sites	AAP 1.8	Noted.
818	AAP7.	Our Tottenham	Development ; infrastructure	How this balance will be achieved is not demonstrated and highly questionable. See our overall comment about social and community infrastructure.	AAP 1.8	Noted. Action: Amend text to outline that the infrastructure delivery plan will be used to inform the delivery of infrastructure to support growth outlined in the AAP.
818	AAP8.	Our Tottenham	Consultation	See our general comment about the consultation process and its flaws.	AAP 1.8	Noted.
818	AAP9.	Our Tottenham	Infrastructure ; growth target	This is not the function of an AAP. These things should have been thought through before the final draft of the AAP.	AAP 1.9	Noted, this paragraph will be amended to make the role of the AAP clearer. Action: Amend text to make it clear that the infrastructure

						delivery plan will be used in conjunction with the AAP
818	AAP10.	Our Tottenham	Edit	Incomplete sentence...	AAP 1.9	Noted, this will be amended. Action: amend text as appropriate
818	AAP11.	Our Tottenham	Map	A much more detailed map, with the name of the streets marking the exact boundaries, need to be included.	AAP figure 1.0	Noted, clearer maps will be produced to ensure they are easier to understand.
818	AAP12.	Our Tottenham	Community	Who is 'the community' here? That there is such an agreement is the Council's view, but has been seriously contested and challenged by many community groups in Tottenham. See comment made on p. 3 about that.	AAP 1.11	In October 2013 a five-month consultation exercise called Tottenham's Future was undertaken to gather views from the community on their views and ambitions for the next 20 years. More than 3,700 people contributed to the consultation through a variety of methods.
818	AAP13.	Our Tottenham	Consultation	No evidence that comments, feedback, demands, objections made by many community groups have been taken into account. See comment made on p. 3. For High Road West, see Appendix A2: Local traders condemn 'sham' Council consultation for North Tottenham High Road West. Backed by 4,000-strong local petition against demolitions, they call for a new scenario for the area.	AAP 1.13	Noted.
818	AAP14.	Our Tottenham	Consultation; evidence base	Several of these studies were released to the public on the same day as the public consultation for the 4 Local Plan documents opened. This is unacceptable as it does not give any member of the public or community group the time to read and process some key studies which underpin the policy choices proposed by the Council.	AAP 1.13	Noted, however there is a requirement to hold statutory consultation and the Council has followed this in regard the Local Plan. Evidence documents are generally made available as soon as they are prepared on the Council's website.
799	AAP15.	Bob Lindsay-Smith	Issues of importance	AAP does not address the matters that people care about most - not even points listed in the document itself..	AAP 1.17	Noted, Council believes this AAP will help to address concerns outlined in 1.17. Consultation responses from the community will help to address this further.
818	AAP16.	Our Tottenham	Community	These summarizing themes (1.17) actually describe quite well what the core concerns expressed in our previous responses to the January 2014 consultation were. However, there is no evidence in the current draft AAP document that they have been seriously taken into account in the actual proposals made for various key sites.	AAP 1.17	Noted, Council believes this AAP will help to address concerns outlined in 1.17. Consultation responses from the community will help to address this further.
818	AAP17.	Our Tottenham	Edit	That link is invalid. Where is the report referred to? It is not here either: http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/tottenham-area-action-plans-aaps	AAP 1.17	Noted, a new link will be provided in the document. Action: update link to January 2014 consultation
799	AAP18.	Bob Lindsay-Smith	Local services	The AAP does not address the difficulty of attracting primary care groups and new schools to take up sites in new developments. They are businesses or at least, social enterprises that still have to show return on capital, and will go where there is the most S106 or CIL support. Sadly large developers in Tottenham have recently not provided as much S106 funding as was originally required of them.	AAP 1.17 3 rd Bullet point.	Noted. The provision of primary care facilities and new schools will be addressed through the infrastructure delivery plan. Section 106 planning obligations for large developments are set out in the planning obligations supplementary planning document.
408	AAP19.	Mario Petrou	Healthcare	Angered by comments of deficiencies in healthcare when the Council granted planning permission for St Ann's hospital.	AAP 1.17, 3 rd Bullet point.	Noted.
799	AAP20.	Bob Lindsay-Smith	Regeneration	The AAP does not address the problem that these regeneration schemes would increase rental and land values, so that it would become increasingly difficult for people to live in the area. Many existing residents and businesses will be forced out. Even if a resident owns the freehold of their house or flat, their adult children are unlikely to be able to continue to live in the area unless they stay with their parent.	AAP 1.17 4 th Bullet point.	Noted.
799	AAP21.	Bob Lindsay-Smith	Community preservation	The AAP fails in the preservation of existing communities, with their existing character of buildings. High Road West with its mix of	AAP 1.17 5 th Bullet	Noted.

				residential and business would be destroyed. The residential blocks there could have been improved with concierges, as local Councillors have argued for years. Northumberland Park would be transformed completely - the residential blocks there also have plenty of life left in them and do not need to be demolished.	point NT3; NT2	
421	AAP22.	Historic England	Heritage	In respect of the statement "A desire to see distinctiveness existing character of neighbourhoods retained and preserved, including local heritage", we would suggest that the term "designated and undesignated local heritage assets" is used in order (to more closely tie this to the policies set out the NPPF).	AAP 1.17 5 th Bullet point	Noted.
799	AAP23.	Bob Lindsay-Smith	Decent homes	The best single thing that could be done to support local communities would be to complete the Decent Homes programme for all social housing. The AAP does not even mention this programme. The prospect of regeneration, far from benefiting tenants, has been used to justify putting it off because 'it needs to be considered within the context of more comprehensive regeneration options for the area' ('Housing Capital and Decent Homes Programme 2014-16', Section 2.5).	AAP 1.18	As outlined in the document, the Decent Homes programme is not always the best way to improve housing stock. This is because the programme can not deal with issues of estates which were poorly laid out and constrained in their ability to make further modifications.
818	AAP24.	Our Tottenham	Previous consultation	The AAP ignores most of the above points (1.17 and 1.18) or its proposals would go in the opposite direction to what is expressed.	AAP 1.18	Noted.
818	AAP25.	Our Tottenham	Consultation	See our concern about the flaws of that process [Tottenham's Future consultation] in the comment made on p. 3	AAP 1.18	Noted.
818	AAP26.	Our Tottenham	Local businesses	'Support local independent traders' - Many proposals (e.g. NT3) contradict this directly.	AAP 1.18	Noted. Action: strengthen text in document to reflect comment.
818	AAP27.	Our Tottenham	Social housing	Explicit reference should be made to the principle of NO NET LOSS of Council or social housing units anywhere in the Borough.	AAP 1.18	Local Plan: Strategic Policies SP2 Housings states that there will be no net loss of existing affordable housing, by habitable rooms, in new development.
799	AAP28.	Bob Lindsay-Smith	Affordable housing	The AAP does not address one cause of overcrowding: the fact that private rents for small houses are already so high that large numbers of people are compelled to share each house, to be able to afford the total cost. The AAP would appear (see above) to set a target in this area for social housing to comprise just 20% of the total housing (40% of the 'affordable' which would be 50% of the total). Has the effect of this figure on waiting lists been evaluated?	AAP 1.18 (d)	Noted. The Plan seeks to maximise the proportion of overall affordable housing, within viability and policy constraints which limit the number, and price, of new stock.
799	AAP29.	Bob Lindsay-Smith	Wind tunnelling	Some improvements to the physical environment are suggested, but where there are high rise buildings planned the well-known effects on ground wind speed are likely to detract from the physical environment. Local amenities which are currently available to all the public will be reduced by the requirements of new schools for playing areas - at Northumberland Park and at Tottenham Hale.	AAP 1.18 (e)	Design guidelines in the development management policies will help ensure that any adverse effects of tall buildings on the area are minimised or mitigated. The infrastructure delivery plan will address local amenities including where these should be located in Northumberland Park and Tottenham Hale.
799	AAP30.	Bob Lindsay-Smith	Playground	The AAP does not mention the fantastic Somerfield Grove Adventure Playground. Does that mean that it would be built on? Nor Bruce Grove Youth Club.	AAP 1.18 (b)	This section outlines comments made by the community from previous consultations. It is not making any management suggestions for any facilities already in the borough.
818	AAP31.	Our Tottenham	Consultation	The previous High Road West consultation was highly criticised and contested by key local stakeholders. See Appendix A2. Following the highly biased and flawed consultation any objections were ignored, and the Council's spinning of the results would have sent a clear message that it was futile to object in any future 'consultation'.	AAP 1.19	Noted.

818	AAP32.	Our Tottenham	Edit	'Broad agreement' - This is not true.	AAP 1.19	The High Road West consultation document reports that of those who responded to the consultation between 50 and 83 per cent of each household was in support of all Love Lane properties being included in the redevelopment plans. Considering all residents were given the same opportunity to respond to the consultation it is considered this statement is correct.
810	AAP33.	Tynemouth Area Residents Association (TARA)	Consultation	AAP Reg 18 Consultation Document, page 11, omitted Tottenham from the list of public consultation meetings. This omission gives some indication of the misguided perceptions of Tottenham.	AAP 1.19	Noted.
421	AAP34.	Historic England	Previous consultation	We responded in detail to the High Road West Consultation (this was submitted after the consultation date at the Council's agreement as we were not initially consulted). Our letter of 31 October 2014 to Sarah Lovell sets out our concerns and observations.	AAP 1.19	Noted.
818	AAP35.	Our Tottenham	Consultation	There needs to be clearer evidence that the broad concerns outlined in para. 1.17 and 1.18 have been addressed and if so through which amended, removed or added concrete proposals, principles or policies. It is not enough to list those concerns. We believe that these concerns have in fact largely been ignored. Vague references to these consultations 'shaping' future iterations, or creating 'shared objectives' compound the misuse of these consultations.	AAP 1.20	Noted. The objectives and policies are being updated to reflect better some of the concerns outlined in sections 1.17 and 1.18. It is considered that much of the existing document, in particular the vision and site allocations, addresses these concerns Action: Amend APP as appropriate to reflect concerns listed under previous consultation outcomes
818	AAP36.	Our Tottenham	Consultation	Again, the short time window for consultation leaves no time for residents and community groups to engage with the vast quantity and size of all those supporting documents.	AAP 1.21	Note. Council fulfilled its statutory requirements for consultation. However, the Council is reviewing its statement of community involvement which will inform how consultation is undertaken in Haringey.
818	AAP37.	Our Tottenham	Consultation	How can a document which is in draft form, has not been through Examination in Public, has not been approved, be a material consideration in the determination of planning applications? This should be clarified.	AAP 1.22	Noted. Documents which have been through at least one phase of public consultation may be considered as material considerations in the determining of planning applications. Less weight is afforded to these plans at this stage. The weight afforded them will increase as they go through Examination in Public and are adopted.
818	AAP38.	Our Tottenham	Consultation	See our overall concerns with the public consultation process.	AAP 1.24	Noted.
799	AAP39.	Bob Lindsay-Smith	Consultation	It is unclear what the end date for this consultation is. Section 1.26 says 'Consultation will commence on 5 February 2015 for an eight week period' which would take it to 2nd April. Section 1.28 says 23rd March. The website says 27th March	AAP 1.26; AAP 1.28	Noted, the council apologies for this mistake in the document which caused confusion regarding the end date of consultation. The final day for consultation was 23 March 2015.

AAP Ch2 Issues, Challenges and Opportunities

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Policy Ref	Council Response
422	AAP40.	Environment Agency	Evidence base	In our response dated 20 March 2014 to the previous version of this document we raised a number of concerns mainly with regard to the level of utilisation of the evidence bases. It is disappointing that environmental issues, challenges and opportunities are still largely absent in Sections 2 and 3. I refer you to our previous response as the comments are still relevant.	AAP Sections 2 & 3	Noted. We will work with the Environment Agency to identify the relevant evidence to inform plan production and take this into account. Action: Addition of information on environmental challenges in Tottenham
421	AAP41.	Historic England	Heritage	The AAP area encompasses significant development from the early 18 th Century and many of the most important heritage assets date from that period. We would recommend this paragraph is edited to reflect the wider historic and architectural significance of heritage assets within the plan area, to better reflect Tottenham's rich historic built legacy. It may also be worth acknowledging the harm to character and amenity caused by much of the planned post war development which was poorly designed and severed local through road connections. An issue which the council wishes to address, particularly at Northumberland Park and High Road West (alternatively this could be identified at para. 2.25.).	AAP 2.2	Noted. Action: Amend urban character section of the document to make reference to the historic nature of Tottenham.
818	AAP42.	Our Tottenham	Social housing; affordable housing	See comments under the proposals for NT1 and NT2. We strongly challenge the negative depiction made of social housing concentrations in Tottenham. Indeed the level of social housing in Haringey is low (less than 30%) when it is the only genuinely affordable and secure housing available and there is a recognised London-wide affordable housing crisis. The same applies to Tottenham, where many people are being priced out by housing costs – the Council's current strategy if not amended will accelerate this. There is a massive imbalance in the housing market and the chronic deficiency of genuinely affordable housing must be addressed urgently. Up until 1988 rent controls on private landlords ensured much private accommodation was affordable. This should be brought back. Until then, the protecting and expanding social housing is the only way of addressing this scandalous failure of market housing.	AAP 2.2	The social housing stock is disproportionately located in Northumberland Park ward. One aim of the AAP is to rebalance levels of social, intermediate, and private stock across the borough to create mixed and balanced communities. Private rent controls are outside the scope of planning (apart from affordable rent products through new developments).
818	AAP43.	Our Tottenham	Social housing	The Council's uniquely targeted approach to social housing estates as needing the insertion of private housing to create a 'mixed and balanced community' is blatant discrimination against local people on the basis of their economic status. This approach is quite rightly not being used to criticise streets of predominantly owner occupiers by claiming they are in need of social housing to make a 'mixed and balanced community'. All such references and bias against social and council housing should be removed from all Council documents as insulting, untrue, discriminatory and potentially unlawful breaches of Equalities Legislation. This approach is clearly a cover to try to justify the sell-off or use of some Council land cheaply to property developers, and to justify the increasing abandonment of the need to address the needs of local people for more (not less) social housing as the only genuinely affordable and secure housing for thousands of residents.	AAP 2.2	Some housing 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 and legibility, socioeconomic disadvantage for existing residents, 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. 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.

421	AAP44.	Historic England	Heritage	We would recommend referring to the Historic Tottenham Town Hall “complex” to encompass the important civic group which includes the listed former fire station and public baths buildings.	AAP 2.6	Noted. Action: A new policy supporting the continued improvement of this civic area will be included.
818	AAP45.	Our Tottenham	Edit	Please state very clear what are the precise source(s) and year of the various pieces of statistics mentioned in this section.	AAP 2.7	Noted. Action: Reference statistics appropriately
643	AAP46.	Giota Alevizou, local resident	Local business diversity	Paragraph 2.7 describes the ethnic diversity of Tottenham’s population. The ethnic diversity of its business community should also be acknowledged. Nowhere in the AAP is it discussed how this has been taken into account. We have been unable to locate the Equalities Impact Assessment mentioned in other planning documents out for consultation online, and have therefore been unable to comment on this. Specifically in relation to the West Green Road / Seven Sisters Development Trust, the Further Alterations to the London Plan introduced by the Mayor in March 2015 include a requirement for boroughs to manage the cluster of uses in town centres having regard to (amongst other things) the ‘potential to realise the benefits of London’s diversity’ (Policy 4.8 para Bgviii).	AAP 2.7	Noted.
644	AAP47.	Wards Corner Coalition	Local business diversity	Paragraph 2.7 describes the ethnic diversity of Tottenham’s population. The ethnic diversity of its business community should also be acknowledged. Nowhere in the AAP is it discussed how this has been taken into account. We have been unable to locate the Equalities Impact Assessment mentioned in other planning documents out for consultation online, and have therefore been unable to comment on this. Specifically in relation to the West Green Road / Seven Sisters Development Trust, the Further Alterations to the London Plan introduced by the Mayor in March 2015 include a requirement for boroughs to manage the cluster of uses in town centres having regard to (amongst other things) the ‘potential to realise the benefits of London’s diversity’ (Policy 4.8 para Bgviii).	AAP 2.7	Noted. Action: Amend paragraph to mention the ethnic diversity of the business community.
408	AAP48.	Mario Petrou	Life expectancy	Life expectancy figures are false and too low. The Council should be using the London Health Observatory Figures rather than the GLAs which suits a pro development agenda	AAP 2.12	The health observatory figures are only available by council area. The GLA figures however are by ward. This shows the clear difference between the life expectancy of a person living in the west of the borough compared to the east.
818	AAP49.	Our Tottenham	Economy	We strongly dispute the picture painted of the Tottenham economy paras 2.14-2.16. This is entirely inadequate in both length and understanding. Para 2.14 suggests that there are no major manufacturers in Tottenham any more – this is not the case – as work from CASS Cities from Mark Brearley and Jane Clossick and students, as well as the From Around Here survey of industrial estates in Tottenham shows http://www.gortscott.com/media/uploads/639-final-3.pdf (see separate submission by Mark Brearley and Jane Clossick for this consultation). The description of the existing economy as ‘fragmented’ is not based in evidence. The one sentence mention of a recent increase in SME activity warrants much more detailed study and consideration. More generally, small businesses make up the majority of the Tottenham economy and are a major focus of regeneration and economic development policy, yet are given very little attention. Overall, these paras present an inadequate evidence base for the AAP, rendering it unsound.	AAP 2.13	Noted. Support for SMEs in and around the High Rd. New policy to manage the transfer of employment space in this area. Note that there are significant quantities of SIL in north/east Tottenham, which provide an important reservoir for industry, including SMEs. Action: Update the economy section to reflect better the Tottenham economy.
818	AAP50.	Our Tottenham	Affordable housing;	All developments to address deficiencies of genuinely affordable housing and social infrastructure, and conform to and enhance the	AAP 2.14	Noted. Developments will be assessed against the development management policies which include affordable housing. Social

			social infrastructure	principles of Lifetime Neighbourhoods.		infrastructure provision will be addressed in the infrastructure delivery plan. Lifetime homes is being
643	AAP51.	Giota Alevizou, local resident	Local economy	<p>I disagree with the way the local economy has been described at paragraphs 2.14 - 2.16 and do not see that any evidence has been provided to support this view. I consider that in this regard the AAP fails to meet the NPPF requirement for local plans to support existing business sectors (para 21) and work closely with the business community and develop a clear understanding of business needs (para 160).</p> <p>For instance, no mention is made of the many strengths and assets in the local economy; how Haringey Council has working with local business groups to ensure a good understanding of the local economy; nor of the various initiatives underway in Tottenham in relation to local economy. I provide below some detailed suggestions about how these aspects could be addressed in relation to the Seven Sisters / West Green Road Town Centre.</p>	AAP 2.14	<p>Noted.</p> <p>Action: Update the economy section to reflect better the Tottenham economy. Include information on how council is working with local business groups.</p>
644	AAP52.	Wards Corner Coalition	Local economy	<p>I disagree with the way the local economy has been described at paragraphs 2.14 - 2.16 and do not see that any evidence has been provided to support this view. I consider that in this regard the AAP fails to meet the NPPF requirement for local plans to support existing business sectors (para 21) and work closely with the business community and develop a clear understanding of business needs (para 160).</p> <p>For instance, no mention is made of the many strengths and assets in the local economy; how Haringey Council has working with local business groups to ensure a good understanding of the local economy; nor of the various initiatives underway in Tottenham in relation to local economy. I provide below some detailed suggestions about how these aspects could be addressed in relation to the Seven Sisters / West Green Road Town Centre.</p>	AAP 2.14	<p>Noted.</p> <p>Action: Update the economy section to reflect better the Tottenham economy. Include information on how council is working with local business groups.</p>
643	AAP53.	Giota Alevizou, local resident	Local business organisations	<p>Local business organisations should be referred to in the sub-section on 'Economy' (paras 2.14-2.16), and the council should set out its approach to working with those groups here. Reference should be made to the Tottenham Traders Partnership, Tottenham Traders Group, Federation of Small Businesses, West Green Road / Seven Sisters Development Trust etc. A new section should also be added to Chapter 2 to set out Tottenham's assets in terms of community and business engagement, organising and development, and the Council's approach to working in partnership with community groups and organisations to secure developments that benefit and involve local groups. For example, this should mention the various community groups that are taking action to develop their own ideas and pursue their own projects in Tottenham. In relation to the West Green Road / Seven Sisters Town Centre, this should include Wards Corner Community Coalition, the West Green Road / Seven Sisters Development Trust, Pueblito Paisa Association, Pedro Achata Trust and local residents groups. The London Plan requires boroughs to support and encourage community engagement and business involvement in the management of town centres (Policy 2.15 para Dc3).</p>	AAP 2.14	<p>Noted.</p> <p>Action: Update the economy section to reflect better the Tottenham economy including particular mention of council's relationship with local business organisations. Also refer to community groups and their contribution to the economy.</p>

644	AAP54.	Wards Corner Coalition	Local business organisations	Local business organisations should be referred to in the sub-section on 'Economy' (paras 2.14-2.16), and the council should set out its approach to working with those groups here. Reference should be made to the Tottenham Traders Partnership, Tottenham Traders Group, Federation of Small Businesses, West Green Road / Seven Sisters Development Trust etc. A new section should also be added to Chapter 2 to set out Tottenham's assets in terms of community and business engagement, organising and development, and the Council's approach to working in partnership with community groups and organisations to secure developments that benefit and involve local groups. For example, this should mention the various community groups that are taking action to develop their own ideas and pursue their own projects in Tottenham. In relation to the West Green Road / Seven Sisters Town Centre, this should include Wards Corner Community Coalition, the West Green Road / Seven Sisters Development Trust, Pueblito Paisa Association, Pedro Achata Trust and local residents groups. The London Plan requires boroughs to support and encourage community engagement and business involvement in the management of town centres (Policy 2.15 para Dc3).	AAP 2.14	Noted. Action: Update the economy section to reflect better the Tottenham economy including particular mention of council's relationship with local business organisations. Also refer to community groups and their contribution to the economy.
421	AAP55.	Historic England	Heritage	We would suggest referring to Bruce Grove as the historic centre for retail, reflecting its former prominence, its retail designation, and the neighbourhood characteristics identifies in the site allocations section.	AAP 2.16	Noted. Action: Amend text to mention that Bruce Grove is the retail centre of the area as per the text in the Bruce Grove neighbourhood section.
810	AAP56.	Tynemouth Area Residents Association (TARA)	Health	Given the Council's slowness in acknowledging the increasing healthcare deficit in the area, we question the ability of the NHS and the Council to deliver 21 st century healthcare to existing residents, let alone those of 10,000 new dwellings - which could amount to 30-40,000 new patients. Any new development must meet with an absolute planning guarantee that the health needs of addition residents will be met via NHS provision.	AAP 2.18	Noted. The provision of healthcare to support the increased population will be addressed in the infrastructure delivery plan.
818	AAP57.	Our Tottenham	Affordable housing; inequality	Low cost home ownership is only one way of addressing inequality. Given the cost of housing in London, only genuinely socially rented housing units can cater for lower income groups.	AAP 2.18	Noted.
818	AAP58.	Our Tottenham	Mixed communities	See comments made for NT1 and NT2 and in the overall response letter to this AAP. We strongly question the strategy behind the vocabulary of 'balanced and mixed communities', which is effectively about social housing estate demolitions. High levels of social housing is NOT the problem per se.	AAP 2.18	The London Plan states that "communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods". This does not mention any demolition of social housing estates.
818	AAP59.	Our Tottenham	education	The level of need (both current backlog and future need) and where the provision for it will be achieved is not demonstrated in this AAP.	AAP 2.18	Education provision will be addressed in the infrastructure delivery plan.
818	AAP60.	Our Tottenham	Small businesses;	Para's 2.19 and 2.20 explore the potential for Tottenham to provide space for start-ups in new industries that could employ local people. Where will this be delivered? No acknowledgement is made of the importance of low cost and industrial typologies in achieving this. No mention is made of the existing businesses that employ and train local people. None of these ambitions are realised in the AAP. Make references to Craving Coffee, which is often cited example of a successful new business in Tottenham, having their premises in Gaunson House on Markfield Road. Loss of employment land to	AAP 2.18	Noted. Council seeks to maximise the amount of new employment floorspace in developments as per DM50 of the development management policies. Action: Amend text to reflect better the existing businesses providing employment in Tottenham.

				housing will reduce the supply of the units that have enabled Craving Coffee to start-up in the area.		
818	AAP61.	Our Tottenham	housing	See our comment about this target in the response to the Alterations to the Strategic Policies.	AAP 2.23	Noted, this has been addressed in the strategic policies document. This figure will reflect the one agreed in that document.
818	AAP62.	Our Tottenham	Housing; employment; population density; social infrastructure	<p>We disagree with the fact that Tottenham should host half of this targeted growth. The target of 10,000 new homes in Tottenham is totally over-estimated. Several wards of Tottenham already have the highest densities in the Borough (see table and map in the overall response to this APP). Bruce Grove, Saint Ann's Seven Sisters and Tottenham Green have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate). White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land – which means that the population density in the residential areas of those North Tottenham wards is high, too. Tottenham has the highest level of social deprivation and shortages in social infrastructure.</p> <p>Tottenham cannot cater for 10,000 extra residents without grave problems for its social infrastructure and existing population. Unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough.</p>	AAP 2.23	It is considered Tottenham has the capacity to provide approximately 10,000 new homes due to the availability of developable strategic brownfield sites, its excellent transport connections, and the need for investment and change to bring about the regeneration needed within Tottenham. Infrastructure to support proposed development will be addressed through the infrastructure delivery plan.
818	AAP63.	Our Tottenham	Estate regeneration; brownfield land	Council housing estates should NOT be considered brownfield sites. Many of the sites listed here are not brownfield in the sense that they are being used by viable economic activities or homes.	AAP 2.23	Council defines brownfield land as “previously developed land which is or has been occupied by a permanent structure” (Local Plan: Strategic Policies). Therefore council estates (and all other developed land) may be considered brownfield sites.
818	AAP64.	Our Tottenham	Estate regeneration	We contest this model of renewal. See points below made about NT1 and NT2.	AAP 2.23	Noted
818	AAP65.	Our Tottenham	Estate regeneration	We contest this model of renewal. See points below made about NT1 and NT2.	AAP 2.25	Noted.
818	AAP66.	Our Tottenham	Social housing	No structurally sound estate should be demolished. No net loss of Council or social housing units through urban renewal.	AAP 2.26	Some housing estates are not currently configured in such a way that they make the maximum contribution to their needs, variously experiencing issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, 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.
259	AAP67.	Archdeacon of Hampstead Fr Luke Miller	Faith	Underplayed as an important social driver. Tottenham is an area of great strength and growth of faith organisations yet this is not mentioned or planned for. Faith organisations often provide affordable and sustainable community facilities. Para 2.27 attempts to cover social infrastructure but makes no mention of faith.	AAP 2.27	<p>In the development management policies reference to community facilities includes religious facilities.</p> <p>Action: amend meeting social needs section to make reference to religious facilities.</p>

818	AAP68.	Our Tottenham	Social infrastructure	The AAP needs to make it explicit that the Council will retain and protect existing community centres, some of which are currently under threat of eviction or seeking extended leases.	AAP 2.29	The provision of community centres will be covered by the infrastructure delivery plan.
818	AAP69.	Our Tottenham	Affordable housing	The Council should revisit the £17m s106 planning obligation and the affordable housing commitment the club were allowed to abandon. See comments under NT5.	AAP 2.33	Noted. This is outside the scope of the Tottenham area action plan.
818	AAP70.	Our Tottenham	Conservation	All listed and locally listed buildings should be protected and valued. But heritage is not just about a few key buildings but also about the historic fabric and character of an area. This policy fails to demonstrate the Council's commitment to protect Tottenham's heritage and character at a time when massive profit-led development is being proposed throughout the area.	AAP 2.35	Much of Tottenham is protected as conservation area. Conservation areas can be designated for their special architectural interest that may derive from the setting or features provided by a collection of buildings and spaces. Actions: Amend text to make it clear it is all listed buildings which should be protected. Addition of information under Tottenham today regarding conservation areas and heritage buildings Addition of a policy that outlines Haringey's heritage and the council's approach to conservation led development.
259	AAP71.	Archdeacon of Hampstead Fr Luke Miller	Heritage	No mention of listed church buildings. These range from medieval to Tudor All Hallows church which is one of most significant heritage assets through fin Victorian buildings to the award winning S Paul's Haringay. These are maintained for community at the expense of the parishes concerned.	AAP 2.35	Noted. Action: Amend text to make it clear it is all listed buildings which should be protected.
421	AAP72.	Historic England	Heritage	We are pleased to note the acknowledgement of the importance of heritage and cultural assets. We would suggest that the AAP needs to ensure heritage assets are appropriately identified and that new development should seek opportunities to enhance both heritage assets and their setting, whilst putting them to viable uses consistent with their conservation (as set out in NPPF Para. 131). The area includes numerous heritage assets "at risk" from neglect and poor condition which would benefit from a positive, proactive approach, beyond "integration" into new developments. This could include repair, adaptation and, where appropriate reuse to secure the best long term viable use. Some of these assets are identified in the site allocations, however the proposed AAP would benefit from an overarching commitment to a positive strategy to address the condition of the historic environment through working with partners, including developers, English Heritage, the GLA, HLF, Charities and Trusts.	AAP 2.35	Noted. Action: Addition of a policy that outlines Haringey's heritage and the council's approach to conservation led development.
818	AAP73.	Our Tottenham	Consultation	This document does not do that [ensures community knows what is being proposed]. It does not communicate well what is being proposed in many sites (see overall response to the AAP) and does not reflect well the input by community groups in previous consultations.	AAP 2.37	There are no fixed plans for most sites in the borough. Where planning permission has been granted this is referred to in the document. The allocations set additional parameters that developers must consider when seeking to develop a site.
643	AAP74.	Giota Alevizou, local resident	Affordable workspace	A new sub-section should be added on 'Affordable Workspace' to the section on 'key drivers for change and regeneration'. Haringey Council's recently announced £3.65m Opportunity Investment Fund for Tottenham is based on the understanding that the availability of low-cost workspace will be essential to the sustainable and inclusive development of Tottenham's economy. This understanding is entirely missing from the AAP and should be included within Chapter 2.	AAP Ch2	Noted. Affordable workspace is covered in the DMDPD.
644	AAP75.	Wards Corner	Affordable workspace	A new sub-section should be added on 'Affordable Workspace' to the section on 'key drivers for change and regeneration'. Haringey	AAP Ch2	Noted.

		Coalition		Council's recently announced £3.65m Opportunity Investment Fund for Tottenham is based on the understanding that the availability of low-cost workspace will be essential to the sustainable and inclusive development of Tottenham's economy. This understanding is entirely missing from the AAP and should be included within Chapter 2		Action: addition of information regarding affordable workspace in chapter 2
643	AAP76.	Giota Alevizou, local resident	Seven sisters market	<p>For instance, no mention is made of the many strengths and assets in the local economy; how Haringey Council has working with local business groups to ensure a good understanding of the local economy; nor of the various initiatives underway in Tottenham in relation to local economy. I provide below some detailed suggestions about how these aspects could be addressed in relation to the Seven Sisters / West Green Road Town Centre.</p> <p>Seven Sisters market (housed in the historic Wards Building at Seven Sisters, and home to one of London's two main markets providing Latin American goods and services) is not referred to in the description of 'Tottenham Today'. References should be added to this at key points in which the High Street and town centres; heritage and cultural assets; and diversity are mentioned i.e. at paragraph 2.4, 2.6, 2.7 and 2.16. Other markets in Tottenham should also be mentioned. This is necessary because the NPPF (para 23) and the London Plan (Policy 4.8) require boroughs to plan positively to support and enhance markets, as well as the more general requirements mentioned above. Additionally, Seven Sisters market has been listed by the Council as an asset of community value; the Council is required by the Further Alterations to the London Plan adopted in March 2015 to prevent the loss of 'valued local community assets' (Policy 4.8 para Bc).</p>	AAP Ch2	Noted.
644	AAP77.	Wards Corner Coalition	Seven Sisters Market	<p>For instance, no mention is made of the many strengths and assets in the local economy; how Haringey Council has working with local business groups to ensure a good understanding of the local economy; nor of the various initiatives underway in Tottenham in relation to local economy. I provide below some detailed suggestions about how these aspects could be addressed in relation to the Seven Sisters / West Green Road Town Centre.</p> <p>Seven Sisters market (housed in the historic Wards Building at Seven Sisters, and home to one of London's two main markets providing Latin American goods and services) is not referred to in the description of 'Tottenham Today'. References should be added to this at key points in which the High Street and town centres; heritage and cultural assets; and diversity are mentioned i.e. at paragraph 2.4, 2.6, 2.7 and 2.16. Other markets in Tottenham should also be mentioned. This is necessary because the NPPF (para 23) and the London Plan (Policy 4.8) require boroughs to plan positively to support and enhance markets, as well as the more general requirements mentioned above. Additionally, Seven Sisters market has been listed by the Council as an asset of community value; the Council is required by the Further Alterations to the London Plan adopted in March 2015 to prevent the loss of 'valued local community assets' (Policy 4.8 para Bc).</p>	AAP Ch2	<p>Noted.</p> <p>Action: Make reference to the current economy including how council is working with local business groups and various initiatives currently underway. Reference to the seven sisters market will also be included.</p>

AAP Ch3 The vision and strategic objectives for Tottenham

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Policy Ref	Council Response
421	AAP78.	Historic England	Design quality	We support the aspiration for “Tottenham to be a unique place of beauty and interest as its historic character and natural environment is enhanced through investment and high quality and low-carbon building and space design”. However this will only be achieved if the poor condition of the environment and quality of new design is addressed.	AAP 3.1 Vision	All development will be assessed against the development management policies which seek a high level of design in all new developments.
629	AAP79.	DP9 on behalf of undisclosed	Supports Vision	Supports vision on P23	AAP 3.1 vision	Support noted.
669	AAP80.	HTA Design LLP on behalf of The Woodgate Group	Vision	The Woodgate Group fully supports the vision for Tottenham as set out in the AAP, and look forward to working with the Council to achieve this objective on the Island Site:	AAP 3.1 vision	Support noted.
818	AAP81.	Our Tottenham	Community	Most local residents and businesses are already happy and proud to live, work and invite their friends to Tottenham. It is already ‘a place for diverse communities that people are proud to belong to’.	AAP 3.1 vision	Noted.
818	AAP82.	Our Tottenham	Gentrification	The aim of attracting new investments, new residents, new businesses and new development to Tottenham which underpins the AAP should not be done at the expense of the existing community, i.e. by displacing local residents and local businesses; and it should actually improve the lives of existing residents. Regeneration should not lead to gentrification in which local residents are forced or priced out of the area, and should not be done at the expense of the people of Tottenham.	AAP 3.1 vision	Noted. It is the aim of the area action plan to benefit the existing residents as well as any future ones.
818	AAP83.	Our Tottenham	Education	A listing of the exact sites where this is planned for needs to be included, otherwise this remains a rhetorical statement.	AAP 3.2	A number of sites make provision for education facilities including NT2, NT3, TH2 and TH3. The infrastructure delivery plan will further address the provision of education facilities.
818	AAP84.	Our Tottenham	Edit	[through the planning process] i.e.? Specify.	AAP 3.2	Training and employment provision may be secured through planning obligations or conditions on major applications.
818	AAP85.	Our Tottenham	Wording	Strong reservations with the wording, and approaches, proposed under Obj. 2, Obj. 3 and Obj. 7	AAP 3.2-3.10	Noted.
818	AAP86.	Our Tottenham	Economy	Objective 2 and para 3.3 is a formulaic approach to urban economic development that is totally ungrounded in an understanding of the existing economy and its strengths. No mention of how existing businesses will be involved in and benefit from changes rather than be displaced by them. No mentions of how the plan will ensure new jobs are quality jobs and can be accessed by local people. The Our Tottenham Local Economy section of the Charter (Appendix A1) should be considered and incorporated.	AAP 3.3	Noted. Action: addition of a policy related to supporting existing local businesses in regeneration of Tottenham.
818	AAP87.	Our Tottenham	Local businesses	This should be re-written to ensure small businesses, markets, affordable workspace, the contribution of ethnic retailers, local business and community development groups are included and supported within the objective and the policies of the AAP	AAP 3.3	Noted. Action: Amend text to specify the contribution of existing businesses to Tottenham’s economy.

818	AAP88.	Our Tottenham	Estate regeneration	See comment about estate renewal in the overall response to the AAP, and in relation to Sites NT1 and NT2.	AAP 3.3	Noted.
643	AAP89.	Giota Alevizou, local resident	Objective 2	Our comments on Chapter 2 apply to Objective 2 (improved access to jobs and business opportunities) and para 3.3. This should be re-written to ensure small businesses, markets, affordable workspace, the contribution of ethnic retailers, local business and community development groups are included and supported within the objective and the policies of the AAP.	AAP 3.3	Noted. Action: Addition of a point under objective 2 regarding supporting of small businesses, markets, affordable workspace, the contribution of ethnic retailers, local business and community development groups
644	AAP90.	Wards Corner Coalition	Objective 2	Our comments on Chapter 2 apply to Objective 2 (improved access to jobs and business opportunities) and para 3.3. This should be re-written to ensure small businesses, markets, affordable workspace, the contribution of ethnic retailers, local business and community development groups are included and supported within the objective and the policies of the AAP.	AAP 3.3	Noted. Action: Amend text to specify the contribution of existing businesses to Tottenham's economy.
818	AAP91.	Our Tottenham	Housing	'for having a different London housing market' -? What does this mean? Unclear.	AAP 3.4	Noted.
818	AAP92.	Our Tottenham	Social housing	No mention is made of low cost rental options. This is a clear weakness in the plan. The word "tenants" does not appear in this APP, but "owners" appear 46 times.	AAP 3.4	Action: Amend text to outline that a range of tenures will be provided
818	AAP93.	Our Tottenham	Social housing	[Mixed and balanced communities] should not hide net losses of Council or social housing units. In any event this is a discriminatory and arguably unlawful policy if only applied to social housing residents.	AAP 3.4	Some housing 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 and legibility, socioeconomic disadvantage for existing residents, 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. 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.
818	AAP94.	Our Tottenham	Infrastructure	A precise list of sites where such infrastructure can be provided needs to be included, otherwise this remains a rhetorical statement.	AAP 3.6	Individual site allocations specify opportunities for the provision of this infrastructure. It will also be further addressed in the infrastructure delivery plan.
818	AAP95.	Our Tottenham	Objective 6	Objective 6 (great places) and para 3.7 should mention Seven Sisters market and the Wards building. WCC's response to the Tottenham Futures consultation and the community plan for Wards Corner (attached to this submission) have already set out how retaining, refurbishing and bringing back into use Wards building can provide a great town centre at Seven Sisters and West Green Road	AAP 3.7	Noted. The objectives have been amended to outline more clearly the goals for Tottenham. Specific mention of targets and other more specific detail will be covered by the policies. Action: Amend objective to reflect only the high level goals for Tottenham
643	AAP96.	Giota Alevizou, local resident	Objective 6	Objective 6 (great places) and para 3.7 should mention Seven Sisters market and the Wards building. WCC's response to the Tottenham Futures consultation and the community plan for Wards Corner (attached to the submission from Wards Corner Community Coalition) have already set out how retaining, refurbishing and bringing back into use Wards building can provide a great town centre at Seven Sisters and West Green Road. Comments above on Chapter 2 in relation to involvement of local business and community	AAP 3.7	Noted. The objectives have been amended to outline more clearly the goals for Tottenham. Specific mention of targets and other more specific detail will be covered by the policies. Action: Amend objective to reflect only the high level goals for Tottenham

				groups in management of town centres and on the role of markets and ethnic retailers also apply here.		
644	AAP97.	Wards Corner Coalition	Objective 6	Objective 6 (great places) and para 3.7 should mention Seven Sisters market and the Wards building. WCC's response to the Tottenham Futures consultation and the community plan for Wards Corner (attached to the submission from Wards Corner Community Coalition) have already set out how retaining, refurbishing and bringing back into use Wards building can provide a great town centre at Seven Sisters and West Green Road. Comments above on Chapter 2 in relation to involvement of local business and community groups in management of town centres and on the role of markets and ethnic retailers also apply here.	AAP 3.7	Noted. The objectives have been amended to outline more clearly the goals for Tottenham. Specific mention of targets and other more specific detail will be covered by the policies. Action: Amend objective to reflect only the high level goals for Tottenham
421	AAP98.	Historic England	Heritage	The Council needs to develop the objective of recognising and enhancing the historic environment into policy and through seeking to address "at risk" status and ensuring that new investment addresses existing issues of neglect and disrepair.	AAP 3.7	Noted. Action: amend strategic vision to cover the importance of enhancing the historic environment in Tottenham
818	AAP99.	Our Tottenham	Local economy	The Tottenham AAP DPD does not consider research on stadium led development and regeneration, which finds very little contribution to the local economy – jobs provided are generally small scale and part time and arguments about local multiplier effects do not take place in practice. Therefore, the new Spurs stadium should not be presented as a driver of economic development in Tottenham. See separate submission from Mark Panton, Birkbeck University, on this point for more information, and the recent London Assembly Regeneration Committee report on this topic.	AAP 3.8	The London Assembly Report concludes that while there is "a lack of firm data about the economic impact of a stadium, our evidence indicates that stadium-led regeneration schemes can act as a catalyst for physical and social regeneration" (London Assembly, March 2015). Therefore it is considered appropriate to present the new Spurs stadium as a driver of economic development in Tottenham.
818	AAP100.	Our Tottenham	Spatial strategy	Dividing the Tottenham in 4 areas does not make a spatial strategy.	AAP 3.10	Noted.
818	AAP101.	Our Tottenham	Site allocations	See comments made below about the Tottenham Hale sites and proposed developments.	AAP 3.12	Comments are addressed under Tottenham Hale sites.
818	AAP102.	Our Tottenham	Green link	See comments on the Green Link made below in the section about the Tottenham Hale sites and proposed developments. The planned crossing of Down Lane Park is strongly opposed.	AAP 3.12	Noted.
818	AAP103.	Our Tottenham	Local economy	The Tottenham AAP DPD does not consider research on stadium led development and regeneration, which finds very little contribution to the local economy – jobs provided are generally small scale and part time and arguments about local multiplier effects do not take place in practice. Therefore, the new Spurs stadium should not be presented as a driver of economic development in Tottenham. See separate submission from Mark Panton, Birkbeck University, on this point for more information, and the recent London Assembly Regeneration Committee report on this topic.	AAP 3.14	The London Assembly Report concludes that while there is "a lack of firm data about the economic impact of a stadium, our evidence indicates that stadium-led regeneration schemes can act as a catalyst for physical and social regeneration" (London Assembly, March 2015). Therefore it is considered appropriate to present the new Spurs stadium as a driver of economic development in Tottenham.
818	AAP104.	Our Tottenham	Estate renewal	This estate renewal programme is strongly contested (see comments about NT1 and NT2).	AAP 3.15	Noted.
799	AAP105.	Bob Lindsay-Smith	Document	The AAP fails to be clear at all. I live in Northumberland Park Ward, and there is no clear information about what is proposed, just (Section 3.15)	AAP 3.15 (1.17a)	The North Tottenham site allocations (NT1 to NT5) set out what development may be expected in Northumberland Park.
799	AAP106.	Bob Lindsay-Smith	Social housing	What does 'better mix of social housing' in Section 3.15 mean? If it means that the total number of social housing units would be reduced, that is a kick in the teeth for people who have been waiting for a place for years. Intermediate housing is promised, but NO social housing is mentioned in Policy AAP2 Housing, paragraph B subsection b. Maybe it contains a misprint: It says 'the affordable tenure split (DM17 A(c) which in the case of development in the	AAP 3.15 (1.17b); Policy AAP2; DM17 A(c)	Noted. A better mix of housing refers to there being a range of housing types and tenures provided. The policies outline that there will be no net loss of social housing by habitable room.

				Tottenham AAP area will result in an overall tenure mix of 60% intermediate accommodation and 40% affordable rented accommodation.' Perhaps it should read '... development in the Tottenham AAP area will result in an overall tenure mix of 60% intermediate accommodation and 40% social rented accommodation.' That would make social housing 40% of 50% of the total - ie 20% of all housing. This can be compared with 24% over the borough as a whole. Having less social housing in the East implies a reversal of the current East-West poverty/prosperity trend. No-one has been asked whether that is desirable, or if so, achievable.		
818	AAP107.	Our Tottenham	Green space	Where? There needs to be a clause ensuring that existing open and green space be protected from development.	AAP 3.16	SP13 of the adopted Local Plan: Strategic Policies outlines that new development shall protect and improve Haringey's parks and open spaces.
421	AAP108.	Historic England	Infrastructure	Bruce Grove has been the subject of on-going conservation-led regeneration for many years but remains at risk, following damage during the riots and a number of designated heritage assets at risk. Co-ordinated public realm works, high quality design, enforcement and strategic improvement of targeted buildings are required to help address this. We would encourage the Council to work with partners to set out how this can be achieved, setting out specific goals to address the issues identified.	AAP 3.17	Noted. Action: Addition of a policy on heritage and character which discusses conservation led regeneration and the historic environment.
421	AAP109.	Historic England	Infrastructure	The public realm works at Tottenham Green need to co-ordinate with the proposed Cycle Super-Highway.	AAP 3.18	Noted. Action: Amend text to make reference to the cycle superhighway
818	AAP110.	Our Tottenham	Planning permissions	1. See comments about Wards Corner and Apex House made under SS3 and SS5. This does not convey that there are two planning permissions in place for Wards Corner, which both have been determined to meet planning policy. Yet para 3.19 is written on the basis of the Grainger plan going ahead. Para 3.19 should be amended to provide a more balanced position in line with the Council's role as local planning authority, communicating the vision of the community plan for Wards building as well as that of the Grainger plan for the site. We propose a new sentence is added to this para as follows: <i>The community plan for Wards Corner, which also has planning permission, would restore the existing heritage buildings at the heart of the town centre, providing affordable workspace and community space and enhancing the existing market to provide a unique destination and gateway to Tottenham.</i> to confirm the Council's willingness to work with the community on the future development of the West Green Road / Seven Sisters Town Centre.	AAP 3.19	This paragraph states that there will be new landmark buildings around the station as provided in various site allocations for seven sisters. It makes no specific mention of any buildings in particular and so it is not considered necessary to discuss the planning permission here.
644	AAP111.	Wards Corner Coalition	Planning permissions	The Spatial Strategy for Seven Sisters / West Green Road set out at para 3.19 does not convey that there are two planning permissions in place for Wards Corner, which both have been determined to meet planning policy. Yet para 3.19 is written on the basis of the Grainger plan going ahead. Para 3.19 should be amended to provide a more balanced position in line with the Council's role as local planning authority, communicating the vision of the community plan for Wards building as well as that of the Grainger plan for the site. In drawing the Community Plan, several groups comprising of residents' and traders' (including the Wards	AAP 3.19	This paragraph states that there will be new landmark buildings around the station as provided in various site allocations for seven sisters. It makes no specific mention of any buildings in particular and so it is not considered necessary to discuss the planning permission here.

				<p>Corner Community Coalition), worked together with researchers from the Open University who have government funding (i.e., from AHRC and EPSRC) to enable civic engagement for urban regeneration. Local community groups and researchers co-designed a digital consultation platform and virtual tour to the plan and orchestrated several public engagement events to create a collective vision for the future. In April 2014, the plan received overwhelming support on the planning website, StickyWorld site and on the ground by traders, residents and other local stakeholders (with more than 400 expressions of support). Local groups have since been working together to set up a Trust and suggest aspects for business and entrepreneurial vitality that would ensure community-led regeneration and sustainability for Tottenham.</p> <p>I propose a new sentence is added to Para 3.19 as follows:</p> <p><i>The community plan for Wards Corner, which also has planning permission, would restore the existing heritage buildings at the heart of the town centre, providing affordable workspace and community space and enhancing the existing market to provide a unique destination and gateway to Tottenham.</i></p> <p>We propose a new sentence is added to para 3.19 to confirm the Council's willingness to work with the community on the future development of the West Green Road / Seven Sisters Town Centre</p>		
643	AAP112.	Giota Alevizou, local resident	Planning permissions	<p>The Spatial Strategy for Seven Sisters / West Green Road set out at para 3.19 does not convey that there <u>are two planning permissions</u> in place for Wards Corner, which both have been determined to meet planning policy. Yet para 3.19 is written on the basis of the Grainger plan going ahead. Para 3.19 should be amended to provide a more balanced position in line with the Council's role as local planning authority, communicating the vision of the community plan for Wards building as well as that of the Grainger plan for the site. In drawing the Community Plan, several groups comprising of residents' and traders' (including the Wards Corner Community Coalition), worked together with researchers from the Open University who have government funding (i.e., from AHRC and EPSRC) to enable civic engagement for urban regeneration. Local community groups and researchers co-designed a digital consultation platform and virtual tour to the plan and orchestrated several public engagement events to create a collective vision for the future. In April 2014, the plan received overwhelming support on the planning website, StickyWorld site and on the ground by traders, residents and other local stakeholders (with more than 400 expressions of support). Local groups have since been working together to set up a Trust and suggest aspects for business and entrepreneurial vitality that would ensure community-led regeneration and sustainability for Tottenham.</p> <p>I propose a new sentence is added to Para 3.19 as follows:</p> <p><i>The community plan for Wards Corner, which also has planning permission, would restore the existing heritage buildings at the heart of the town centre, providing affordable workspace and</i></p>	AAP 3.19	This paragraph states that there will be new landmark buildings around the station as provided in various site allocations for seven sisters. It makes no specific mention of any buildings in particular and so it is not considered necessary to discuss the planning permission here.

				<i>community space and enhancing the existing market to provide a unique destination and gateway to Tottenham.</i> We propose a new sentence is added to para 3.19 to confirm the Council's willingness to work with the community on the future development of the West Green Road / Seven Sisters Town Centre		
818	AAP113.	Our Tottenham	Estate regeneration	We disagree with the estate renewal approach taken. See overall response to the AAP.	AAP 3.20	Opposition noted.
818	AAP114.	Our Tottenham	Support	We support Obj. 1, Obj. 4, Obj. 5, Obj. 6	AAP Ch3	Support noted.

Ch 5 neighbourhood areas and opportunity sites

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Policy Ref	Council Response
815	AAP115.	Zena Brabazon	Infrastructure	The introduction to the individual plans, titled the <i>Character of the Neighbourhood Area</i> , states that this is an area where 'targeted investment can best accelerate the delivery of substantial volumes of new homes and jobs'. It suggests that for 5000 homes and 4000 jobs to be created, there is a need for 'early infrastructure planning' with reference to utility providers. Yet, the infrastructure is more than utilities; scant and superficial mention is made of the need for a health infrastructure for example, which even now, before 5000 people move in, is entirely inadequate for the local population. People moving into Hale Village find it difficult to register with a GP for example and things are not improving.	AAP Ch5	Infrastructure provision to support growth will be addressed by the infrastructure delivery plan.
415	AAP116.	Transport for London	AAP Infrastructure	A coordinated approach to the provision of infrastructure to support each of the opportunity sites identified in the AAP will be necessary. Whilst infrastructure requirements are listed under each specific site, reference should be made to the Upper Lee Valley Development Infrastructure Funding Study (DIFS), which is currently being undertaken jointly by the GLA, TfL and the four Upper Lee Valley boroughs. The purpose of the DIFS is to identify and cost the strategic infrastructure required to deliver anticipated levels of growth, to identify the phasing of this in line with development and highlight the timing and scale of funding gaps and possible ways of addressing these. The associated financial model will be flexible and available for use by Haringey Council in the future.	AAP Chapter 5	Noted. Action: make reference to the DFIS in the AAP
421	AAP117.	Historic England	AAP Allocations	We recognise this section largely sets out the site allocations but identifies large neighbourhoods which encompass varied local character. As such the neighbourhood analysis would benefit from greater detail informed by the Urban Character Study. It would be useful to clarify the split with the Site Allocations document.	AAP Chapter 5	Noted. Action: strengthen the character text in each of the neighbourhood areas to provide more information drawn from the urban characterisation study
421	AAP118.	Historic England	Heritage	It would be helpful to identify archaeological priority areas within site allocations as these will impact on the planning requirements for potential developers.	AAP Chapter 5	Noted. Action: Identify sites in archaeological priority areas
414	AAP119.	GLA	Site Allocations	The proposed neighbourhood area objectives and opportunity site allocations are broadly supported in strategic planning terms. Nevertheless, specific comments with respect to various allocations are provided for the Council to consider below. In addition, the Council is encouraged to provide indicative figures for residential capacity and/or employment generating potential (as relevant) as part of the various site allocation profiles. Whilst it is acknowledged that this information currently resides in Appendix A of the draft plan, the aforementioned approach is likely to assist with the practical implementation of the plan.	AAP Chapter 5	Noted. Action: Amend site allocations to show the approximate number of units each site could contain.

Chapter 6 Implementation Delivery and monitoring

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Policy Ref	Council Response
818	AAP120.	Our Tottenham	Delivery	Add community groups and trusts	AAP 6.4	Noted. Action: add community groups and trusts to the list of council partners in paragraph 6.4
818	AAP121.	Our Tottenham	Ownership	Public land belongs to everyone and we are against it being sold off. There may of course be options for leasing which might be considered	AAP 6.8	Noted.
818	AAP122.	Our Tottenham	Employment	[One major education institution] Is that enough to match the population growth target?	AAP 6.14	The infrastructure delivery plan will provide for education needs of the borough. It is considered that in order for the plan to have been successful at least one major institution should have been delivered.
818	AAP123.	Our Tottenham	Monitoring	Deficiencies of social infrastructure should be addressed and overcome.	AAP 6.14	Social infrastructure delivery will be addressed in the infrastructure delivery plan.
818	AAP124.	Our Tottenham	Housing	As expressed elsewhere Tottenham may not be able to realistically accommodate 10,000 new and well-designed homes and the social and other infrastructure needed to support them.	AAP 6.14	Noted. Council believes there is capacity within the Tottenham AAP area to deliver 10,000 new homes.
818	AAP125.	Our Tottenham	Affordable housing	'Affordable' needs to be defined so that it is genuinely affordable. This is a totally inadequate target, and should be revised upwards to nearer 100%.	AAP 6.14	The alterations to the strategic policies set a new target of 40% affordable housing in the borough. The final target in the strategic policies will be the one used in this document as well.
818	AAP126.	Our Tottenham	Affordable housing	Spell out an explicit and high target for social rented housing	AAP 6.14	This is set out in the Local Plan: Strategic Policies DPD.
818	AAP127.	Our Tottenham	Transport	[strategic transport infrastructure] Clarify the definition and threshold	AAP 6.14	Strategic infrastructure is generally, but not always, regional or sub-regional, for example projects which link, or have benefits for, multiple suburbs.
414	AAP128.	GLA	Infrastructure delivery	The Council is encouraged to include a reference to the Development Infrastructure Funding Study (DIFS) for the Upper Lee Valley - which has been jointly commissioned by the GLA, Transport for London and the London Boroughs of Enfield, Hackney, Haringey and Waltham Forest, and is currently underway. The DIFS is due to be completed in spring 2015, and will identify the strategic infrastructure required to deliver the growth outlined in the Upper Lee Valley OAPF (including transport, utilities, social/community facilities). The DIFS will set out how infrastructure delivery may be phased and prioritised in line with forecast development, identifying existing funding streams and quantifying funding gaps, as well as suggesting how such gaps may be bridged through a variety of funding mechanisms.	AAP Ch6 Page 120	Noted Action: make reference to the Development Infrastructure Funding Study.
415	AAP129.	Transport for London	Monitoring	TfL welcomes the indicator of better transport links, however the reference to Edmonton Green should be deleted.	AAP Chapter 6	Support noted.
799	AAP130.	Bob Lindsay-Smith	Affordable housing	Section 6.12 states 'Given market values there is a demonstrable prospect of raising funding through private developer contributions as indicated by the Borough's existing planning evidence base....'	AAP 6.12	Noted.

				So far we have had the developer and landowner Tottenham Hotspur Football Club reduce their promised £16m S106 contribution to £0.5m, and remove any affordable homes from their plan. The AAP plays into the hands of developers and landowners.		
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