

Appendix 2.3 – Comments on the Tottenham High Rd, including Seven Sisters, Tottenham Green, and Bruce Grove sections of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

General comments on Tottenham High Rd in the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
577	AAP228.	Jane Clossick, PhD researcher	Mixed use	In light of the above, 'mixed-use' including residential is not appropriate for any existing employment sites adjacent to the High Road, or in its wider hinterlands. Mixed use developments supposedly integrate housing with employment uses, but many business occupiers do not like mixed use (especially divided vertically) because they need access, there are often too many restrictions (eg. for 24 hr operation) and space is often badly designed and laid out. It is seen as a 'loss leader' by developers, who have long term plan to convert to residential (Roger Tym & Partners, 2011, p. 21) and often mixed use remains unlet. Planning should also restrict the conversion of upper floors to housing—otherwise there is too much incentive for small individual developers to reduce potential for a thriving High Road by conversion to flats. Employment-classed land is also cheaper for businesses because of its separation in planning from higher value uses (housing) which keeps units affordable for a wide range of local businesses. The kind of uses adjacent to Tottenham High Road include niche, bespoke, 'just-in-time' services (bakers, recording studios, taxis), artists, creative industries, businesses which need office/industrial, charities, education, community uses and faith uses (CAG Consultants, 2008). The important multiplier effects of these uses on the vitality and viability of the High Road will be lost if the depth of the blocks is filled with housing or 'mixed use' developments. Examples of this filling of depth are at site BG2 Tottenham Delivery Office or at BG4 Moorefield Road. Densifying a block adjacent to the High Road with a new flat adds a handful of new residents to the area. Densifying it with new business adds all the people who work there, plus all of their customers, who will make linked trips to other uses on the High Road. This is the vital multiplier effect.	It is noted that a variety of different spaces are required in order to support a variety of different business typologies. The plan seeks to protect employment land in suitable areas, but in highly accessible locations, such as Tottenham High Rd, the provision of a mixed use typology is necessary in order to meet objectively identified housing and employment needs. It is considered that the mixed use developments encouraged in these areas will increase the number of local jobs available.
643	AAP229.	Giota Alevizou, local resident	Affordable workspace	Bullet 4 of para 5.9 should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.	This is considered inappropriate. Affordable rents for commercial uses are appropriate to ensure occupancy. It is considered that by restricting the size of plots in a retail environment, the range of users will be limited, and hence price growth will not be an issue.
644	AAP230.	Wards Corner Coalition	Affordable workspace	Bullet 4 of para 5.9 should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.	This is considered inappropriate. Affordable rents for commercial uses are appropriate to ensure occupancy. By restricting the size of plots in a retail environment, the range of users will be limited; hence price growth will not be an issue.
577	AAP231.	Jane Clossick, PhD researcher	Block structure	I have found that businesses need a range of kinds of places with different attributes, depending on their particular needs—like proximity to custom, cheapness, civic presence, an office, yard or workshop. There are commonalities between types of businesses and their needs which mean that certain kinds of business are often located in similar spots in the depth of blocks. It is advantageous for shops to have a position where they can maximize passing trade so they are generally on the High Road, but other businesses or civic	It is noted that a variety of spaces is required in order to support a variety of business typologies. The plan seeks to protect employment land in suitable areas, but in highly accessible locations, such as Tottenham High Rd, the provision of a mixed use typology is necessary in order to meet objectively identified housing and employment needs. It is considered that the mixed use developments encouraged in these

				uses also need places proximate to the High Road. Where different activities sit in the depth of blocks adjacent to the High Road is determined by what value they place on the qualities of different locations, and how important these qualities are to their particular business activities. In order to provide the best environment for entrepreneurs in Tottenham to thrive, this structure must be understood properly and the needs of a range of wide variety of businesses provided for appropriately.	areas will lead increase the number of local jobs available.
421	AAP232.	Historic England	Bruce Grove	We would welcome inclusion of an objective to address the “at risk” status of a number of designated heritage assets within the neighbourhood, including the conservation area itself. Much has been achieved in respect of conservation-led regeneration but the area would benefit from an identification of target objectives to resolve the issues which undermine the wider positive work undertaken. We note that the site allocations do seek to address some of these issues – particularly through requirements for BG1 & BG2.	Noted. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd.
259	AAP233.	Archdeacon of Hampstead Fr Luke Miller	Church views	Protecting views of local churches is important if people are to feel proud of where they live and find their way around. It is unfortunate that other authorities have allowed the views of St Paul's Cathedral to be despoiled but we would hope that this view and that of other landmarks that signify London (e.g. Alexandra Palace) should be protected. It is welcomed that two views of Churches are included in 5.10.	Views are analysed in the urban characterisation study and where appropriate are protected in local policy.
818	AAP234.	Our Tottenham	Clarification	Bruce grove aspirations - Whose aspirations?	Noted. Action: Clarify wording in supporting text
818	AAP235.	Our Tottenham	Community partner	All developments of the kind identified in this document should have at least one community partner involved in its design, implementation and long-term management.	Planning permission exists to ensure there is a level of democratic control over development. This includes a requirement for public consultation on larger schemes to ensure local residents, businesses and stakeholders can have their say on proposed developments. It is not considered to be within the scope of the plan to create a requirement for community involvement of this type.
643	AAP236.	Giota Alevizou, local resident	Conservation	In addition, the heritage assets at the Seven Sisters / West Green Road town centre should be acknowledged as they are for Tottenham Green (e.g. the Wards building and 1A West Green Road).	Noted. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd.
644	AAP237.	Wards Corner Coalition	Conservation	In addition, the heritage assets at the Seven Sisters / West Green Road town centre should be acknowledged as they are for Tottenham Green (e.g. the Wards building and 1A West Green Road).	Noted. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd.
627	AAP238.	Alison Armour, local resident	District Centre	Re Bruce Grove (paras 3.10, 3.17) – the idea that BG should be a District Centre and so be targeted for new development because it is going to get new investment is misconceived. New housing in the BG Ward is extremely limited as the area is already almost 100% developed. The retail in the High Road at BG is restricted by small sizes of shops. E.g. ASDA is too small to offer a decent range of food and one has to shop elsewhere outside the area for many essential items. None of the many national chains which have used this shop premises over the past 30 years have made a success of it. The new Sainsbury's in Park Road has the attraction of wide choice and short queues but is so under used as to be	Bruce Grove is not being targeted for redevelopment due to its designation as a District Centre. Growth in this part of Tottenham is very modest compared to Tottenham Hale and North Tottenham. The policy aims to retain small independent traders and assist small businesses setting up in the area. Therefore small floor plate units are considered appropriate for this area.

				unsustainable. The Council's attempt to engineer retail offer is bound to fail and social engineering is not the answer.	
643	AAP239.	Giota Alevizou, local resident	Diversity of businesses	paras 5.5-5.8: the text should be re-drafted to acknowledge the importance and community value of Seven Sisters market, ethnic retailers, small independent shops and local community and business groups to the town centre, as well as the vision of the community plan for the town centre.	Noted. Action: Include reference to the market in the policy.
644	AAP240.	Wards Corner Coalition	Diversity of businesses	Paras 5.5-5.8: the text should be re-drafted to acknowledge the importance and community value of Seven Sisters market, ethnic retailers, small independent shops and local community and business groups to the town centre, as well as the vision of the community plan for the town centre.	Noted. Action: Include reference to the market in the policy.
818	AAP241.	Our Tottenham	Employment	Should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.	This is considered inappropriate. Affordable rents for commercial uses are appropriate to ensure occupancy. It is considered that by restricting the size of plots in a retail environment, the range of users will be limited, and hence price growth will not be an issue. There is a requirement included in the development guidelines for capped commercial rent in the Gourley Place site allocation. Action: Include a requirement for capped commercial rents on Lawrence Rd.
577	AAP242.	Jane Clossick, PhD researcher	Employment sites	Over the course my research I have studied the blocks adjacent to Tottenham High Road and found a complex and interconnected metabolism of business and civic uses. The generalisations made in the Tottenham Area Action Plan in particular are very concerning, as it proposes redevelopment of sites immediately adjacent to and in the hinterlands of the High Road without a clear understanding of precisely what will be lost, and what this might mean for Tottenham's liveability and competitiveness in the future	Noted.
644	AAP243.	Wards Corner Coalition	Evidence Base	We have concerns about the evidence base in relation to the West Green Road / Seven Sisters town centre, as set out in the Retail and Town Centres study and appendices. These concerns include: a. No mention is made of Seven Sisters market in the Retail and Town Centre study, despite NPPF requirements to enhance and support existing markets and the London Plan policies relating to specialist functions, clustering and diversity (see above). On this aspect, the evidence base and the AAP is therefore unsound. Seven Sisters market, as one of only two markets offering Latin American goods and services in London, should be explicitly mentioned in the summary of the High Road on page 69. b. The Town Centre Health checks were conducted in 2011, while the financial recovery was still underway. Seven Sisters market remained lively and full during the crisis, but is now reporting a further resurgence. Since then, West Green Road has begun receiving investment through the Mayor's Outer London Fund e.g. new shopfronts and pocket parks. Additionally, the listings of existing uses for the town centre do not include arrivals since 2011 e.g. Sainsburys and Costa Coffee. Being based in 2011, the retail and town centre reviews are out of date.	Noted. The existing Seven Sisters market is valued, and a requirement for retention will be included within the AAP. Action: Include reference to the market in the policy.

				c. Description of the town centre as being perceived to be in decline (para 11.2e and 11.3): long-term neglect and uncertainty are important factors here. The community plan for Wards Corner provides a basis for addressing these factors, facilitating the investments and improvements that have been stalled while large scale redevelopment has been on the horizon.	
818	AAP244.	Our Tottenham	Floorspace	We disagree with bullet 1 under para 5.9, which suggest a key objective is to increase retail floorspace at Seven Sisters town centre. The Further Alterations to the London Plan adopted in March 2015 make clear that as changes to retailing impact, it will become increasingly important for town centres to develop distinctive roles. Delivering more retail floorspace without consideration for the likely use of that floorspace goes counter to the policy direction introduced by the Further Alterations to the London Plan (in particular, Policies 2.10, 4.7 and 4.8). Instead, the aim should be to support the development of a distinctive, specialist retail offer, such as that provided by Seven Sisters market, as has been the case in Camden and Brixton, for example.	Noted, the evidence does not support increased retail offer in Seven Sisters/West Green Rd District Centre. However, the evidence does suggest that improvements from regeneration could lead to uplift in the area. Action: Remove reference to increasing retail floorspace, and instead focus on improving the quality of urban realm with the aim of enhancing the retail experience in Seven Sisters.
624	AAP245.	Tottenham & Wood Green Friends of the Earth	Green grid	The key objectives for this neighbourhood area are: We would like to see an additional objective, “to create and enhance green corridors in new developments”	Noted. This will be considered through the Green Grid policy in the DMDPD.
421	AAP246.	Historic England	Heritage	We would recommend alteration of the final sentence along the following lines “Any new development must seek opportunities and demonstrate how it enhances the historic character and setting of the area”.	Noted. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd.
421	AAP247.	Historic England	Heritage	We would recommend the final sentence states. The area is significantly enriched by a number of prominent listed buildings and includes the Tottenham Green, Seven Sisters, and Clyde Circus conservation areas.	Noted. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd.
577	AAP248.	Jane Clossick, PhD researcher	High Rd	The existing literature about high roads is full of discussions of how they are under threat (eg. From large shopping centres). There is a general agreement that careful spatial design/planning is key to strengthening the functional linkages between regenerative improvements and the existing facilities (Wrigley & Lambiri, 2014, p. 8) and recommendations that town centres should include community hub activities like health, housing, education, arts, entertainment, business space, manufacturing and leisure (see for example Grimsey, 2013; Portas, 2011). Haringey should lead the way in clever husbandry of employment land in Tottenham, particularly around its fantastic, historic High Road. Nurturing the existing adaptability of the High Road would maintain its capacity to support local businesses and be a heart of economic and civic life. The first step is to really understand what is there. This is not a naïve view which sees the High Road as some kind of relic, but one which recognises that its adaptability is its strength and social value. Rather than mixed use with housing, High Road sites should contain mixed use with community infrastructure, so sorely lacking in and around Tottenham. The resultant multiplier effect and circular trips would increase footfall on the High Road and enable more	Noted.

				businesses to set up there, either at the front of the block as a retail shop on in the vertical or lateral depth, as a business. The answer to increasing the vitality and vibrancy of Tottenham High Road lies not in blocking up the valuable, adaptable depth on the blocks on either side with housing, but to make the depth more accessible, with more delivery points and more premises and to make these financially accessible to the smallest entrepreneurs. Entrepreneurial spirit from Tottenham's huge and diverse immigrant population is an extremely valuable asset; it just needs places to flourish.	
695	AAP249.	Russell Dove, local resident	Incremental change	Bruce Grove and the High Road area do not need redevelopment or demolition (I would argue that is also true of most of Tottenham), but they do require systematic environmental improvement and enforcement, matched with initiatives to promote local retail/restaurant businesses. Guidance should also be available to local businesses to improve the appearance of shops and the quality of their offer. The buildings in the High Road at Bruce Grove make an interesting and diverse patchwork but they need support - with restoration (particularly the Art Deco Methodist church building and the east side from Chesnut Road to Stoneleigh Road), sensitive floodlighting (the same, the police station, former Tottenham Palais) and trees planted at the wider sections. This would create an attractive environment to encourage local businesses to invest.	Noted. It is considered that this is in line with the thrust of the plan in this area.
818	AAP250.	Our Tottenham	Lifetime neighbourhoods	Add additional point: Protection and enhancement of each area's character, heritage, communities, small business opportunities, open spaces, play spaces, culture and diversity, and range of necessary local accessible social infrastructure serving all ages and interests to ensure compliance with Lifetime Neighbourhoods policies. In fact such policies are increasingly embedded in the London Plan and there should be a specific section reflecting the importance of this.	Noted. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd.
818	AAP251.	Our Tottenham	Local businesses	The text should be re-drafted to acknowledge the importance and community value of Seven Sisters market, ethnic retailers, small independent shops and local community and business groups to the town centre, as well as the vision of the community plan for the town centre.	Noted. Action: Include reference to the market in the policy.
643	AAP252.	Giota Alevizou, local resident	Local distinctiveness	We disagree with bullet 1 under para 5.9, which suggests a key objective is to increase retail floorspace at Seven Sisters town centre. The Further Alterations to the London Plan adopted in March 2015 make clear that as changes to retailing impact, it will become increasingly important for town centres to develop distinctive roles. Delivering more retail floorspace without consideration for the likely use of that floorspace goes counter to the policy direction introduced by the Further Alterations to the London Plan (in particular, Policies 2.10, 4.7 and 4.8). Instead, the aim should be to support the development of a distinctive, specialist retail offer, such as that provided by Seven Sisters market, as has been the case in Camden and Brixton, for example.	Noted, the evidence does not support increased retail offer in Seven Sisters/West Green Rd District Centre. The evidence does suggest that improvements from regeneration could lead to uplift in the area however. Action: Remove reference to increasing retail floorspace, and instead focus on improving the quality of urban realm with the aim of enhancing the retail experience in Seven Sisters.
644	AAP253.	Wards Corner Coalition	Local distinctiveness	We disagree with bullet 1 under para 5.9, which suggests a key objective is to increase retail floorspace at Seven Sisters town centre. The Further Alterations to the London Plan adopted in March 2015 make clear that as changes to retailing impact, it will become increasingly important for town centres to develop distinctive roles. Delivering more retail floorspace without consideration for the likely use of that floorspace goes counter to the policy direction introduced	Noted, the evidence does not support increased retail offer in Seven Sisters/West Green Rd District Centre. The evidence does suggest that improvements from regeneration could lead to uplift in the area however. Action: Remove reference to increasing retail floorspace, and instead focus on improving the quality of urban realm with

				by the Further Alterations to the London Plan (in particular, Policies 2.10, 4.7 and 4.8). Instead, the aim should be to support the development of a distinctive, specialist retail offer, such as that provided by Seven Sisters market, as has been the case in Camden and Brixton, for example.	the aim of enhancing the retail experience in Seven Sisters.
577	AAP254.	Jane Clossick, PhD researcher	Maintaining high road adaptability	The depth of some blocks adjacent to Tottenham High Road is also very adaptable. Businesses can expand upwards or sideways, they can move about within adjacent premises as their needs change, and boundaries between neighbours can be re-negotiated. This adaptability allows people without much capital to establish a tiny business which can grow so a business owner can occupy incrementally more elaborate premises. In Seven Sisters Market it is this flexibility of small cheap units which means they easily change hands, so they can respond very quickly to economic changes and help the market sustain itself. This applies to the high street as a whole, businesses can respond very rapidly to economic, social or technological shifts. In general, high roads can undergo anticipatory and reactive reorganisation which minimises the impact of economic shock by reconfiguring internal structures—diversity is protective (Wrigley & Dolega, 2011, pp. 2345–6). High roads which were most resilient in the economic crisis of 2008 were small, with a high proportion of services relative to retail, small independent shops and are easy to reconfigure (Wrigley & Dolega, 2011, p. 2353). The source of this resilience is complex and adaptable block depth <i>behind</i> the retail facade. This is how much of Tottenham High Road is at the moment and this adaptability to the rapidly changing local and global economy should be maintained and improved through extremely careful husbandry of the existing as well as careful additions.	One of the principles of the relevant DMDPD policy is to create flexible units which allow businesses to start, and to expand.
818	AAP255.	Our Tottenham	Open space	Address all deficiencies relating to open space, play facilities and other social infrastructure in accordance with London Plan guidance. Address deficiencies of genuinely affordable and family-sized housing in the area.	Policy SP13 of the adopted strategic policies sets out that it is difficult to increase public open space in Haringey as it is an urban borough. Instead the focus is on improving the function, accessibility and quality of existing open space. New developments will be expected to accommodate a range of new affordable housing.
577	AAP256.	Jane Clossick, PhD researcher	Parking in town centre locations	In order that businesses and other civic or 'town centre' uses can be located inside blocks as well as on high street frontage, there must be accessible physical links to the High Road. Places along the High Road which have such access, such as Morrison Yard, are well developed and thriving with a mix of civic and employment uses. This should be understood and replicated, which is not the case currently in the documents. For example, "Car free development is suitable for this site." (from p.50, of Tottenham AAP)—car free is never appropriate where you want small a range of businesses to run. The physical link to the High Road via Morrison Yard enables access to road transport (eg. for Flourish Bakery, whose fleet of vans can easily drive out and access major routes) and means vehicles can be parked (for deliveries or distribution). Accessibility of site depth also means that new buildings can be incrementally built inside blocks (because there is a route for vehicles and building materials). This chimes with a major finding from UCL Adaptable Suburbs project (Vaughan & Griffiths, 2013, p. 6), that non-residential density usually corresponds with most spatially accessible	The Workspace viability assessment states: "Businesses are increasingly demanding of their surroundings, with start-ups seeking to locate in areas with strong accessibility, a good residential offer and a wider ambiance and character that matches how the business and entrepreneurs view themselves" It is considered that a town centre location with a high quality urban realm is the preferred location for new workspace. Parking will be considered through any planning application in line with the DMDPD.

				streets.	
654	AAP257.	Latin Elephant on behalf of Pueblito Paisa Ltd	Recognise diverse economies	<p>More evidence on small local businesses is needed and we feel that a detailed survey of local businesses and in particular migrant and ethnic businesses is needed in order to gain greater understanding of small local business, their contribution to the local economy and how to provide support throughout and after regeneration.</p> <p>The document seems to miss opportunities where the case for migrant and ethnic economies could have been made stronger. There are ample opportunities in the document for Seven Sisters Market and other markets in Tottenham to be acknowledged and referred to as key components to Haringey's economic strategy for the period consulted. These should be included where possible and in particular at paragraphs 2.4, 2.6, 2.7, 2. 14, 2.16, 3.7, 5.5 - 5.8</p> <p>This is consonant and in line with National Planning Policy Framework (NPPF – paragraph 23) and London Plan (FALP 2015 policy 4.8), both of which require boroughs to support markets, prevent the loss of valued community assets and take advantage of the 'potential to realise the economic benefits of London's diversity'.</p>	<p>The Council considers that the document creates significant opportunity for new employment space, but notes this can be more clearly set out in the introduction to the document, and in the introduction to the character areas.</p> <p>Action: set out in greater detail the vision for employment included in the Plan in the introduction to the document, and in each area.</p>
818	AAP258.	Our Tottenham	Refurbishment	should be amended to reflect the fact that refurbishment is also an option for Wards Corner, as well as redevelopment (as evidenced by the two planning permissions in place for the site).	<p>Noted.</p> <p>Action: Balance wording in relation to Wards Corner to reflect the two extant planning permissions.</p>
643	AAP259.	Giota Alevizou, local resident	Refurbishment of Wards Corner	Bullet 2 of para 5.9 should be amended to reflect the fact that refurbishment is also an option for Wards Corner, as well as redevelopment (as evidenced by the two planning permissions in place for the site).	Redevelopment can also be the adaptive reuse of a building which would cover refurbishment. Therefore both planning permissions would be covered by this bullet point.
644	AAP260.	Wards Corner Coalition	Refurbishment of Wards Corner	Bullet 2 of para 5.9 should be amended to reflect the fact that refurbishment is also an option for Wards Corner, as well as redevelopment (as evidenced by the two planning permissions in place for the site).	Redevelopment can also be the adaptive reuse of a building which would cover refurbishment. Therefore both planning permissions would be covered by this bullet point.
644	AAP261.	Wards Corner Coalition	Seven Sisters Market	The importance of small independent businesses to Tottenham's economy is not acknowledged in the description of 'Tottenham Today'. In relation to the Seven Sisters / West Green Road Town Centre, these small and independent businesses that sustain the vitality and vibrancy of the centre. Amendments should be made to set out the Council's vision for small and independent businesses in high streets, town centres and employment areas in Tottenham at relevant places e.g. paragraph 2.4, 2.6, 2.14-2.16. Consideration of small shops is required by London Plan Policy 4.9 and is acknowledged and addressed in other Haringey Council policies and projects.	<p>Noted, the wording will be updated to reflect the current state of the economy paying attention to small independent businesses.</p> <p>Action: Addition of text within the Tottenham description regarding small independent businesses.</p>
421	AAP262.	Historic England	Site requirements	Re. the requirement to preserve or enhance, we would suggest deleting "as per the statutory requirements". This implies a minimum standard of design in this context. It would be helpful to identify any design guidance or proposed strategy which will ensure high design quality in this location.	
818	AAP263.	Our Tottenham	Social housing	Add additional bullet pt: All residential development should address the low % of social housing in Tottenham relative to the desperate need for genuinely affordable housing and overwhelming public support identified in Council consultations. If many people can't afford to live in Tottenham this will undermine efforts to protect existing communities and ensure they remain mixed and balanced	All development will contribute to balancing the mix of housing tenures in Tottenham.

				into the future.	
624	AAP264.	Tottenham & Wood Green Friends of the Earth	Support Policy	We welcome: “5.22 This situation is worsened by the high volumes of traffic and the car dominated movement corridor of the High Road which does not promote pedestrian movement. In general there are a number of transport infrastructure issues that need to be addressed through proactive planning if the Council’s aim of facilitating a modal shift from the car in this area is to be achieved. These issues include the quality of Bruce Grove station which serves this area but is poorly located and inaccessible to people with limited mobility, parking standards, poor east west movement to the Lee Valley Park and the lack of safe routes for cycling”. So all development needs to be car-free and surrounded by CPZ streets.	Support noted. Car free developments will be considered appropriate for all proposed developments in sites close to Bruce Grove station.
635	AAP265.	Christopher Phiniefs, local resident	Urban realm	I am supportive, in principle on the proposals to improve the urban realm around Seven Sisters, but would like to raise some concerns on some aspects of the document.	Noted.
818	AAP266.	Our Tottenham	Town centre	The heritage assets at the Seven Sisters / West Green Road town centre should be acknowledged as they are for Tottenham Green (e.g. the Wards building and 1A West Green Road).	Noted. Action: Addition of heritage assets to Seven Sisters / West Green Road town centre description
644	AAP267.	Wards Corner Coalition	Vision	An additional bullet point should be added to communicate the vision for the West Green Road / Seven Sisters town centre, as is the case for Tottenham Green.	Noted. Action: Add vision for West Green Rd/ Seven Sisters District Centre in the introduction to the chapter.
415	AAP268.	Transport for London	Wayfinding	For new wayfinding and signage, TfL would support the use of Legible London signage, which is already being provided in Wood Green.	Preference for Legible London signage is noted. Urban realm improvement will be updated to clarify that way finding signage will not be part of separate Tottenham branding.

Comments on SS1 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
643	AAP269.	Giota Alevizou, local resident	Affordable workspace	Bullet 4 of para 5.9 should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.	Agreed.
644	AAP270.	Wards Corner Coalition	Affordable workspace	Bullet 4 of para 5.9 should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.	
422	AAP271.	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site	Noted. Action: Addition of a development guideline noting that a flood risk assessment is required. Council’s Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.

				<p>requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:</p> <p><i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	
818	AAP272.	Our Tottenham	Green space	Extra pt: Expand the green space to the north into a substantial public park.	<p>Noted.</p> <p>Action: Allocate as SLOL the area of green space at the northern end of Lawrence Rd.</p>
635	AAP273.	Christopher Phiniefs, local resident	Height	In relation to page 45, proposals to continue redevelopment on Lawrence Road, I have some concerns about the height and rise of proposed buildings which would back on to Bedford Road. Specifically, considerations for rights of light for Bedford Road residents, as the proposed height of the buildings is higher than the current factory units.	<p>The Council considers the proposed heights to be appropriate for the context of Lawrence Road, taking account of existing and future character of neighbourhood. Specific heights will be removed from the document. Any proposed development will be assessed against the development management policies which require buildings to respect their context. Issues of lights and impact of neighbouring amenity will be assessed as part of any future planning application for the development sites.</p> <p>Action: Delete specific height references in the policy</p>
818	AAP274.	Our Tottenham	Local businesses	No loss of existing businesses.	<p>The proposal here makes provision for a new use of the land, as and when an application for development comes forward. Replacement employment generating an increased number of jobs will be required as part of the development.</p>
422	AAP275.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	<p>Noted.</p> <p>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</p>
635	AAP276.	Christopher Phiniefs, local resident	Security	Secondly, the properties on Bedford Road have security/safety benefits arising from the secure access implemented by the existing dwellings. Replacing these factory units with open mews roads raises concerns about how security can be maintained.	<p>The Local Plan design policies will ensure all future development ensures security is maintained. Any future planning application will need to meet all the design standards of the Local Plan. Residential development by its nature is a more active use and will ensure better surveillance across the site than the current uses.</p>

Comments on SS2 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
643	AAP277.	Giota Alevizou, local resident	Affordable workspace	Bullet 4 of para 5.9 should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.	Noted. Where the council considers site specific requirements for affordable workspace these will be set out in site allocations otherwise provision will be managed through development management policies.
644	AAP278.	Wards Corner Coalition	Affordable workspace	Bullet 4 of para 5.9 should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.	Noted. Where the council considers site specific requirements for affordable workspace these will be set out in site allocations otherwise provision will be managed through development management policies.
422	AAP279.	Environment Agency	De-culverting	<p>This site has been included in your SFRA but the site outline is different to that depicted in the site allocation. Assuming that the red line boundary is correct in the AAP, the SFRA must be amended to reflect the presence of Stone Bridge Brook in culvert running across the site.</p> <p>The culvert runs beneath the site and it will affect how the site can be developed. Therefore we suggest you change the text in your development guidelines to include a bullet point stating: <i>The Stone Bridge Brook runs in a culvert under the site.</i> <i>Development proposals must explore opportunities to de-culvert the Moselle Brook, with clear and robust justification provided if considered unachievable. No new buildings will be permitted within 8m of the edge of the culvert and it's condition must be commensurate with the lifetime of the development.</i></p>	<p>The site allocation is the same as Gourley Triangle in the SFRA.</p> <p>Haringey Council does not believe that an 8 metre buffer zone on culverts is consistent with meeting the borough's housing targets. Where deculverting is considered viable as part of a development, an 8 metre buffer zone to the open watercourse could be acceptable.</p> <p>Action: Addition of a development guideline regarding deculverting of Stone Bridge Brook</p>
422	AAP280.	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	<p>The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording: <i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i> We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum: <i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	<p>Noted.</p> <p>Action: Addition of a development guideline noting that a flood risk assessment is required.</p>
612	AAP281.	Carlsons Solicitors on	Interest in obtaining	Interested in obtaining a transfer of the freehold title.	This is outside of the scope of the plan.

		behalf of Myrtezan Krasniqi, commercial leaseholder	freehold		
624	AAP282.	Tottenham & Wood Green Friends of the Earth	Open space	We were pleased to see two items in the draft version of the TAAP presented to the Cabinet on 20 January, in the Gourley Triangle section, a reference to the possibility of creating a public park on the Plevna Crescent open space. We hope this objective will be re-included in the TAAP once the public inquiry has taken place.	Noted, there is a possibility that Plevna triangle may be required as a Crossrail 2 works site. Any development that comes forward after the works will be required to preserve the ecological corridor and SINC status of the site.
422	AAP283.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone
612	AAP284.	Carlsons Solicitors on behalf of Myrtezan Krasniqi, commercial leaseholder	Security of tenure	Our client wish to investigate what the Council have in mind so far as our client's continuing occupation, use and leasing of the premises, are concerned and given the very significant investment he has already made in the premises since he took up occupation in 2011. Could the Council give an indication as to how secure the client is?	This is outside the scope of the plan.

Comments on SS3 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
579	AAP285.	Laura Harrison, resident	Affordable housing	Given its public ownership, any supplementary residential development at this site should be 100% affordable.	There are costs associated with the development that mean that a 100% public scheme will render it unviable. DM13 of the proposed development management policies and AAP3 of this document set out the affordable housing requirements for any proposed development.
622	AAP286.	Rebecca Opoku, local resident	Affordable housing	I strongly object to any developments taking place that does not include social housing	DM13 of the proposed development management policies and AAP3 of this document set out the affordable housing requirements for any proposed development.
623	AAP287.	Cllr Felicia Opoku, and separate identical response as local resident	Affordable housing	Any developments should include the same amount of social housing reprovided on site (reference to Seacole Court).	Agreed, this is in line with the aspiration included in SP2 of the amendments to the Local Plan: Strategic Policies.
803	AAP288.	Liz Young	Amenities	Concerned about proposals to shift staff from Apex House and to reduce Marcus Garvey Library space and provision. Libraries are an essential service. It is important to provide a comprehensive library service for children. able to read increase people's socio economic success (OECD). One in three children in London have no books in	Noted, library provision will be managed through the IDP.

				their home. Crucial that the library continues to have professional qualified librarians.	
567	AAP289.	Page Green Residents' Association	Capacity	Breaks Haringey Council's draft plan for only 95 units on this site, Breaks London Plan Density Matrix – too many people per room	There is no planning permission for this site therefore no laws or rules are being broken. Any future proposal will be designed according to the Mayors Housing Supplementary Planning Guidance.
818	AAP290.	Our Tottenham	Community; sustainability	We support the response by Wards Corner Coalition with respect to this site. We consider this site allocation does not provide a strong enough vision for such a key strategic site, either in terms of meeting needs of Tottenham's diverse communities; ensuring a high-quality sustainable building; or ensuring a vital and viable town centre as required by the London Plan. This is especially important in relation to the value of the site and its potential to yield benefits for Tottenham.	Noted, new commentary will set out the overall vision for each site. Action: Commentary will be added to set out the strategic role of this site.
644	AAP291.	Wards Corner Coalition	Cross referencing	Further cross referencing is needed to key council policies relating to tall buildings (DM5 but also DM1, DM2, DM3 and DM6), given this is the first time such a building has been proposed in this area and given the height Grainger are currently considering. A blanket reference to the Development Management DPD does not provide sufficient clarity to developers nor to the community as to what they can expect from any development on this site. If this development goes ahead, this will likely be the first time these new policies allowing taller buildings are tested. There is therefore a need for caution to ensure that a precedent is not set that damages Tottenham's character and strengths. See also out comments on the need for policy and supporting evidence for the Council's approach to tall buildings in Tottenham in relation to policy AAP2. The following policies should be explicitly referred to in SS3: a. High quality design (DM1, DM5) b. Privacy (DM3) c. Light (DM2, E) d. Need to relate to surrounding buildings and heritage – it should be clarified that the building must not be so tall that it cannot relate to the surrounding area (DM2, A; DM5, B)	Council does not consider it necessary to cross reference development management policies and site allocations. All proposed developments will be subject to all relevant development management policies.
818	AAP292.	Our Tottenham	Cross referencing	We propose the following aspects should be mentioned and the relevant policies cross-referred to: a. Need for the highest environmental standards to be achieved b. Need to ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable) c. Need to reflect and support the culture and diversity of the area d. Need to deliver affordable workspace, space for small shops, space for cultural and creative uses e. Need to enhance the public realm f. Need to ensure safety	Council does not consider it necessary to cross reference development management policies and site allocations. All proposed developments will be subject to all relevant development management policies.
242	AAP293.	Karin Lock	Height	Scale of homes planned is ridiculous (a 22 floor tower at seven sisters - really?)	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 to gain planning permission and any development will be assessed against the relevant development management policies.

345	AAP294.	S. Dobie, Local resident	Height	Concern about future height of development at Apex House site. Understand that Council have sold site to developers to build a 22-storey building. Object to a building of this height in Tottenham.	<p>The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required to gain planning permission and any development will be assessed against the relevant development management policies.</p>
587	AAP295.	Carol Sykes	Height	This site is NOT suitable for a tall building. That is not the sort of "gateway" that Tottenham needs.	<p>The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required to gain planning permission and any development will be assessed against the relevant development management policies.</p>
622	AAP296.	Rebecca Opoku, local resident	Height	I also object to the current proposal of the high tower which will cast a shadow over nearby residential housing and also overlook my garden. There should not be any poor doors in Haringey like other boroughs have.	Any future proposal will be assessed against development management policies which manage the effect on light and privacy of neighbouring properties.
623	AAP297.	Cllr Felicia Opoku, and separate identical response as local resident	Height	Height restrictions should be in place	<p>The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required on all sites to gain planning permission. Specific height limits will not be included in Site Allocations as all developments will be expected to respond appropriately to their context.</p>
643	AAP298.	Giota Alevizou, local resident	Height	<p>Further cross referencing is needed to key council policies relating to tall buildings, given this is the first time such a building has been proposed in this area and given the height Grainger are currently considering. If this goes ahead, this will likely be the first time these new policies allowing taller buildings are tested. There is therefore a need for caution to ensure that a precedent is not set that damages Tottenham's character and strengths. In particular the following policies should be explicitly referred to:</p> <ul style="list-style-type: none"> g. Privacy h. Light i. Need to relate to surrounding buildings and heritage – it should be clarified that the building must not be so tall that it cannot relate to the surrounding area <p>The density and height allowable on this site should be clarified with reference to an evidence base, policy and other relevant factors (e.g. flood study).</p>	Council does not consider it necessary to cross reference development management policies and site allocations. All proposed developments will be subject to all relevant development management policies.
644	AAP299.	Wards Corner Coalition	Height	<p>Further cross referencing is needed to key council policies relating to tall buildings, given this is the first time such a building has been proposed in this area and given the height Grainger are currently considering. If this goes ahead, this will likely be the first time these new policies allowing taller buildings are tested. There is therefore a need for caution to ensure that a precedent is not set that damages Tottenham's character and strengths. In particular the following policies should be explicitly referred to:</p> <ul style="list-style-type: none"> j. Privacy k. Light l. Need to relate to surrounding buildings and heritage – it should 	Council does not consider it necessary to cross reference development management policies and site allocations. All proposed developments will be subject to all relevant development management policies.

				<p>be clarified that the building must not be so tall that it cannot relate to the surrounding area</p> <p>The density and height allowable on this site should be clarified with reference to an evidence base, policy and other relevant factors (e.g. flood study).</p>	
695	AAP300.	Russell Dove, local resident	Height	<p>“Suitable location for a high quality tall building” and “high-quality public realm”</p> <p><i>I object to aspects of these plans as described.</i></p> <p><i>The high-rise building is presented as a foregone conclusion. What I would argue, however, is that any high-rise building on the prow of the Apex House site will have a major impact on the light for any businesses at the front of the Wards Corner site, which will be cast into shadow for a large part of the day. The controversy over Wards Corner is likely to continue but, in any event, the existing Grainger proposals for that site are now several years old. In that time, Tottenham and its economic prospects have moved on. I believe the existing designs are disproportionate in size and risk creating an entirely sterile location (cf. the similar development at Spouters Corner in Wood Green). Proposals for this entire area need to be revisited.</i></p>	<p>Objection noted.</p> <p>The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required to gain planning permission and any development will be assessed against the relevant development management policies which address effects on light and privacy of neighbouring properties.</p>
695	AAP301.	Russell Dove, local resident	Height	<p>“Suitable location for a high quality tall building” and “high-quality public realm”</p> <p><i>I object to aspects of these plans as described.</i></p> <p><i>The high-rise building is presented as a foregone conclusion. What I would argue, however, is that any high-rise building on the prow of the Apex House site will have a major impact on the light for any businesses at the front of the Wards Corner site, which will be cast into shadow for a large part of the day. The controversy over Wards Corner is likely to continue but, in any event, the existing Grainger proposals for that site are now several years old. In that time, Tottenham and its economic prospects have moved on. I believe the existing designs are disproportionate in size and risk creating an entirely sterile location (cf. the similar development at Spouters Corner in Wood Green). Proposals for this entire area need to be revisited.</i></p>	<p>Objection noted.</p> <p>The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required to gain planning permission and any development will be assessed against the relevant development management policies which address effects on light and privacy of neighbouring properties.</p>
695	AAP302.	Russell Dove, local resident	Height	<p>“Suitable location for a high quality tall building” and “high-quality public realm”</p> <p>I object to aspects of these plans as described.</p> <p>The high-rise building is presented as a foregone conclusion. What I would argue, however, is that any high-rise building on the prow of the Apex House site will have a major impact on the light for any businesses at the front of the Wards Corner site, which will be cast into shadow for a large part of the day. The controversy over Wards Corner is likely to continue but, in any event, the existing Grainger proposals for that site are now several years old. In that time, Tottenham and its economic prospects have moved on. I believe the existing designs are disproportionate in size and risk creating an entirely sterile location (cf. the similar development at Spouters Corner in Wood Green). Proposals for this entire area need to be</p>	<p>Objection noted.</p> <p>The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required to gain planning permission and any development will be assessed against the relevant development management policies which address effects on light and privacy of neighbouring properties.</p>

				revisited.	
810	AAP303.	Tynemouth Area Residents Association (TARA)	Height	The 22 storey tower block being proposed for this site is entirely unacceptable and an inappropriate development for this area. The link between high-rise buildings and social problems is well documented (see Appendix 3). We acknowledge that this site is suitable for more appropriate development that is in keeping with the local character and environment of the area.	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 to gain planning permission and any development will be assessed against the relevant development management policies.
818	AAP304.	Our Tottenham	Height	A tower block, let alone a 22-storey building, is inappropriate at this site. Further cross referencing is needed to key council policies relating to tall buildings, given this is the first time such a building has been proposed in this area and given the height Grainger are currently considering. If this goes ahead, this will likely be the first time these new policies allowing taller buildings are tested. There is therefore a need for caution to ensure that a precedent is not set that damages Tottenham's character and strengths. In particular the following policies should be explicitly referred to: Privacy, Light, Need to relate to surrounding buildings and heritage – it should be clarified that the building must not be so tall that it cannot relate to the surrounding area. The density and height allowable on this site should be clarified with reference to an evidence base, policy and other relevant factors (e.g. flood study).	Council does not consider it necessary to cross reference development management policies and site allocations. All proposed developments will be subject to all relevant development management policies.
808	AAP305.	Christine Lewis	Height; views;	This is partly a conservation area and the proposed building is totally in contradiction to this. The presence of a high rise block will ruin the views for miles around as well as mar the High road which residents were hopeful would be improved. People do not want to live in a high rise unless it is an iconic tasteful building in a desirable areas - none of these apply to Grainger's proposed design.	Planning permission has not yet been granted for any development on this site. Development management policies will help to ensure that any development on the site is of a high quality and design led.
798	AAP306.	Nora Kirkwood	Height	I am also concerned that the development of a multi-storey block at the current Apex House site is not suitable for the location as the area is already over populated and numerous studies have identified that people do not want to live in multi storey blocks once dismissed as 'sky-scrappers'	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.
654	AAP307.	Latin Elephant on behalf of Pueblito Paisa Ltd	Impact of new development	The proposals for development at either side of the Seven Sisters / West Green Road Town Centre and the development of a new town centre at Tottenham Hale does not acknowledge the potential impact this could have upon the existing town centre at West Green Road.	It is considered that the preferred use will be for a town centre use to complement the additional residential floorspace, but there is no requirement for it to necessarily be A1 retail. The retail evidence shows there isn't sufficient demand for additional retail in this Centre. The development of a new district centre at Tottenham Hale has had regard to the potential impacts this could have on nearby centres.
567	AAP308.	Page Green Residents' Association	Light	Breaks European Law on blocking light and impinging privacy – Grainger's solution to this is to knock down the neighbouring council building, Seacole Court! This demolition is not part of Haringey's original plan. Furthermore, the tower would block all of Stonebridge Estate's morning light up till 1pm. This is illegal according to European Law.	There is no planning permission for this site therefore no laws or rules are being broken. Any future proposal will be assessed against development management policies for light and privacy.
643	AAP309.	Giota Alevizou,	High quality design	We consider this site allocation does not provide a strong enough vision for such a key strategic site, either in terms of meeting needs	The Council does not consider it necessary to cross reference development management policies and site allocations. All

		local resident		<p>of Tottenham's diverse communities; ensuring a high-quality sustainable building; or ensuring a vital and viable town centre as required by the London Plan (see comments on previous chapters). This is especially important in relation to the value of the site and its potential to yield benefits for Tottenham. We propose the following aspects should be mentioned and the relevant policies cross-referred to:</p> <ul style="list-style-type: none"> a. Need for the highest environmental standards to be achieved b. Need to ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable) c. Need to reflect and support the culture and diversity of the area d. Need to deliver affordable workspace, space for small shops, space for cultural and creative uses e. Need to enhance the public realm f. Need to ensure safety 	proposed developments will be subject to all relevant development management policies.
644	AAP310.	Wards Corner Coalition	High quality design	<p>We consider this site allocation does not provide a strong enough vision for such a key strategic site, either in terms of meeting needs of Tottenham's diverse communities; ensuring a high-quality sustainable building; or ensuring a vital and viable town centre as required by the London Plan (see comments on previous chapters). This is especially important in relation to the value of the site and its potential to yield benefits for Tottenham. We propose the following aspects should be mentioned and the relevant policies cross-referred to:</p> <ul style="list-style-type: none"> a. Need for the highest environmental standards to be achieved b. Need to ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable) c. Need to reflect and support the culture and diversity of the area d. Need to deliver affordable workspace, space for small shops, space for cultural and creative uses e. Need to enhance the public realm f. Need to ensure safety 	Council does not consider it necessary to cross reference development management policies and site allocations. All proposed developments will be subject to all relevant development management policies.
818	AAP311.	Our Tottenham	Planning permission	<p>Any proposal should consider its relationship to the proposals (not proposal) at Wards Corner, given there are two plans with planning permission.</p> <p>The Wards Corner Community Plan should be preferred.</p>	<p>Noted</p> <p>Action: Amend site requirement in line with comment</p>
579	AAP312.	Laura Harrison, resident	Pro retail	Give its location, this site would be best used for new retail opportunities, rather than primarily residential.	The development guidelines provide for retail on the ground floor of any proposed development.
622	AAP313.	Rebecca Opoku, local resident	Residents rehousing	Any residents from Seacole Court should be rehoused on the site and not be forced to move elsewhere.	Noted, this is generally in line with the aspiration included in amended policy SP2 to reprovide affordable housing on a habitable room basis.
627	AAP314.	Alison Armour, local resident	Scale	Present plans are too tall and too bulky. Not a gateway but an eyesore in the making. A challenging site to make anything attractive but to make it profitable will entail making it ugly. Solution	The development will be guided by development management policies which seek to provide high quality design led developments.

				= lower expectations of profit.	
627	AAP315.	Alison Armour, local resident	Seacole Court	I had understood from the architects that Seacole Court was not to be affected.	It is noted that sites may come forward at different times. Any development on any part of the site should not compromise any other part of the site.
644	AAP316.	Wards Corner Coalition	Seacole Court	It is not clear why Seacole Court has been included in this site allocation. It should be clarified how any new development at Apex House should relate to Seacole Court – saying new development should ‘have regard to properties to the rear of the site’ is not clear.	Noted. There may be potential for development at Seacole Court as well as on Apex House. Action: Clarify that if the site is to come forward in phases, that each phase must not compromise the other.
415	AAP317.	Transport for London	Servicing	It should be added into the development guidelines that servicing arrangements for this site would be expected to take place away from Seven Sisters Road and Tottenham High Road which form part of the TLRN, utilising Stonebridge Road, and avoid impact on existing bus stops.	Noted. Action: Addition of a development guideline stating that the servicing of the development should be provided from Stonebridge Road.
414	AAP318.	GLA	Tall building	This site allocation is broadly supported. It is noted that the allocation identifies the opportunity for a high quality tall building marking the location of the Severn Sisters public transport interchange. GLA officers are satisfied that this is a suitable location for a tall building in principle, subject to the requirements of London Plan Policy 7.7.	Support noted.
579	AAP319.	Laura Harrison, resident	Tall building	I remain to be convinced that a tall tower in this prominent location is an acceptable design decision, and should only be considered to the extent that it can be constructed without restricting light to buildings in the surrounding area. An appropriate relationship with the existing façade at Wards corner should be established, and also with the former Barclay’s bank building, the ground floor of which should be brought back into public use as a priority for regeneration in this area.	Noted, there will be an active use at ground floor level on this site. Action: Require an active use on the ground floor of the Seven Sisters Rd and High Rd frontages.
644	AAP320.	Wards Corner Coalition	Tall building	It is not clear why this site has been identified as suitable for a tall building, given it does not appear on Map 2.2 (Locations suitable for tall buildings) in the Development Management DPD and as no policy framework or evidence base is given in the AAP to explain why a different approach is being taken in Tottenham (see our comments on AAP2). The density and height allowable on this site should be clarified with reference to an evidence base, policy and other relevant factors (e.g. flood study).	Page 124 of the Haringey Urban Character Study shows that this site is appropriate for a building of 11 or more storeys. The tall buildings map will be amended. Action: Amend development management policies map to reflect heights shown in the urban characterisation study.
567	AAP321.	Page Green Residents’ Association	Urban Design	Breaks urban design rules regarding mass & scale compared to surrounding buildings We propose that this site have a building no higher than 6 or 7 floors.	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 to gain planning permission and any development will be assessed against the relevant development management policies.
643	AAP322.	Giota Alevizou, local resident	Wards Corner	Fifth bullet point under ‘site requirements’: any proposal should consider its relationship to the proposals (not proposal) at Wards Corner, given there are two plans with planning permission.	Noted Action: Amend site requirement to reflect comment
644	AAP323.	Wards Corner Coalition	Wards Corner	Fifth bullet point under ‘site requirements’: any proposal should consider its relationship to the proposals (not proposal) at Wards Corner, given there are two plans with planning permission.	Noted Action: Amend site requirement to reflect comment

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
818	AAP324.	Our Tottenham	Consultation	This needs to be a REAL process of participation in which residents' expressed preferences during genuine consultation are respected,	Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan. Action: Remove Helston Court site allocation from the AAP
378	AAP325.	Alis Smith, Local resident – Helston Court	Design	Believe that Helston court was designed by someone who wanted to create a beautiful place for people to live in.	Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan. Action: Remove Helston Court site allocation from the AAP
818	AAP326.	Our Tottenham	Estate regeneration	??? On what basis is this judgement made? Demolition of buildings in use should be avoided.	Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan. Action: Remove Helston Court site allocation from the AAP
818	AAP327.	Our Tottenham	Estate regeneration	We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents. Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.	Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan. Action: Remove Helston Court site allocation from the AAP
818	AAP328.	Our Tottenham	Social housing	What does this mean? Clarify the principles of the renewal process. No net loss of social housing units.	Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan. Action: Remove Helston Court site allocation from the AAP
378	AAP329.	Alis Smith	Estate renewal	Suggest that a majority of estate residents surveyed agreed with a petition and wanted to sign.	Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan. Action: Remove Helston Court site allocation from the AAP
378	AAP330.	Alis Smith	Estate renewal	When I visited Braemar House, the fact it is enclosed with railings gave complete security. Much more difficult at Helston Court but not impossible to solve. I appreciate there have been efforts made but it needs more will and deserves a review. Whilst there are some problems on the block (e.g. teenagers congregating, damp, etc) the solution need not be demolition. More /better interaction between residents and the Council could address these.	Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan. Action: Remove Helston Court site allocation from the AAP
378	AAP331.	Alis Smith	Estate renewal	While most residents are sympathetic to the need for more affordable housing, it should not be solved by wasting good stock to cram many more flats into the same space.	Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.

					Action: Remove Helston Court site allocation from the AAP
422	AAP332.	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	<p>The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:</p> <p><i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
378	AAP333.	Alis Smith	Legal challenge to proposals	So much money has been spent on improvements via the Decent Homes programme. Could this support a legal challenge to demolition?	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
623	AAP334.	Cllr Felicia Opoku, and separate identical response as local resident	Mixed tenure	Any development should include mixed tenure on principle.	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
378	AAP335.	Alis Smith	Objection	We, the undersigned, being residents of the block referred to as SSA Helton Court potential estate renewal opportunity, and are opposed to any plans to demolish our housing in order to increase housing density in this area. (Petition submitted with 60 signatures).	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
422	AAP336.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
822	AAP337.	Ann Mallon,	Pro	I think it would be a good idea to get rid of big estates as they seem	Council has reviewed its estate renewal programme and as

		Helston Court resident	redevelopment	<p>to create problems with noise and gangs and rubbish.</p> <p>I would feel a lot safer if I didn't live in such a big estate and would welcome change, even if the flats had to come down as long as I would be rehomed somewhere in London.</p>	<p>Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
588	AAP338.	Edward Steer, leaseholder, Pagin House	Purchase properties	<p>We propose that the council purchase the property now. This will enable us to get on with our lives and minimise any adverse impact on the welfare of our son. The council will benefit from a valuation today which inevitably will be lower than the value of the property in 5 years' time. Furthermore, the local authority will be able to obtain rental income from the property until the Local Plan is finally determined or thereafter, thereby avoiding the costly exercise of obtaining a CPO.</p>	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
432	AAP339.	Louise Welch and Edward Steer	Selling issues	<p>Leaseholder of house in SS4. Planned to move to a bigger house and had 10 offers one of which was accepted. Heard about Local Plan information to demolish houses before 2020 and had to let prospective buyer know who withdrew offer. Are now in the unenviable position of living in a property that is no longer suitable, that no one will buy and no lender will lend on for the foreseeable future. The impact of the proposal on family life will be detrimental if have to stay in house for a further five years, awaiting the decision of whether or not will be affected by local plan. Should the local plan mean the flat will eventually be compulsorily purchased, we do not relish the thought of trying to obtain prompt and reasonable recompense for "Homes for Haringey" given or previous dealings with them.</p>	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
623	AAP340.	Cllr Felicia Opoku, and separate identical response as local resident	Social Housing	<p>The same amount of social housing or more should be reprovided on site.</p>	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
414	AAP341.	GLA	Regeneration	<p>It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this site as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.</p>	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
585	AAP342.	Ann Mallon, resident	Supports renewal	<p>I think it would be a very good idea to change a lot of the estates or even knock them down, especially Heston Court at Culvert road. It attracts a lot of gangs and noise and non- stop litter. A lot of tenants don't feel safe walking around there.</p> <p>I personally would be very happy to leave my flat and as long as the Council would move me somewhere else I would be willing to leave. Think it would be better for the area as well for the flats to come down.</p>	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been removed from the plan.</p> <p>Action: Remove Helston Court site allocation from the AAP</p>
588	AAP343.	Edward Steer, leaseholder, Pagin House	Uncertainty for leaseholders	<p>The impact of your proposal on our family life will be detrimental if we have to stay in the flat for a further 5 years, awaiting your decision as to whether or not we will be affected by the Local Plan. Should the</p>	<p>Council has reviewed its estate renewal programme and as Helston Court is not considered likely to come forward for development due to other estate investment priorities it has been</p>

				Local Plan mean that our flat will eventually be compulsorily purchased, we do not relish the thought of trying to obtain prompt and reasonable recompense from “Homes for Haringey” given our previous dealings with them.	removed from the plan. Action: Remove Helston Court site allocation from the AAP
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Comments on SS5 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
654	AAP344.	Latin Elephant on behalf of Pueblito Paisa Ltd	2 extant planning permissions	The document does not mention that there are two planning permissions for the Wards Corner site. This is the case at paragraph 3.19, and we believe that the Council should be communicating the community plan vision in parallel to that of the developers plan. In this respect bullet 2 of paragraph 5.9 should be amended to reflect refurbishment (community vision) as well as redevelopment (developer vision).	There are two planning permissions described on page 53 of this document. Redevelopment can also be the adaptive reuse of a building which would cover refurbishment. Therefore both planning permissions would be covered by this bullet point.
818	AAP345.	Our Tottenham	Affordable housing; community; amenities	It should be clarified that this re-provision will proceed with the agreement and partnership of existing traders, with particular care to ensure long-term affordability, space to grow and provide community services, units suitable for existing uses, and compensation for moving, fit-out costs and legal fees etc. Such commitments are necessary in light of the Mayor of London's commitments in relation to retaining the existing market.	Noted. There is reference to the re-provision of a market at this location if and when a redevelopment goes ahead. Action: Strengthen text regarding re-provision of the market
643	AAP346.	Giota Alevizou, local resident	Affordable workspace	Bullet 4 of para 5.9 should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.	It is considered that this is inappropriate. Affordable rents for commercial uses are appropriate to ensure occupancy. It is considered that by restricting the size of plots in a retail environment, the range of users will be limited, and hence price growth will not be an issue. There is a requirement included in the development guidelines for capped commercial rent in the Gourley Place site allocation.
644	AAP347.	Wards Corner Coalition	Affordable workspace	Bullet 4 of para 5.9 should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.	This change will be made. There is a requirement included in the development guidelines for capped commercial rent in the Gourley Place site allocation.
643	AAP348.	Giota Alevizou, local resident	Apex House	Second bullet re: Apex House is inappropriate given two plans already have permission for Wards Corner. The site allocation for Apex House requires any plans for Apex House to consider these existing plans for Wards Corner, so the issue of coordination is dealt with through SS3.	Disagree, the mutual cross-referencing approach is sound as then it does not matter in which order proposals, including multiple proposals, come forward.
644	AAP349.	Wards Corner Coalition	Apex House	Second bullet re: Apex House is inappropriate given two plans already have permission for Wards Corner. The site allocation for Apex House requires any plans for Apex House to consider these existing plans for Wards Corner, so the issue of coordination is dealt with through SS3.	Disagree, the mutual cross-referencing approach is sound as then it does not matter in which order proposals, including multiple proposals, come forward.
622	AAP350.	Rebecca Opoku, local resident	Business re-provision	Any other businesses which would suffer a loss as a result of the development should be compensated appropriately and/or offered a spot on the site	Noted. The Local Plan seeks to identify a range of sites which can enable businesses to grow in Haringey. The Local Plan cannot require a specific business to be relocated on a site, or financially recompensed however. There is an expectation that the market will be replaced on the site.

579	AAP351.	Laura Harrison, resident	Conservation	Any development here should retain and restore the historic façade, and as far as possible the remaining period features of the interior, which are a local historical asset. Attempts should also be made to de-clutter the streetscape, particularly near the tube entrances. A coherent approach should be applied to the whole block.	Noted. Improvement to the public realm around station entrances is listed as an urban realm improvement for this area. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd.
643	AAP352.	Giota Alevizou, local resident	Conservation	Fifth bullet re: conservation area should explicitly mention locally listed buildings and refer to the Council's broader policies and approach to securing the refurbishment of heritage assets along the High Road and more generally	Noted. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd. Action: identify listed buildings in the site allocations
644	AAP353.	Wards Corner Coalition	Conservation	Fifth bullet re: conservation area should explicitly mention locally listed buildings and refer to the Council's broader policies and approach to securing the refurbishment of heritage assets along the High Road and more generally	Noted. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd. Action: identify listed buildings in the site allocations
818	AAP354.	Our Tottenham	Conservation	This should explicitly mention locally listed buildings and refer to the Council's broader policies and approach to securing the refurbishment of heritage assets along the High Road and more generally	Noted. Action: Include reference to the opportunities to enhance existing heritage assets around the High Rd. Action: identify listed buildings in the site allocations
644	AAP355.	Wards Corner Coalition	Consistency with Tottenham Futures	It is suggested that the AAP reflects a shared vision and objectives for Tottenham established through the Tottenham Futures consultation and agreed with the community. This is not the case in relation to Wards Corner. WCC responded to this consultation (please cross refer to our response for details of the issues raised) and met with the Tottenham Futures community engagement officer during the consultation period, as recorded on page 32 of the Annex to the Tottenham Futures consultation1.	Noted.
818	AAP356.	Our Tottenham	Allocation wording	This section should provide details as to actual usage i.e. indoor market; retail and workspace; community uses; housing.	The text outlining ownership and use were swapped in the document. This will be amended to ensure the details of the site are correct. Action: Amend current and previous use to provide details of actual usage
643	AAP357.	Giota Alevizou, local resident	Allocation wording	'current /previous use' Should provide details as to actual usage i.e. indoor market; retail and workspace; community uses; housing.	The text outlining ownership and use were swapped in the document. This will be amended to ensure the details of the site are correct. Action: Amend current and previous use to provide details of actual usage
644	AAP358.	Wards Corner Coalition	Allocation wording	Should provide details as to actual usage i.e. indoor market; retail and workspace; community uses; housing.	The text outlining ownership and use were swapped in the document. This will be amended to ensure the details of the site are correct. Action: Amend current and previous use to provide details of actual usage
643	AAP359.	Giota Alevizou, local resident	Decentralised energy	potential for a decentralised energy hub on this site	This is provided for in the policy.
644	AAP360.	Wards Corner Coalition	Decentralised energy	potential for a decentralised energy hub on this site	This is provided for in the policy.

627	AAP361.	Alison Armour, local resident	Destination development	If the Council is serious about developing a destination development then only the WCC is going to achieve that. I that route is not taken then we will have an ugly white elephant.	Objection is noted.
818	AAP362.	Our Tottenham	Development	It should be acknowledged that incremental development would be consistent with an integrated approach to the development of this site, as long as the whole site and broader area is taken into account.	Noted.
587	AAP363.	Carol Sykes	Disabled access	Any development should secure disabled access to the stations. If development goes ahead without this, the chance to do it will be lost for all time	Noted, improvements of this type will be delivered through Transport for London's strategic plan and managed locally though the IDP.
622	AAP364.	Rebecca Opoku, local resident	Height	Height restrictions should apply here.	Specific height requirements have been removed from all site allocations. Detailed design will be required to gain planning permission and any development will be assessed against the relevant development management policies including for tall and taller buildings.
623	AAP365.	Cllr Felicia Opoku, and separate identical response as local resident	Height	Height restrictions should be in place	Specific height requirements have been removed from all site allocations. Detailed design will be required to gain planning permission and any development will be assessed against the relevant development management policies including for tall and taller buildings.
654	AAP366.	Latin Elephant on behalf of Pueblito Paisa Ltd	Impact of new development	The proposals for development at either side of the Seven Sisters / West Green Road Town Centre and the development of a new town centre at Tottenham Hale does not acknowledge the potential impact this could have upon the existing town centre at West Green Road.	The preferred use will be for a town centre use to complement the additional residential floorspace, but there is no requirement for it to necessarily be A1 retail. The retail evidence shows there isn't sufficient demand for additional retail in this Centre. The development of a new district centre at Tottenham Hale has had regard to the potential impacts this could have on nearby centres.
665	AAP367.	Friends of the Earth	Include local communities	We are concerned that the matter of 'affordability' is particularly important for existing and start up businesses that need low overheads, and which is not mentioned in the district centre for Tottenham Hale description. In our view Tottenham's existing traders should not be marginalised, but rather protected and encouraged. Local traders often serve the needs of the local community best. Site SS5 Wards Corner and Suffield Road does not mention cultural and ethnic diversity retention or affordability as part of future planning requirements. This should be a consideration.	Noted. The Local Plan seeks to identify a range of sites which can enable businesses to grow in Haringey. The Local Plan cannot require a specific business to be relocated on a site, or financially recompensed however.
643	AAP368.	Giota Alevizou, local resident	Incremental approach	First bullet re: comprehensive approach. It should be acknowledged that incremental development would be consistent with an integrated approach to the development of this site, as long as the whole site and broader area is taken into account.	Noted. Action: A master plan will be required to show how incremental development would deliver comprehensive development
644	AAP369.	Wards Corner Coalition	Incremental approach	First bullet re: comprehensive approach. It should be acknowledged that incremental development would be consistent with an integrated approach to the development of this site, as long as the whole site and broader area is taken into account.	Noted. Action: A master plan will be required to show how incremental development would deliver comprehensive development

654	AAP370.	Latin Elephant on behalf of Pueblito Paisa Ltd	Incremental development	Incremental development should be consistent with an integrated approach to the development of this site and not as an isolated development.	Noted. Action: A master plan will be required to show how incremental development would deliver comprehensive development
622	AAP371.	Rebecca Opoku, local resident	Market	I strongly object to developments taking place where Seven Sisters Market is not re-provided on site	Noted. Action: Amend policy to state market must be reprovided on site
623	AAP372.	Cllr Felicia Opoku, and separate identical response as local resident	Market	Reprovision of Seven Sisters Market should be onsite	Noted. Action: Amend policy to state market must be reprovided on site
643	AAP373.	Giota Alevizou, local resident	Ownership	'Ownership' should include Transport for London	The text outlining ownership and use were incorrectly swapped in the document. This will be amended to ensure the details of the site are correct. Action: Amend ownership to include public and private
644	AAP374.	Wards Corner Coalition	Ownership	should include Transport for London	The text outlining ownership and use were incorrectly swapped in the document. This will be amended to ensure the details of the site are correct. Action: Amend ownership to include public and private
818	AAP375.	Our Tottenham	ownership	Wrong data. Ownership should be specified and include Transport for London	The text outlining ownership and use were incorrectly swapped in the document. This will be amended to ensure the details of the site are correct. Action: Amend ownership to include public and private
818	AAP376.	Our Tottenham	Planning permission	[bullet point 2 – coordinated approach to development] This is inappropriate given two plans already have permission for Wards Corner. The site allocation for Apex House requires any plans for Apex House to consider these existing plans for Wards Corner, so the issue of coordination is dealt with through SS3.	Disagree, the mutual cross-referencing approach is sound as then it does not matter in which order proposals, including multiple proposals, come forward.
414	AAP377.	GLA	Planning permissions	This site allocation is broadly supported. It is noted that the allocation recognises existing planning permissions HGY/2008/0303 and HGY/2011/1275.	Support noted.
644	AAP378.	Wards Corner Coalition	Prefers WCC planning permission	WCC's position is that the community plan for Wards Corner is preferable to Grainger's Plan and supports the work of the West Green Road / Seven Sisters Development Trust to implement the community plan. The comments we provide below relate only to the long-term planning framework provided by SS5 for this site.	Planning preference noted.
654	AAP379.	Latin Elephant on behalf of Pueblito Paisa Ltd	Recognise diverse economies	Latin Elephant would welcome a section in Tottenham's AAP that acknowledges and expresses its support and intention to protect Tottenham existing migrant and ethnic economies. This is particularly relevant if considering that over half of the Haringey's population is of a migrant and ethnic background; and as acknowledged at the beginning of the document, 'is home to many distinct, diverse and strong communities where over 200 different languages are spoken' (p5). Latin Americans account for approximately 5.3% of Haringey's population according to the 2011	Noted.

				Census, and have also gained recognition as an ethnic group for local monitoring processes. Also, a high proportion of the shops at Seven Sisters Market and surrounding roads cater to Tottenham's migrant and ethnic population. Supporting specialist ethnic and migrant retail is relevant for regeneration schemes across London and a pertinent policy aspect which we outlined in our response to FALP2014 (see references below).	
643	AAP380.	Giota Alevizou, local resident	Refurbishment	Need to add an additional bullet point re: the potential for refurbishment, restoration and infill in and around existing housing	It is considered that wording to this effect would require certainty that only the planning permission HGY/2011/1275 goes ahead.
644	AAP381.	Wards Corner Coalition	Refurbishment	An additional bullet point should be added to the site allocation to ensure that development proposals for refurbishment, restoration, densification or infill in and around existing housing on the site are not ruled out.	It is considered that wording to this effect would require certainty that only the planning permission HGY/2011/1275 goes ahead.
818	AAP382.	Our Tottenham	Refurbishment	There is potential for refurbishment, restoration and infill in and around existing housing .	It is considered that wording to this effect would require certainty that only the planning permission HGY/2011/1275 goes ahead.
643	AAP383.	Giota Alevizou, local resident	Refurbishment of Wards Corner	Bullet 2 of para 5.9 should be amended to reflect the fact that refurbishment is also an option for Wards Corner, as well as redevelopment (as evidenced by the two planning permissions in place for the site).	Redevelopment can also be the adaptive reuse of a building which would cover refurbishment. Therefore both planning permissions would be covered by this bullet point.
644	AAP384.	Wards Corner Coalition	Refurbishment of Wards Corner	Bullet 2 of para 5.9 should be amended to reflect the fact that refurbishment is also an option for Wards Corner, as well as redevelopment (as evidenced by the two planning permissions in place for the site).	Redevelopment can also be the adaptive reuse of a building which would cover refurbishment. Therefore both planning permissions would be covered by this bullet point.
643	AAP385.	Giota Alevizou, local resident	Reprovision of market	Third bullet re: reprovision of the existing market. It should be clarified that this reprovision will proceed with the agreement and partnership of existing traders, with particular care to ensure long-term affordability, space to grow and provide community services, units suitable for existing uses, and compensation for moving, fit-out costs and legal fees etc. Such commitments are necessary in light of the Mayor of London's commitments in relation to retaining the existing market.	Noted. There is reference to the re-provision of a market at this location if and when a redevelopment goes ahead.
644	AAP386.	Wards Corner Coalition	Reprovision of market	Third bullet re: reprovision of the existing market. It should be clarified that this reprovision will proceed with the agreement and partnership of existing traders, with particular care to ensure long-term affordability, space to grow and provide community services, units suitable for existing uses, and compensation for moving, fit-out costs and legal fees etc. Such commitments are necessary in light of the Mayor of London's commitments in relation to retaining the existing market.	Noted. There is reference to the re-provision of a market at this location if and when a redevelopment goes ahead.
579	AAP387.	Laura Harrison, resident	Retail	The refurbishment of this site to rehouse the market, and provide other opportunities for small stalls and boutiques, would be a good complement to provision for larger-scale retail on the Apex house site	Noted, it is considered key to the retention of the market that small units are provided. Action: Include reference to requiring small units to enable market use in the allocation.
587	AAP388.	Carol Sykes	Retail offer	The Wards Corner shopfront should be retained. There is no need at all to demolish the human scale houses in Suffield Road and the useful shops and market on the High Road and West Green Road. There are so many newly built retail units on the High Road which	Noted. It is considered that an active frontage will be provided on this site in the future. Investment in this area will attract new retailers into the area and drive further investment in the longer term.

				are still empty. And what is coming to the only one to be occupied? Poundland! What will the gateway to Tottenham become? Empty boarded up shops and pound stores.	
421	AAP389.	Historic England	Site requirements	Re. the requirement to preserve or enhance, we would suggest deleting “as per the statutory requirements”. This implies a minimum standard of design in this context. It would be helpful to identify any design guidance or proposed strategy which will ensure high design quality in this location.	Agreed.
654	AAP390.	Latin Elephant on behalf of Pueblito Paisa Ltd	Support community planning consent	The community of traders at Wards Corner’s desire is for the community plan to be implemented. This plan has been granted planning permission and takes into account projected growth in the market. Having said this, the comments below relate only to long term planning framework provided by TAAP.	Noted.
567	AAP391.	Page Green Residents’ Association	Support extant planning permission	We support the Existing Permission 2 – HGY/2011/1275 as it keeps the façade of these valuable Edwardian Buildings, which make this site truly distinctive rather than a concrete and glass structure that you could find any where in Europe. These buildings are a valuable asset and part of Tottenham’s history. It would be a real shame to demolish them. We want Haringey to find a developer who can restore and renovate these fine buildings, whilst helping to maintain their current and lively and unique Latin American community.	Noted.
643	AAP392.	Giota Alevizou, local resident	Town Centre Vision	Earlier comments relating to the lack of vision for the town centre. This is a key site for the expression of Tottenham’s diversity, its cultural and heritage offer and its strength in small businesses and community activities. The potential arrival of Crossrail 2 to Seven Sisters and the Further Alterations to the London Plan relating to retail and town centres and diversity discussed above make this essential. An additional bullet point should be added to confirm that future development proposals will be required to contribute positively to this vision.	Noted. It is agreed that the vision for Seven Sisters/ West Green Rd can be improved upon in the introduction. Action: Improve the articulation of the opportunities to improve Seven Sisters/ West Green Rd centre in the introduction to this section.
644	AAP393.	Wards Corner Coalition	Town Centre Vision	Earlier comments relating to the lack of vision for the town centre. This is a key site for the expression of Tottenham’s diversity, its cultural and heritage offer and its strength in small businesses and community activities. The potential arrival of Crossrail 2 to Seven Sisters and the Further Alterations to the London Plan relating to retail and town centres and diversity discussed above make this essential. An additional bullet point should be added to confirm that future development proposals will be required to contribute positively to this vision.	Noted. It is agreed that the vision for Seven Sisters/ West Green Rd can be improved upon in the introduction. Action: Improve the articulation of the opportunities to improve Seven Sisters/ West Green Rd centre in the introduction to this section.
818	AAP394.	Our Tottenham	Town centre; local businesses; transport	We support the response by Wards Corner Coalition with respect to this site. Earlier comments relating to the lack of vision for the town centre. This is a key site for the expression of Tottenham’s diversity, its cultural and heritage offer and its strength in small businesses and community activities. The potential arrival of Crossrail 2 to Seven Sisters and the Further Alterations to the London Plan relating to retail and town centres and diversity discussed above make this essential. An additional bullet point should be added to confirm that future development proposals will be required to contribute positively	Noted. It is agreed that the vision for Seven Sisters/ West Green Rd can be improved upon in the introduction. Action: Improve the articulation of the opportunities to improve Seven Sisters/ West Green Rd centre in the introduction to this section.

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Comments on SS6 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
414	AAP395.	GLA	Estate renewal	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this site as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.	Support noted.
422	AAP396.	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording: <i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i> We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum: <i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i>	Noted. Action: Addition of a development guideline noting that a flood risk assessment is required.
624	AAP397.	Tottenham & Wood Green Friends of the Earth	Open Space	This area of Tottenham is deficient in open space and access to nature. Could this site include some open space and link to the open space behind the Fountain pub?	Noted. Action: Addition of site requirement to look at providing open space on site as part of a new development
422	AAP398.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.

818	AAP399.	Our Tottenham	Refurbishment; social housing	<p>We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.</p> <p>Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.</p>	<p>In the face of challenging housing (including affordable housing) and employment needs, there is a requirement to consider a number of approaches to meet these, and thus fulfil the spatial objectives for the borough through the Local Plan. This includes making the best use of land, including the Council's existing stock of land for housing.</p> <p>Some estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity, low socioeconomic indicators, and poor quality construction. It is therefore the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents.</p> <p>When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.</p>
818	AAP400.	Our Tottenham	Refurbishment; social housing	<p>??? On what basis is this judgement made? [existing buildings do not need to be retained] Demolition of buildings in use should be avoided.</p>	<p>The buildings are not of architectural merit that requires their retention. When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary.</p>
818	AAP401.	Our Tottenham	Social housing	<p>What does it [masterplan process] mean? This needs to be a REAL process of participation in which residents' expressed preferences are respected. Clarify the principles of the renewal process. No net loss of social housing units.</p>	<p>Any master planning process will be undertaken in full consultation with existing residents.</p>
423	AAP402.	National Grid	Site Requirements	<p>Brunel Walk and Turner Avenue crossed by underground cables. Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times.</p>	<p>Noted.</p> <p>Action: Addition of a site requirement outlining that cables are on site and need to be identified and built around to ensure access for contractors is maintained</p>

Comments on TG1 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
817	AAP403.	Annie Lennox	Affordable housing	<p>Tottenham has a strikingly younger than average population and increasingly unaffordable to average salaries.</p>	<p>As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit.</p>

					Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP404.	Annie Lennox	Amenities	The site's location -- adjacent to both the Sports Centre and Tottenham Green -- make it a strategic location for this. It is usual for sports centres to be located adjacent to playing fields and outdoor courts, which extend and supplement their important public health role.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
662	AAP405.	Holy Trinity C of E on behalf of the Church of England	Civic space	We agree that this is an under-used and poorly organised space, and that a suitable use could significantly benefit the centre and the green. However, we have some concerns around the assumption of a large, built development, which reduces the amount of green space and car parking spaces, and prohibits the land being used for outdoor facilities, which benefit the growing population in the area. Any development should enhance the cultural and civic designation of this area.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
810	AAP406.	Tynemouth Area Residents Association (TARA)	Conservation	This would be a totally inappropriate site for housing development given its location within the Tottenham Green Conservation Area. Development on this land which, if necessarily should be extremely limited, should provide facilities in the form of outside sports or informal exercise areas. Some protected wildlife areas should be strategically located to enhance the visual aspect of the site and to provide a green corridor between the recently upgraded Tottenham Green West, and the adjacent railway line. Some car parking provision should be retained.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP407.	Annie Lennox	Consultation	I request to be included in the circulation for future 'consultation' for this and other Tottenham sites. I endorse many of the views you will have received from local community groups on this site and on others, though I have not had time of late to review them all personally.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP408.	Annie Lennox	Design	I understand the desire to continue the line of civic buildings along the edge of the Green - but that could be counteracted by a clever and imaginative design 'suggesting' an extension of the building line to give a playful edge to play structures or whatever goes on in that space.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
652	AAP409.	Geraldine Turvey, local resident	Green space	Please be advised that I would like to object to the TG1 proposal as I feel the location needs to be enhanced as a green space. I agree whole-heartedly with the argument as set out below by my neighbour and fellow 'Friends of Tottenham Green' committee member Judith Hanna.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
810	AAP410.	Tynemouth	Green space	Concerned that in Tottenham there is still a deficit in green space.	As a result of comments to the consultation the allocation has

		Area Residents Association (TARA)		The proposed plans would exacerbate this problem, rather than resolve it. It is alarming to note proposed developments on <i>any</i> green area. The Tottenham Leisure Centre Car Park (TG1) is a prime example. Tottenham Green has undergone huge loss of green space since the 1970s. Down Lane Park is another example of 'nibbling away' at our green spaces.	been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP411.	Annie Lennox	Green space	Age-friendly urban environment – needs to consider and cater for both young and old. Evidence on the importance of green spaces within five minutes of all homes for both physical and mental health is now overwhelming. Physical activity, Mental health, Equality, Natural air conditioning. The Leisure Centre and Library both offer important services for them: an outdoor gym would add to this.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP412.	Annie Lennox	Green space	more public green and open space is needed for residents to enjoy decent quality of life	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP413.	Annie Lennox	Green space	The predominant character of the existing Green is for quiet recreation and social interaction. The main Green has a strong municipal heritage character set by the surrounding mainly Victorian public buildings, for hosting public events such as a weekly market, festivals, etc.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP414.	Annie Lennox	Green space	Tottenham Green area is identified in Haringey's Local Spatial Framework as an area of green space deficiency. The London Plan sets a 'no net loss of green space' policy.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
818	AAP415.	Our Tottenham	Green space	The case for not building on the Leisure Centre car park – but returning it to public open space, as an extension of the Green -- to make good the existing green space deficiency, even more essential as other new housing developments increase population density in what is already one of the most densely built up areas of London. The target of 10,000 new homes in the borough, most of which will be in Tottenham, means more public green and open space is needed for residents to enjoy decent quality of life – especially as most of the new homes will have little or no home garden space.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
818	AAP416.	Our Tottenham	Green space	Tottenham Green area is identified in Haringey's Local Spatial Framework as an area of green space deficiency: Bruce Grove South Residents Association area has no public green space at all; Clyde Area RA area has just the Elizabeth Place pocket park and Maysie Memorial Garden micro-patch. Tynemouth Area RA has just	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit.

				Hanover Rd community garden and a grass patch back of the old Prince of Wales hospital.	Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
818	AAP417.	Our Tottenham	Green space	The London Plan sets a 'no net loss of green space' policy. Tottenham Green area has suffered massive loss of green space over recent years. Dedicating the open space now used as for car parking as a formal part of the adjacent Tottenham Green, the old village common, last year regenerated as a major community focus, would help re-balance these and other past green space losses. For ideas about what form should such a Green extension best take see the representation made to the LDF team by email on 24th March 2015.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
801	AAP418.	Sam Davies	Green space; amenities	Developing this site for housing would be a very bad idea. Instead the existing green space should be protected and extended if possible. Given the lack of nearby amenities, and the proximity of the leisure/health centre, it would be better to add more outdoor facilities for kids & teenagers	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
127	AAP419.	Luci Davin (local resident)	Height	Object to proposals to build a 5 storey building in front of Tottenham Green sports centre and Marcus Garvey library as this would have a negative impact on users of the services in the building.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
579	AAP420.	Laura Harrison, resident	Height	Although I absolutely do not support it, if any kind of development is to be considered here, it should also be remembered that prior to becoming public open/ green space, this site was occupied partially by 2-storey terraced houses, and any further increase in scale is not appropriate	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
695	AAP421.	Russell Dove, local resident	Height	I object to any proposal to build on this site both in principle and at the height proposed. As in the other proposal above, this involves building on green land in front of the leisure centre. The recommendation is also for a 5-storey building. Both are unacceptable in this context. There is no possibility that a 5-storey development will enhance the appearance of the conservation area as claimed, but rather it will dominate and make more congested an important local open space, and tower over residential properties opposite. The impact on users of the leisure centre and library must be considered, and those accessing council services also proposed for relocation to this site. Far from “improving the sense of enclosure and improving the approach”, any building here would create a claustrophobic and enclosed environment. Although it is a key link between Tottenham Green and Turnpike Lane, Philip Lane at this end consists mainly of small-scale residential/ retail properties of no more than 2-3 storeys, including	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP

				all adjacent historic buildings (former Tottenham School, Town Hall etc.) and properties opposite. This is an attempt to squeeze in another large building where it does not belong. There is scope to improve this open space but it must be retained and this proposal must be withdrawn.	
817	AAP422.	Annie Lennox	Height	A building here would sever the library and leisure centre from their communities, with the risk that these facilities would atrophy [leaving space for much more - and higher - housing development!!] I am not convinced that the Council will be able to achieve the quality stated in its opportunity site brief, as procurement methods inevitably mean design and build by developers whose imperatives are purely financial. Even 5 storeys may be too high	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP423.	Annie Lennox	Local business	I am not against commerce per se and something like that could help subsidise the civic use which should be an absolute requirement - but it must promote local and distinctive businesses and the cultural aspirations of the Green, and not be a big chain, fried chicken or betting shop.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
199	AAP424.	Amanda Wright (local resident)	Marcus Garvey library	Should not have any reduction in facilities, particularly children's area. Uses library regularly and is one of only places that welcomes children whatever the weather.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
622	AAP425.	Rebecca Opoku, local resident	Objection	I strongly object to any developments taking place on this site. I walk by this area every day and regularly use the library and leisure centre. Developments should enhance the area and this does not. It just adds to the already dense area and blocks light from the Green (Tottenham Green) and also the library and leisure centre. Users of the leisure centre/library will have to park elsewhere but where? Will this be on existing roads (affecting local residents)? I cannot understand why you want to build on this car park!!!!	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
649	AAP426.	Judith Hanna, local resident	Objection	I am writing to object to the TG1 proposal, which identifies the Leisure Centre car park as a site for built development. This site should not be built on	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
579	AAP427.	Laura Harrison, resident	Open Space	However, although currently underutilised, this site is currently largely composed of open public green space, and should under no circumstances be built upon I am in support of Judith Hanna's proposals for a 'green gym' and other sports provision at this location. The creation of an enclosed green space could also provide a new site for a market at Tottenham Green, given the licensing difficulties of providing this as an ongoing venture on the unenclosed green itself. Good redesign of the green space here could help to reconnect the leisure centre and library to Tottenham Green and the	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP

				high street itself, increasing the visibility and connectivity of these key cultural facilities.	
649	AAP428.	Judith Hanna, local resident	Open space	Proposal enclosed for a Tottenham Green 'Active Health' extension. I.e. inclusion of an outdoor gym, basketball courts, climbing frame and skateboarding area.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
649	AAP429.	Judith Hanna, local resident	Open space	This site should not be built on, but designated to be retained as open space -- particularly to provide facilities for outdoor physical activity, which are almost completely lacking in the already densely built up central Tottenham area. There is a lack of other open space large enough to provide this.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP430.	Annie Lennox	Open space	I am writing to object to the TG1 proposal, which identifies the Leisure Centre car park as a site for built development. This site should not be built on, but designated to be retained as open space - particularly to provide facilities for outdoor physical activity, which are almost completely lacking in the already densely built up central Tottenham area. There is a lack of other open space large enough to provide this.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
818	AAP431.	Our Tottenham	Open space	We object to the TG1 proposal, which identifies the Leisure Centre car park as a site for built development. We support the objection presented by Clyde Area Residents Association and a committee member of Friends of Tottenham Green, and of the Sustainable Haringey network. This site should not be built on, but designated to be retained as open space -- particularly to provide facilities for outdoor physical activity, which are almost completely lacking in the already densely built up central Tottenham area. There is a lack of other open space large enough to provide this. The site's location -- adjacent to both the Sports Centre and Tottenham Green -- make it a strategic location for this. It is usual for sports centres to be located adjacent to playing fields and outdoor courts, which extend and supplement their important public health role.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
571	AAP432.	Matthew Bradby, Chair, Tottenham Civic Society	Opposition	We are opposed to the principle of development on the open space (parking/grass) in front of Tottenham Green Leisure Centre. We agree with the submission of Clyde Area Residents Association in this respect. The site is an important open extension of Tottenham Green, and has enormous potential as future amenity space.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
579	AAP433.	Laura Harrison, resident	Opposition	Residential development here would be completely unsuitable	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit.

					Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
418	AAP434.	Sport England	Parking	<p>Sport England is pleased to note the inclusion of the following wording under consideration of the allocation of this site for Mixed use development:</p> <p><i>Evidence will need to be provided to the Council to demonstrate the loss of the car park will not demonstrably affect the vitality and viability of the leisure centre and library and opportunities have been explored to work with the leisure centre operator to enhance the remaining car parking provision and re-provide an appropriate number of spaces on site where possible.</i></p> <p>Sport England considers it essential that proper consideration is given to the parking requirements of the leisure centre and library, not just in terms of applying local parking standards, but by undertaking a traffic survey the site to understand its current levels of usage and peak times of demand. Any decision should be based on peak time demand. This should be considered ahead of any policy allocation being made to establish if this allocation is deliverable and viable. Sport England would not support the allocation of this site for mixed use development until this was done – it should not be left to planning application stage as the allocation of the site would establish a precedent which would be difficult to defend if challenged.</p>	<p>As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit.</p> <p>Action: Withdraw Tottenham Leisure Centre Car Park from the AAP</p>
579	AAP435.	Laura Harrison, resident	Parking	<p>It should also be noted that the largely 'car free' recent development at Isobel Place has already placed significant extra stress on the available parking in the area, since the estate itself has very limited provision for residents, and no provision at all for visitors to the estate. Any further residential development without its own parking provision is completely untenable.</p>	<p>As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit.</p> <p>Action: Withdraw Tottenham Leisure Centre Car Park from the AAP</p>
587	AAP436.	Carol Sykes	Parking	<p>The loss of car parking will deny access to the Library and Leisure Centre to people with disabilities</p>	<p>As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit.</p> <p>Action: Withdraw Tottenham Leisure Centre Car Park from the AAP</p>
623	AAP437.	Cllr Felicia Opoku, and separate identical response as local resident	Parking	<p>Development on this site will not enhance the area. The current site has 50 car parking spaces which are in use throughout the day. Additionally, any development will increase the traffic issues along Philip Lane and the High Road. There is no justifiable reason to build on this site.</p>	<p>As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit.</p> <p>Action: Withdraw Tottenham Leisure Centre Car Park from the AAP</p>
627	AAP438.	Alison Armour, local resident	Parking	<p>A car park is required in this location for the centre's users. This need will vastly increase if the Library were to become an Information Hub (such as in Enfield and other boroughs where the use has expanded dramatically).</p>	<p>As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit.</p>

					Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
648	AAP439.	Jennifer Williams, local resident	Parking	Where are people going to park their cars if you build on it?	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
652	AAP440.	Geraldine Turvey, local resident	Parking	In addition I would like to specify that the car park should be hidden from view. It was bad planning in the first place, is an eyesore and is detrimental to the value of the neighbourhood on several counts. A better design would be to hide the parking from view and bring natural elements to the fore. This would benefit both the health of the residents and improve the aesthetics of the place.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
801	AAP441.	Sam Davies	Parking	I'm concerned about any loss of parking on this site. It is already difficult to park there at times. I'm glad the AAP identifies this as a sensitive site, given its proximity to the Green and nearby listed buildings; and also the need to retain the same number of parking spaces.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP442.	Annie Lennox	Parking	A leisure centre relies on parking. If parking is inadequate, neighbouring streets start to be used, to everyone's frustration. Underground car parking. At least some of the parking could be relocated to the rear of the swimming pool by removing the ridiculously wide unused pavement, and there are perhaps also opportunities to improve the situation through green travel planning. Whatever the solution, any above ground parking needs sensitive redesign so that vehicular movements do not dominate the play facility.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
579	AAP443.	Laura Harrison, resident	Phillip Lane	I also strongly support the encouragement of high-quality café and restaurant provision along the North edge of Phillip lane, where existing premises are either vacant or provide options of limited quality. The creation of a public 'plaza' at this site, as developed but not actually delivered though public consultation by the Princes Trust concerning Tottenham Green itself, could provide a key driver for private enterprises to create new restaurant provision within the existing buildings on Phillip lane.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP444.	Annie Lennox	Play space	A play facility should be aimed at slightly older children rather than toddlers who need more 'doorstep play' there should be something for the little ones too. A facility of that imagination and quality, to really bring kids and their parents to the Green. This would be an opportunity for a well-publicised design competition.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP445.	Annie Lennox	Play space	The leisure centre was built 'back to front': the car park dominates and gives a very unsatisfactory edge to the Green. However, two	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further

				wrongs don't make a right. The answer should not be to cram another building on the site, but to remove as much car parking as feasible and build an absolutely amazing play facility to help redress the recognised deficiencies in small parks and play opportunities in the area.	consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
422	AAP446.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
233	AAP447.	Rockstone Foundation	Recreation	This land should complement the leisure centre with outdoor recreational space i.e. basketball, 5 a side football, tennis or MUGA (multi games usage area) to engage local people, with floodlights. This would help preserve green space, engage young people and meet health targets of leisure centre.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
627	AAP448.	Alison Armour, local resident	Recreation	I would support the suggestion of making an outdoor gym for teenagers in this location.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
817	AAP449.	Annie Lennox	Recreation	The form of greenspace provision most needed in the area around Tottenham Green is active physical exercise provision, particularly catering for teenagers. This could include: 'Outdoor gym' , Basketball court, Climbing frame, Skateboarding area	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
579	AAP450.	Laura Harrison, resident	Redesign	Admittedly, this car-park, and the areas to the rear of the sports centre and the arts centre, are very poorly designed. It is unfortunate this was not recognized when Tottenham Green itself was recently redesigned, to afford a coherent approach to the whole area. The sports centre building itself is also not a visual asset to the area, but has been recently refurbished. Some extension to the existing building to provide further public services fitting to the site's existing designation as the 'cultural heart of Tottenham' might possibly be acceptable. Redesign, perhaps moving much of the parking towards the rear of the centre, could be beneficial- there is a significant opportunity here to create further functional public green space in an area where this is in dire need.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
627	AAP451.	Alison Armour, local resident	Scale of development	The suggested Tower (as appears in the Tottenham Model in JMP's N17 Office) is entirely inappropriate at this location. It would compete with the listed buildings to their detriment. The human scale grand buildings need space around them to set off their	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public

				monumentality. The space could be improved and should be part of the Green (the medieval village green).	benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP
562	AAP452.	Cllr John Bevan	Withdraw Site	I am requesting that this site be withdrawn as a development opportunity as this car park is essential for families with children that use the leisure facilities. Often they are bringing equipment etc to use at the leisure centre.	As a result of comments to the consultation the allocation has been withdrawn from the plan. This is to allow further consideration for the reconciliation of parking issues, along with other design matters, so the site can be optimised for public benefit. Action: Withdraw Tottenham Leisure Centre Car Park from the AAP

Comments on TG2 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
818	AAP453.	Our Tottenham	Amenity	We strongly oppose this. T-Chances, is a very important community centre providing key services and facilities for Tottenham's youth. The protection of T-Chances needs to be explicitly included in the site requirements.	Noted, the ability for the community facility to continue to function will be required in any future development.
801	AAP454.	Sam Davies	Community asset	T-Chances is an important community asset, used by many community groups. Any development on this site must protect this asset for the community.	Noted, the ability for the community facility to continue to function will be required in any future development.
587	AAP455.	Carol Sykes	Community facility	I object to the loss of a community facility	Noted, the ability for the community facility to continue to function will be required in any future development.
579	AAP456.	Laura Harrison, resident	Community Value	This community centre makes a huge contribution to cultural value in the area, and this should under no circumstances be compromised	Noted, the ability for the community facility to continue to function will be required in any future development.
587	AAP457.	Carol Sykes	Conservation	Object to demolition of a listed building and any development which affects the environs of the listed High School.	Noted, the policy supports this.
618	AAP458.	Penny Porter, chair, Tottenham Chances trustees	Conservation	Noting that the action plan provides for the preservation of the site as a listed building. It is difficult for us to envisage any "Comprehensive redevelopment justifying the loss of the listed building." mentioned as a possibility in the action plan. In these circumstances, we would expect the earliest possible indication of any demolition and/or compulsory purchase considerations by the council.	There is no intent to carry out a CPO on this site. The Trustees will be consulted regarding their aspirations for the site.
617	AAP459.	Tottenham War Services Institute	Consultation issue	It has been drawn to our attention that there is or may be some intent within Haringey Council or associated agency to commence proceedings for a compulsory purchase order to be acquired for the land and buildings at the above address to which the TWSI holds deed and title. We, the trustees, have not at time of writing, received any formal notification of this intention or 'requisition for information' from Haringey Council or other statutory body.	There is no intent to carry out a CPO on this site. The Institute will be consulted regarding their aspirations for the site.
627	AAP460.	Alison Armour,	Height	This site should not be used for a 5 storey development. Any development should be small scale and low rise. It should respect	Detailed design will be required on all sites to gain planning permission. Specific height limits will not be included in Site

		local resident		the listed and locally listed buildings and not detract from the settings of each of these.	Allocations as all developments will be expected to respond appropriately to their context. Action: Remove specific heights from the allocation
622	AAP461.	Rebecca Opoku, local resident	Landowner consent	I strongly object to any developments taking place without consent from the Trustees and users of TChances. This centre is used by many community groups and they do great work in the area and help many disadvantaged people by providing them with work.	Noted, the ability for the community facility to continue to function will be required in any future development.
618	AAP462.	Penny Porter, chair, Tottenham Chances trustees	Objection	opposition to the redevelopment of our property	Objection noted.
617	AAP463.	Tottenham War Services Institute	Objection at this time	However, having been made aware that such action may be being considered, we wish to request that you advise us immediately whether and by whom any such proposal has in fact been placed before Haringey Council for their consideration, in any form. Whether or not steps towards acquisition of our lands have as yet been proposed, we wish to make present our formal objection to any such plans at this time. We also fully recognise our responsibility to ensure best use of all TWSI assets in accordance with our charter as a charity tasked with supporting ex-service personnel and the less able residents of Tottenham.	Noted.
422	AAP464.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.
415	AAP465.	Transport for London	TG2: Development Guidance	Due to the location of this site on the TLRN and high PTAL of 6a, there are both opportunities to create a car free development and remove servicing from the High Road, these should be incorporated into the development guidelines.	Noted, the potential for a car free development will be explored on this site. Action: Add a development guideline that recommends a car-free development should be pursued.
623	AAP466.	Cllr Felicia Opoku, and separate identical response as local resident	Trustees	Any development on this site must be in agreement with the current Trustees	Noted.
579	AAP467.	Laura Harrison, resident	Views	The view to the old school building is also a significant asset to the area and should be improved by any development.	Noted, the policy supports this.
627	AAP468.	Alison Armour,	Views of High School	Views of the former High School from the High Road must be	Noted, the policy supports this.

		local resident		maintained.	
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Comments on TG3 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
415	AAP469.	Transport for London	Car free development	Due to the location of this site on the TLRN and high PTAL of 6a, there are both opportunities to create a car free development and remove servicing from the High Road; these should be incorporated into the development guidelines.	Noted. Action: Add a development guideline recommending car-free development on this site.
587	AAP470.	Carol Sykes	Police station	I can't see that the loss of a local police station in Tottenham is going to be acceptable.	Noted, reprovision will be required before any development can take place. Action: Require reprovision of police facility to be identified prior to redevelopment taking place.
622	AAP471.	Rebecca Opoku, local resident	Police station	I strongly object to moving the police station from its current site. The current location is central to Tottenham and has very good transport system. The existing police station should be redeveloped on site as a police station.	Noted, reprovision will be required before any development can take place. Action: Require reprovision of police facility to be identified prior to redevelopment taking place.
623	AAP472.	Cllr Felicia Opoku, and separate identical response as local resident	Police station	The Police Station should stay on this site as it is in a central area	Noted, reprovision will be required before any development can take place. Action: Require reprovision of police facility to be identified prior to redevelopment taking place.
648	AAP473.	Jennifer Williams, local resident	Conservation	What about lovely but derelict old toilet building by the Monument?	This building is not allocated within the plan, and therefore it will be protected as necessary using the heritage DMDPD policies.
648	AAP474.	Jennifer Williams, local resident	Open Space	The green space behind Reynardson Court requires consideration, Although currently the offices for a building site, it is a little piece of woodland, with mature trees. I have noted bluebells and a primrose growing there in the past and personally enjoy walking past it and looking at it from where I work in Holy Trinity School.	Noted. The mature trees should be retained for amenity of future residents. Action: Amend policy to state that trees must be retained.
648	AAP475.	Jennifer Williams, local resident	Parking	The car park next to it is very necessary for the residents of Chesnut Estate, and is now very heavily used because of the worsened access to the estate from Monument Way (see later).	Due to the high public transport accessibility there will be no need for a public car park in any future development.
648	AAP476.	Jennifer Williams, local resident	Police station	Where will the police go?	Noted, reprovision will be required before any development can take place. Action: Require reprovision of police facility to be identified prior to redevelopment taking place.
662	AAP477.	Holy Trinity C of E on behalf of the Church of England	Police station	We are concerned about the potential loss of a police presence on the High Road. We recognise the changing requirements of modern policing, and understand that the current building may not suit the needs of the police force. However, we would be concerned if there were no longer a permanent police presence in an area that is often one of the busiest parts of the High Road.	Noted, reprovision will be required before any development can take place. Action: Require reprovision of police facility to be identified prior to redevelopment taking place.

818	AAP478.	Our Tottenham	Estate renewal	<p>We contest the red lining of housing estates for future demolition/ redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.</p> <p>Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.</p>	<p>Some estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity, low socioeconomic indicators, and poor quality construction. It is therefore the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents.</p> <p>When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.</p>
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Comments on BG1 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
623	AAP479.	Cllr Felicia Opoku, and separate identical response as local resident	Parking	The current proposal is to build on the existing car park at the rear of the building. This car park is currently used by visitors to the Regency. Loss of the car park will affect the business and may also lead to visitors parking on nearby residential roads. Residents currently living in Woodside Gardens and other parts of the Bruce Grove area have difficulty finding parking spaces as people who do not live in the area park on their streets. This would adversely add to the current/existing problem.	Development management policy DM43 Parking will guide the parking provision required on site for any proposed development. As the site is in an area of high public transport accessibility, parking will be limited in line with borough-wide parking standards. However, as this site is located in an area highly accessible to public transport it is likely a car free development would be accepted.
587	AAP480.	Carol Sykes	Conservation	The snooker hall (formerly a cinema) is locally listed and should not be demolished, even partially. Any additional storeys added to the banqueting suite should not exceed the height of the listed buildings opposite so as not to be detrimental to the Conservation Area.	The presence of blank facades and closed shops is considered to be of detriment to the listed buildings opposite, and to the Conservation Area in general. Any redevelopment will need to be appropriate to the listed buildings opposite and show it can have a positive effect on them.
415	AAP481.	Transport for London	Refuse	A further bullet point " <i>servicing and refuse storage to be resolved</i> " should be included within the Development Guidelines. A car free development would also be expected.	<p>Access arrangements are the same for any site in the borough, and this will be managed through the DMDPD.</p> <p>Noted that a car free development could be appropriate.</p> <p>Action: Add a development guideline anticipating a car-free development.</p>
818	AAP482.	Our Tottenham	Viability	The site consists of viable buildings and usage and therefore should not be subject to a site allocation. Any future development should conform to the Guiding Principles set out in our overall response to the AAP.	The site allocation identifies sites with significant opportunities for development which can achieve wider regeneration objectives. The allocation does not seek to displace businesses rather it sets guidelines should development be appropriate in the future.
422	AAP483.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any	<p>Noted.</p> <p>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</p>

				studies undertaken	
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Comments on BG2 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
587	AAP484.	Carol Sykes	Access	The creation of a new road to the new homes built or planned to the rear of the listed buildings on Bruce Grove will clearly improve access. But the inadequacy of the access was cited in objections to planning applications to all of these developments and no notice was taken of this at the time	Noted.
587	AAP485.	Carol Sykes	Bruce Grove Wood	It is not clear whether the proposal includes removal of all or part of the wood to the rear of 6-9 Bruce Grove. This is a designated Ecologically Valuable Site of Local Importance in an area which is lacking in green space. I object very strongly if this is under threat for the sake of vehicle access to houses which should not have been permitted in the first place.	Bruce Grove Wood will be preserved as a SINC. Action: Addition of Bruce Grove Wood to the updated policies map
624	AAP486.	Tottenham & Wood Green Friends of the Earth	Bruce Grove Wood	We were pleased to see two items in the draft version of the TAAP presented to the Cabinet on 20 January, in the delivery office Moorefields Road, Bruce Grove, section, reference to the council's long term objective to create a small park at the rear of Bruce Grove. We would like to see this aim re-instated in the TAAP.	The Bruce Grove Wood will be preserved as a SINC. Action: Addition of Bruce Grove Wood to the updated policies map
627	AAP487.	Alison Armour, local resident	Bruce Grove Wood	I note that Bruce Grove Wood is not mentioned in the new edition of this Site Allocation. I hope that the aspirations expressed in the UDP of 2006 will not be abandoned. Should the site at BR2 become available in the future, the woodland character of the surrounding area should be respected for the benefit of those who live in this still tranquil area.	Noted, the Bruce Grove Wood will be preserved as a SINC. Action: Addition of Bruce Grove Wood to the updated policies map
818	AAP488.	Our Tottenham	Bruce Grove Wood	In the back of this site is the only open space in Bruce Grove. The Impact of any development on BG2 on this adjacent green space needs to be very carefully considered and in Site Requirements the council should aim to ensure the protection of the Ecological Valuable Site.	Any development on site is required to be compatible with its surroundings. There is currently a road and row of buildings between the site and Bruce Grove Wood so the impact on the wood from the development is significantly less than if it were adjacent to the site.
587	AAP489.	Carol Sykes	Business loss	I object to the loss of a local deliver office. Moving this from the centre of the area it serves will cause problems for people with disabilities and those without transport.	Royal Mail nominated this site for this document as the delivery office is potentially surplus to their requirements. Redevelopment would only occur if it were no longer required by Royal Mail or if it were re-provided elsewhere.
621	AAP490.	Andie Frost, local resident	Business loss	the Royal mail sorting office provides a very convenient place from which parcels can be collected	Royal Mail nominated this site for this document as the delivery office is potentially surplus to their requirements. Redevelopment would only occur if it were no longer required by Royal Mail or if it were re-provided elsewhere.
695	AAP491.	Russell Dove, local resident	Business loss	I object to the closure and forced relocation of viable local businesses. Whereas there is scope for environmental improvements here, my main concern is the removal of viable and well-used local businesses and replacing them with housing. This does not promote economic activity in Tottenham that is critical to its success, but removes it. What happens to the existing businesses here and how does their closure further the economic development of Tottenham?	The plan does not foreclose any businesses. The delivery office was nominated as a potential site by Royal Mail. A balance of new housing and new employment floorspace opportunities will be delivered to meet the spatial requirements of the plan.

818	AAP492.	Our Tottenham	Business loss	NO NET LOSS OF EMPLOYMENT LAND AND FACILITIES: The site is occupied by the Tottenham Delivery Office which provides a vital public service including retrieval of parcels and special delivery items and therefore should not be subject to a site allocation. Howarth, a timber and building merchant, occupies part of the proposed site allocation. It is a thriving local business which should not be displaced.	The plan does not foreclose any businesses. The delivery office was nominated as a potential site by Royal Mail. A balance of new housing and new employment floorspace opportunities will be delivered to meet the spatial requirements of the plan.
623	AAP493.	Cllr Felicia Opoku, and separate identical response as local resident	Clarification	Further clarification is needed on whether it is No 1 or No 7 Bruce Grove the plan is referring to (p. 85, Tottenham Area Action Plan, lists No 1 in address section of document however the document makes reference to No 7).	The site is 1 and the rear of 5 Bruce Grove. A reference to 7 has been included to highlight recent planning permissions nearby. The allocation has been amended to make this clear. Action: Amend address to only be Bruce Grove and Delivery Office and builder's yard on Moorefield Rd.
421	AAP494.	Historic England	Conservation	No 5 Bruce Grove is also a Grade II building (as one of a pair of early C19th semi-detached properties with No.6) and as such this should be identified in the description. We would recommend that the Council should expect new development to respond positively to its historic character and preserve <i>and</i> enhance (rather than "or") the significance of heritage assets in this location. The general condition of the built environment and opportunities to address poor condition, setting, and secure viable future uses are widespread.	Noted.
648	AAP495.	Jennifer Williams, local resident	Conservation	I welcome any plans to improve the state of the old houses on the south west side of the street, but hope we can keep the Italian Restaurant and the unique baby / toy shop, if they want to stay!	Neither the toy shop nor the Italian restaurant is within the boundary of the site allocation.
695	AAP496.	Russell Dove, local resident	Conservation	I object to the demolition of parts of 5 Bruce Grove. It is stated that developments "should seek to enhance the setting of all heritage assets along Bruce Grove" but the same proposals envisage demolition rather than restoration of the side and rear of 5 Bruce Grove. This is a further destruction of Tottenham's heritage and the proposal for demolition must be withdrawn.	This was not proposed in the document.
627	AAP497.	Alison Armour, local resident	Height	I repeat that the development should be low rise and not more than 2 storey – as are the terraces in Sperling Road and Moorefields Road – or there would be issues of overlooking. The development should also be low density.	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. Action: Remove specific heights from the allocation
799	AAP498.	Bob Lindsay-Smith	Local employment	The AAP does retain some local employment sites, but loses employment in others: NT2 (- but existing businesses in Park Lane are not mentioned), NT3 (- how can 'modern, flexible workspaces' get your car fixed?), BG2, BG4, TH10. Also in TH3 the 'intensification of current employment uses' (with the implication of higher rents) would appear to put the excellent social enterprise Restore at risk.	The Council is putting forward a Local Plan that seeks to locate higher density mixed use development in the most accessible locations in the borough. This is required in order to meet the spatial objectives of the Plan in terms of job creation, and to be in conformity with the London Plan. Higher density uses such as managed workspace, offices, and potentially some light industry will be sought in these areas. While it is noted that lower density employment (ie industrial) uses are important to economic growth, it is no longer suitable that they are located in highly accessible regeneration areas. The Council is hopeful that affected industrial enterprises will remain in the borough, and is willing to work with businesses to achieve this.

623	AAP499.	Cllr Felicia Opoku, and separate identical response as local resident	Mixed tenure	Any development should have mixed tenure and include social housing to address housing waiting list in the borough esp. as the Planning Committee granted planning permission for No 5 and this did not include any affordable or social housing	Development management policies will determine the provision of affordable housing for any proposed development.
627	AAP500.	Alison Armour, local resident	Parking	Although carless developments are favoured it should be remembered that Sperling Road already has a severe problem of lack of parking caused by drivers who do not live in the street.	Noted. Car parking requirements are assessed under the development management policies.
422	AAP501.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.
627	AAP502.	Alison Armour, local resident	Security	I am glad to see that it is no longer thought necessary to combine workshops with housing at this location, or to connect with Sperling Road. However I am still concerned with the matters of security I raised previously, both in respect of residents in the development and re the occupiers of Sperling Road houses whose gardens back onto the site.	Noted. Action: add a development guideline regarding new developments and their relationship with existing residential properties
818	AAP503.	Our Tottenham	Security	Need to address security concerns of residents affected by the route	Noted, a development guideline ensuring passive surveillance from new residences of the route will be added to the development guidelines. Action: add that the new route should have properties facing it to ensure passive surveillance.
675	AAP504.	The Howarth Timber Group, leaseholder	Support	Supports this piece of land being included within the policy	Support noted.

Comments on BG3 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
587	AAP505.	Carol Sykes	Access	This is rail land and its primary purpose should be for the benefit of public transport. There is no disabled access at this station. In fact it is one of the worst in the area, with very steep stairs to both platforms. The High Road and Bruce Grove in the area of the station is also a major bus exchange. The bus stops are far apart because of problems of blocking the traffic. The pavements are also too narrow for the numbers of people waiting even outside peak times. All this means access for people with disabilities or buggies is very poor. The retention of an outdoor area would perpetuate the problem of build-up of debris and litter.	Noted. The Council supports improved access to the station. At present there are only proposals for the redevelopment of the forecourt area, but long term objectives to optimize access will be included. Action: Include reference to seeking improved access to Bruce Grove Station.
648	AAP506.	Jennifer Williams, local	Access	I welcome plans to improve the dismal corner under the bridge. I suppose this next query is really for TfL but.....any plans to make the	Noted. The Council supports improved access to the station. This is outside the scope of the Tottenham Action Plan. Any

		resident		actual access to the trains better? Lifts to platform, doing something about the lethal gap between the carriage and the platform especially on the London bound side?	improvements will be included in the IDP.
421	AAP507.	Historic England	Conservation	We would recommend inclusion of a requirement to preserve and to seek opportunities to enhance the setting and character of heritage assets. We would suggest a commitment to high quality natural materials for public realm works and reviewing positive examples of schemes such as the new Overground Stations at Haggerston and Hoxton.	Noted. It is considered that the existing “dead” space can be improved. Action: Include a requirement to preserve and to seek opportunities to enhance the setting and character of heritage assets, including a commitment to high quality natural materials for public realm works.
627	AAP508.	Alison Armour, local resident	Conservation	This attractive locally listed building which enhances the Conservation Area should not be spoilt by any development.	Noted. It is considered that the existing “dead” space can be improved.
422	AAP509.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.
579	AAP510.	Laura Harrison, resident	Urban realm	It is imperative that a much-needed redesign in this area provides a much wider pavement and improved public streetscape.	Noted. Action: Include reference to requiring a high quality urban realm at this location.
623	AAP511.	Cllr Felicia Opoku, and separate identical response as local resident	Urban realm	I have been informed that this area was improved some time ago following a long campaign by local residents. The council and Network Rail should work with residents to keep this area set back (not to build out) as it is a natural resting spot along the High Road and maybe include a cafe in this spot which will service both commuters and Tottenham residents shopping along the High Road	Noted. The aim to widen the pavement for pedestrians is included in this policy. Action: Include reference to requiring a high quality urban realm at this location.
695	AAP512.	Russell Dove, local resident	Urban realm	The High Road side of the site was improved some time ago following a long campaign by local residents, with seats, trees and floodlighting. The fact that the floodlights were never used and the site was allowed to develop into a shanty town of unregulated stalls is indicative of the neglect of Tottenham by the council over many years. This has the potential to be a pleasant area set back from the High Road for leisure/ café use. Building here will add to the tunnel effect of the High Road at this point and remove a valuable breathing space.	Noted.

Comments on BG4 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
587	AAP513.	Carol Sykes	Builders merchants	This builders' supplies/DIY/hardware store is well located in the centre of Tottenham as opposed to all the huge chain stores that you need a car to get to. They have an extraordinary variety of stock, are knowledgeable and helpful and they deliver big stuff. This would be a totally unsuitable site for residential as it is directly next to the railway	Noted, while it is noted that the existing use is valued, it is noted that a new development could make a better contribution to the character of the Conservation Area. There are no plans to displace Mems from the site, but if the site becomes available, it is considered appropriate that design guidelines are in place to manage this development.

				and below the station platform.	
621	AAP514.	Andie Frost, local resident	Builders merchants	Builders merchants adjacent to the station is used regularly by local DIYers and like many small businesses is prized by residents and adds to the attraction of the area.	Noted.
627	AAP515.	Alison Armour, local resident	Builders merchants	I hope the useful Mems remains in occupation of this site.	Noted, while it is noted that the existing use is valued, it is noted that a new development could make a better contribution to the character of the Conservation Area. There are no plans to displace Mems from the site, but if the site becomes available, it is considered appropriate that design guidelines are in place to manage this development.
728	AAP516.	Ali Mentesh	Correction	I am the owner of the business that occupies the site below. I would like to point out that your listing is incorrect and inaccurate. The site is occupied by a builders merchant and has done for over 30 years. The current business is thriving and employs over 10 people from the local community.	Noted, while it is noted that the existing use is valued, it is noted that a new development could make a better contribution to the character of the Conservation Area. There are no plans to displace Mems from the site, but if the site becomes available, it is considered appropriate that design guidelines are in place to manage this development. Amend: Current/Previous use to Builders merchant and Ownership to private.
818	AAP517.	Our Tottenham	Correction	Wrongly identified. The site is occupied by Mems, building merchants.	Noted. Amend: Current/Previous use to Builders merchant and Ownership to private.
818	AAP518.	Our Tottenham	Employment	NO NET LOSS OF EMPLOYMENT LAND AND FACILITIES. This site is occupied by MEMS, building merchants, a successful local business and therefore should not be subject to site allocation.	Noted, while it is noted that the existing use is valued, it is noted that a new development could make a better contribution to the character of the Conservation Area. There are no plans to displace Mems from the site, but if the site becomes available, it is considered appropriate that design guidelines are in place to manage this development.
623	AAP519.	Cllr Felicia Opoku, and separate identical response as local resident	Existing business	Cafe Life/Community Centre is at No 22 Moorefield Road. This centre is regularly used by various community groups. Any development should bear in mind the Centre and not cause a decline to the existing business and its usage.	Any proposed development on the site will be required, by development management policy DM1, to be of a high standard of design and compatible with the surrounding area.
627	AAP520.	Alison Armour, local resident	Height	4 storeys is far too high for this location and would alter the character of the street to its detriment. The space is really too small for residential use. The adjoining buildings are only 2 storeys.	The height requirements set out in the policy are drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area. Detailed design will be required on all sites to gain planning permission, but the heights set out in the document are considered appropriate to enable development that brings change while having an acceptable impact on the rest of the borough.
421	AAP521.	Historic England	Heritage	Having reviewed our records it is unclear which designated heritage assets/listed structures are directly adjacent to this site allocation. It would therefore be helpful to clarify this.	This site is in the vicinity of a number of listed buildings. The site requirement has been updated to reflect this. Action: Amend site requirements to reflect comments

799	AAP522.	Bob Lindsay-Smith	Local employment	The AAP does retain some local employment sites, but loses employment in others: NT2 - but existing businesses in Park Lane are not mentioned, NT3 - how can 'modern, flexible workspaces' get your car fixed? BG2, BG4, TH10. Also in TH3 the 'intensification of current employment uses' (with the implication of higher rents) would appear to put the excellent social enterprise Restore at risk.	<p>The Council is putting forward a Local Plan that seeks to locate higher density mixed use development in the most accessible locations in the borough. This is required in order to meet the spatial objectives of the Plan in terms of job creation, and to be in conformity with the London Plan. Higher density uses such as managed workspace, offices, and potentially some light industry will be sought in these areas.</p> <p>While it is noted that lower density employment (i.e. industrial) uses are important to economic growth, it is no longer suitable that they are located in highly accessible regeneration areas. The Council is hopeful that affected industrial enterprises will remain in the borough, and is willing to work with businesses to achieve this.</p>
623	AAP523.	Cllr Felicia Opoku, and separate identical response as local resident	Mixed tenure	Any developments should include mixed tenure and social housing to address Haringey's housing list.	Any proposed development will be subject to policy DM19 which sets requirements for affordable housing.
422	AAP524.	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	<p>Noted.</p> <p>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</p>