Appendix 2.5 - Comments on the Tottenham Hale section of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

General comments on the Tottenham Hale section of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent ID | Comment ID | Respondent                           | Topic                | Summary of Response   | Council Response  |
|---------------|------------|--------------------------------------|----------------------|---|---|
| 579           | AAP610.    | Laura<br>Harrison,<br>resident       | Access to light      | There already exist a large number of new tall buildings at the Tottenham Hale site. I am concerned that master-planning here to date has been poorly considered, with many properties receiving only limited daylight. A further tall building is planned for the south end of the site, which will only increase this problem. Post-occupancy studies should be undertaken before further development progresses here, and consideration of access to natural light should be a primary concern in any further developments of a similar height are permitted, and especially to the north of this site.  | 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 allocations |
| 815           | AAP611.    | Zena<br>Brabazon                     | Affordable housing   | The housing proposed in the plans is largely high rise tower blocks 'with the emphasis being on the more affordable end of the spectrum'. Yet the great need here in Tottenham Hale, as in the rest of Tottenham is for genuinely affordable public housing for families. Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise.   | Noted. All new developments will be required to provide affordable housing in line with development management policies.  |
| 636           | AAP612.    | David<br>Nutsford, local<br>resident | Cycling              | I have lived in the Ferry Lane Estate, near the Tottenham Hale station for one year. I don't own a car so use the trains or cycle most days. Harringey is ideally placed for a cycling commute into central London and I don't seen enough being made of this opportunity. I would like to see more facilities for cyclist around Haringey such as:  More secure cycle parking (in retail areas, at train stations and in new residential developments)  Improving the Lea Navigation tow path between Tottenham Hale and The Olympic Park.  An improved cycle lane network connecting Tottenham Hale to the Lea River, to Finsbury Park and ideally to Shoreditch. | Noted. The Council is seeking to improve cycling routes in the borough through its Quietways network of cycle routes. Many of the development sites in this area contribute to this aim.  Cycle parking requirements will be addressed through the DMDPD.   |
| 421           | AAP613.    | Historic<br>England                  | Design Quality       | The area is likely to experience the greatest transformation in respect of new development as set out in the objectives. If Masterplans are to deliver the quality of development sought the council needs to develop mechanisms for securing a high quality of design within a challenging fragmented area. As such we would welcome the inclusion of requirements which help drive a higher quality of development than previously experienced, avoiding blocking views and access to the Lee Valley and improves pedestrian and cycle access, whilst mitigating the impact of the gyratory system.   | Noted, these issues will be picked up in the DMDPD.   |
| 695           | AAP614.    | Russell Dove,<br>local resident      | Economic development | The documents envisage large-scale development in North Tottenham and Tottenham Hale. While I will not comment on those proposals here, I am concerned about the impact that focusing on these sites may have on the key town centre in Bruce Grove. The development of Wood Green and the shopping city had a very negative effect on the economic viability of the centre of Tottenham from the 1970s onwards. The same may happen again if all the   | It is noted that the developments must be organised in such a way as to maximise investment in the area, and it is considered that a plan is essential to being able to deliver this outcome.   |

|     |         |               |            | economic development and council investment is directed away from the existing town centre.  I am also concerned that in the medium to longer term the proposals at Tottenham Hale in particular will dislodge existing businesses there. The Retail Park is a busy place at present but it is proposed for demolition. All the proposals together, especially the existing situation at Wards Corner and High Road West (and the East side at the Spurs stadium site), are in fact creating a situation of massive planning blight all at the same time right across Tottenham where no one can invest. Far from helping Tottenham, this is holding Tottenham back from normal incremental and organic growth at a critical time. If any of these initiatives go ahead they must be timed in such a way as not effectively to close Tottenham down. |   |
|-----|---------|---------------|------------|--|---|
| 818 | AAP615. | Our Tottenham | Employment | What criteria will be used to define what is 'successful employment'? This needs to be made very clear.  | What is a successful employment outcome for an area will vary based on its spatial characteristics. In terms of Tottenham Hale, due to its excellent public transport legibility, and improving amenity, successful employment will be knowledge-driven and generally high density. |
| 818 | AAP616. | Our Tottenham | Green link | The Green Link construction referred to here does not mention its proposed route through Down Lane Park. The green link will have a detrimental impact on Down Lane Park, and this poses a threat to peaceful safe use of the park as well as loss of park amenities.  | The aim will be to link Down Lane Park to other open spaces in the borough.   |
| 818 | AAP617. | Our Tottenham | Green link | The proposal has been strongly objected by the Friends of Down Lane Park and their response provided as an appendix A3 provides further detail of their position. There is no evidence that it is what local people want or any indication that people will use. For much of the route there are existing well-used roads and pavements, and for other parts of the proposed link there is no demand for extra routes. The proposed route also depends on the removal of significant barriers, such as Murphy Ltd builders yard on Ashley Road.  | The aim will be to link Down Lane Park to other open spaces in the borough, not to build over it.   |
| 818 | AAP618. | Our Tottenham | Green link | The Green Link construction referred to here does not mention its proposed route through Down Lane Park. The Park is a vital local amenity fought for by local people when there were previous proposals to build houses on it. This was opposed by the community, who then worked to secure funding for the new children's playground. This is a lifeline for families living locally, especially those in temporary housing or in flats. The green link will cut through this and it is entirely unacceptable that this should go ahead at vast public cost, and at great social cost to the community living in the areas to the north west of Tottenham Hale Station.  | The aim will be to link Down Lane Park to other open spaces in the borough, not to build over it.   |
| 818 | AAP619. | Our Tottenham | Green link | The Green Link construction referred to here does not mention its proposed route through Down Lane Park. The Park is a vital local amenity fought for by local people when there were previous proposals to build houses on it. This was opposed by the community, who then worked to secure funding for the new children's playground. This is a lifeline for families living locally, especially those in temporary housing or in flats. The green link will cut through this and it is entirely unacceptable that this should go ahead at vast public cost, and at great social cost to the community living in the areas to the north west of Tottenham Hale Station.  | The aim will be to link Down Lane Park to other open spaces in the borough, not to build over it.   |

| 818 | AAP620. | Our Tottenham   | Green link;<br>amenities | The Park is a vital local amenity fought for by local people when there were previous proposals to build houses on it. This was opposed by the community, who then worked to secure funding for the new children's playground. This is a lifeline for families living locally, especially those in temporary housing or in flats. The green link will cut through this and it is entirely unacceptable that this should go ahead at vast public cost, and at great social cost to the community living in the areas to the north west of Tottenham Hale Station.       | The aim will be to link Down Lane Park to other open spaces in the borough, not to build over it.   |
|-----|---------|---|--------------------------|--|---|
| 415 | AAP621. | Transport for London  | Gyratory                 | The traffic gyratory has now been removed.   | Noted.  Action: remove reference to the gyratory  |
| 818 | AAP622. | Our Tottenham   | Health                   | Demonstrate this is enough for the existing backlog/shortage AND planned population growth   | Health provision will be addressed in the infrastructure delivery plan.   |
| 623 | AAP623. | Cllr Felicia Opoku, and separate identical response as local resident | Height                   | Height restrictions should apply to developments in this area as it may have a detrimental impact to the wildlife on the Marshes as well as block natural light to existing residents  | The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission. Specific height limits will not be included in Site Allocations as all developments will be expected to respond appropriately to their context. |
| 818 | AAP624. | Our Tottenham   | Height                   | The housing proposed is largely high rise tower blocks 'with the emphasis being on the more affordable end of the spectrum'. It goes on to say 'the delivery of 1 and 2 bed units will be prioritised in keeping with Tottenham Hale's urban character'. Yet the great need here in Tottenham Hale, as in the rest of Tottenham is for genuinely affordable public housing for families. Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise.                 | The Plan recognises the need to produce a number of houses, across a number of tenures and house sizes, to meet identified housing need in the borough.   |
| 421 | AAP625. | Historic<br>England   | Heritage                 | Whilst comparatively low in designated heritage assets (with the exception of 62 Monument Way, a grade II building at risk) the Urban Characterization Study has identified significant local heritage assets which should be integrated into aspirations for the area. Heritage assets can be preserved and enhanced to provide a much needed sense of place within what was once an important historic neighbourhood. Identified heritage assets include high quality industrial buildings (particularly within TH3) and surviving pre-post war residential streets. | Noted.  |
| 653 | AAP626. | CBRE on<br>behalf of<br>Hermes and<br>Argent                          | Housing zone             | In addition, the DPD should recognise the funds available for infrastructure as part of the now confirmed Housing Zone, reducing the likely requirement for developers' contributions.   | Noted.  Action: Increase information around the Housing Zone Bid/Implementation.  |
| 634 | AAP627. | Alan Stanton,<br>local resident                                       | Infrastructure           | The introduction to the individual plans, titled the Character of the Neighbourhood Area, states that this is an area where 'targeted investment can best accelerate the delivery of substantial volumes of new homes and jobs'. It suggests that for 5000 homes and 4000 jobs to be created, there is a need for 'early infrastructure planning' with reference to utility providers. Yet, the infrastructure is more than utilities; scant and superficial mention is made of the need for a   | Enhancements to the levels of infrastructure will be managed through the IDP, and included in this document prior to submission.  |

|     |         |   |                           | health infrastructure for example, which even now, before 5000 people move in, is entirely inadequate for the local population. People moving into Hale Village find it difficult to register with a GP for example and things are not improving.  |  |
|-----|---------|---|---------------------------|--|--|
| 818 | AAP628. | Our Tottenham   | Infrastructure            | The infrastructure needed to cater for such a growth is more than utilities. Scant and superficial mention is made of the need for health infrastructure for example, which even now, before 5,000 people move in, is entirely inadequate for the local population. People moving into Hale Village find it difficult to register with a GP for example.                             | Health infrastructure provision will be addressed in the infrastructure delivery plan  |
| 818 | AAP629. | Our Tottenham   | Infrastructure            | More social infrastructure is needed to cater for the planned growth, and more evidence is needed of where this would go.  | Infrastructure provision will be addressed in the infrastructure delivery plan.  |
| 818 | AAP630. | Our Tottenham   | Wording                   | Very unclear sentence [portfolio approach to housing] which needs unpicking. What does this really mean, what are the implications for local residents, and what are the Council's intentions?   | The portfolio approach aims to create flexibility through allowing a range of sizes and tenures of housing to be provided across a range of sites within an area.  |
| 810 | AAP631. | Tynemouth<br>Area<br>Residents<br>Association<br>(TARA) | Local services            | Such a provision is likely to meet only the massive existing shortfall – not the new developments. Further, our local General Practitioners at Tynemouth Area Medical Practice advise us that there is great difficulty in this area with recruiting doctors.  | Health provision will be addressed in the infrastructure delivery plan.  |
| 653 | AAP632. | CBRE on<br>behalf of<br>Hermes and<br>Argent            | Mix of uses               | We suggest: Employment land in [the Tottenham Hale] area will be retained and intensified in order to create a greater job density, whilst recognising that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives and meeting housing as well as employment targets.                              | Noted.  Action: Add clarification that both employment and residential outcomes are required in the introduction.  |
| 634 | AAP633. | Alan Stanton,<br>local resident                         | PWording                  | Phrases such as 'the Council will take a portfolio approach to housing, using the delivery tools at its disposal to make flexible arrangements for certain uses in key areas of Tottenham Hale' need unpicking. What does this really mean, what are the implications for local residents, and what are the Council's intentions?  | The portfolio approach aims to create flexibility through allowing a range of sizes and tenures of housing to be provided across a range of sites within an area.  |
| 653 | AAP634. | CBRE on<br>behalf of<br>Hermes and<br>Argent            | PRS in<br>Tottenham Hale  | We welcome this text and recommend that bullets one and two above are upgraded to policy status rather than supporting text.   | Support is noted.  |
| 636 | AAP635. | David<br>Nutsford, local<br>resident                    | Smaller scale development | When it comes to Tottenham Hale more generally I think there is a need to encourage smaller scale developments as it is currently very soulless.   | Tottenham Hale has been identified as a Growth Area in the Local Plan, and as such will be the focus of higher density development. This was established in the London Plan, and in the adopted Local Plan: Strategic Policies document, which the AAP must be in accordance with. |
| 818 | AAP636. | Our Tottenham   | Tenure                    | Tottenham Hale has a high proportion of families living in private rented and temporary accommodation. There is no mention of tenants and their needs in Haringey's "Local Plan Preferred Option Development Management Policies Consultation Document February 2015. The AAP for Tottenham Hale similarly does not mention tenants once, whilst making 46 references to owners. Yet | Noted. Reference has been made to the housing tenure patterns in Tottenham.  Action: Addition of information on housing tenure   |

|     |         |                      |           | the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments. |  |
|-----|---------|----------------------|-----------|---|--|
| 415 | AAP637. | Transport for London | Transport | The document should refer to the Tottenham Hale station upgrade and West Anglia Main Line improvements.   | Noted, this will be included in the IDP. |

# Comments on TH1 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent ID | Comment ID | Respondent                                   | Topic          | Summary of Response   | Council Response  |
|---------------|------------|--|----------------|---|---|
| 632           | AAP638.    | The Friends of<br>Down Lane<br>Park          | Tall buildings | The proposed tower blocks on the Ashley Road sites (TH2 and TH3) would similarly have a detrimental impact on the park and its positioning in the park. The same is true of the site along Hale Road the current petrol station (TH1), while a ten storey tower block on the Welbourne site next to a park is a mistaken judgement that stands out as starkly as such a building would. The fantasy of twenty storey towers on Watermead Way is an alarming prospect for those who would have to look at them, and a likely nightmare existence for any residents. You don't have to make a lengthy case against tower blocks that are surrounded by other tower blocks, the railway line with tower blocks the other side, and a busy road with tower blocks the other side to begin to recognise what an appalling development that would be.  Living in Tottenham Hale, in zone 3 of the transport network, and the Lea Valley in close proximity then residents would expect to see the sky above. Yet, the planned forest of tower blocks will substantially ruin the skyline. The area has the advantage of being open and with a rural landscape context. Yet, the plans to create a Manhattanesque new entity threatens that and represents an architectural abuse of the area. Seeing the sky is important to human life. There are psychological benefits to feeling the warmth of the sun, as sunshine improves the mind and gives us health benefits. Living and working in the shade of the proposed tower blocks is not healthy or desirable. | 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. |
| 653           | AAP639.    | CBRE on<br>behalf of<br>Hermes and<br>Argent | Clarification  | The proposed allocation is set out on page 95, but is very vague. We therefore recommend that the proposed allocation is clarified, simply by drawing out some of the supporting text from pages 96 to 98.  In terms of site requirements, bullet 1 says that any development 'must accord' with the emerging masterplan. However, decision-makers will not be able to attach the same weight to the masterplan as the AAP, as it will not have been subject to the same scrutiny and nor will it form part of the development plan.  We therefore recommend that bullet 1 is amended to say that development should be 'informed by' the emerging masterplan.  | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan.   |

| 818 | AAP640. | Our Tottenham  | Community                   | There are serious concerns about Tottenham Hale being designated a district centre. The proposals for development do not mention the impact of a night time economy which can be detrimental to a community's quality of life and this is largely a residential area. This is a serious omission and needs to be rectified and spelt out so local people can make an informed judgement.  | Agreed text can be clarified. The policy will set the parameters for development in the area, but further detail will be set out in the District Centre Framework.  Action: Amend text to "support applications for appropriate development within the Tottenham Hale District Centre as indicated on map 4.1, and in line with the principles set out in the District Centre Framework." |
|-----|---------|--|-----------------------------|---|---|
| 625 | AAP641. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Comprehensive redevelopment | We note the revised expectation in Policy "AAP1- E" Regeneration that a comprehensive approach to development is expected by the Council with neighbouring landowners interests and adjacent uses being assessed and accounted for when detailed planning commences, with this obligation being added between the Cabinet approved AAP draft and the AAP issued for consultation. Micuber Estates and Berkeley Square Developments respect this approach and have established constructive dialogue with neighbouring and surrounding landowners, however there are limitations with respect to retaining the ability to delivery the individual sites within their respective ownerships. Council officers have been party to this dialogue and respective design teams have held joint meetings to ensure this comprehensive approach is in place. An emerging design for the Island supports a development of some scale on subject site 4 and by developing these sites in the initial stage of the regeneration, will provide an early opportunity to improve the public realm around the Station Square. Micuber Estates and Berkeley Square Developments support the statements from the Council that a Meanwhile Strategy is being prepared to consider how the Station Square is to be developed in stages and welcome a copy of such proposals. | Support is noted.   |
| 669 | AAP642. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group                   | DCF conformity              | Site Requirements: Area B'states that Area B "will be comprehensively developed" and must accord with the emerging Tottenham Hale District Centre Framework (DCF), including areas A and C of 'this policy'. At present the DCF has not been subject to sustainability appraisal or consultation. It has not been adopted as a formal planning policy guidance document. It does not refer to the Tottenham Urban Characterisation Study, published in February 2015. As such there is no justification for development to 'accord' with it. The chosen wording of the emerging planning policy that development should also accord with areas A and C of 'this policy' is also not correct. Site requirements and development guidelines do not constitute sound planning policy.  | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan.   |
| 669 | AAP643. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group                   | DCF referencing             | The Woodgate Group is fully supportive of an approach that recognises that Tottenham Hale requires taller buildings of high quality. It is positive to see that the District Centre Framework proposes locations for 11+ storeys as it is evident that much higher density proposals will have to be delivered around the station to fulfil the housing delivery expectations related to the Housing Zone. The Haringey Urban characterisation study clearly classifies this area as 'central' - the highest density setting for London. Yet, the District  | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan.   |

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|     |         |  |                 | Centre Framework at Paragraph 10.6 (page 87) indicates a shortfall of 40 dwellings and 290 jobs against a target for the 'Island Site' of 470 dwellings and 500 jobs. It seems unusual that a framework that is to demonstrate how challenging housing requirements are to be delivered concludes a shortfall of 40 homes. In our view, the DCF does not yet demonstrate the true capacity of the site in terms of the number of homes it could deliver. The Woodgate Group is committed to working with Haringey and the GLA to illustrate how the site has the capacity in townscape and urban design terms to deliver a scheme suitable to the future character of the area, the policy requirements to deliver high quality high density housing, and able to deliver in the region of 320 homes alone on Site B of Station Square West.                                   |   |
| 669 | AAP644. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group | DCF referencing | The introduction of the AAP does not refer to the emerging District Centre Framework (DCF) however the emerging the neighbourhood area policies, and consequently the emerging site allocations, do. This is a contradiction.  | Noted, maximise consistency.  |
| 669 | AAP645. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group | DCF referencing | The content of the DCF (2014) does not form part of this formal consultation process. References to the DCF (2014) should not be a material consideration in the determination of planning application against these emerging planning policies as the DCF has not been through a formal consultation or adoption process  | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan. |
| 669 | AAP646. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group | DCF referencing | The Interim Sustainability Appraisal supporting the AAP (URS, February 2015) highlights policies on tall building in the AAP need to respond to, and where possible help to define, the surrounding character, as well as make the most of the opportunities for intensification and regeneration. This is not clear in the AAP or the emerging site allocations.  Paragraph 7.4 in the emerging District Centre Framework sets out a number of building height scenarios which affect the Island Site, including 'node', 'ring' and 'strip'. The chosen approach - the strip - one where 'taller buildings in the Tottenham Hale is one that reflects the prevailing east-west grain of the area" and where "the Wellbourne Centre sits at the threshold to the central area of Tottenham Hale and the core east-west axis that runs through the area" requires justification | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan. |
| 669 | AAP647. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group | Design          | Following the recent designation of the Housing Zone in January 2015, the emerging site allocations, and consequently the housing capacity at Tottenham Hale, must now be reviewed to ensure that the development principles for each site allocation enable the most efficient use of land on Tottenham Hale Island. Emerging planning policy should not be restrictive and prevent Haringey meeting or exceeding its minimum housing supply targets of the London Plan (2015). Currently the massing and urban design strategies suggested for the emerging Site Allocation TH1 Station Square West(Area B) under-utilise the potential of the site and introduces restrictive requirements on landowners concerning future massing of the proposal. The emerging policy states that the Local Planning Authority will assess planning applications based on this emerging   | Tottenham Hale's housing zone complement is addressed in Appendix A.  |

| 653 | AAP648. | CBRE on<br>behalf of<br>Hermes and<br>Argent | Developer<br>contributions | planning Policy TH1 Station Square West . This policy wording needs to be deleted as the emerging policy is too restrictive and is not based on a sound evidence base. The DCF (2014) is inconsistent with the Haringey Urban Characterisation Study (2015) and the emerging Development Management Policies DPD (2015). The DPD refers to pooled section 106 contributions in dealing with Station Square West (site ref TH1, pages 95-98), suggesting that they will fund improvements to the public realm. That is an entirely reasonable approach, but seeking additional section 106 contributions may have a bearing on, for example, the level of affordable housing that the sites might bear. We recommend that this is noted in the supporting text. | Noted.  |
|-----|---------|--|----------------------------|--|---|
| 815 | AAP649. | Zena<br>Brabazon                             | District centre            | There are serious concerns about Tottenham Hale being designated a district centre. The proposals for development do not mention the impact of a night time economy which can be detrimental to a community's quality of life and this is largely a residential area. This is a serious omission and needs to be rectified and spelt out so local people can make an informed judgement.   | The allocation of Tottenham Hale as a District Centre is in line with adopted Regional and Local Policy, and supported by the Borough's Retail Study.   |
| 634 | AAP650. | Alan Stanton, local resident                 | Children's play<br>area    | This proposal includes a 'green link' from Hale Village to the Tottenham High Road. This cuts directly across Down Lane Park and specifically across the children's play area. We object to this since the play area is sited near to the families living on Chestnuts Estate, Warren Court and the flats around Monument Way. No account is taken of their needs or wants or of this loss of amenity. At the same time the development guidelines say the 'interface with Down Lane Park should be treated with care'. The development of the green link would not do so.   | Down Lane Park is an important local asset which forms part of Haringey and Tottenham's green grid. It is recognised that it needs to be optimised to complement the development coming forward in Tottenham Hale. Children's play facilities will be improved not eroded in this area. |
| 414 | AAP651. | GLA  | General                    | This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies various opportunities for taller point block buildings of 11+ storeys at prominent locations. GLA officers are satisfied that this is a suitable location for taller buildings in principle, subject to the requirements of London Plan Policy 7.7.   | Support is noted.   |
| 815 | AAP652. | Zena<br>Brabazon                             | Green link                 | This proposal includes a 'green link' from Hale Village to the Tottenham High Road. This cuts directly across Down Lane Park and specifically across the children's play area. We object to this since the play area is sited near to the families living on Chesnuts Estate, Warren Court and the flats around Monument Way. No account is taken of their needs or wants or of this loss of amenity.  | Down Lane Park is important and forms part of the green grid. Council recognises the park needs to be optimised due to development coming forward. Children's play space will be important in the green grid, as will be optimising links to and from them.                             |
| 818 | AAP653. | Our Tottenham                                | Green link                 | This proposal includes a 'green link' from HaleVillage to the Tottenham High Road. This cuts directly across Down Lane Park and specifically across the children's play area. We object to this since the play area is sited near to the families living on Chestnuts Estate, Warren Court and the flats around Monument Way. No account is taken of their needs or wants or of this loss of amenity. At the same time the development guidelines say the 'interface with Down Lane Park should be treated with care'. The development of  | Down Lane Park is important, forms part of green grid, recognise this needs to be optimised due to development coming forward. Children's play will be of critical importance.  |

|     |         |  |        | the green link would not do so.  |   |
|-----|---------|--|--------|--|---|
| 634 | AAP654. | Alan Stanton, local resident                               | Height | The comprehensive redevelopment proposed suggests perimeter blocks of 11+ storeys around the southern edge of the site, and a wider forest of blocks up to 15 storeys. This would change the character of the area, impact on the open feeling and environment of the park, and could conceal it from view. There is mention of block courtyards which suggests grouping of towers which will impact on our local environment, views and quality of life.  Building a 15 storey tower on the adjacent site at the corner of Ashley Road is entirely unnecessary and out of keeping with this side of Tottenham Hale. This proposal from the planning service seems more aligned to the financial interests of developers to have highest densities on every piece of land in our locality. | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan. |
| 669 | AAP655. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group | Height | The emerging site allocation (TH1, 2015) restricts the future supply of housing on this site by determining where height should go. As this site falls within a housing zone and has excellent accessibility, this limitation should be removed provided that comprehensive proposals comply with Policies DM2 'Design Standards and Quality of Life, Policy DM 5 'Siting and design of tall buildings (excluding Section A as the locations are not clear), and Policy DM6 'Locally Important views and vistas' of the emerging Development Management DPD.   | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan  |
| 815 | AAP656. | Zena<br>Brabazon   | Height | The comprehensive redevelopment proposed suggests perimeter blocks of 11+ storeys around the southern edge of the site, and a wider forest of blocks up to 15 storeys. This would change the character of the area, impact on the open feeling and environment of the park, and could conceal it from view. There is mention of block courtyards which suggests grouping of towers which will impact on our local environment, views and quality of life.  | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan. |
| 815 | AAP657. | Zena<br>Brabazon   | Height | Tower blocks along Watermead Way will impact on the view people have from the Park View Road side of Tottenham Hale. We wish to retain that view as that enhances our quality of life and enjoyment of the park. No regard is given in these proposals to the impact on existing residents in this part of Tottenham Hale.   | This is not based on the document.  |
| 815 | AAP658. | Zena<br>Brabazon   | Height | The petrol station is a very useful local service which is located at the confluence of many roads. We wish it to be retained. Building a 15 storey tower on the adjacent site at the corner of Ashley Road is entirely unnecessary and out of keeping with this side of Tottenham Hale. This proposal from the planning service seems more aligned to the financial interests of developers to have highest densities on every piece of land in our locality.   | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan. |
| 818 | AAP659. | Our Tottenham  | Height | Comment to edit once Claire has an answer from Zena about the location:  | Convenience shopping will be enhanced. Petrol station not consistent with high PTAL future.   |

|     |         |  |                         | The petrol station is a very useful local service which is located at the confluence of many roads. We wish it to be retained. Building a 15 storey tower on the adjacent site at the corner of Ashley Road is entirely unnecessary and out of keeping with this side of Tottenham Hale   | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan.   |
|-----|---------|--|-------------------------|---|---|
| 818 | AAP660. | Our Tottenham  | Height                  | Tower blocks along Watermead Way will impact on the view people have from the Parkview Road side of Tottenham Hale. No regard is given in these proposals to the impact on existing residents in this part of Tottenham Hale.   | Tower blocks along Watermead Way are not included in the document.  |
| 818 | AAP661. | Our Tottenham  | Height                  | The comprehensive redevelopment proposed suggests perimeter blocks of 11+ storeys around the southern edge of the site, and a wider forest of block up to 15 storeys. This would change the character of the area, impact on the open feeling and environment of the park, and could conceal it from view. There is mention of block courtyards which suggests grouping of towers which will impact on the local environment, views and quality of life   | The Strategic Policies document sets Tottenham Hale as a growth area, and as such higher density development is appropriate in this area.   |
| 625 | AAP662. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | District Centre         | In order to achieve some consistency in the policy text we would also suggest revised text be applied to TH1 Station Square West Area A. "Area A: Comprehensive redevelopment of the Southern end of Ashley Road forming part of a new District Centre, creation of a new Green Link and an enhanced Ashley Road."-   | Agreed.  Action: Amend Site Allocation.   |
| 625 | AAP663. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Landmark<br>development | In addition supporting text notes that buildings of 11+ storeys will be considered and this we also agree with as it provides an opportunity to create landmark development, particularly with the constraints of the tube line impacting on the viability of a reduced scale development.  | Support is noted.   |
| 669 | AAP664. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group                   | Links between documents | Chapter 5 of the AAP includes Site Allocations for the Neighbourhood Area of Tottenham Hale where there are significant opportunities for development and change. The chapter provides expectations for each site relating to land use, design, infrastructure and delivery. The emerging capacity studies the land owners have provided together have not been considered regarding the opportunities at Tottenham Hale. The Woodgate Group is keen to continue discussions with the Borough in this regard and review the amended wording of the site allocations of Tottenham Hale following this Regulation 18 consultation. The Physical Development Framework for Tottenham (2012) was conceived within a different planning policy framework and does not utilise the full potential of the area. The recent District Centre Framework (DCF, 2014) does not consider the Haringey Urban Characterisation Study. Neither does either report consider the site or area as a cross-section. The DCF | The Physical Development Framework only forms one part of the evidence base at this stage. It was prepared as early evidence to inform regeneration across Tottenham, but the District Centre Framework adds more detail.  The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan |

| 634 | AAP665. | Alan Stanton,<br>local resident  | Local View                | which appears to have informed the area based policies of the AAP has not been consulted or reviewed against the emerging local plan and therefore should not solely inform the content of the AAP and development aspirations for Tottenham Hale as a new Housing Zone for London to boost the supply and delivery of new homes.  Tower blocks along Watermead Way will impact on the view people have from the Park View Road side of Tottenham Hale. We wish to retain that view as that enhances our quality of life and enjoyment of the park. No regard is given in these proposals to the impact on existing residents in this part of Tottenham Hale. | This comment is not based on the document.   |
|-----|---------|--|---------------------------|---|--|
| 625 | AAP666. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Marketability             | Very limited marketability of sites in the Ashley Road area, with the interventions of Green link, improved station design, and general improvement of building stock are needed to improve this "address".   | Support is noted.  |
| 624 | AAP667. | Tottenham &<br>Wood Green<br>Friends of the<br>Earth                         | Parking                   | "Parking should be minimised on this site due to the excellent local public transport connections" but as we have said above, we need comprehensive CPZs in area or parking will "leak out".  | Support is noted.  |
| 634 | AAP668. | Alan Stanton,<br>local resident  | Petrol station            | The petrol station is a very useful local service which is located at the confluence of many roads. We wish it to be retained.  | Convenience shopping will be enhanced through the creation of a new District Centre. The retention of a petrol station is not consistent with the high PTAL future for the area.           |
| 625 | AAP669. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Preliminary<br>masterplan | Preliminary Masterplan enclosed   | Noted.   |
| 625 | AAP670. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | DEA Deallocation          | Given its location within the District Centre area this land (referred to in the HELS as the "island" (para 5.89) and subject site 4) was recommended in that report to be de-allocated from the LEARA designation, which we agree with.  | Support is noted.  |
| 669 | AAP671. | HTA Design<br>LLP on behalf<br>of The  | Tall buildings            | The accompanying DCF (2014) does not provide any supporting analysis as to why tall buildings cannot be accommodated on each corner of Area B of the emerging site allocation TH1 for Station   | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the |

|     |         | Woodgate<br>Group  |                | Square West and therefore the proposed wording of the emerging Policy TH1 Station Square West is not 'sound' or 'evidenced'.  The current wording of the site allocation TH1 Station Square West will not harness the benefit of the Housing Zone investment and will not maximise the opportunity the Tottenham Hale Island presents. It is of concern that there are inconsistencies across the emerging AAP, the accompanying Interim Sustainability Appraisal, the Development Management DPD, the DCF and the borough's characterisation study in relation to strategy for the preferred approach to tall buildings; all of which do not support this restrictive wording proposed for the site allocation. Given the significant increase in accessibility of this site and the surrounding area with Crossrail, the Council's local plan should focus on optimising the Tottenham Hale Island sites for high density housing led schemes to increase delivery rather than constrain development opportunities as supported by the GLA.   | implementation strategy for the allocations set out in the Local Plan  |
|-----|---------|--|----------------|---|--|
| 669 | AAP672. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group                   | Tall buildings | Area C is a similar triangular site to Area B. The emerging planning policy which restricts the provision of tall buildings on all corners of the Area B is completely unjustified (Policy TH1).  | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan |
| 625 | AAP673. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Timings        | In addition the Ashley Road sites (Sites 1, 2 and 3), when combined with those outside of Micuber Estates direct ownership, offers a comprehensive development area that can be bought forwards in a timely programme and in a more accessible location for the broader community, both existing and new. This accessibility and centrality argument is more evident when the overall AAP area is considered in context (Key Diagram Figure 1.3)  | Support is noted.  |
| 669 | AAP674. | HTA Design LLP on behalf of The Woodgate Group                               | UCS Vs DCF     | Paragraph 7.4 in the emerging District Centre Framework sets out a number of building height scenarios which affect the Island Site, including 'node', 'ring' and 'strip'. The chosen  The Haringey Urban Characterisation Study includes a number of important recommendations regarding building heights and tall buildings not reflected in the AAP, including (see page 238 of the 'General Recommendations' of the Haringey Urban Characterisation study):  • "It is important to consider building heights across a neighbourhood, a block and along a street not just a development site": The Woodgate Group is in particular concerned that the AAP makes site specific recommendations on tall buildings based on the DCF (2014), whereas the DCF (2014) has not fully justified the approach taken to preferred siting of tall buildings or long distance view impact.  • "Urban design principles - such as relating heights to urban grain, public transport, street hierarchy, nodes, creation of landmarks and wider townscape considerations": The Woodgate Group notes the importance of wider townscape considerations and are fully supportive of this.  • "The development /intensification potential of an area now and in | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan |

|     |         |  |                         | the future (through an understanding of Council regeneration projects, site allocations, masterplans and briefs)". The Woodgate Group is of the view that Tottenham Hale will undergo significant change in the coming years. The Group have been working with the Council and adjoining landowners to demonstrate how the Island Site could deliver three tall buildings making a substantial contribution to setting in place a new skyline for Tottenham Hale and the emerging District Centre. It is critical for the emerging masterplan of the area to reflect the true ambition and potential for growth.   |  |
|-----|---------|--|-------------------------|--|--|
| 669 | AAP675. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group                   | UCS/ DCF                | If Haringey Council intends that the emerging site allocation policy be supported by an urban design strategy to the site, then the accompanying DCF should be updated to reflect the Housing Zone status, the Borough's Characterisation Study, the protected local views and vistas, the emerging Development Management DPD, and consultation should take place with the landowners on capacity studies, before the site allocation can be considered 'sound'. The current massing and the supporting policy for the site allocation 'TH1' cannot be considered 'sound' as it does not appear to have been positively prepared, justified in a clear evidence base, effective in conveying how this will deliver the GLA's ambition to boost housing supply as part of a designated housing zone or consistent with national planning policy as the potential of the brownfield site is under-utilised. | The allocation positively seeks to help meet Haringey's objectively identified housing and employment needs, and the issues identified are being identified in the DCF.  |
| 625 | AAP676. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Development constraints | The site is constrained by the surrounding roads and proximity of the Victoria line which runs under the corner of the site, and any development will need to consider the costs of building over the tube line and isolating the building from vibration.   | Noted.   |
| 669 | AAP677. | HTA Design<br>LLP on behalf<br>of The<br>Woodgate<br>Group                   | Views/ vistas           | The DCF does not consider locally protected views or vistas. As a result the wording of the emerging Site Allocation TH1 Station Square West has not been informed by a proportionate evidence base.   | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan |

### Comments on TH2 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent ID | Comment ID | Respondent  | Topic               | Summary of Response  | Council Response   |
|---------------|------------|---|---------------------|--|--|
| 625           | AAP678.    | Stride Treglown on behalf of Micuber Estates and Berkely Square | Industrial heritage | The Council's aspiration to retain the existing warehouse style buildings on Site 1 (16 Ashley Road) is not supported; as it will limit the potential to create truly innovate design and accommodation standards. The existing buildings have little architectural merit or historical value, other than Berol House, which will be retained, with continued investment supporting its improved appearance. | These are considered to be an important link to the areas past, and will be preserved, at least in part. |

|     |         | Developments   |                |   |   |
|-----|---------|--|----------------|---|---|
| 632 | AAP679. | The Friends of<br>Down Lane<br>Park  | Tall buildings | The proposed tower blocks on the Ashley Road sites (TH2 and TH3) would similarly have a detrimental impact on the park and its positioning in the park. The same is true of the site along Hale Road the current petrol station (TH1), while a ten storey tower block on the Welbourne site next to a park is a mistaken judgement that stands out as starkly as such a building would. The fantasy of twenty storey towers on Watermead Way is an alarming prospect for those who would have to look at them, and a likely nightmare existence for any residents. You don't have to make a lengthy case against tower blocks that are surrounded by other tower blocks, the railway line with tower blocks the other side, and a busy road with tower blocks the other side to begin to recognise what an appalling development that would be.  Living in Tottenham Hale, in zone 3 of the transport network, and the Lea Valley in close proximity then residents would expect to see the sky above. Yet, the planned forest of tower blocks will substantially ruin the skyline. The area has the advantage of being open and with a rural landscape context. Yet, the plans to create a Manhattanesque new entity threatens that and represents an architectural abuse of the area. Seeing the sky is important to human life. There are psychological benefits to feeling the warmth of the sun, as sunshine improves the mind and gives us health benefits. Living and working in the shade of the proposed tower blocks is not healthy or desirable. | 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. |
| 625 | AAP680. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Employment use | We recognise that "employment" for this site, being in an identified Regeneration Area can cover a very broad range of employment uses. In addition, we have witnessed the stricter B1, B2 and B8 application of planning policy say 10 years ago, to a more diluted and broad land use range now. For instance uses such as hotel have become more acceptable aligned to employment uses. For reasons outlined below, and in our local market assessment, the demand for the more traditional B1, B2 and B8 uses is not strong. Therefore, recognising the strong push for housing, a broad range of uses are proposed by Berkeley Square Developments and Micuber Estates. There is evidence locally of the success of mixed-use residential development, namely Hale Village, which whilst providing a quantum of residential development, also contributes significantly to local employment.  For the reasons outlined above a truly mixed use is advocated, with land uses currently being promoted being:  A1 retail  A2 Financial and Professional Services  A3 food and drink  C3 dwelling houses  B1 offices  | The Council will welcome a range of employment uses in regeneration areas. The range of uses set out here is overly flexible however. For example A1-3 uses in particular should be located primarily in town centre locations. As this site is edge of centre, employment uses should be provided in new development in preference to "A class uses".  |

|     |         |  |                               | ☐ C3 dwelling houses   |  |
|-----|---------|--|-------------------------------|--|--|
|     |         |  |                               | □ C1 hotel   |  |
|     |         |  |                               | <ul><li>□ D1 health centres, nurseries</li><li>□ Sui Generis</li></ul>   |  |
| 625 | AAP681. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Combine Ashley<br>Rds sites   | The severance of Ashley Road North and South be removed and the 2 areas be combined in a single designation  | This area has been divided into two site allocations as the aspirations differ for each site.  |
| 625 | AAP682. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Employment designation        | The LEARA allocation is removed  | It is considered that this area has an important role to play in the provision of economic growth in Tottenham Hale, and should remain a Regeneration Area as recommended in the ELS.  |
| 625 | AAP683. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Design principles             | The scale of this new development (Berol House et al) will take reference from the surrounding context, and be used to shelter the residential development from the realities of the highways infrastructure, which is both detrimental visually and environmentally to any residents. A mixed use, employment-led scheme on Site 2, will step down from the height of the existing Unite Development on Hale Village, to create a courtyard with Berol House, which enables pedestrian movement between the station and Ashley Road. Berol House could benefit from an additional two-storey modern development to increase the B1 capacity, then the residential development on the West of Ashley Road will be of varying heights to create an exciting design which is not over-bearing but delivers the quantum of housing needed. By working with the Green Link there are design opportunities to create exciting areas of public realm and open square's for pedestrian movement, entrainment and pop-up markets. Around such squares, additional height could be appropriate and we support a review of the public realm strategy to reflect the proposals contained in Appendix 1 of this response which illustrate such potential along Ashley Road | Noted.   |
| 625 | AAP684. | Stride Treglown on behalf of Micuber Estates and Berkely                     | District Centre clarification | This statement P99, under "Proposed Site Allocation" is inaccurate. Figure 1.3 whilst not entirely of clear resolution, when aligned with Map 4.2 "The Green Link," shows the TH2 site as lying within the town centre defined area.   | Noted. The District Centre boundary in the document will be amended to bring the allocation into accordance.  Action: Change map 4.2 to make the former alignment of the Green Link the northernmost point of the District Centre. |

|     |         | Square<br>Developments              |                |   |   |
|-----|---------|-------------------------------------|----------------|---|---|
| 634 | AAP685. | Alan Stanton,<br>local resident     | Green link     | This plan proposes a green link which cuts directly across Down Lane Park, and specifically through the children's play area. We object to this proposal. Down Lane Park is one of the very few amenities for people living in Tottenham Hale's residential roads and estates. This is treasured and valued, and its development has been fought for by the local community and we now have a thriving Green Flag Award park with new tennis courts, a fine play area, and other facilities.  | It is noted that the Green Link will not be the only route around the area linking green spaces. The council is exploring ways to establish a network of green spaces in Tottenham, with better access to the Upper Lea Valley and improved public realm that unifies the streets and prioritises pedestrian and cyclist circulation and safety. Children's play will be of critical importance.                                    |
| 632 | AAP686. | The Friends of<br>Down Lane<br>Park | Park expansion | To provide recreational options for people in any new flats in the area the case for a bigger park providing more open green space and more play facilities is clear. Therefore it is proposed that if the council acquires land between Hale Road and the existing footprint of the park, and land between Ashley Road and the existing footprint of the park, then that area be used to expand the park. Such an expansion would provide enhanced park opportunities for current local people and any new residents moving into the area.   | It is noted that the Green Link will not be the only route around the area linking green spaces. The council is exploring ways to establish a network of green spaces in Tottenham, with better access to the Upper Lea Valley and improved public realm that unifies the streets and prioritises pedestrian and cyclist circulation and safety. Children's play will be of critical importance.                                    |
| 815 | AAP687. | Zena<br>Brabazon                    | Green link     | The proposed green link is a very expensive and unnecessary project since there are many ways people living in Hale Village and Ferry Lane can reach Tottenham High Road should they wish to do so. This could be better spent on social housing or local environmental improvements.   | It is noted that the Green Link will not be the only route around the area linking green spaces. The council is exploring ways to establish a network of green spaces in Tottenham, with better access to the Upper Lea Valley and improved public realm that unifies the streets and prioritises pedestrian and cyclist circulation and safety. Children's play will be of critical importance.                                    |
| 818 | AAP688. | Our Tottenham                       | Green link     | This plan proposes agreed link which cuts directly across Down Lane Park, and specifically through the children's play area. We object to this proposal. Down Lane Park is one of the very few amenities for people living in Tottenham Hale's residential roads and estates. This is treasured and valued, and its development has been fought for by the local community and we now have a thriving green flag park with new tennis courts, a fin play area, and other facilities.  | It is noted that the Green Link will not be the only route around the area linking green spaces. The council is exploring ways to establish a network of green spaces in Tottenham, with better access to the Upper Lea Valley and improved public realm that unifies the streets and prioritises pedestrian and cyclist circulation and safety. Children's play will be of critical importance.                                    |
| 818 | AAP689. | Our Tottenham                       | Green link     | The proposed green link is a very expensive and unnecessary project since there are many ways people living in HaleVillage and Ferry Lane can reach Tottenham High Road should they wish to do so. The millions proposed for this could be better spent on social housing or local environmental improvements.  | It is noted that the Green Link will not be the only route around the area linking green spaces. The council is exploring ways to establish a network of green spaces in Tottenham, with better access to the Upper Lea Valley and improved public realm that unifies the streets and prioritises pedestrian and cyclist circulation and safety. Children's play will be of critical importance.                                    |
| 632 | AAP690. | The Friends of<br>Down Lane<br>Park | Tall buildings | The park is threatened with being encircled by high tower blocks and new buildings installed as part of the Harris Federation school. If realised the proposals would result in building blocks on the north edge of the park along the recycle centre and council depot. Then there will tall buildings on the Ashley Road sites that will tower over the tennis courts to children's playground area. In addition, the south edge of the park will face on to tower blocks on Hale Road and the Welbourne site. This enclosure of tower blocks will be over-bearing on a community park, as well as the terraced housing on Park View | 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. |

|     |         |  |                                       | Road. It is a park for people, not a patch of green between tall buildings.  A community park should not become a grassed area between tower blocks. Parks are there to replicate being in the countryside and provide an outlet for the human desire to be detach at times from the bustle of the urban world. They are great places because they are not surrounded by a screen of concrete and glass slabs. A bank of tall towers will cast long shadows over the park. It is important to remember that physchologically parks play a vital function in our lives. They provide tranquility and enable us to get away from stressful living because they are secluded or have secluded sections.  |   |
|-----|---------|--|---------------------------------------|---|---|
| 625 | AAP691. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | District centre                       | Reference (P99) to Ashley Road South being "north of a new District Centre" be replaced with "within the District Centre as shown on the Key Diagram"   | Noted, it is not considered that this area should be included within the new District Centre. It is considered that this area has an important role to play in the provision of economic growth in Tottenham Hale, and should remain a Regeneration Area as recommended in the ELS. |
| 625 | AAP692. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | District centre                       | Similar to the text used in the other District Centre sites we would also suggest new text be applied to the combined Ashley Road North and South site.  "Comprehensive redevelopment of the Northern end of Ashley Road forming part of a new District Centre, creation of a new Green Link and an enhanced Ashley Road."  | Noted, it is not considered that this area should be included within the new District Centre. It is considered that this area has an important role to play in the provision of economic growth in Tottenham Hale, and should remain a Regeneration Area as recommended in the ELS. |
| 625 | AAP693. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Mixed use<br>development<br>potential | The Ashley Road site 1(adjoining Down Lane Park) provides the most exciting opportunity within the Housing Zone for an inspirational residential development of exceptional quality and standard of living accommodation. With the benefit of close connectivity through the train and bus stations, in addition to direct access to Down Lane Park, this will create a place where families and individuals will thrive, and benefit from a diverse and vibrant development. The potential to include active ground floor retail, public amenity and community facilities in a location that via the Green Link also enables residents from outside of the Housing Zone to directly benefit from this thriving mixed use development and the broader District Centre facilities. | Noted.  |
| 625 | AAP694. | Stride<br>Treglown on<br>behalf of<br>Micuber                                | Mixed use<br>development<br>potential | Site 2 (Berol House et al) offers the opportunity to create a diverse mixed use scheme development, which could include a variety of employment uses and also residential development. We support the proposals in the THDCF for residential and commercial   | Noted.  |

|     |         | Estates and<br>Berkely<br>Square<br>Developments                             |                           | development, with such commercial uses to reflect both market requirements and viability. The current market requirements are detailed in Section 6 below, but current market rents did not support the further development of B1 of B8 uses, however other opportunities exist for C1, C3, D1 and Sui Generis.  |   |
|-----|---------|--|---------------------------|--|---|
| 625 | AAP695. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Preliminary<br>masterplan | Preliminary Masterplan enclosed  | Noted.  |
| 410 | AAP696. | North London<br>Waste<br>Authority   | Existing buildings        | Welcomes comments regarding this site that 'Good quality buildings, including but not limited to Berol House and 16 Ashley Road should be retained and adapted for flexible and affordable employment use.   | The NLWA's support is noted.  |
| 625 | AAP697. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | District Centre           | The rationale for these landholdings being part of the District Centre area are clear:  The preceding and recent (October 2014) THDCF recognised the appropriateness for the area to include key town/district centre uses. For example, "the Green Link with a cluster of bars and cafes," (P68), reference to 4,167 sqm retail (P69), and both sides of Ashley Road identified for retail and commercial uses at ground floor (P65).  The THDCF, when referring to the diagram below, states "A connected and integrated district centre." (P56).  The THDCF placing this area as part of and nearer the centre of the District Centre.  The use of the green link as a key east-west pedestrian linkage would be more appropriate through the middle of a District Centre rather than on the edge where employment uses could be less appropriate.  The concept of the District Centre as initially prepared by Allies and Morrison was explicit in its inclusion of Ashley Road to its boundary with the Down Lane Park and any move away from this goes to the heart of the District Centre proposals and the intention for comprehensive regeneration (see page 53). Micuber Estates and Berkeley Square Developments strongly resist any recommendation to segregate the District Centre and weaken the sense of place across the whole area. | Noted, it is not considered that this area should be included within the new District Centre. It is considered that this area has an important role to play in the provision of economic growth in Tottenham Hale, and should remain a Regeneration Area as recommended in the ELS. |
| 421 | AAP698. | Historic<br>England  | Industrial heritage       | Ashley Road contains a number of fine undesignated industrial heritage assets. We would suggest that the council consider including requirements which seek to integrate these buildings within new development. Such buildings can provide useful and attractive opportunities for creative industries (as acknowledged in the GLA's draft City Fringe OAPF). They can also help define local character   | It is noted, the Council has made reference to this in the policy.  |

|     |         |  |        | and act as an inspiration for high quality contextual design.  |        |
|-----|---------|--|--------|--|--------|
| 625 | AAP699. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Timing | In addition the Ashley Road sites (Sites 1, 2 and 3), when combined with those outside of Micuber Estates direct ownership, offers a comprehensive development area that can be bought forwards in a timely programme and in a more accessible location for the broader community, both existing and new. This accessibility and centrality argument is more evident when the overall AAP area is considered in context (Key Diagram Figure 1.3) | Noted. |

### Comments on TH3 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent ID | Comment ID | Respondent                    | Topic                    | Summary of Response   | Council Response  |
|---------------|------------|-------------------------------|--------------------------|---|---|
| 414           | AAP700.    | GLA                           | Strategic<br>aspirations | This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that part of the allocation includes a licensed waste site. Accordingly, requirement for equivalent waste capacity to be re-provided is supported in accordance with London Plan Policy 5.17.   | Support is noted.   |
| 632           | AAP701.    | The Friends of Down Lane Park | Tall buildings           | The proposed tower blocks on the Ashley Road sites (TH2 and TH3) would similarly have a detrimental impact on the park and its positioning in the park. The same is true of the site along Hale Road the current petrol station (TH1), while a ten storey tower block on the Welbourne site next to a park is a mistaken judgement that stands out as starkly as such a building would. The fantasy of twenty storey towers on Watermead Way is an alarming prospect for those who would have to look at them, and a likely nightmare existence for any residents. You don't have to make a lengthy case against tower blocks that are surrounded by other tower blocks, the railway line with tower blocks the other side, and a busy road with tower blocks the other side to begin to recognise what an appalling development that would be.  Living in Tottenham Hale, in zone 3 of the transport network, and the Lea Valley in close proximity then residents would expect to see the sky above. Yet, the planned forest of tower blocks will substantially ruin the skyline. The area has the advantage of being open and with a rural landscape context. Yet, the plans to create a Manhattanesque new entity threatens that and represents an architectural abuse of the area. Seeing the sky is important to human life. There are psychological benefits to feeling the warmth of the sun, as sunshine improves the mind and gives us health benefits. Living and working in the shade of the proposed tower blocks is not healthy or desirable. | 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. |
| 632           | AAP702.    | The Friends of                | Alternative route        | The housing proposals for the recycle site and the current depot site   | Note that potential for an improved link from the northern end of Ashley Rd through to Park View Road and the Lee Valley  |

|     |         | Down Lane<br>Park                                    |                      | could result in unsightly and too high tower blocks sitting ugly next to a community park and low-level street terraced housing. Yet the removal of the depot offers an opportunity to improve the access to the Lea Valley and the Tottenham Marshes at the northern end. This end is where a genuine green link could improve access for residents to the beauty of the Lea Valley. Achieving this would be a significant boost to environmental and health capital in the area.  | Regional Park are included within the document.  |
|-----|---------|--|----------------------|---|--|
| 815 | AAP703. | Zena<br>Brabazon                                     | Amenities            | With regard to design guidelines for Area B, the council confirmed that the games areas of Down Lane Park would not be used to provide the school with sports facilities. It was accepted very early on in the discussions regarding the sale of the Technopark that the park was a community facility and that the resources secured were for local community use. This commitment made to councillors and the Friends of Down Lane Park should be honoured.   | The use of the protected open space is not an issue to be considered in this Plan.   |
| 818 | AAP704. | Our Tottenham  | Community facilities | The Council confirmed that the games areas of Down Lane Park would not be used to provide the school with sports facilities. It was accepted very early on in the discussions regarding the sale of the Technopark that the park was a community facility and that the resources secured were for local community use. This commitment made to councillors and the Friends of Down Lane Park should be honoured.  | The use of the protected open space is not an issue to be considered in this Plan.   |
| 815 | AAP705. | Zena<br>Brabazon                                     | Height               | These plans seem vague and sketchy, but raise serious concerns which need full clarification.  The site requirement for Area B states that 'the southeast corner of this site should be the tallest point. Heights should be reduced towards the north and where the site faces Down Lane Park'. There is no mention of how high these buildings might be, although elsewhere Watermead Way is proposed as an area for buildings up to 22 storeys. these heights would impact on the park and also on the residents living along Park View Road and other nearby roads. these vague proposals conceal the possibility of another forest of tower blocks looming over Down Lane Park and on the horizon. | 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.  The comment attributed to Watermead way is not in the document. |
| 815 | AAP706. | Zena<br>Brabazon                                     | Design               | We draw your attention to the CABE report on the initial designs for Hale Village which expressed clear criticism of the wall of blocks proposed. In this AAP new buildings on Watermead Way (TH3 area B) extends this 'wall' much further.   | We are not sure what part of the document this comment refers to. All developments will be required to respond to their surroundings as set out in DM1 of the DMDPD.   |
| 815 | AAP707. | Zena<br>Brabazon                                     | Design               | We draw your attention to the CABE report on the initial designs for Hale Village which expressed clear criticism of the wall of blocks proposed. In this AAP new buildings on Watermead Way (TH3 area B) extends this 'wall' much further.   | We are not sure what part of the document this comment refers to. All developments will be required to respond to their surroundings as set out in DM1 of the DMDPD.   |
| 624 | AAP708. | Tottenham &<br>Wood Green<br>Friends of the<br>Earth | Green Corridor       | TH3 should include creation of a green corridor between the development and A1055.  | We are not sure how this is possible.  |

| 634 | AAP709. | Alan Stanton, local resident   | Height                 | The site requirement for Area B states that 'the southeast corner of this site should be the tallest point. Heights should be reduced towards the north and where the site faces Down Lane Park'. There is no mention of how high these buildings might be, although elsewhere Watermead Way is proposed as an area for buildings up to 22 storeys. It is inconceivable that these heights would not impact on the park and also on the residents living along Park View Road and other nearby roads. Although not spelt out in the site requirements and design guidelines, it would seem that these vague proposals conceal the possibility of another forest of tower blocks looming over Down Lane Park and on the horizon. | 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: Create consistency regarding height guidelines for all sites. |
|-----|---------|--|------------------------|---|--|
| 818 | AAP710. | Our Tottenham  | Height                 | There is no mention of how high these buildings might be, although elsewhere Watermead Way is proposed as an area for buildings up to 22 storeys. It is inconceivable that these heights would not impact on the park and also on the residents living along Parkview and other nearby roads. Although not spelled out in the site requirements and design guidelines, it would seem that these vague proposals conceal the possibility of a forest of tower blocks looming over Down lane Park and on the horizon.   | Noted.  Action: Create consistency regarding height guidelines for all sites.  |
| 799 | AAP711. | Bob Lindsay-<br>Smith  | Local<br>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 aim with regards this policy is to increase the job density in an area with high public transport accessibility.   |
| 634 | AAP712. | Alan Stanton,<br>local resident  | Park for school<br>use | With regard to design guidelines for Area B, the council confirmed that the games areas of Down Lane Park would not be used to provide the school with sports facilities. It was accepted very early on in the discussions regarding the sale of the Technopark that the park was a community facility and that the resources secured were for local community use. This commitment made to councillors and the Friends of Down Lane Park should be honoured.   | The use of the protected open space is not an issue to be considered in this Plan.   |
| 410 | AAP713. | North London<br>Waste<br>Authority   | Waste                  | NLWA welcomes the statement that the site's existing licensed waste capacity will be replaced prior to any redevelopment taking place. This will ensure waste management capacity is not lost and will not have a detrimental effect on progress towards achieving an area wide recycling rate of 50% by 2020.  | The NLWA's support is noted  |
| 625 | AAP714. | Stride Treglown on behalf of Micuber Estates and Berkely Square Developments | Timings                | In addition the Ashley Road sites (Sites 1, 2 and 3), when combined with those outside of Micuber Estates direct ownership, offers a comprehensive development area that can be bought forwards in a timely programme and in a more accessible location for the broader community, both existing and new. This accessibility and centrality argument is more evident when the overall AAP area is considered in context (Key Diagram Figure 1.3)  | Noted.   |

| 624 | AAP715. | Tottenham &    | Waste | "The site's existing licensed waste capacity will be replaced prior to | Noted. |  |
|-----|---------|----------------|-------|--|--------|--|
|     |         | Wood Green     |       | any redevelopment taking place." but the TAAP must set out clearly     |        |  |
|     |         | Friends of the |       | where it will be moved to  |        |  |
|     |         | Earth          |       |  |        |  |
|     |         |                |       |  |        |  |

## Comments on TH4 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent<br>ID | Comment<br>ID | Respondent                          | Topic           | Summary of Response  | Council Response  |
|------------------|---------------|-------------------------------------|-----------------|--|---|
| 632              | AAP716.       | The Friends of<br>Down Lane<br>Park | District Centre | Proposals (TH 4 and TH5) are also not convincing on whether the planned district centre will be a great place for the workers and residents envisaged making up the future population.   | Further detail will be included in the District Centre Framework.   |
| 818              | AAP717.       | Our Tottenham                       | Retail centre   | Haringey Council has plans to revitalise Tottenham High Road and to make Seven Sisters station an anchor site for the High Road. To develop an enlarged retail centre at Tottenham Hale is more than likely to contradict the Council's first aim. The current retail park is busy and successful, and is a day time centre. These proposals would significantly increase the usage, again over developing which will cause even greater traffic problems, air contamination and noise pollution.  | The District Centre is allocated in both the London Plan, and in the Council's adopted Strategic Policies DPD. These documents have already made the case for this allocation.  The aim is to make Tottenham Hale a public-transport led District Centre, thus the impact of additional cars on the road network stemming from these developments is considered to be minimal.  |
| 818              | AAP718.       | Our Tottenham                       | Economy         | Concerns about developing a new district centre have also been set out above. The document is silent on the matter of the night time economy which is a glaring and unacceptable omission.   | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan.   |
| 818              | AAP719.       | Our Tottenham                       | Green Link      | Objections to the Green Link crossing Down Lane Park have already been set out above. We consider the proposals to be over development. The plans here propose up to eleven storeys, yet when the last permission was given for Tottenham Hale the number of storeys proposed was nine. There is an emerging pattern her where developers get agreement for a certain height, and then return for a couple of additional storeys which is then granted.  This sets a precedent for higher towers elsewhere irrespective as to whether or not they are appropriate. In this instance eleven storeys above the station is in effect 12 or 13 storeys since the station is already there, and this will be in front of a current wall of blocks at HaleVillage which now form the eastern aspect of the site. This will only intensify the concentration of tower blocks in the area. We draw your attention to the CABE report on the initial designs for HaleVillage which expressed clear criticism of the wall of blocks proposed. In this AAP new buildings on Watermead Way (TH3 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 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.  We are not sure what part of the document the "wall" comment refers to. All developments will be required to respond to their surroundings as set out in DM1 of the DMDPD. |
| 634              | AAP720.       | Alan Stanton,<br>local resident     | Height          | B) extends this 'wall' much further.  We consider the proposals to be an over-development. The plans here propose up to eleven storeys, yet when the last permission was given for Tottenham Hale the number of storeys proposed was nine. There is an emerging pattern her where developers get agreement for a certain height, and then return for a couple of additional storeys  | The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission. Specific height limits will not be included in Site   |

|     |         |                              |                     | which is then granted. This sets a precedent for higher towers elsewhere irrespective as to whether or not they are appropriate. In this instance eleven storeys above the station is in effect 12 or 13 storeys since the station is already there, and this will be in front of a current wall of blocks at Hale Village which now form the eastern aspect of the site. This will only intensify the concentration of tower blocks in the area. We draw your attention to the CABE report on the initial designs for Hale Village which expressed clear criticism of the wall of blocks proposed. In this AAP new buildings on Watermead Way (TH3 area B) extends this 'wall' much further.          | Allocations as all developments will be expected to respond appropriately to their context.   |
|-----|---------|------------------------------|---------------------|--|---|
| 815 | AAP721. | Zena<br>Brabazon             | Height              | We consider the proposals to be an over-development. The plans here propose up to eleven storeys, yet when the last permission was given for Tottenham Hale the number of storeys proposed was nine. There is an emerging pattern her where developers get agreement for a certain height, and then return for a couple of additional storeys which is then granted. This sets a precedent for higher towers elsewhere irrespective as to whether or not they are appropriate. Eleven storeys above the station is in effect 12 or 13 storeys since the station is already there, and this will be in front of a current wall of blocks at Hale Village which now form the eastern aspect of the site. | 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.   |
| 815 | AAP722. | Zena<br>Brabazon             | Public realm        | The station has just undergone extensive re-modelling at significant public cost. Is the intention to build a new square or will the bus station and square remain as they are? This building work was very disruptive and now it appears to be repeated.  | It is recognised that the bus station element of Tottenham Hale station has undergone significant remodelling. The rail station itself requires upgrading to make the full use of the services that pass through it, including improving wheelchair accessibility. It is noted that the potential for 4/5 tracking of the West Anglia line may necessitate further improvements to the station. The creation of development above, and around as part of a new District Centre is considered appropriate, and in line with the adopted Spatial vision for the area. |
| 634 | AAP723. | Alan Stanton, local resident | Station remodelling | The station has just undergone extensive re-modelling at significant public cost. Is the intention to build a new square or will the bus station and square remain as they are? This building work was very disruptive and now it appears to be repeated.  | It is recognised that the bus station element of Tottenham Hale station has undergone significant remodelling. The rail station itself requires upgrading to make the full use of the services that pass through it, including improving wheelchair accessibility. It is noted that the potential for 4/5 tracking of the West Anglia line may necessitate further improvements to the station. The creation of development above, and around as part of a new District Centre is considered appropriate, and in line with the adopted Spatial vision for the area. |
| 415 | AAP724. | Transport for London         | Height              | "Development of this site could be up to 11 storeys" – It should be noted that this should be taken as being two storeys of station building with nine storeys above it, making a total of 11 storeys.   | Noted.  |
| 415 | AAP725. | Transport for London         | Pedestrian link     | "potential to introduce a new pedestrian link beneath the road to the retail park with the introduction of Crossrail". Further clarification is required on this on both the location of the link, and which road is being referred to. The current station scheme proposes closing off the Ferry Lane underpass. It will need to be assessed against any other Haringey Council guidance on creating new underpasses.   | Noted, improved text on this will be included.  Action: Improve text to clarify the pedestrian network around the Station Square area.  |
| 415 | AAP726. | Transport for London         | Physical link       | "Creation of a physical link between the Station and the Green Link".  What is meant by a physical link - does this mean a new station entrance? Clarification is required here.   | For clarity, a physical link is access through which you can walk. It is not per se a station entrance, but clearly a station entrance will be one end of the physical link.  |

|     |         |                      |           |   | Action: Improve text to clarify the pedestrian network around the Station Square area.  |
|-----|---------|----------------------|-----------|---|---|
| 415 | AAP727. | Transport for London | Land use  | We would suggest adding two more bullets: "This site should seek an active ground floor frontage to enliven the area around the station entrance" and "A retail use at ground floor level with residential above will represent an appropriate mix of uses."  | Agreed.  Action: Include amendments as drafted.   |
| 415 | AAP728. | Transport for London | Wording   | TfL welcome the reference to "new residential and/or commercial development above the station". However, TfL believes the following statement: "The new public square will become the heart of the new station" should seek to better promote Tottenham as a whole, rather than just the station, the words "new station" could be better replaced with '…the heart of the new district centre' or '… the heart of the new, fully integrated transport interchange'. Further to this, TfL considers the statement: "This site will form the new Tottenham Hale District Centre" should be revised as TfL considers that a number of the sites (all of the ones mentioned in this section) will form the district centre, rather than just this one. | Action: Revise wording to align the preferred approach as having the train station as the centre of the new District Centre, with a number of sites combining to form a new District Centre.  |
| 818 | AAP729. | Our Tottenham        | Transport | The station has just undergone extensive remodelling at significant public cost. Is the intention to build a new square or will the bus station and square remain as they are?  | It is recognised that the bus station element of Tottenham Hale station has undergone significant remodelling. The rail station itself requires upgrading to make the full use of the services that pass through it, including improving wheelchair accessibility. It is noted that the potential for 4/5 tracking of the West Anglia line may necessitate further improvements to the station. The creation of development above, and around as part of a new District Centre is considered appropriate, and in line with the adopted Spatial vision for the area. |

## Comments on TH5 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent ID | Comment<br>ID | Respondent                                  | Topic                  | Summary of Response   | Council Response   |
|---------------|---------------|---|------------------------|---|--|
| 414           | AAP730.       | GLA   | Tall buildings         | This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies opportunities for taller point block buildings of 11+ storeys to promote legibility. GLA officers are satisfied that this is a suitable location for taller buildings in principle, subject to the requirements of London Plan Policy 7.7. | Support is noted.  |
| 415           | AAP731.       | Transport for London                        | Pedestrian connections | We would suggest adding an additional bullet point to the Development Guidelines: "Potential to explore pedestrian connections across the railway to improve access from the east (Ferry Lane estate)."   | Noted, this will be addressed in the streets and spaces strategy.  |
| 624           | AAP732.       | Tottenham & Wood Green Friends of the Earth | Road layout            | It is not clear why we need a new road through site where there is a two-way Broad Lane nearby. Any new thoroughfare should be for walking and cycling only   | There is a need for a fine graining of the road layout in new development to create a street-based centre with active frontages. Pedestrian and cycling permeability will be given preference. |
| 624           | AAP733.       | Tottenham &<br>Wood Green<br>Friends of     | Height                 | We are concerned at the visual impact of a building of more than 11+ storeys on the view from Ferry Lane Estate   | 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.          |

|     |         | the Earth   |                       |   | 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.   |
|-----|---------|---|-----------------------|---|--|
| 624 | AAP734. | Tottenham & Wood Green Friends of the Earth                                   | Green Corridors       | Any new development on the retail park should include creation of new green corridors along the railway and other edges and along any central corridor.   | Noted.  Action: Add point considering how a contribution to the borough's ecological network can be made.  |
| 625 | AAP735. | Stride Treglown on behalf of Micuber Estates and Berkely Square Development s | Timings               | We do recognise that TH5 would retain its ability to provide "destination retail" as outlined in the THDCF and in any event, is likely to be delayed due to its current obligations to existing tenants but should not prevent the full potential of Tottenham Hale being achieved.   | Noted.   |
| 632 | AAP736. | The Friends<br>of Down<br>Lane Park   | District centre       | proposals (TH 4 and TH5) are also not convincing on whether the planned district centre will be a great place for the workers and residents envisaged making up the future population.  | Noted, the principles of how a District Centre will operate will be set out in the AAP. Further implementation advice regarding specific mixes of uses will be included in the DCF.  |
| 634 | AAP737. | Alan Stanton, local resident  | Retail<br>competition | Haringey Council claims it wants to revitalise Tottenham High Road and to make Seven Sisters station an anchor site for the High Road. Therefore to develop an enlarged retail centre at Tottenham Hale is more than likely to contradict the Council's first aim. The current retail park is busy and successful, and is a day time centre   | The District Centre is allocated in both the London Plan, and in the Council's adopted Strategic Policies DPD. These documents have already made the case for this allocation.  It is noted that the types of business, including taking into account the local town centre offer at Seven Sisters/West Green Rd, and Tottenham High Rd/Bruce Grove can be expanded in the District Centre Framework, but the overarching policy framework will be set out in the AAP. |
| 634 | AAP738. | Alan Stanton, local resident  | Traffic               | These proposals would significantly increase the usage, again over developing which will cause even greater traffic problems, air contamination and noise pollution. These plans are silent on Ferry Lane which is the direct route into Tottenham Hale from Walthamstow. How will developing a new town centre and extending the retail park impact on Ferry Lane and the people who live along it? People mainly drive to retail centres, yet no mention is made in this proposal of traffic issues and management.  Anyone living locally will know that despite the improvements from the new gyratory, traffic problems are still very frequent and significant. | 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.  |
| 634 | AAP739. | Alan Stanton, local resident  | Night time<br>economy | No mention is made of potential night time activities which remains a serious omission. This is a residential area and even with the developments you propose will remain so.   | Noted, the development of an evening/ night time economy is essential for any District Centre. Further evidence is being prepared to identify how this can be addressed through future planning frameworks for the centre.   |

| 634 | AAP740. | Alan Stanton, local resident                  | Air pollution              | For people living along Broad Lane, and indeed for children attending Earlsmead School, air pollution remains a real day-to-day issue.  | Noted.  |
|-----|---------|---|----------------------------|---|---|
| 634 | AAP741. | Alan Stanton, local resident                  | District centre            | Finally, these proposals seek to create a town centre for an area which is not a town and is essentially a transport interchange. It is not like Stratford which always was a shopping and town centre, nor is it like Walthamstow which has always had a main shopping urban street. This is an artificial development which runs the risk of destroying a perfectly good and popular retail park, imposing even more very tall buildings with over intensification, whilst also undermining the retail trade along High Road, Tottenham.                      | The clear aim of the redevelopment of this site is to shift the mode by which visitors come to Tottenham Hale, from carbased, to public transport/foot/bike-based.  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. |
| 636 | AAP742. | David<br>Nutsford,<br>local resident          | Sense of place             | The retail park feels very cut off from the tube station due to the way the bus station was designed. More needs to be done in the near future to ensure Tottenham is a welcoming place to pedestrians or it may never shrug off its industrial past. It needs more greenery, cafes, playgrounds  | Noted. It is expected that Ashley Rd will link the various parcels in Tottenham Hale together in a coordinated fashion.   |
| 653 | AAP743. | CBRE on<br>behalf of<br>Hermes and<br>Argent  | Developer<br>contributions | The DPD refers to pooled section 106 contributions in dealing with Station Square West (site ref TH1, pages 95-98), suggesting that they will fund improvements to the public realm. That is an entirely reasonable approach, but seeking additional section 106 contributions may have a bearing on, for example, the level of affordable housing that the sites might bear. We recommend that this is noted in the supporting text.   | Noted. This is covered in the adopted Planning Obligations SPD.   |
| 653 | AAP744. | CBRE on<br>behalf of<br>Hermes and<br>Argent  | Clarification              | In terms of site requirements, bullet 1 says that:  Any [presumably 'a'] Council-approved District Centre Framework will be prepared for this site, and development should be in accordance with it.  However, decision-makers will not be able to attach the same weight to the District Centre Framework as the AAP, as it will not have been subject to the same scrutiny and nor will it form part of the development plan.  We therefore recommend that bullet 1 is amended to say that development should be 'informed by' the District Centre Framework. | The District Centre Framework is informed by the principles of the Urban Characterisation Study, but goes into a great deal more detail, particularly on viability grounds. It will be the implementation strategy for the allocations set out in the Local Plan.   |
| 653 | AAP745. | CBRE on<br>behalf of<br>Hermes and<br>Argent  | Parking                    | In terms of design guidelines for the retail park site, the draft AAP suggests that parking should be minimised. However, parking requirements are likely to be driven by the type of retail offer, and policy should reflect this.  Summary of recommendation: Revise text to require that the amount of parking sought should reflect the type and role of the proposed retail floorspace   | The growth predicated in Tottenham Hale is based on its high public transport accessibility. The provision of high levels of parking will not be supported, as it compromises the spatial vision for the area.  |
| 810 | AAP746. | Tynemouth<br>Area<br>Residents<br>Association | Traffic                    | Broad Lane, now undergoing improvements to decrease traffic and create a residential environment, would provide entrance/exit points for huge developments on Tottenham Retail Park leading to vastly increased business and residential road usage. Access to other sites around Broad Lane will similarly increase traffic flow through Broad   | Noted. The clear aim of the redevelopment of this site is to shift the mode by which visitors come to Tottenham Hale, from carbased, to public transport/foot/bike-based. Car free development will be sought as much as possible on sites in Tottenham Hale due to the excellent public transport connections.   |

|     |         | (TARA)  |               | Lane. Therefore, car-free zones must be implemented in all residential developments.  |   |
|-----|---------|---|---------------|---|---|
| 810 | AAP747. | Tynemouth<br>Area<br>Residents<br>Association<br>(TARA) | Viability     | The current buildings and usage of the site is viable, and should not normally be subject to a special Site Allocation for Development.  However an argument for exception could be made in this case. The site in its current form was created relatively recently and does not integrate with the general form or character of Tottenham.  The northern part of the site consists of viable buildings and usage and should therefore not be subject to a Site Allocation. The southern part of this site is historically very poorly designed, and could be redeveloped (including the removal of traffic access through the site and the creation of a public square).   | It is considered that the whole site must be considered as a single entity due to its unified use and ownership.  It is noted that the use can be improved, paying particular attention to connections into and through the site.   |
| 810 | AAP748. | Tynemouth<br>Area<br>Residents<br>Association<br>(TARA) | Traffic       | With the narrowing of Broad Lane this area is no longer equipped to deal with heavy traffic flow. This development means a substantial increase in heavy traffic and should, therefore be a car-free zone.  Any future development should conform to the Guiding Principles set out above.  | Noted. Car free development will be sought as much as possible on sites in Tottenham Hale due to the excellent public transport connections.  |
| 815 | AAP749. | Zena<br>Brabazon  | Retail centre | To develop an enlarged retail centre at Tottenham Hale is more than likely to contradict the Council's first aim. The current retail park is busy and successful, and is a day time centre. These proposals would significantly increase the usage, again over developing which will cause even greater traffic problems, air contamination and noise pollution. These plans are silent on Ferry Lane which is the direct route into Tottenham Hale from Walthamstow. How will developing a new town centre and extending the retail park impact on Ferry Lane and the people who live along it? People mainly drive to retail centres, yet no mention is made in this proposal of traffic issues and management. | The aim of the redevelopment of this site is to shift the mode by which visitors come to Tottenham Hale, from car-based, to public transport/foot/bike-based.   |
| 815 | AAP750. | Zena<br>Brabazon  | Activities    | No mention is made of potential night time activities which remains a serious omission. This is a residential area and even with the developments you propose will remain so. For people living along Broad Lane, and indeed for children attending Earlsmead School, air pollution is a real day-to-day issue.   | Noted, the development of an evening/ night time economy is essential for any District Centre. Further evidence is being prepared to identify how this can be addressed through future planning frameworks for the centre.  |
| 815 | AAP751. | Zena<br>Brabazon  | Town centre   | These proposals seek to create a town centre for an area which is not a town and is essentially a transport interchange. This is an artificial development which runs the risk of destroying a perfectly good and popular retail park, imposing even more very tall buildings with over intensification, whilst also undermining the development of Tottenham High Road.  | The clear aim of the redevelopment of this site is to shift the mode by which visitors come to Tottenham Hale, from carbased, to public transport/foot/bike-based.  The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission. Specific height limits will not be included in Site Allocations as all developments will be expected to respond appropriately to their context. |

| 818 | AAP752. | Our<br>Tottenham | Ferry Lane  | These plans are silent on Ferry Lane which is the direct route into Tottenham Hale from Walthamstow. How will developing a new town centre and extending the retail park impact on Ferry Lane and the people who live along it? People drive to retail centres, yet no mention is made in this proposal of traffic issues and management.  | The growth predicated in Tottenham Hale is based on its high public transport accessibility. The current retail park is a significant draw by private car, and it is envisaged that a shift to other uses will be created.   |
|-----|---------|------------------|-------------|--|--|
| 818 | AAP753. | Our<br>Tottenham | Economy     | No mention is made of potential night time activities which remains a serious omission. This is a residential area and even with the developments you propose will remain so. Anyone living locally will know that despite the improvements from the new gyratory, traffic problems are still very frequent and significant. For people living along Broad Lane, and indeed for children attending Earlsmead School, air pollution is a real day to day issue. | Noted, the development of an evening/ night time economy is essential for any District Centre. Further evidence is being prepared to identify how this can be addressed through future planning frameworks for the centre.   |
| 818 | AAP754. | Our<br>Tottenham | Town centre | These proposals seek to create a town centre for an area which is not a town and is essentially a transport interchange. It is not like Stratford which always was a shopping and town centre, nor is it like Walthamstow which has always had a main shopping urban street. This is an artificial development, imposing even more very tall buildings with over intensification, whilst also undermining the development of Tottenham High Road.              | The aim of the redevelopment of this site is to shift the mode by which visitors come to Tottenham Hale, from car-based, to public transport/foot/bike-based.  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. |

### Comments on TH6 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent ID | Comment ID | Respondent   | Topic                              | Summary of Response  | Council Response  |
|---------------|------------|--|------------------------------------|--|---|
| 809           | AAP755.    | Montagu Evans on behalf of Hale Village Properties             | Height                             | TH6 allocation fails to maximise the opportunities available to the Council in respect of the Site. The allocation as currently drafted only suggests support for an 18 storey building and makes no comment as to whether the principle of a building above 18 storeys could be acceptable. The purpose of the AAP must be to ensure that development sites within Tottenham are fully optimized.   | 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. |
| 809           | AAP756.    | Montagu<br>Evans on<br>behalf of<br>Hale Village<br>Properties | Height                             | bullet point 1 of the Development Guidelines section is negatively worded as the policy suggests that a building of over 18 storeys will require justification and no commentary is provided in terms of potential support of a building above this height. It is our position that this part of the policy as drafted is unsound as it has not been positively prepared.  Paragraph 182 of the National Planning Policy Framework requires Plans to be positively prepared to meet objectively assessed development requirements. | The Council believes the text is appropriate, in that all tall buildings need to be of excellent architectural quality.   |
| 809           | AAP757.    | Montagu<br>Evans on<br>behalf of<br>Hale Village               | Urban<br>characterisation<br>study | the Council's own evidence base, in the form of the Urban Characterisation Study, which at page 108 states that the Hale Village Tower could reach 20 – 25 storeys.  | The Council believes the text is appropriate, in that all tall buildings need to be of excellent architectural quality.   |

|     |         | Properties                                  |             | In order to make this part of the policy sound we recommend that the first bullet point is reworded as follows:  "Proposals for a tall building over 18 storeys should be explored in line with the Urban Characterisation Study which suggests a building of between 20 – 25 storeys could be appropriate. Any proposal for a tall building within or above these parameters will need to be of exceptional architectural quality in accordance with the DMDPD tall building policy." |  |
|-----|---------|---|-------------|--|--|
| 810 | AAP758. | Tynemouth Area Residents Association (TARA) | Section 106 | The council failed to appropriately secure Section 106 contributions   | This issue is outside the scope of the Plan. |
| 810 | AAP759. | Tynemouth Area Residents Association (TARA) | Education   | The council failed to provide onsite education facilities, as planned.   | This issue is outside the scope of the Plan. |
| 810 | AAP760. | Tynemouth Area Residents Association (TARA) | Health      | The council failed to provide health service centre, as planned. Thus contributing to the wider deficit in health provision in the area  | This issue is outside the scope of the Plan. |
| 810 | AAP761. | Tynemouth Area Residents Association (TARA) | Viability   | The developer had to be bailed out with public money due to financial failure. This led to the expansion of the development (increase of height of buildings); developer citing lack of viability of the original plans.   | This issue is outside the scope of the Plan. |
| 810 | AAP762. | Tynemouth Area Residents Association (TARA) | Education   | Hale Village development failed to provide the education facilities that were incorporated into the plans for the site. The expansion of Welbourne School has created capacity to help meet current needs but at the cost of valuable green amenity space.   | This issue is outside the scope of the Plan. |
| 810 | AAP763. | Tynemouth Area Residents Association        | Delivery    | There is strong evidence that the Council is not competent to ensure the proper delivery of major projects, as evidenced by two major developments in our area: Hale Village and Spurs. The Council has been out-maneuvered by property developers, and singularly failed to provide the expected outcomes for its local constituents.   | This issue is outside the scope of the Plan. |

|     |         | (TARA)                              |                                    |   |  |
|-----|---------|-------------------------------------|------------------------------------|---|--|
| 815 | AAP764. | Zena<br>Brabazon                    | Development                        | Permission for this has already been granted for a hotel. If this is developed as residential flats then this would, in our view, constitute glaring over development in this already congested site full of tower blocks.  | The current permission is for a mix of residential flats and a hotel, and already has, in principle, permission for 18 storeys of development. The Urban Characterisation Study supports this as a suitable location for a tall building.  |
| 562 | AAP765. | Cllr John<br>Bevan                  | Design                             | The design and the overall uncoordinated look of the recent existing development at this site is attracting much criticism and reflects badly on the Council in its failure to ensure that the original design brief was properly and rigorously applied.  The Hale Village Tower need to ensure that its design does not lead to more critiscm and indeed needs to be used as an opportunity, as far as possible, to try and bring some uniformity / a joined up approach to the overall design / look of the Tottenham Hale development.  | Noted. The design policies of the DMDPD will manage the quality of development on this site.   |
| 632 | AAP766. | The Friends<br>of Down<br>Lane Park | Design quality                     | The existing glass towers of Hale Village have spoilt the skyline of Tottenham Hale. People passing through are frequently critical of the green and orange face of the block along the station and railway line. More tower blocks will increase the likelihood of people passing through the area having a negative view of the area. So far from staying, the proposals will result on people passing through quicker or potentially avoiding the area. This is an important point because of the common stereotyping of Tottenham and the worth of its residents. More ugly tall buildings make the area less attractive and less a place where residents have strong civic pride. An outcome of the council's proposals could be to make Tottenham Hale an area residents are less willing to associate with and a place where people might be put-off from living in. | The Council aims to make Tottenham Hale a liveable destination based around good public transport, a new district centre, and a network of green spaces.  All new development will be assessed against the design principles in the development management policies which aim to deliver high quality design-led developments.   |
| 634 | AAP767. | Alan Stanton,<br>local resident     | Residential<br>overdevelopmen<br>t | Permission for this has already been granted for a hotel. If this is developed as residential flats then this would, in our view, constitute glaring over development in this already congested site full of tower blocks.  | The current permission is for a mix of residential flats and a hotel, and already has, in principle, permission for 18 storeys of development. The Urban Characterisation Study supports this as a suitable location for a tall building.  |
| 632 | AAP768. | The Friends<br>of Down<br>Lane Park | Lee Valley<br>Regional Park        | This is the Lea Valley. A regional park. An area of beauty. An area of environmental importance. An historical area. The monstrous development plans will damage all of this. If the plans are ever realised then history would surely view it as a mistaken period of urban planning never to be repeated. The council's proposals need to be stopped now so that the area doesn't go in the wrong direction, with the consequences remaining with us the residents for decades.  The proposed development on Hale Wharf (TH7) is out-of-step with the character of the area. A line of tall tower blocks along the Lea will destroy the skyline, affect bird migration, and have a detrimental  | Noted. It is the aim of this policy to outlook from, and routes through LVRP Reference to Lee Valley Regional Park. These will be critical issues when considered through planning applications, as picked up in DM1 and DM2. As such it is the aim of this document to improving access, ecology quality, improving paddocks through appropriate adjacent development.  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 |

|     |         |                       |                          | impact on the context of and to the area and its relationship with the river. A new Wetlands is being developed at the Walthamstow Reservoirs to encourage people to appreciate and enjoy nature more. In contrast, Haringey Council's contribution to the environment is to plonk a series of tower blocks adjacent to this development to exploit it for the sale of property.  Hale Village is an existing blot on the landscape. So, any new tower blocks (TH6) over-shadowing the Tottenham Marshes and Lea Valley would made the blot bigger. What a dreadful legacy that the future dominant view in Tottenham Hale will be of a concentrated suite of tall buildings and not the beauty of the open wildness of the marshes and reservoirs.   | Allocations as all developments will be expected to respond appropriately to their context.   |
|-----|---------|-----------------------|--------------------------|---|---|
|     |         |                       |                          | The housing on Bream Close and the Ferry Lane estate show how housing can be built without destroying the natural setting of those areas and providing harmonious riverside living. The buildings blend into their surroundings. Animals actually roam the green space around the houses along the waterways. It is difficult to imagine tall tower blocks having the same togetherness of nature and communities.  |   |
| 818 | AAP769. | Our<br>Tottenham      | Height                   | Permission for this has already been granted for a hotel. If this is developed as residential flats then this would, in our view, constitute glaring over development in this already congested site full of tower blocks.  | The current permission is for a mix of residential flats and a hotel, and already has in principle permission for 18 storeys of development. The Urban Characterisation Study supports this as a suitable location for a taller building.   |
| 414 | AAP770. | GLA                   | Strategic<br>aspirations | This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation recognises existing planning permission HGY/2006/1177.  | Support is noted.   |
| 415 | AAP771. | Transport for London  | Pedestrian connections   | We would suggest adding an additional bullet point to the Development Guidelines: "Potential to explore pedestrian connection under Ferry Lane and is a condition of the original Hale Village planning consent to investigate."  |   |
| 422 | AAP772. | Environment<br>Agency | Sites in Flood<br>Zone 2 | Where sites are in Flood Zone 2 this should be noted explicitly in the explaining what this means for the design guidelines of the development. Where there is more than one flood zone (e.g. in Flood Zones 1 & 2) this should also be noted and the development should follow the sequential approach to steer the development to the parts of the site at lowest risk of flooding. We suggest the following additional wording is added to the development guidelines for the above sites:  This site is in Flood Zone 2, classified by the National Planning Practice Guidance as having a medium risk of flooding from rivers. Development of this site must be supported by a Flood Risk Assessment. For development on this site to be acceptable the FRA must show there will be no increase in flood risk on or off site and that the development will be safe for future users. Development should be focussed in areas of Flood Zone 1 and no highly vulnerable uses will be permitted in areas of Flood Zone 2 without passing the sequential test. | Action: Add "This site is in Flood Zones 2 [delete as applicable], classified by the National Planning Practice Guidance as having a low/medium/high [delete as applicable] risk of flooding from rivers. Development of this site must be supported by a Flood Risk Assessment. The FRA must show there will be no increase in flood risk on or off site and that the development will be safe for future users. Development must be steered to the areas within the red line boundary that are at lowest risk of flooding. Development should be focussed in areas of Flood Zone 1 and no highly vulnerable uses will be permitted in areas of Flood Zone 2 without passing the sequential test." |

|     |         |                       |  | For sites where there is more than one Flood Zone ( <b>AAP</b> : NT2, NT3, NT4; <b>SA</b> : SA52, SA63, SA66) we suggest the following additional wording:  This site is in Flood Zones 1 & 2 & 3 [delete as applicable], classified by the National Planning Practice Guidance as having a low/medium/high [delete as applicable] risk of flooding from rivers. Development of this site must be supported by a Flood Risk Assessment. The FRA must show there will be no increase in flood risk on or off site and that the development will be safe for future users. Development must be steered to the areas within the red line boundary that are at lowest risk of flooding. Development should be focussed in areas of Flood Zone 1 and no highly vulnerable uses will be permitted in areas of Flood Zone 2 without passing the sequential test.   |  |
|-----|---------|-----------------------|--|---|--|
| 422 | AAP773. | Environment<br>Agency | Flood Risk<br>Assessment of<br>Sites of 1ha or<br>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:  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.  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:  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. | 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. |
| 422 | AAP774. | Environment<br>Agency | Potentially contaminated sites                         | National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken  | Noted.  Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.  |

## Comments on TH7 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent ID | Comment ID | Respondent | Topic    | Summary of Response   | Council Response |
|---------------|------------|------------|----------|---|------------------|
| 421           | AAP775.    | Historic   | Heritage | New development should preserve and/or enhance the setting of the | Noted.           |
|               |            | England    |          | adjacent grade II listed Ferry Boat Inn                           |                  |

| 422 | AAP776. | Environment<br>Agency                                | De-culverting  | This allocation is included in the SFRA, however the red line boundary is different and the site name is also different (Tottenham Hale, Tottenham Hale Retail Park). The SFRA identifies the flood zone that the development falls in but does not highlight the river wall and its importance as a flood defence within the flood risk implications for the site. This must be amended. We are pleased to see that we are flagged as a key stakeholder in the development guidelines. We have suggested additional wording on page 3 of our response to secure a satisfactory development design in terms of flood risk. For this site we also request the following wording in addition to consider the adjacent rivers and implications on flood risk and biodiversity:  The site is surrounded by a network of main rivers (Pymmes Brook, Lee Navigation and Lee Cut). Development should ensure opportunities to enhance the ecological status of the rivers, reduce flood risk and ensure access for future maintenance and replacement of the river walls is realised. The condition of the flood defence must be commensurate with the lifetime of the development. A condition survey will need to be undertaken and any repair works intertified a parient extention. | The site is included in the SFRA as site 128.  Action: Add suggested wording.   |
|-----|---------|--|----------------|--|---|
| 423 | AAP777. | National Grid  | Overhead lines | identified carried out.  Hale Wharf is crossed by VC 275 kV overhead line. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. National Grid prefers that buildings are not built directly beneath its overhead lines. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ.  | Noted.  |
| 573 | AAP778. | Michael<br>Hodges, local<br>resident                 | Height         | How tall will these buildings be? I object to tall buildings or tower blocks located anywhere on Hale Wharf.   | 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. Therefore specific height limits will not be included in Site Allocations as all developments will be expected to respond appropriately to their context. |
| 579 | AAP779. | Laura<br>Harrison,<br>resident                       | Paddocks       | The Paddock Nature reserve could be a huge public asset but is currently isolated, inaccessible and unsafe, and attracts rough sleepers. Substantial investment is needed to transform this area. Any development which includes the Paddock nature reserve should retain and safeguard the current green space, whilst creating a higher quality, more accessible wildlife and leisure environment.   | Support is noted.   |
| 624 | AAP780. | Tottenham & Wood Green Friends of the Earth          | Ecology        | It should include a green strip of small trees and bushes along the eastern edge to soften it visually from the Paddock. It needs rigorous lighting control to prevent light pollution affecting the Paddock and adjacent river and reservoir areas.   | Noted, a new bullet on landscaping requirements will be added.  Action: Addition of a new bullet point on landscaping   |
| 624 | AAP781. | Tottenham &<br>Wood Green<br>Friends of<br>the Earth | Height         | This development must "step down" in height from the road to no more than 5 storeys along the section backing onto the Paddock   | 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. Therefore specific height limits will not be included in Site Allocations as all developments will be expected to respond appropriately to their context. |

| 632 | AAP782. | The Friends<br>of Down<br>Lane Park | Paddocks                    | The Paddock green space is in an unacceptable poor condition. Yes, some improvements have been started, but it is largely unkempt and there are areas of dumped rubbish. It could do with a significant investment to both safeguard it as a green area and enhance it as a resource for the community to enjoy. This should be a priority of the work for improving the future of the area.   | Principles are agreed.  |
|-----|---------|-------------------------------------|-----------------------------|--|---|
| 632 | AAP783. | The Friends of Down Lane Park       | Lee Valley<br>Regional Park | This is the Lea Valley. A regional park. An area of beauty. An area of environmental importance. An historical area. The monstrous development plans will damage all of this. If the plans are ever realised then history would surely view it as a mistaken period of urban planning never to be repeated. The council's proposals need to be stopped now so that the area doesn't go in the wrong direction, with the consequences remaining with us the residents for decades.  The proposed development on Hale Wharf (TH7) is out-of-step with the character of the area. A line of tall tower blocks along the Lea will destroy the skyline, affect bird migration, and have a detrimental impact on the context of and to the area and its relationship with the river. A new Wetlands is being developed at the Walthamstow Reservoirs to encourage people to appreciate and enjoy nature more. In contrast, Haringey Council's contribution to the environment is to plonk a series of tower blocks adjacent to this development to exploit it for the sale of property.  Hale Village is an existing blot on the landscape. So, any new tower blocks (TH6) over-shadowing the Tottenham Marshes and Lea Valley would made the blot bigger. What a dreadful legacy that the future dominant view in Tottenham Hale will be of a concentrated suite of tall buildings and not the beauty of the open wildness of the marshes and reservoirs.  The housing on Bream Close and the Ferry Lane estate show how housing can be built without destroying the natural setting of those areas and providing harmonious riverside living. The buildings blend into their surroundings. Animals actually roam the green space around the houses along the waterways. It is difficult to imagine tall tower blocks having the same togetherness of nature and communities. | Noted. The document recognises the importance of the Lee Valley Regional Park and aims to improve access to and from the park. However, we also acknowledge that the park contains internationally protected wetlands and therefore development should protect and improve the park. SP13 and the open space development management policies seek to ensure that development adjacent to open space does not adversely impact on it.  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 allocations |
| 634 | AAP784. | Alan Stanton, local resident        | Height                      | The plans for Hale Wharf are silent as to the height of new buildings. It is entirely inappropriate, in our view, for tall buildings or tower blocks to be located anywhere on Hale Wharf.   | 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 from allocations references to specific heights   |
|-----|---------|---|--------------------------------|--|--|
| 650 | AAP785. | Jeanette<br>Sitton, local<br>resident                                     | Antisocial<br>behaviour        | Presumably, bridge pedestrians will be able to enter the site at any time - day or night, and this will inevitably result in an increase in antisocial activity, more so than now, (eg littering; drugs; violence; fire setting and structural damage to the site. I fear it will no longer be the wildlife haven as we know it now, if the bridge enters it   | A separate masterplan for the Paddocks will be produced to guide enhancement of ecological & open space quality. It is assumed that entrance to the Paddocks will not be 24Hrs.  |
| 650 | AAP786. | Jeanette<br>Sitton, local<br>resident                                     | Biodiversity                   | The Paddock is a locally unique site, rich in biodiversity. Much of its wildlife are accustomed to quietness, minimal disturbance through low footfall. As a result, they thrive there, in an oasis - a semi-island, with water running along each side. I fear, a bridge will change all of that  | A separate masterplan for the Paddocks will be produced to guide enhancement of ecological & open space quality.   |
| 650 | AAP787. | Jeanette<br>Sitton, local<br>resident                                     | Safety                         | Also, FYI, the Friends of the Paddock still exist, but now in name only. As Secretary, I was very active there for a number of years, but since the increase in squatter activity I have stopped visiting the site, as it's unsafe to do so alone. Of course, Haringey should have used a firmer hand on this issue but anyway, I digress  | Noted.   |
| 651 | AAP788. | Tibbalds on<br>behalf of ISIS<br>Waterside<br>development<br>s and Newlon | Comprehensive redevelopment    | Given that the site is in multiple ownerships and that each landowner may have differing objectives for the future use of their site it would be inappropriate and in the context of the overarching objective in relation to timely delivery, unwise to 'require' a comprehensive proposal for the Site. Such a requirement could fetter the ability of a willing landowner bringing forward development on one site, should another landowner choose not to bring forward his/ her land. In addition each landowner will be required to secure individual stand – alone planning consents on land in their ownership and will want to control the delivery of such a planning consent.  Each landowner, will however as part of any pre-application process be willing to demonstrate that their individual schemes would not fetter the ability of an adjacent landowner to bring forward his/ her site in the future.  Suggested rewording: Given this commentary we would suggest that bullit point 5 should be deleted and bullit point 6 be re-worded; 'Development should be delivered in a co-ordinated manner. The Council will work with landowners and developers to help secure the delivery of the comprehensive redevelopment of the Site'. | Noted. It is considered that the policy is appropriate to ensure coordinated delivery. The Council cannot require development to come forward at the same time or by a single developer, but it can ensure co-ordinated development.  Action: Add a comprehensive development policy to the DMDPD.   |
| 651 | AAP789. | Tibbalds on<br>behalf of ISIS<br>Waterside<br>development<br>s and Newlon | Existing employment floorspace | The Sitse currently support a mix of low-grade storage, building contractors and B1 light industrial/ office uses. Based on survey work we confirm that the Newlon/ ISIS sites support around 7,000sqm of floorspace and that this floorspace supports between 40 and 50 workers. Given the nature of the activities it is difficult to confirm whether such jobs are full or part time. As part of the regeneration proposals both Sites will be cleared to enable redevelopment to take place. In the context of the objective to deliver a residential led mixed development ISIS's feasibility exercise suggests that it will be possible to introduce some commercial uses into the ground floors fronting onto a new landscaped space associated with the proposed new east/ west Green Link. It is envisaged that whilst east west movement across the Sites will be fairly limited they will   | The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.  Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out for DM50. |

|     |         |                        |                     | experience some pedestrian footfall and hence there will be an opportunity to introduce a small amount of active commercial uses into buildings fronting onto the Green Link. In addition ISIS believe that there will be the potential to exploit the waterways and to introduce additional canal boats, which could support some commercial/leisure functions.  The ISIS Site, given the nature of the proposed development will also need to support concierge staff and general maintenance staff. As part of any future planning application and indeed as part of the pre-application process the applicants will be happy to work with their commercial agents in order to try and maximise the potential to deliver new commercial/ leisure activity on the TH7 Site. As will be appreciated, however ISIS and Newlon do not want to reserve space within their developments, as a result of some artificial and undeliverable planning requirement, for commercial uses that will never be taken up. Such commercial uses are likely to be best suited to the ground floors of the development. Such space is already at a premium in that it is providing for the operational needs of the scheme and the accommodation of high quality family accommodation with gardens and hence it is our view that any commercial provision should be capable of delivery and of sustaining itself and its provision should be weighed up against the other key objective for the site i.e. the delivery of high quality family accommodation  Suggested rewording: Delete bullit point one and modify bullit point 2 to read:  'Part of the site (Hale Wharf) is in employment use and will need to reflect the Council's aspiration to create a mix of uses on this site |  |
|-----|---------|------------------------|---------------------|---|--|
|     |         |                        |                     | through the introduction of a mix of new commercial and leisure uses, which take advantage of the site's waterside location and which provide amenities for the users of the Regional Park'.  |  |
| 657 | AAP790. | Canal &<br>River Trust | Waterfront location | Although the Trust would support some employment uses within the site, in line with the Upper Lee Valley Opportunity Area Planning Framework, we consider that a residential-led development will provide the best opportunity to maximise the waterfront location of the site and improve public access and interaction with the River Lee.  | Noted, it is considered that the policy includes provision for this.   |
| 657 | AAP791. | Canal &<br>River Trust | Regeneration area   | The Trust is concerned that giving the site Designated Employment Area: Regeneration Area status will not make best use of its waterfront location. Although the site currently contains employment, in the form of low quality warehousing space, this use does not encourage access or interaction with the waterspace.   | Regeneration area status is the only designation that supports mixed use development. Therefore it is considered the most appropriate for this site.   |
| 657 | AAP792. | Canal &<br>River Trust | OAPF                | The Upper Lee Valley Opportunity Area Planning Framework, which was adopted by the Greater London Authority in July 2013, states for Hale Wharf there should be a "Landmark residential-led development with public realm maximising the waterfront location". The Mayor's framework indicates that the site would include residential, retail, leisure and workspace uses. The Trust is therefore concerned that the Tottenham Area Action Plan's focus on the site as a Designated Employment Area would be contrary to the Mayor's Upper Lee Valley Opportunity Area Planning Framework.   | It is a key objective of the Plan to meet employment as well as housing need. Regeneration area status is the only designation that supports mixed use development. The use of this designation is supported by the findings of the Employment Land Study. |

| 657 | AAP793. | Canal &<br>River Trust                      | Employment barges   | We also support the provision of other types of moorings at Hale Wharf and we note that planning permission been implemented at the site for four employment barges. Whilst we support the provision of further employment barges, we would not want future moorings to be restricted to this use as the site may be suitable for other types of moorings such as leisure, café or restaurant and visitor and community boat moorings.   | Noted, but the Council is keen to ensure this part of the waterway provides a mix of uses to complement future residential use. As such this area is not seen as an area to promote residential moorings. |
|-----|---------|---|---------------------|--|---|
|     |         |   |                     | Accordingly, we request that the wording of bullet point one be amended as follows:  Redevelopment of the Hale Wharf site will need to ensure the continued provision of facilities for the residential mooring community to the north of Hale Wharf. On the western side of the site, redevelopment should maximise the potential for the provision of a range of other types of moorings, including employment barges, café and restaurant boats, and leisure, visitor and community boats.  |   |
| 657 | AAP794. | Canal &<br>River Trust                      | Cooling             | With regard to the seventh bullet point, we would also suggest that the site could benefit from using water from the Navigation for heating and cooling purposes and we would like this reflected within the text  | This is a feature that could be supported as part of a detailed design.   |
| 657 | AAP795. | Canal &<br>River Trust                      | Residential mooring | Within the development guidelines, we object to the wording of the first bullet point (page 111). We would consider a 'house boat' to be a static purpose built floating home which is not self-propelled and does not have the ability to freely move within the canal network. This is as opposed to the more typical self-propelled narrow boat, which is most common on the River Lee Navigation and which are currently moored at Hale Wharf. We therefore request that the term 'house boat' is removed and replaced with the term 'residential mooring'.  | Agreed, change word.  Action: Amend text to reflect change  |
| 676 | AAP796. | Lee Valley<br>Regional<br>Park<br>Authority | Paddocks            | It would be helpful to include the full Proposals text in relation to Hale Wharf as follows:  Work with the London Borough of Haringey, the Canal and River Trust and other stakeholders to identify options for development on Hale Wharf that will bring this site into a Park compatible leisure use whilst also meeting its designation as a Regeneration Area within the London Borough of Haringey's Core Strategy. Appropriate uses would include (but are not restricted to) one or more of the following:  • New recreational or sporting facilities, based on the sites waterside location • Accommodation serving visitors to the Park • Waterside visitor facilities and facilities for clubs with a community emphasis, incorporating leisure uses for example café, cycle and canoe hire/club facilities.  The type, scale and design of development would need to be appropriate in terms of the sites location within the heart of the Park adjacent to internationally and nationally important biodiversity sites and its waterside environment.  Any development of the site would be expected to support and | There is no value in repeating guidance from a non-statutory document in a statutory one. It is considered that the principles set out in the guidance document conform to the proposed planning policy.  |

|     |         |                   |        | complement existing leisure and nature conservation activity and facilities in the area in particular the Walthamstow Wetlands project. It should also enhance landscape quality and visual permeability, the ecological values of the environment and adjoining waterways and support waterside habitat creation. Design should allow views through the site from the towpath to the reservoirs and wider Park.  Development on the site should encourage sustainable modes of transport, making full use of the Tottenham Hale Station and bus interchange, with improved pedestrian and cycle links between this hub, Blackhorse Road station to the east and strategic pedestrian and cycle links within the valley.  A new southern gateway into the Regional Park and Tottenham Marshes from Ferry Lane via Hale Wharf and a new pedestrian link across the waterways should form part of the regeneration of Hale Wharf.  Development of the site which is not appropriate under the terms of the Park Act 1966 and the Park Authority's remit and does not accord with the proposals set out in the Park Development Framework will be resisted. |   |
|-----|---------|-------------------|--------|--|---|
| 802 | AAP797. | Michael<br>Hodges | Height | How tall will these buildings be? I object to tall buildings or tower blocks located anywhere on Hale Wharf.   | 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.  |
| 815 | AAP798. | Zena<br>Brabazon  | Height | The plans for Hale Wharf are silent as to the height of new buildings. It is entirely inappropriate, in our view, for tall buildings or tower blocks to be located anywhere on Hale Wharf.   | The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.   |
|     |         |                   |        |  | Detailed design will be required on all sites to gain planning permission. Specific height limits will not be included in Site Allocations as all developments will be expected to respond appropriately to their context.  |
| 818 | AAP799. | Our<br>Tottenham  | Height | The plans for Hale Wharf are silent as to the height of new buildings. It is entirely inappropriate, in our view, for tall buildings or tower blocks to be located anywhere on Hale Wharf. Tall towers on Hale Wharf will damage the view of the Lea Valley and place a shield around the new Wetlands Trust Centre being established at the Walthamstow Reservoirs.   | 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. |

## Comments on TH8 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent ID | Comment ID | Respondent                              | Topic  | Summary of Response   | Council Response   |
|---------------|------------|---|--|---|--|
| 414           | AAP800.    | GLA                                     | Strategic<br>context                                   | This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies an opportunity for a taller building marking the edge of the proposed 'green link', and the gateway to the new district centre at Tottenham Hale. 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 is noted.  |
| 815           | AAP801.    | Zena<br>Brabazon                        | Tall building  | A tower would be entirely out of keeping with the estate and with Park View Road. Would this be allowed or even considered in other parts of Haringey?  | 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.                      |
| 619           | AAP802.    | Amanda<br>Richardson,<br>local resident | Monument Way   | In addition, we are not in favour of building extra housing across the end of Fairbanks Road. We are well aware that the Government requires councils to increase housing, but feel that there are sites in Haringey that would be less detrimental to Chestnuts Estate, such as the disused space beside Ikea. It is particularly unfair to residents at the end of each row closest to Monument Way, who would have new structures looming over them.   | It is the Council's view that the existing open space on Monument Way has limited value and has no formal open space or biodiversity designation. Housing development would have a higher level of benefit than preserving the current amenity value that the land provides.  All development will be designed to respect the amenity of adjoining and future occupants of properties, as set out in draft DMDPD policies DM1 and DM2. |
| 422           | AAP803.    | Environment<br>Agency                   | Flood Risk<br>Assessment of<br>Sites of 1ha or<br>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:  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.  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:  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. | 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.   |
| 579           | AAP804.    | Laura<br>Harrison,                      | Green links  | The strip of land to the north of Monument way currently also provides an informal opportunity to travel through green space from   | It is considered that the Green Link to the north offers a preferred pedestrian route to the Lee Valley from Tottenham High Rd.  |

|     |         | resident  |               | Tottenham High Cross to the Marshes- this option is currently partially interrupted by demolition hoardings surrounding the old Welborme Centre, but could be formally reinstated through appropriate development there, to include access through the surrounding green space. Further opportunities to provide connections to the marshes should also be sought further North, to create a well-connected, well-used, safe and accessible space.  |   |
|-----|---------|---|---------------|---|---|
| 818 | AAP805. | Our<br>Tottenham  | Green space   | The green space should be treasured, protected and enhanced.  | It is the Council's view that the existing open space on Monument Way has limited has no formal open space or biodiversity designation, and that housing development would have a higher level of benefit than preserving the current amenity value that the land provides.   |
| 632 | AAP806. | The Friends<br>of Down<br>Lane Park                     | Green space   | The land along Fairbanks Road (site TH8) should be enhanced both as attractive landscaping along the Chesnuts Estate, but also have installed outdoor gym facilities, such an investment will provide accessible in terms of being free and locally based on the estate. It is an investment that will result in healthier and more active lives for the estate's residents.  | It is the Council's view that the existing open space on Monument Way has limited has no formal open space or biodiversity designation, and that housing development would have a higher level of benefit than preserving the current amenity value that the land provides.   |
| 810 | AAP807. | Tynemouth<br>Area<br>Residents<br>Association<br>(TARA) | Green space   | This site consists of a green corridor adjacent to Chestnuts Housing Estate and the site of the Caribbean Senior Citizens Welbourne Community Centre (now demolished).  Since the community centre was a popular and well-used facility before demolition, this site should provide a multi-purpose community facility.  The green corridor is used by children as an informal play area and has no buildings. It provides a shield for the housing estate from the heavy traffic along Monument Way. This must be retained and enhanced to offset the green space deficit  | It is the Council's view that the existing open space on Monument Way has limited has no formal open space or biodiversity designation, and that housing development would have a higher level of benefit than preserving the current amenity value that the land provides.   |
| 634 | AAP808. | Alan Stanton, local resident                            | Height        | We would oppose yet another tower since this is a residential area with low rise blocks. The highest block is Warren Court, which is set back from the road and is eight or nine storeys.  The Welbourne site is surrounded by a four and one five storey block, A tower would be entirely out of keeping with the estate and with Park View Road. Would this be allowed or even considered in other parts of Haringey? The Welbourne centre site is not in the proposed Tottenham Hale District Centre, it is in a quiet residential neighbourhood comprising residential streets of terraced housing and a low rise estate. Building a tower block on this site, which in these plans would stand almost opposite another tower block would destroy the character of our neighbourhood and be entirely out of keeping with the rest of the area's layout. | 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. |
| 573 | AAP809. | Michael<br>Hodges, local<br>resident                    | Health centre | This Local Authority land would be ideal for social housing and a much needed health centre. I object to the building of tower blocks here, beside the current low rise public housing.   | Support for the mix of uses is noted.   |
| 818 | AAP810. | Our<br>Tottenham  | Height        | The Welbourne site is surrounded by four and one five storey block and a tower would be entirely out of keeping with the estate and with  | The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are  |

|     |         |  |              | Parkview Road. The Welbourne centre site is not in the proposed Tottenham Hale District Centre, it is in a quiet residential neighbourhood comprising residential street of terraced housing and a low rise estate. Building a tower block on this site would destroy the character of our neighbourhood and be entirely out of keeping with the rest of the area's layout. We do not support aspects of the Green Link for reasons set out above in this document.  | 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.   |
|-----|---------|--|--------------|--|--|
| 815 | AAP811. | Zena<br>Brabazon   | Monument Way | Turning to the design guidelines, what does 'introducing activity to Monument Way' mean? Monument Way is a main road which is greened, provides protection for the nearby houses from air and noise pollution through high walls and through an earth bund and high willow fencing. It should remain as it is. Any further housing on this road will be putting people in harm's way and this is entirely unnecessary. The green space along Fairbanks Road is part of the landscaping of Chesnuts Estate and should not be built on. It provides outdoor amenity for residents, with dog walkers using it for owners and pet exercise while young children play there so as to not disturb residents by playing in the grassed patches between the housing. | The principle of returning activity to Monument Way seeks to create doors facing the street, thereby creating passive surveillance onto Monument Way.  It is the Council's view that the existing open space on Monument Way has limited has no formal open space or biodiversity designation, and that housing development would have a higher level of benefit than preserving the current amenity value that the land provides. |
| 579 | AAP812. | Laura<br>Harrison,<br>resident                                     | Monument Way | It is absolutely not acceptable to build on the green strip of land to the north of Monument Way, which currently provides a walkway, sheltered from the heavy traffic and along green land, from Tottenham Green to Down Lanes park, and on to the Marshes beyond. This green pedestrian route should be safeguarded and improved. Any development on the Welbourne Centre site should seek to reinstate the valuable community space previously provided here.   | It is the Council's view that the existing open space on Monument Way has limited has no formal open space or biodiversity designation, and that housing development would have a higher level of benefit than preserving the current amenity value that the land provides.  |
| 648 | AAP813. | Jennifer<br>Williams,<br>local resident                            | Monument Way | I am unhappy at the recent spate of flat building along Monument Way. Which it seems is planned to continue. I realise that there is a very underused green space by the wall separating it from the Chesnuts estate, but find it hard to comprehend how anyone could happily live in a flat that faces straight on to a major road. I wonder what is air quality of such homes as well as the ambient noise level, especially when you'd just like to open a window to get some air, or to cool down in the summertime.   | All development will be designed to respect the amenity of adjoining and future occupants of properties, as set out in draft DMDPD policies DM1 and DM2.   |
| 662 | AAP814. | Holy Trinity C<br>of E on<br>behalf of the<br>Church of<br>England | Monument Way | While we appreciate the need to develop the site of the former Wellbourne Centre, the use of land alongside Monument way will overshadow the estate and school, diminishing the quality of life for those living there, and reducing a significant portion of Green space and parking for local residents.   | Support for the mix of uses is noted.  It is the Council's view that the existing open space on Monument Way has limited has no formal open space or biodiversity designation, and that housing development would have a higher level of benefit than preserving the current amenity value that the land provides.   |
| 799 | AAP815. | Bob Lindsay-<br>Smith  | Open space   | Neither will open spaces be protected: The open space in Northumberland Park is described in Section 5.12.4 The solution given in the document is however not to look after these spaces better, but to build over them! The open space beside Monument Way would be built on as part of the Welbourne Centre scheme. There doesn't appear to be a definite promise to keep the whole of   | An overarching aim of the document is to protect open space, and improve its quality and improve access to and through them.  It is the Council's view that the existing open space on Monument Way has limited has no formal open space or biodiversity designation, and that housing development would have a higher   |

|     |         |  |                                | The Paddock as a nature reserve.   | level of benefit than preserving the current amenity value that the land provides.  The Paddock will remain as open space, the only part of the Paddock with potential for new development in the existing garages/M.O.T centre site, which makes a detrimental neighbour to the green space.  |
|-----|---------|--|--------------------------------|--|--|
| 818 | AAP816. | Our<br>Tottenham                                     | Monument Way                   | What does 'introducing activity to Monument Way' mean? Monument Way is a main road which is greened, provides protection for the nearby houses from air and noise pollution through high walls and through an earth bund and high willow fencing. It should remain as it is. Any further housing on this road would destroy a much needed public green space, be overdevelopment and will be putting people in harm's way and this entirely unnecessary.   | The principle of returning activity to Monument Way seeks to create doors facing the street, thereby creating passive surveillance onto Monument Way.  |
| 422 | AAP817. | Environment<br>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   |  |
| 634 | AAP818. | Alan Stanton, local resident                         | Pro health centre              | Having a health centre underneath, and access to some community meeting space would be welcome given the shortage of primary health and community facilities in the area   | Support is noted.  |
| 634 | AAP819. | Alan Stanton, local resident                         | Pro public housing             | Given the shortage of public housing, the proximity of this site to Chestnuts estate, and the fact that Haringey owns the land, it would make good sense to build public housing on this site  | Support is noted.  |
| 624 | AAP820. | Tottenham &<br>Wood Green<br>Friends of<br>the Earth | Green space                    | The proposal would build over green open space along Monument Way. If this takes place, the green open space needs to be replaced nearby   | It is the Council's view that the existing open space on Monument Way has limited has no formal open space or biodiversity designation, and that housing development would have a higher level of benefit than preserving the current amenity value that the land provides.  |
| 815 | AAP821. | Zena<br>Brabazon                                     | Social housing                 | Given the shortage of public housing, the proximity of this site to Chestnuts estate, and the fact that Haringey owns the land, it would make good sense to build public housing on this site. Having a health centre underneath, and access to some community meeting space would be welcome given the shortage of primary health and community facilities in the area. We would oppose yet another tower since this is a residential area with low rise blocks. The highest block is Warren Court, which is set back from the road and is eight or nine storeys. | Support for the mix of uses is noted.  The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission. Specific height limits will not be included in Site Allocations as all developments will be expected to respond appropriately to their context. |
| 818 | AAP822. | Our<br>Tottenham                                     | Social housing                 | Given the shortage of public housing, the proximity of this site to Chestnuts estate, and the fact that Haringey owns the land, it would make good sense to build public housing on the east end of this site. Having a health centre underneath, and access to some community meeting space would be welcome given the shortage of primary  | Support for the mix of uses is noted.  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.   |

|     |         |  |   | health and community facilities in the area. We would oppose yet another tower since this is a residential area with low rise blocks. The highest block is Warren Court, which is set back from the road and is eight or nine storeys.   | 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.   |
|-----|---------|--|---|--|--|
| 802 | AAP823. | Michael<br>Hodges  | Social housing                                    | This Local Authority land would be ideal for social housing and a much needed health centre. I object to the building of tower blocks here, beside the current low rise public housing.  | Support for the mix of uses is noted.  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. |
| 662 | AAP824. | Holy Trinity C<br>of E on<br>behalf of the<br>Church of<br>England | Tall building                                     | Many of the children who attend Holy Trinity School live in the Chestnuts estate, and we are concerned that a tall building, as proposed, along Monument Way, will have a negative impact on those living in homes in this area.   | All development will be designed to respect the amenity of adjoining and future occupants of properties, as set out in DMDPD policies DM1 and DM2.   |
| 619 | AAP825. | Amanda<br>Richardson,<br>local resident                            | Threat to<br>Chestnuts<br>Estate                  | We attended the meeting on March 25th at Holy Trinity Church Primary School regarding housing. We are sorely disappointed that the speakers were unable to answer key questions about whether the estate, including Tamar Way, would be demolished and redeveloped. This has been a rumor for over five years now, which have been heightened by builders on the estate who are curretnly refurbishing Hamilton Close. Demolition seems likely with the increasing number of redevelopments proposed, such as Broadwater Farm Estate. It seems pointless to waste money updating bathrooms, kitchens and windows if the estate will be flattened in a few years. We feel we have been left in the dark and that the council is not being honest about their plans for Chestnuts Estate.  | There are no proposals for redevelopment of the Chestnuts Estate.  |
| 619 | AAP826. | Amanda<br>Richardson,<br>local resident                            | Wall separating<br>Monument Way<br>& Fairbanks Rd | My family and I are strongly disapprove of plans to remove the wall, trees and greenery separating Monument Way from Fairbanks Road. As you have written, residents of the estate value the secluded nature of our location. Removing the wall would expose us to traffic and increase the number of pedestrians walking through the estate, increasing the risk of theft. Furthermore, there will be the nuisance of increased noise and traffic. Your reasoning that trees would be adequate replacement of the wall is paltry. The proposed trees used at other locations are feeble and will take many years to grow. The ones that have been erected near the Welbourne Centre site are glorified sticks poking our of laminated pebbles that already have weeds growing through them. In short, trees have large spaces between them that the current wall lacks, which will allow people to freely walk onto the estate. We are not desperate for a side road from Monument Way onto the estate, especially if means losing the wall. | It is the Council's view that the existing open space on Monument Way has limited has no formal open space or biodiversity designation, and that housing development would have a higher level of benefit than preserving the current amenity value that the land provides.  Does the proposed development offer protection from the Road?   |

## Comments on TH9 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

| Respondent ID | Comment ID | Respondent            | Topic  | Summary of Response   | Council Response  |
|---------------|------------|-----------------------|--|---|---|
| 400           | AAP827.    | Ms J<br>Hancher       | Warehouse living locations                             | The policy is welcomed but should not be restricted only to the area of Fountayne Road / Markfield Road identified in policy TH9.   | Noted, the boundary will be reviewed to ensure the most appropriate area is created.  |
| 422           | AAP828.    | Environment<br>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.   |
| 422           | AAP829.    | Environment<br>Agency | Flood Risk<br>Assessment of<br>Sites of 1ha or<br>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:  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.  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:  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. | 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.  |
| 422           | AAP830.    | Environment<br>Agency | Sites in Flood<br>Zone 2                               | Where sites are in Flood Zone 2 this should be noted explicitly in the explaining what this means for the design guidelines of the  | Noted.  |
|               |            |                       |  | development. Where there is more than one flood zone (e.g. in Flood Zones 1 & 2) this should also be noted and the development should follow the sequential approach to steer the development to the parts of the site at lowest risk of flooding. We suggest the following additional wording is added to the development guidelines for the above sites:  This site is in Flood Zone 2, classified by the National Planning Practice Guidance as having a medium risk of flooding from rivers. Development of this site must be supported by a Flood Risk Assessment. For development on this site to be acceptable the FRA must show there will be no increase in flood risk on or off site and that the development will be safe for future users. Development should be focussed in areas of Flood Zone 1 and no highly vulnerable uses will be permitted in areas of Flood Zone 2 without   | Action: Add "This site is in Flood Zones 1 & 2 & 3 [delete as applicable], classified by the National Planning Practice Guidance as having a low/medium/high [delete as applicable] risk of flooding from rivers. Development of this site must be supported by a Flood Risk Assessment. The FRA must show there will be no increase in flood risk on or off site and that the development will be safe for future users. Development must be steered to the areas within the red line boundary that are at lowest risk of flooding. Development should be focussed in areas of Flood Zone 1 and no highly vulnerable uses will be permitted in areas of Flood Zone 2 without passing the sequential test." |

|     |          |            |                   | passing the sequential test.  |        |
|-----|----------|------------|-------------------|---|--------|
|     |          |            |                   | For sites where there is more than one Flood Zone (AAP: NT2, NT3,         |        |
|     |          |            |                   | NT4; <b>SA</b> : SA52, SA63, SA66) we suggest the following additional    |        |
|     |          |            |                   | wording:  |        |
|     |          |            |                   | This site is in Flood Zones 1 & 2 & 3 [delete as applicable],             |        |
|     |          |            |                   | classified by the National Planning Practice Guidance as having a         |        |
|     |          |            |                   | low/medium/high [delete as applicable] risk of flooding from rivers.      |        |
|     |          |            |                   |   |        |
|     |          |            |                   | Development of this site must be supported by a Flood Risk                |        |
|     |          |            |                   | Assessment. The FRA must show there will be no increase in flood          |        |
|     |          |            |                   | risk on or off site and that the development will be safe for future      |        |
|     |          |            |                   | users. Development must be steered to the areas within the red line       |        |
|     |          |            |                   | boundary that are at lowest risk of flooding. Development should be       |        |
|     |          |            |                   | focussed in areas of Flood Zone 1 and no highly vulnerable uses will      |        |
|     |          |            |                   | be permitted in areas of Flood Zone 2 without passing the sequential      |        |
|     |          |            |                   | test.   |        |
| 428 | AAP831.  | Mr Green   | Site description  | The site is located to the east side and south side of Fountayne          | Noted. |
| 720 | 7000     | (CgMs)     | One description   | Road. The site has a PTAL of 4. The site is located 500 metres to         | Noted. |
|     |          | (Cgivis)   |                   | the south of Tottenham Hale Underground and Rail station, and             |        |
|     |          |            |                   | ·   |        |
|     |          |            |                   | approximately 500 metres to the west of Seven Sisters Underground         |        |
|     |          |            |                   | Station.  |        |
|     |          |            |                   | The surrounding area comprises a mix of uses including warehouses         |        |
|     |          |            |                   | and industrial, live/work, residential and retail uses. Markfield Park is |        |
|     |          |            |                   | located approximately 500 metres to the south.                            |        |
|     |          |            |                   | The site comprises a mixture of uses. These are predominantly             |        |
|     |          |            |                   | live/work and residential uses. The site also comprises a car repair      |        |
|     |          |            |                   | garage and some warehousing. The site comprises a variety of              |        |
|     |          |            |                   | buildings. Along the eastern side of Fountayne Road there are             |        |
|     |          |            |                   | original warehouse buildings comprising approximately 2 storeys.          |        |
|     |          |            |                   | These runs perpendicular to Fountayne Road. To the south of               |        |
|     |          |            |                   | Fountayne Road are further former warehouse buildings, comprising         |        |
|     |          |            |                   |   |        |
|     |          |            |                   | approximately 2 storeys. There is approximately 20,000 m2 of              |        |
| 400 | A A D000 | MacOnstant | \\\ / = = I = = . | floorpsace, and the site area is approximately 1.72 ha.                   | NI-(I  |
| 428 | AAP832.  | Mr Green   | Warehouse         | The estate houses approximately 500 people, who are                       | Noted. |
|     |          | (CgMs)     | living            | predominantly aged 25 – 35. All occupants are registered for, and         |        |
|     |          |            |                   | pay Council Tax. Across Haringey we understand there are                  |        |
|     |          |            |                   | approximately a further 1,000+ people in warehouse living that we         |        |
|     |          |            |                   | are aware of, a further 2,000+ in Hackney and considerably more           |        |
|     |          |            |                   | across wider London.  |        |
|     |          |            |                   | The units are predominantly residential, but there are some               |        |
|     |          |            |                   | commercial units. A number of residents are sole traders working at       |        |
|     |          |            |                   | or near home. The principal underlying characteristic is the              |        |
|     |          |            |                   | entrepreneurial approach of the residents, setting up small creative      |        |
|     |          |            |                   | businesses and adopting a co-operative and open approach to the           |        |
|     |          |            |                   | sharing of skills and ideas. Many people run their own businesses.        |        |
|     |          |            |                   | These range across a spectrum of creative industries.                     |        |
|     |          |            |                   | Their incomes are relatively low, and the advantage of these spaces       |        |
|     |          |            |                   |   |        |
|     |          |            |                   | is they provide affordable space where artists can live (and work in      |        |
|     |          |            |                   | some cases).  |        |
|     |          |            |                   | The changes to Mr Green's properties have taken place organically         |        |
|     |          |            |                   | over the past 10-15 years and have provided a new lease of life to        |        |
|     |          |            |                   | previously redundant warehousing and vacant office space, giving a        |        |
|     |          |            |                   | home to a wide variety of individuals - most with a creative arts         |        |
|     |          |            |                   | background. This regeneration has largely been a 'bottom up'              |        |
|     |          |            |                   | process with people learning about the spaces through social              |        |

|     |         |                    |                      | networks and using their creative talents to adapt them, making the necessary improvements to facilitate safe occupation for their comfort and to suit their living arrangements.  As a result of the process, previously unoccupied estate buildings and unsafe streets and neighbourhoods (where prostitution and drug dealing prevailed) have been transformed into vibrant and safe places, with innovative creative and economic activity sustained and promoted. Local businesses have benefitted from this growing community and the increased spending power that has been brought to these neighbourhoods as well as the benefits of reduced crime.   |        |
|-----|---------|--------------------|----------------------|--|--------|
| 428 | AAP833. | Mr Green<br>(CgMs) | Accommodation format | Each warehouse unit varies but a typical example comprises a large communal area with kitchen, sitting area(s), and some creative space. These areas are often well lit with good levels of natural daylight. Off this communal area will be a number of large (approximately 16 m2) bedrooms. For some units these will have direct access to natural daylight, for a few units the light will be borrowed.  In addition units will have a number of shared bathrooms and sometimes outdoor amenity space and cycle parking. The large communal spaces and large bedrooms exceed London Plan minimum sizes and are therefore very popular and good value. Mr Green has been committed to ensuring excellent standards are achieved throughout their estates. Unlike other estates they ensure units are not crammed with too many rooms, large areas of communal spaces are provided and a high level of amenity is achieved. | Noted. |
| 428 | AAP834. | Mr Green<br>(CgMs) | Lawful uses          | Unlike most of the other established employment sites that have been identified in the Site Allocations DPD, this site has evolved over the past 15 years to become predominantly residential in use with a well established warehouse community and creative living/working. The majority of the units are in residential use (previously commercial space), that is being occupied without a Certificate of Lawfulness.  However, the majority of this space has been in established residential use by the host community for 5-10 + years and therefore capable of qualifying for a Certificate of Lawfulness of Existing Use as residential.  There are significant physical barriers to use of the site for commercial uses including access, quality of floorspace and the residential nature of the area.  | Noted. |
| 428 | AAP835. | Mr Green<br>(CgMs) | Legislation          | On the 15th April 2015 changes to the General Permitted Development Order introduced permitted development rights for the change of use of Use Class B8 Storage and Distribution to Use Class C3 dwellinghouse. There are a number of conditions that have to be met, but the thrust of the changes mean there is an acceptance from Central Government on the principle of the change of use form B8 to C3.   | Noted. |
| 428 | AAP836. | Mr Green<br>(CgMs) | Relevant<br>appeals  | There are a number of appeal decisions pertinent to this site where Inspectors have considered the planning merits of the loss of traditional industrial uses in these units and the change of use to warehouse living.  5 Fountayne Road  Appeal (ref APP/Y5420/C/07/2058098) against Enforcement Notice served by Haringey Council for the unauthorised change of use from   | Noted. |

|     | •       |                    | •                |  |        |
|-----|---------|--------------------|------------------|--|--------|
| 428 | AAP837. | Mr Green<br>(CgMs) | Relevant appeals | business use (use class B1) to residential and live/work units in Haringey was part allowed on 13th January 2009 (the decision is at Appendix 1). The live/work element was granted temporary planning permission because of the significant employment and economic benefits arising from the use, as well as additional environmental and social benefits that substantially outweighed the conflict with UDP Policy EMP 7, and the compromised living amenity. The site was in part live/work, part residential use. There are some important points raised by the Inspector. Significant weight was given by the Inspector (paras 42-47 of appeal decision) to the way the use had come about organically and in response to the characteristics of the building, to meet the needs of the operators and the ability of the units to attract and support small creative types of employment, as a material consideration that outweighed the requirements of UDP Policy EMP7 and the desire of the LPA for the unit to meet specific residential standards.  The Inspector recognised at Para 41 the building was 'an old industrial building with an inflexible and awkward layout, and access which would present problems of adaptation and occupation to many Class B1, B2 or B8 users. The nature of the building and its limited potential for alternative use is a significant material consideration'. The Inspector noted the north-south section of Fountayne Road, is a long and somewhat isolated cul-de-sac with two right-angled bends at its southern end, significantly older buildings, a much narrower road, poor turning, parking and servicing facilities, a particularly rundown appearance with buildings occupied for a broad mix of uses, including several outside the preferred EMP2 categories. This part of the employment area would appear to be the most disadvantaged and least attractive to potential employment-generating uses'.  There are a number of appeal decisions pertinent to this site where Inspectors have considered the planning merits of the loss of traditional indust | Noted. |
|     |         |                    |                  | Suitability of the Estate for Employment Uses The Inspector accepted at para 21 of the decision, 'the appeal sites are no longer suitable for business, and agreed evidence tends to   |        |

|     |         |                    |                        | saying Artists Village'. Future of Estates The Inspector accepted residential uses on the estate were appropriate at para 35, supporting the avoidance of the long term protection of sites allocated for employment use, where there is no reasonable prospect of a site being used for that purpose.   |   |
|-----|---------|--------------------|------------------------|--|---|
| 428 | AAP838. | Mr Green<br>(CgMs) | Floorspace replacement | Currently the policy for this site requires the original floorspace before conversion to residential use began to be replaced as part of new developments.  Mr Green strongly objects to this requirement. This is a very unreasonable expectation for Fountayne Road/ Markfield Road site that were last in fully commercial use over 10 years ago. The site is residential in nature and has many physical limitations to being reused as employment floorpsace.  The policy should instead make reference to the established position of the uses on site rather than as currently proposed, the original floorspace prior to the conversions.  Paragraph 22 of the NPPF requires planning policies to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. A large part of Fountayne Road currently has no reasonable prospect of being returned to fully commercial use, which must therefore be a material consideration when deciding if there should be a return to pre-conversion levels of commercial floorspace, which is currently required by this draft policy. Indeed the Inspector for the appeal at 5 Fountayne Road recognised the inflexible and awkward layout, and access for the site which would present problems of adaptation and occupation to many Class B1, B2 or B8 users. The nature of the building and its limited potential for alternative use is a significant material consideration. | A more flexible approach to reprovision of new employment floorspace will be set out in the emerging plan.  |
| 428 | AAP839. | Mr Green<br>(CgMs) | Heritage               | Mr Green recognises some of the buildings on the site are historic and have an element of industrial heritage value. Indeed some of the buildings could be incorporated into a redevelopment scheme for the site. However Mr Green objects to the requirement of retention of all the historic buildings on the site.  The site is not within a conservation area, none of the buildings are listed nor locally listed. Therefore under current policy they are not protected.  The buildings are only 2 storeys and whilst some may be retained as part of a comprehensive redevelopment, the policy needs to allow flexibility to consider their demolition. There are significant material planning benefits of a redevelopment scheme such as, an increase in provision of better quality employment floorpsace, provision of new housing and provision of warehouse living, that would require demolition of some of the buildings. These benefits will not be fully realised if there was a requirement to protect all the buildings on the site.  Mr Green therefore requests the wording of the policy is changed to allow flexibility, wording to include:  The industrial heritage value of the buildings on the site should be fully assessed as part of a redevelopment scheme. The loss of historic buildings may be acceptable where justified, where the planning benefits outweigh their loss.   | Agreed that the heritage value of the existing building stock should be fully assessed, and if valued, and suitable for its proposed mixed of uses, retained. |
| 428 | AAP840. | Mr Green           | Warehouse              | Supports the concept of warehouse living at the site. Given there is   | Support is noted.   |

|          | (CgMs)   | living                 | currently a large established warehouse living population at the site, this is an appropriate use for the site and will ensure the existing community can be retained.  Considers warehouse living on this site an innovative form that can significantly contribute to meeting the housing and employment needs of the area.  The contribution innovative forms of housing such as warehouse living can make is recognised by the Mayor's Housing Strategy that sets out at Section 4.10 Mayoral support for new approaches to meet housing supply and Section 2.6 and Policy P7 that supports innovative building approaches and modern methods of construction. |  |
|----------|--|------------------------|--|--|
| 428 AAP8 | 1. Mr Green<br>(CgMs)                                  | Building height        | Currently the site allocation has no guidance on acceptable building height. The site is in a very sustainable location bound by a railway line to the south and other employment/ mixed uses to the east and west. Given significant taller buildings will be brought forward to the north of the site on the retail park and around Tottenham Hale, medium height development should be supported on this site. The policy also needs to have flexibility to ensure a viable scheme can be delivered, which may require an increase in height at an appropriate part of the site to ensure the full regeneration benefits of the site are deliverable.           | The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context. |
| 430 AAP8 | 2. Derek Horne<br>& Associates<br>for Majorlink<br>Ltd | Objection              | Objection to area of land included in TH9. It should include adjacent building in particular the building complex of Imperial Works, which is owned by the submitter and is of a similar character to the subject of the proposed policy [map is attached].  | Imperial Works is included within the Allocation.  |
| 430 AAP8 | 3. Derek Horne<br>& Associates<br>for Majorlink<br>Ltd | Warehouse<br>living    | Whilst welcoming the allowance of 'warehouse living' it should be made clear as to whether this refers to C3 residential use or sui generis 'live/work'  | This will be a sui generis form of non-conventional housing. The aim of the policy is explicitly not to allow this type of housing to transfer to C3 residential.  |
| 430 AAP8 | 4. Derek Horne<br>& Associates<br>for Majorlink<br>Ltd | Land use               | Objection is raised to the requirement to specify employment uses at ground level. Experience of live/work units, both within Haringey and elsewhere in London, is that tenants prefer to utilise the available floor space in a flexible manner for both employment and residential use. Such an arrangement has been endorsed in appeal decisions within Haringey in relation to appeals at Fountayne Road, Markfield Road and at Omega Works in hermitage Road and other boroughs including Hammersmith and Barnet.   | It is considered necessary to establish an element of specialised employment floorspace in this area to fully meet employment needs within the borough.  |
| 430 AAP8 | 5. Derek Horne<br>& Associates<br>for Majorlink<br>Ltd | Capped commercial rent | Objection to capped commercial rents. In a market economy the best way to secure investment in employment development is not to inhibit market conditions. The intention to cap commercial rents would be a disincentive to investors and therefore would deter investors, contrary to Council objectives  | Noted, but there is an identified need to make new floorspace affordable in order to meet the borough's employment needs.  |
| 430 AAP8 | 6. Derek Horne<br>& Associates<br>for Majorlink<br>Ltd | Employment floor space | Objection to requirement for the quantum of dedicated employment floor space to match that originally built on site. In live/work units there is, by definition, a mixture of residential and employment uses. More particularly, if the Council's intention is to designate parts of the building at ground floor to be use purely for employment purposes that would imply a degree of segregation of non-employment uses in case of live/work units, which would certainly mean a reduction in dedicated employment floor space which would prejudice live/work.  |  |
| 501 AAP8 | 7. Daniel<br>Hernandez,<br>Warehouse<br>Resident       | Creative community     | High amount of value in creative community/economy existing on the site.   | Noted.   |

| 501 | AAP848. | Daniel,<br>Hernandez,<br>Warehouse<br>Resident                 | Development potential  | As on this site, old and underused industrial estates can be a source of pollution and crime.   | Noted, however the retention of industrial estates in some parts of the borough is essential to meeting the objectively identified growth requirements in the borough  |
|-----|---------|--|------------------------|---|--|
| 502 | AAP849. | James<br>Britten,<br>warehouse<br>resident,<br>Fountayne<br>Rd | Affordability          | Meets affordable housing and affordable workspace needs at the same time.   | Noted, provision of affordable housing and workspace are important to the Council  |
| 502 | AAP850. | James Britten, warehouse resident, Fountayne Rd                | Networking             | Existing set up achieves a centre of gravity for creative enterprises   | Noted.   |
| 502 | AAP851. | James<br>Britten,<br>warehouse<br>resident,<br>Fountayne<br>Rd | Employment designation | Notes that changing to residential would change character of the place.   | It is considered that the deallocation of sites of this type from employment use altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future. The Council wishes to see this area contribute to meeting its employment need, and as such a RA designation can facilitate this aim while enabling an element of residential use, such as already exists on the site, to continue. |
| 502 | AAP852. | James Britten, warehouse resident, Fountayne Rd                | Makes best use of land | By creating mix of interesting uses, warehouse living makes a sustainable use of old industrial stock.  | Noted.   |
| 502 | AAP853. | James Britten, warehouse resident, Fountayne Rd                | Retrofit               | contributions to housing and employment target can be met with the financial burden on the landlord rather than the council and without having to get into bed with a large developer | Noted, in order for the quantums of housing and employment to be managed there is required to be a policy.   |
| 502 | AAP854. | James<br>Britten,<br>warehouse<br>resident,<br>Fountayne<br>Rd | Creative community     | "an oasis" of difference within London that it would be a shame to lose.  | Support for retention of the existing community is noted.  |
| 503 | AAP855. | Rich Young,<br>warehouse<br>resident,<br>Fountayne<br>Rd       | Residential use        | Notes that changing to residential would price current enterprises out of the area.   | Agreed.  |
| 503 | AAP856. | Rich Young,<br>warehouse                                       | Commercial designation | Does not believe that a purely commercial designation reflects the assets in the area.  | Noted.   |

|     |         | resident,<br>Fountayne<br>Rd                                 |                        |  |   |
|-----|---------|--|------------------------|--|---|
| 503 | AAP857. | Rich Young,<br>warehouse<br>resident,<br>Fountayne<br>Rd     | Support                | To make the area/ buildings cleaner & safer.                                     | Noted.  |
| 503 | AAP858. | Rich Young,<br>warehouse<br>resident,<br>Fountayne<br>Rd     | Hackney Wick           | Notes some people have already been forced out of Hackney Wick.                  | Noted, the Council is seeking to create a sustainable mix of uses in this area.               |
| 505 | AAP859. | Miriam<br>Maselkowski,<br>Fountayne<br>Rd resident           | Affordability          | Meets affordable housing and affordable workspace needs at the same time.        | Noted, provision of affordable housing and workspace are important to the Council             |
| 505 | AAP860. | Miriam<br>Maselkowski,<br>Fountayne<br>Rd resident           | Entrepreneuriali<br>sm | Positive environment to start and run a business.                                | Noted, the Council is keen for this area to continue to perform this function.                |
| 505 | AAP861. | Miriam<br>Maselkowski,<br>Fountayne<br>Rd resident           | Likes the area         | Positive sense of community between the firms and population in the area.        | Noted.  |
| 505 | AAP862. | Miriam<br>Maselkowski,<br>Fountayne<br>Rd resident           | Events potential       | It would be good if the area could host events for the wider population.         | Agreed.  Action: Include reference to potential for creation of a destination in this policy. |
| 505 | AAP863. | Miriam<br>Maselkowski,<br>Fountayne<br>Rd resident           | Events potential       | It would be good if the area could host events for the wider population.         | Noted.  Action: Include reference to potential for creation of a destination in this policy.  |
| 507 | AAP864. | Andrea Ling,<br>Fountayne<br>Rd studio<br>occupant<br>(work) | Adverse to change      | Current "organic" set up works well from respondent's perspective                | Noted.  |
| 507 | AAP865. | Andrea Ling,<br>Fountayne<br>Rd studio<br>occupant<br>(work) | Unit size              | A "one size fits all" unit size would not meet the needs of commercial occupants | Agreed.   |

| 507 | AAP866. | Andrea Ling,<br>Fountayne<br>Rd studio<br>occupant<br>(work) | Capped rents                | Supports capping rent increases.  | Support is noted.  |
|-----|---------|--|-----------------------------|---|--|
| 510 | AAP867. | Marika,<br>warehouse<br>resident                             | Support creative community  | Wants to retain this type of space and community, and ability to network with similar people. Willing to work with Council to help secure this.   | Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.   |
| 512 | AAP868. | Billie De<br>Melo Wood,<br>warehouse<br>resident             | Support creative community  | Fears redevelopment could drive away existing creative community, and gentrify area a la Shoreditch.  | Support for retention of the existing community is noted.  |
| 513 | AAP869. | Alex<br>Tennyson,<br>warehouse<br>resident                   | Support creative community  | Love for the area, fear for future of personal business.  | Support for retention of the existing community is noted.  |
| 517 | AAP870. | Camilla<br>Mason,<br>warehouse<br>resident                   | Support creative community  | The community is vibrant and inspiring and one of the happiest places I have ever lived. It is full of inspiring people who are keen to collaborate and create with each other as well as in the surrounding area   | Support for retention of the existing community is noted.  |
| 517 | AAP871. | Camilla<br>Mason,<br>warehouse<br>resident                   | Work with<br>Council        | Willing to work with the Council to create sustainable future.  | Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.   |
| 518 | AAP872. | Louis<br>Rutherford,<br>warehouse<br>resident                | History                     | As I understand it, this adaptation to live/work was once authorised by the council, however, in recent years renewal applications for continued live/work status have stalled/ I understand that on Fountayne Road, the council is reticent to allow the use of the warehouse buildings to be converted to residential use by the landlords              | The Council is concerned with making the best use of land in the borough. It is recognised that warehouse living has certain value, but comes at the expense of industrial stock. This policy seeks to manage how warehouse living can make a positive contribution to the Council's housing and economic needs. |
| 518 | AAP873. | Louis<br>Rutherford,<br>warehouse<br>resident                | Cultural offer              | Tottenham, and the Fountayne Road hub, has already been identified by the V&A Museum as having one of the most vibrant art scenes in London alongside Peckham, Shoreditch/Dalston and Hackney Wick. On the 28 <sup>th</sup> March, 2014, Tottenham artists were invited to 'takeover' the gallery in a celebration of the creativity inherent in the area | Noted.   |
| 518 | AAP874. | Louis<br>Rutherford,<br>warehouse<br>resident                | Warehouse<br>living charter | The council now wishes to establish a new Warehouse Living charter which reflects the precedent being set in permitting a mixed-use, residential/commercial warehouse environment to thrive   | Noted.   |
| 518 | AAP875. | Louis<br>Rutherford,<br>warehouse<br>resident                | ELR criticism               | Examples of live/work failing in ELR are out of date and don't reflect current position.  | The Council does not support live/work as there is evidence to suggest that the employment benefits of this type of accommodation are not substantial  |
| 518 | AAP876. | Louis<br>Rutherford,<br>warehouse                            | Successful example          | Since 2007, Bow Arts, an Arts Council-funded educational charity has worked with social landlord – Poplar HARCA – to develop over 150 live/work studios in Tower Hamlets and has contributed over   | Noted.   |

|     |         | resident  |   | £250,000 back into the local community   |   |
|-----|---------|---|---|--|---|
| 518 | AAP877. | Louis<br>Rutherford,<br>warehouse<br>resident   | Successful<br>example                                 | Fountayne residents wish to start an Arts Council funded not-for-profit.   | Noted.  |
| 518 | AAP878. | Louis<br>Rutherford,<br>warehouse<br>resident   | Local residents<br>happy (in<br>Poplar)               | the assertion of Chief Executive of the Poplar HARCA, Steve Stride that "our residents are happy that artists with a genuine commitment to the local community have been able to make a home [] in properties that were prone to squatting and associated anti-social behaviour"   | Noted.  |
| 518 | AAP879. | Louis<br>Rutherford,<br>warehouse<br>resident   | Support creative community                            | Artists must be seen to be benefitting the local economy, having a positive impact in their community and meeting Council employment targets as set by the GLA. The landlords and council can facilitate this process through assisting the live/work community in formalising the existing warehouse quarter to form a thriving cultural hub for the area | Support for retention of the existing community is noted.   |
| 518 | AAP880. | Louis<br>Rutherford,<br>warehouse<br>resident   | Work with<br>Council                                  | By working directly with the current occupants, the Council can avoid the failings suffered by other London councils a decade ago where the development of new live/work units were being used solely for residential purposes and developers were permitted to side-step the employment promotion and affordable housing policy requirements.             | Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.  |
| 519 | AAP881. | Melanie<br>Powell,<br>warehouse<br>resident     | Current uses obsolete                                 | Returning the industrial spaces around the Seven Sisters/Tottenham Hale and Manor House areas that have become live work communities to employment land, is not feasible - the land was repurposed, all be it unofficially by its tenants, as it wasn't being used by businesses in the first place  | Noted, the buildings are currently being used for a higher value use, and therefore it is unlikely that it will return on viability grounds. What the Council is proposing however is to introduce new employment uses, more in keeping with the emerging character of the area.  |
| 519 | AAP882. | Melanie<br>Powell,<br>warehouse<br>resident     | 24 hour culture                                       | the ability for musicians to work into the early hours composing or playing in a community that can not only tolerant but accommodate their needs is priceless   | The ability to have a 24-hour studio at present is noted. A policy supporting 24-hour noise in residential areas would not be supported however.  |
| 519 | AAP883. | Melanie<br>Powell,<br>warehouse<br>resident     | Support creative community                            | By changing this land you would change a community Cleave your door open, borrow a cup of sugar, share food with neighbours or be struggling home with bags and be offered a lift?   | Support for retention of the existing community is noted.   |
| 520 | AAP884. | Antonella Di<br>Carlo,<br>warehouse<br>resident | Benefits of<br>multicultural<br>communal<br>community | Founatyne Rd is a community and is a cultural hub. Where people from all around the world and from very different backgrounds come and live together. The outcome of this geographical proximity creates numerous results.  1. Sharing ideas 2.Creation of partnership 3. Access to a Network 4. Sharing resources and skills in the local area            | The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. While this is encouraged as it has the potential to yield positive economic benefits resulting from collaboration, the Council also want to promote other firms to use this area as an employment location. Clearly to achieve this second aim, a degree of separation, be it within a building, or in separate buildings, will be required.  This Allocation will not contain detailed specifics on how this can be achieved, but rather seeks to establish a framework in which it can happen over the longer term. |
|     |         |   |   | 5. Creation of an urban community  |   |

|     |         |  |                            | 6.Supportive environment   |  |
|-----|---------|--|----------------------------|--|--|
|     |         |  |                            | 7. Brings wealth to the local area   |  |
|     |         |  |                            | 8. Is an example of the multicultural nature of London where people, literally, from so different backgrounds share with respect a street. (Local Church, professionals, students, people that work there, etc)  |  |
| 521 | AAP885. | Ali Lockhead,<br>warehouse<br>resident     | Support creative community | There is a wealth of artistic talent in this community where people inspire and support one another and where people are also keen to work with the local community, recognising music, art, filmmaking, fashion design, creative writing etc can engage young people who have otherwise become disaffected and help them get on track.  | Support for retention of the existing community is noted.  |
| 521 | AAP886. | Ali Lockhead,<br>warehouse<br>resident     | Point of different         | London too "corporate" these areas offer difference  | Noted.   |
| 521 | AAP887. | Ali Lockhead,<br>warehouse<br>resident     | Communality                | When you're working on a creative project to get it to a point where you can submit it for funding or have something tangible to sell it's really hard. As well as paying for studio rent you have to pay for materials and of course fund your existence. To be able to swap talents and collaborate with others, get help with a sound track, some filming or photography etc is invaluable. | The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. This is supported in the policy. |
| 521 | AAP888. | Ali Lockhead,<br>warehouse<br>resident     | Global competition         | It will such a shame if the talent ends up relocating to possibly<br>Amsterdam or Berlin   | It is noted that the existing population make a positive contribution to the area.   |
| 522 | AAP889. | Jouna<br>Lansman,<br>warehouse<br>resident | Middle class               | We are middle class professionals and generally pleasant people that pay taxes and contribute positively in the area. I hope you will take these things into consideration in your consultation.   | This is not a planning issue.  |
| 522 | AAP890. | Jouna<br>Lansman,<br>warehouse<br>resident | Support creative community | Supporter of warehouse (and other off-plan) living in our council and everywhere else  | Support for retention of the existing community is noted.  |
| 522 | AAP891. |  | Improvement of stock       | This building had been abandoned for over 10 years before we rented it out on 10 year lease and built the place up to great standard   | Noted.   |
| 522 | AAP892. | Jouna<br>Lansman,<br>warehouse<br>resident | Communality                | I am a big believer in communal living and it's effect in improving human kindness and understanding. We live like a big family cooking and cleaning together and whatever else, which in turn promotes tolerance and open-mindedness. This way people are prone to help and socialise with each other and I can feel that being great for one's mental well being                             | Noted. The Council's policy seeks to retain and create new space for these types of outcomes.  |
| 522 | AAP893. | Jouna<br>Lansman,<br>warehouse<br>resident | Innovative policy          | perhaps even pioneer a countrywide legislation of changing planning permission categories to include live/work? As it stands, this is not in existence at the moment.  | The existing policy is considered to be unique. The Local Plan policy needs to be used to determine planning applications at a local level.  |
| 522 | AAP894. | Jouna<br>Lansman,<br>warehouse<br>resident | Improvement of stock       | This building had been abandoned for over 10 years before we rented it out on 10 year lease and built the place up to great standard   | Noted.   |
| 523 | AAP895. | Matt Mead,<br>warehouse                    | Regeneration impact        | I think it is important to stress once again how important live/work can be for regenerating an area, as has been seen in Hackney Wick   | Noted.   |

|     |         | resident   |                            | and Dalston.   |   |
|-----|---------|--|----------------------------|--|---|
| 523 | AAP896. | Matt Mead,<br>warehouse<br>resident  | Economic development       | Area creates positive environment for new firms, cited Odasho Ltd & Craving Coffee   | Noted.  |
| 523 | AAP897. | Matt Mead,<br>warehouse<br>resident  | Affordability              | It seems to me that the community that already exists here provides affordable housing and economic activity for the area - two things that the council wishes to foster in the borough  | Noted, provision of affordable housing and workspace are important to the Council   |
| 523 | AAP898. | Matt Mead,<br>warehouse<br>resident  | Support creative community | I am very pleased to note the council's changed position to the warehouse dwelling in Haringey from the original plan of mass evictions to something more sensitive to the current communities already existing there  | Support for retention of the existing community is noted.   |
| 530 | AAP899. | Planning Co-<br>Operative on<br>behalf of<br>Fountayne<br>Business<br>Centre Group | Promoting site             | Fountayne Business Centre promoted as a site capable of delivering mixed-use development   | Noted, as evidenced in the ELS, this may be an option in the longer term, but is not anticipated over the course of the Plan period.  |
| 530 | AAP900. | Planning Co-<br>Operative on<br>behalf of<br>Fountayne<br>Business<br>Centre Group | Improve access             | Supports development that improves access to the employment areas to the east of the site.   | Noted.  |
| 530 | AAP901. | Planning Co-<br>Operative on<br>behalf of<br>Fountayne<br>Business<br>Centre Group | Increase jobs              | The site proposal should support a mixed use development of employment uses on the ground floor with residential uses above it. The replacement employment floorspace should exceed the floor-space or job density of the existing site or provide a lower proportion of floorspace but ensure that this provision is affordable to meet local business and employment needs | Noted, as evidenced in the employment land study, this may be an option in the longer term, but is not anticipated over the course of the Plan period. There is a requirement to retain some areas of purely employment stock in the short-medium term. |
| 530 | AAP902. | Planning Co-<br>Operative on<br>behalf of<br>Fountayne<br>Business<br>Centre Group | Height                     | Taller elements of the residential development should be considered appropriate set back from the low to medium rise dwellings on Broad Lane   | Noted, no change is being considered appropriate at this time.  |
| 530 | AAP903. | Planning Co-<br>Operative on<br>behalf of<br>Fountayne<br>Business<br>Centre Group | Deliverability             | The AAP relies on some housing sites coming forward where delivery is very uncertain. The FBC site in contrast is very deliverable in a short time-scale.  | Noted, the AAP identifies an appropriate set of deliverable housing sites to meet objectively identified housing need.  |
| 530 | AAP904. | Planning Co-<br>Operative on<br>behalf of  | Uplift on land             | The mixed use proposal of this site makes best use of scarce land resources in one of the most accessible locations in the   | Noted, as evidenced in the employment land study this may be an option in the longer term, but is not anticipated over the course of the Plan period. There is a requirement to retain some areas of  |

|     |         | Fountayne<br>Business<br>Centre Group       |   | Borough.  | purely employment stock in the short-medium term.   |
|-----|---------|---|---|---|---|
| 533 | AAP905. | Heather<br>Wilson,<br>warehouse<br>resident | Support<br>warehouse<br>community                 | My flatmates and I enjoy working and living here and have always been responsible members of the community. I have made professional and personal connections here in a way that wouldn't have been possible in another type of accommodation.  | Support for retention of the existing community is noted.   |
| 533 | AAP906. | Heather<br>Wilson,<br>warehouse<br>resident | Work with<br>Council                              | Speaking to my neighbours, I think we are all willing to cooperate and come to the best solution possible for the neighbourhood. We all want to continue living here and I hope you're able to take our feedback into consideration.  | Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.  |
| 534 | AAP907. | Rosanna<br>Puyol,<br>warehouse<br>resident  | Cultural offer                                    | Tottenham Hale needs this place as a cultural centre and this is a place the council can be proud of. In addition to the residential area and businesses, Fountayne Road has a powerful and unique identity thanks to the artists, recording and dance studios, and small religious communities. Both of these communities inhabit the space and bring public to Tottenham Hale.  Fountayne road provides culture, creation and exchange, which are the cement of a peaceful society.   | Noted, it is agreed that the potential for this area to act as a destination could be explored.  Action: Include reference to this area potentially acting as a cultural destination.   |
| 540 | AAP908. | Jeremy Guth,<br>warehouse<br>resident       | Supports<br>warehouse<br>community                | there are thousands like me in Haringey - working and living from these units, in a supportive community ecompassing many different creative and non-creative pursuits. We are trapese artists, painters, circus performers, musicians, freelance entrepreneurs, digital creatives and much more. We are able to make and do things here a result of our immersive environment of live/work/community. These three elements are inseparable - live/work/community. love our unit the way it is, we do not want forced rennovations. We moved into it by free choice (it wasn't a difficult decision!) | Support for retention of the existing community is noted.   |
| 540 | AAP909. | Jeremy Guth,<br>warehouse<br>resident       | Affordable  | These warehouse units have become centres of art, culture, music and self-employment, they allow the development of flexible and low-overhead self-run businesses that simply would not be possible under other rental conditions   | Noted, provision of affordable housing and workspace are important to the Council   |
| 540 | AAP910. | Jeremy Guth,<br>warehouse<br>resident       | Against<br>residential or<br>employment<br>zoning | I love our community and do not want it to be diluted or dissintrigated though either residential re-zoning or employment-only re-zoning. There is likely more employment here currently than has been for many decades of decay. We want to retain full live/work status   | The RA designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future. |
| 543 | AAP911. | Habiba Nh,<br>warehouse<br>resident         | Affordability                                     | As student I can not pay the rent for a room plus another rent for a trayning space to do my hom-ework and artistic research  | Noted, provision of affordable housing and workspace are important to the Council   |
| 543 | AAP912. | Habiba Nh,<br>warehouse<br>resident         | Knowledge<br>exchange                             | Living in a warehouse brings me also the opportunity to exchange a lot of knowledge and information about all what has to do with contemporary art movements, styles and ethics with my neighbours. This is a place full of creativity from where the contemporary culture of the city benefits.  | Noted.  |
| 545 | AAP913. | Pereira<br>Sodre                            | Supports warehouse                                | I rehearse and record in many studios in this area, and the studios and quite unique cause it's not just a studio but it's a place where I can meet   | Support for retention of the existing community is noted.   |

|     |         |  | community                          | with a lot of different people, from artists to carpenters, who have a sense of community. In this tough place that is London, it's quite rare to find a relief from the day to day struggle, and find people ready to help you.  Thoses kind of places are the cities lungs, as much as any forest can be, and destroying them would only contribute in making London a bit colder and harder.  People would go somewhere else of course, somewhere not too expensive, so of course, far from the center. Until they make life there easier, making people want to move there, attracting interest from developpers and starting the process all over again |  |
|-----|---------|--|------------------------------------|--|--|
| 547 | AAP914. | Philippe<br>Peters,<br>warehouse<br>resident/ rock<br>star | 24 hour noise                      | The freedom of being able to have a space I could soundproof properly, work in seriously, is something that is otherwise plainly IMPOSSIBLE to find in London. It changed my life, I could have a real place to work right where I was living  | The ability to have a 24-hour studio at present is noted. A policy supporting 24-hour noise in residential areas would not be supported however. |
| 547 | AAP915. | Philippe<br>Peters,<br>warehouse<br>resident/ rock<br>star | Affordability                      | there are a lot of people in my situation and let's face it, we cannot afford to have a living space and a separate studio/workshop, this is right impossible.   | Noted, provision of affordable housing and workspace are important to the Council  |
| 554 | AAP916. | Golnar<br>Roshan,<br>warehouse<br>resident                 | Supports<br>warehouse<br>community | Please do not destroy one of the last remaining creative hubs in London. As a resident of the Warehouses in Fountayne road this is a very important and elemental space for us allowing us to live and work creatively as artists and designers. These homes and work spaces are a crucial and elemental part of our creative community and lives.   | Support for retention of the existing community is noted.  |
| 554 | AAP917. | Golnar<br>Roshan,<br>warehouse<br>resident                 | Cultural value                     | the creative communities of Tottenham and Seven Sisters add a huge amount of cultural value to the area  | Noted.   |
| 554 | AAP918. | Golnar<br>Roshan,<br>warehouse<br>resident                 | Heritage                           | We are continuing the heritage of the site by using the spaces for our businesses in making furniture, art, designs, products, fashion and other creative industries.  | Noted.   |
| 554 | AAP919. | Golnar<br>Roshan,<br>warehouse<br>resident                 | Affordability                      | If these spaces were taken from us there would be no other affordable housing in London for us suitable for the work that we do.   | Noted, provision of affordable housing and workspace are important to the Council  |
| 554 | AAP920. | Golnar<br>Roshan,<br>warehouse<br>resident                 | Management                         | With regard to the management and operation of the warehouse living spaces, we support an expansion of a co-operative leasing model, by which a resident-controlled, not for profit, co-operative takes management of more long-term leases of units across the sites. This would drive the retention of a genuine inter-relationship of the living and working elements by aligning the interests of inhabitants with the management of the spaces which they occupy, acting as a further barrier against any potential shift in emphasis within the internal structure of units towards higher residential   | Noted, the management arrangement of the units is outside the scope of the plan.   |

|     |         |   |                                    | occupation.   |   |
|-----|---------|---|------------------------------------|---|---|
| 554 | AAP921. | Golnar<br>Roshan,<br>warehouse<br>resident    | Masterplanning                     | While we recognise and tentatively support the need for a masterplan approach on some sites to protect their character, and ensure that residents are living in safe and comfortable conditions. We believe that a one-size-fits-all approach may put the residents living at warehouse sites with a more complex ownership and management structure at a disadvantage (such as those as Fountayne Road). We ask that the council supplement this stipulation by putting in place a plan for working with residents of these sites towards regularisation and to stimulate co-ordination between the multiple owners of the land, in consultation with its inhabitants, to improve living conditions where necessary. | Noted. The benefit of preparing masterplans is that the principles of the policy can be applied appropriately across the sites that make up the areas covered by this policy. The requirement for existing residents' needs to be assessed through any masterplan in the Policy.  |
| 555 | AAP922. | Fabrizio<br>Panella,<br>warehouse<br>resident | Masterplanning                     | While we recognise and tentatively support the need for a masterplan approach on some sites to protect their character, and ensure that residents are living in safe and comfortable conditions. We believe that a one-size-fits-all approach may put the residents living at warehouse sites with a more complex ownership and management structure at a disadvantage (such as those as Fountayne Road).   | Noted. The benefit of preparing masterplans is that the principles of the policy can be applied appropriately across the sites that make up the areas covered by this policy. The requirement for existing resident's needs to be assessed through any masterplan in the Policy.  |
| 555 | AAP923. | Fabrizio<br>Panella,<br>warehouse<br>resident | Supports<br>warehouse<br>community | The incredible and rare variety of cultures and individuals that Tottenham and Haringey are made of is unique in the whole Europe. Especially looking at the warehouses near Seven Sisters and the Fountayne Road community, we can see examples of how creative communities can extremely benefit the area both on a economical, employment and cultural level.  | Support for retention of the existing community is noted.   |
| 555 | AAP924. | Fabrizio<br>Panella,<br>warehouse<br>resident | Economic<br>benefit                | As a resident of Fountayne Road, I am a member of the freelance community, made of creatives from all industries: graphic designer, set designer, product and food designer, photographers.  We work and collaborate with top level clients, and have created an incredible network of freelance professional that can strongly impact and benefit the economy of the community around us.  Some of the commissions include: Selfridges, House of Parliament, Alexander Mc Queen, Bentley, Krizia, Studio Toogood, London Fashion Week, Milan Fashion Week, Paris Fashion Week, Saatchi Gallery, Topshop, Central Saint Martins College of Art and Design.  | Noted.  |
| 555 | AAP925. | Fabrizio<br>Panella,<br>warehouse<br>resident | Against change to residential      | we do not wish to see the sites changed to an overall designation of residential, as we recognise that this would create a large uplift in the value of the land which would threaten our continuing existence on the sites.  | The RA designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future. |
| 557 | AAP926. | Jo Bee,<br>warehouse<br>resident              | Supports<br>warehouse<br>community | Please consider that the warehouse communities in Haringey retain a subculture famous to London. It is not just the birth place of artistic expression and creative small businesses in the city, it is also where you will find soul and heart where many people from differing backgrounds can mesh successfully and connect.   | Support for retention of the existing community is noted.   |

| 557 | AAP927. | Jo Bee,                                    | Work with                              | work with the residents we are keen to listen and together we can  | Noted, it is agreed that collaboration between the Council and   |
|-----|---------|--|--|--|--|
|     |         | warehouse<br>resident                      | Council                                | continue to inspire this city  | existing residents will be important to ensure a positive outcome for the area.  |
| 560 | AAP928. | Charlie<br>Lewis,<br>warehouse<br>resident | Supports<br>warehouse<br>community     | The varied and unusual spaces found in our converted warehouses allow for a huge variety of artistic and creative endeavours. Musicians are able to budget more profitably by sharing studio and rehearsal space, leading to more successful recordings and gigs. As a musician with nearly 20 years of professional experience, I am ideally placed to point out the local contribution to the British Music Industry. There are numerous DJs, electronic musicians and rock musicians from my road who work in scenes of which I am somewhat unfamiliar, and I can only talk directly from my own studio and stage experience over the past year.  | Support for retention of the existing community is noted.  |
| 560 | AAP929. | Charlie<br>Lewis,<br>warehouse<br>resident | Collaborative environment              | Beyond the musical sphere, my own business is strongly supported by workers from other creative disciplines found in our community here on Fountayne Road – over the past two years, around 30% of my business has come from networking with other local media sector workers, in particularly video editors, film makers, theatre directors and other musicians.  | The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. This is supported in the policy.   |
| 560 | AAP930. | Charlie<br>Lewis,<br>warehouse<br>resident | Against resi or industrial designation | In common with many of my colleagues and neighbours, I do not wish our warehouse community to become fully residential, nor do I perceive that returning the estate to a fully industrial model would be an effective move – it's perfectly clear to anyone who is familiar with what we do that creative workers are contributing far more to the area, economically and culturally, than the limited industrial use of the estate and derelict buildings which existed before our community came into being. And most of the successful industrial businesses in our estate have continued to flourish alongside our growing community.  | The RA designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future.        |
| 560 | AAP931. | Charlie<br>Lewis,<br>warehouse<br>resident | Pro some regularisation                | Equally, I'm not lobbying for "no change". Rather, I would like to see our live/work arrangements fully legitimized, with appropriate alterations to the buildings to comply fully with regulations, and lawful contracts with our landlords that hold up to legal scrutiny. If the process is conducted properly, Fountayne Road and the other live/work areas in Haringey will retain their unique creative and collaborative atmosphere, whilst removing some of the less desirable elements, such as health and safety concerns and municipal issues including, for example, refuse collection   | Noted.   |
| 560 | AAP932. | Charlie<br>Lewis,<br>warehouse<br>resident | Affordable business premises           | Another problem for businesses in the area is the rising cost of rent, pushed upwards by the arrival of an apparently endless stream of people wanting to move to our community. Some of them have come on the basis of wanting genuinely to contribute and thrive but I acknowledge that others approach our road with the touristic mindset of wanting to live somewhere hip. To be fair, our community must be doing something right that we are so popular. On the other hand, we need to preserve the positive aspects of our community and improve on it, or else we will see the area turn into yet another area of unaffordable housing at a time when there are proposals for the quota of affordable housing to be reduced by 10%. I'm not sure that this will serve the area from an economic or community angle. It makes far more sense to build on the vibrant success story that is occurring here in Haringey rather than bury it. | The regeneration area designation is the only one which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future. |
| 579 | AAP933. | Laura<br>Harrison,<br>resident             | Supports<br>warehouse<br>community     | In addition to the established communities at Eade and Overbury roads, which make a valuable contribution to the surrounding communities, the Fountayne and Markfield Road live-work communities also have the potential to make a huge long-term positive contribution to the area, if they can be supported to remain and grow. These accidental communities often exist despite poor treatment by current landlords, and  | Support for retention of the existing community is noted.  |

|     |         |   |                                    | they should be supported to remain and contribute to community life.   |   |
|-----|---------|---|------------------------------------|--|---|
| 579 | AAP934. | Laura<br>Harrison,<br>resident                            | Industrial use                     | The long-term relocation of heavy-industrial uses away from the Markfield area could also improve air quality here whilst freeing up further space for creative uses, with the site immediately overlooking Markfield Park offering an opportunity for more conventional residential development.  | Noted, the Council believes it is important to retain industrial uses in this area to meet the employment needs of the borough.   |
| 624 | AAP935. | Tottenham & Wood Green Friends of the Earth               | O'Donovan's                        | The map suggests green open space S of railway when in fact this is O'Donovans, who also have front site N of railway. Very antisocial use to have adjacent to new warehouse living. The TAAP should be looking for an alternative site for this waste industry which is necessary but which is not a suitable neighbour for the Ferry Lane Estate, which makes Markfield Road an unattractive corridor and which blights any development in the area.   | Noted there are unsuitable neighbours, but it is considered that this will happen with unplanned development.  The O'Donovan's Site forms part of an ecological corridor, hence why it is green on the map. |
| 692 | AAP936. | Atticus<br>Pappin,<br>warehouse<br>resident               | Supports<br>Warehouse<br>community | Fountain road is the greatest road in london. It is so special to me and so many people. it not only brings vibrant atmosphere to tottenham but to the whole of London. before you get rid of the warehouse community why dont you come and see for yourself what a special community it is  | Support for retention of the existing community is noted.   |
| 693 | AAP937. | Rebecca<br>Parkin,<br>warehouse<br>occupant<br>(business) | Affordable<br>workspace            | I am writing with regards to future proposals of development in the Fountayne Road area. It has only been brought to my attention today via word of mouth that proposals which may greatly affect the future of my workshop are being discussed. I have little knowledge as to the details of this and I am greatly concerned as to how this will impact my future.  | Noted, provision of affordable housing and workspace are important to the Council.  |
|     |         |   |                                    | I rent a workshop at 7 Fountayne Road which I have divided into three artists studios. As I am sure you are aware affordable studio/workshop space for designer's / artist's just setting out in business is in limited supply in london. I have put a great deal of time and effort into my workshop and it is a valuable asset for this time in my career and for those designers and artists sharing with me. I am using my studio space to further my career as a fine artist and also to undertake commercial pieces of work for events, backdrops for tv etc. we are all registered self employed. |   |
| 810 | AAP938. | Tynemouth Area Residents Association (TARA)               | Viability                          | Parts of this area are neglected and run down and improvements to this site are necessary. Many of the buildings are viable and are currently occupied, making a valuable contribution to the local community.   | The uses in these buildings need to be carefully managed in order to ensure that they make the appropriate contribution to the local housing and employment need in the borough.                            |
|     |         | (IAIXA)   |                                    | The site consists mostly of viable buildings and usage and should therefore not be subject to a Site Allocation.   |   |

## Appendix H (9) Tottenham AAP Consultation Statement

| Respondent ID | Comment ID | Respondent  | Topic               | Summary of Response  | Council Response  |
|---------------|------------|---|---------------------|--|---|
| 810           | AAP939.    | Tynemouth<br>Area<br>Residents<br>Association<br>(TARA) | Viability           | Parts of this area are neglected and run down and improvements to this site are necessary. Many of the buildings are viable and are currently occupied, making a valuable contribution to the local community.  The site consists mostly of viable buildings and usage and should therefore not be subject to a Site Allocation.   | It is considered that the existing buildings on this particular site are in poor condition, and that their redevelopment can make a positive contribution to the Council's objectively identified housing and employment needs. Additionally the site's relationship with its residential neighbours can be improved through redevelopment.   |
| 799           | AAP940.    | Bob Lindsay-<br>Smith                                   | Local<br>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 developing 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 (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.   |