

Appendix 2.6 – Comments on the Sustainability Appraisal and Appendices of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

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

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
567	AAP1069.	Page Green Residents' Association	Seven Sisters District Centre	17.11 Town centres: This section leaves out West Green Road N15, as a significant bustling business and retail centre, which is in dire need of an improved public realm and the creation of attractive, functional public spaces. The shops along Broad Lane leading to the High Road also need support and regeneration. The District Centres of Seven Sisters need to be protected and improved, particularly in light of retail developments in Tottenham Hale. Otherwise, Haringey Council could produce a further downward slide to the District Centres of Seven Sisters as it did when it developed the West Green Shopping Centre. If Seven Sisters is the gateway to Tottenham, Haringey shouldn't be contributing to its decline.	Noted. The Interim SA Report for the AAP has incorrectly listed the designated town centres in Tottenham in paragraph 17.11.2. However, the SA has made appropriate consideration for the Seven Sisters / West Green Road town centre, as reflected in paragraph 17.11.5. The Local Plan policies seek to protect and enhance Haringey's established town centre hierarchy, along with the designation of a new district centre at Tottenham Hale to reflect its existing and expanded future role in servicing the local area. The SA suggests that the preferred approach will have likely significant positive effects on sustainability and not detrimentally impact on existing centres.
422	AAP1070.	Environment Agency	Drainage	Although paragraph 17.15.7 of the AAP Sustainability Appraisal suggests that water quality could be enhanced by encouraging development adjacent to watercourses utilising SuDS, there is very little reference within the Sustainability Appraisals to how the plan will improve water quality across the borough.	Noted. Water resources, including considerations for water quality, are covered by Haringey's Sustainability Appraisal framework. The SA for the AAP, whilst considering effects of the plan across the borough, particularly in terms of cumulative effects, is necessarily focussed on the AAP area. Section 17.15 in the Interim SA Report for the AAP covers water resources including a discussion on water quality. Similarly, Interim SA Reports for the other Local Plan documents cover this topic. However, the Council will consider how the SA can further consider water quality issues through the integrated appraisal process.

Comments on Appendix A

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
651	AAP1057	Tibbalds on behalf of ISIS Waterside developments and Newlon	Capacity	ISIS/ Newlon's own feasibility work suggests that [TH7 Hale Wharf] should deliver in excess of 500 units, which would equate to a density of approximately 229 units/ ha and 568 hrh, which is in line with the density ranges set by the London Plan for the area. Based on this detailed work and in the absence of any viability evidence being produced as part of the Council's 'Evidence Base' we would suggest that it is inappropriate at this stage in the AAP process to come down on a specific number of units and that it may be more appropriate to specify a unit number range i.e. 400 to 600 units. This range would take in the density ranges expressed by the London Plan and would allow for the Council to work with developers to explore and test options in relation both design, unit mix and viability and come to a conclusion that balances all the issues and is capable of delivery. Suggested rewording: Replace 300 units in the table to a range (i.e. 400 to 600) or up to 600 units.	Noted, the capacity will be modelled as a minimum expected capacity which can be shown to meet housing need in the borough.
653	AAP1058	CBRE on behalf of Hermes and Argent	Clarify	Appendix A of the draft AAP sets out an estimate for the number of residential units which might be accommodated on allocated sites, albeit a footnote suggests that the unit numbers are simply estimates. There may be a case	Noted, the capacity will be modelled as a minimum expected capacity which can be shown to meet housing need in the borough.

				for the estimated capacities to be increased and we therefore recommend that the footnote is revised to explain more clearly that the residential capacities are simply estimates.	
818	AAP1059	Our Tottenham	Community	The community plan for Wards Corner should be included in the monitoring table alongside the Grainger plan.	Agreed.
428	AAP1060	Mr Green (CgMs)	Density	<p>The re-designation of the site to Local Employment Area: Regeneration Area will allow for the provision of some residential accommodation in accordance with LB Haringey's adopted strategic policy SP8. The table at Appendix A of the draft Tottenham Area Action Plan indicates an indicative net residential units for the site of 97.</p> <p>The FALP density matrix sets out at Table 3.2 of the plan acceptable residential densities. Based on a site area of approx 1.72 ha, according to this table between 77 and 442 units would be appropriate on the Fountayne Road site. Given the sustainable location of the site, the size of it and the significant potential it can make to the regeneration of the wider area the upper end of this density range should be encouraged.</p> <p>The existing indicative allocation of 97 units on this site falls right at the lower end of the density range. This will mean the potential opportunity of the site is not fully maximised, and squanders an opportunity for the site to make a more meaningful contribution to Haringey's housing need.</p> <p>Whilst it is acknowledged an element of employment floorspace will be re-provided on the site, para 19 of the NPPF requires the planning system to do everything it can to support sustainable economic growth. Such a small housing allocation does not go far enough in supporting economic growth. In addition provision of just 97 units will not be enough to effectively cross-subsidise an increase in employment provision and the ability to offer subsidised rents on the site.</p> <p>We request the indicative allocation has regard to the FALP density range and is increased to a minimum net additional 442 units. This will ensure the Plan has done everything it can to support sustainable economic growth. We also request this number is in addition to the re-provision of the existing community in warehouse living. This will ensure the provision of housing and employment on the site is maximised and allow the flexibility for a viable scheme to be delivered.</p>	It is appropriate that a mix of uses is shown on these sites.

Comments on Appendix B

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
421	AAP1061.	Historic England	Heritage	In English Heritage's view a number of the Strategy documents (where we have been consulted) do not present a positive strategy for the historic environment. The AAP therefore presents an opportunity to ensure that the Council's strategic vision addresses all aspects of sustainability as set out in the NPPF.	Noted.
421	AAP1062.	Historic England	Evidence Base	We also note inclusion of the Transforming Tottenham Hale Urban Centre SPD. This is now in need of updating as infrastructure programmes such as Crossrail have developed and are likely to influence opportunities significantly	The SPD has helped inform the content of the AAP however the AAP once adopted will supersede this document.
421	AAP1063.	Historic England	CAAs	Although in need of updating the Council possesses adopted conservation area appraisals for all conservation areas and as such we would recommend reference to these.	Noted.
818	AAP1064.	Our Tottenham	Consultation	[Urban characterisation study] was published at the same time than the consultation document and there was no time for the public to process all the	Council is not required to consult on completed evidence based documents and followed the statutory consultation

				supporting evidence.	period of six weeks for the development plan documents. However, it is noted that a large amount of information was released at one time. Council is currently reviewing its consultation methods in its statement of community involvement which will be released for consultation in late 2015. Consultation responses to this document will help inform how council involves the community in future planning proposals.
818	AAP1065.	Our Tottenham	Consultation	[Employment land study] was published at the same time than the consultation document and there was no time for the public to process all the supporting evidence.	Council is not required to consult on completed evidence based documents and followed the statutory consultation period of six weeks for the development plan documents. However, it is noted that a large amount of information was released at one time. Council is currently reviewing its consultation methods in its statement of community involvement which will be released for consultation in late 2015. Consultation responses to this document will help inform how council involves the community in future planning proposals.
818	AAP1066.	Our Tottenham	Consultation	[Open space and biodiversity study] was published at the same time than the consultation document and there was no time for the public to process all the supporting evidence.	Council is not required to consult on completed evidence based documents and followed the statutory consultation period of six weeks for the development plan documents. However, it is noted that a large amount of information was released at one time. Council is currently reviewing its consultation methods in its statement of community involvement which will be released for consultation in late 2015. Consultation responses to this document will help inform how council involves the community in future planning proposals.

Comments on Appendix E

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
818	AAP1067	Our Tottenham	Edit	Definition of affordable housing - Amend to reflect the natural meaning of the word 'affordable', i.e. genuinely affordable.	Noted. Action: Update the definitions of affordable, intermediate and social rented housing to bring them more in line with London Plan and NPPF definitions
818	AAP1068	Our Tottenham	Edit	Definition of lifetime home - Add: Lifetime Neighbourhoods as per London Plan	The minor alterations to the London Plan have suggested the removal of references to lifetime homes. Therefore the addition of a definition of Lifetime homes would be contrary to the London Plan.