

Appendix 2.1 General comments on the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
258	SA4331	Ladder Community Safety Partnership	Height	Ladder roads would be bordered and defined by a series of new high-rise blocks. These new heights will transform the local area and are the biggest changes since area first developed. It is important to be absolutely sure the package of development is not over ambitious in scope, size and scale bearing in mind Harringay is already densely developed and populated. This is clearly demonstrated by councils own policies which are designed to prevent further subdivision of family housing i.e. DM22. Even allowing for some infrastructure improvements why should it that adding 4000 new residents will not put intolerable pressure on traffic, local services, residential character and amenity.	New opportunities to enhance infrastructure will be included in the IDP commensurate to the growth in population.
258	SA4332	Ladder Community Safety Partnership	Proposed development	Disappointed concerns in March 2014 consultation have been confirmed rather than addressed. Concerned proposed development around Green Lanes will create a worrying and negative cumulative effect, No fewer than 11 sites (SAs 21,22,30-38) proposing 1879 residential units. Conservative estimate could mean doubling to 3758 more residents with all resulting implications for infrastructure – traffic, public transport, air quality, flood risk, sewage and water supplies, schools, medical services etc.	The infrastructure delivery plan will address the need for infrastructure and where it should be located based on both current demand and demand arising from potential development on allocated sites.
268	SA4333	Colin Kerr and Simon Fedida	Calculations	The example calculations for assessing site capacity are extremely useful. It would be helpful if this calculation and the starting assumptions (for example, commercial mix, site character, unit density) were to be provided in the summaries of every site, rather than simply the final number of units and floorspace. Recommendation: The calculation and starting assumptions should be provided in the summary for each site.	Noted, it will not be possible or efficient to provide the calculation in full for each site. The number of units can be provided however. Action: Include the potential development capacities within each site.
268	SA4334	Colin Kerr and Simon Fedida	Density	It is not clear what mix of habitable rooms per unit is used in the London Plan SRQ matrix to arrive at the target dwellings per hectare. The SRQ provides very large ranges for each PTAL/character setting/units per ha combination.	The Appendix states that the mid-point of the GLA density matrix range is used.
268	SA4335	Colin Kerr and Simon Fedida	Density	Recommendation: A short explanation of how the target dwellings per hectare was arrived at should be provided in the summary for each site	The method statement is included as an appendix which is considered the most appropriate place in order to avoid repetition through the document.
268	SA4336	Colin Kerr and Simon Fedida	Floorspace	It is not clear how the mix of residential and commercial floorspace is arrived at. Which policies are to be referenced? Recommendation: A short explanation of how the residential/commercial mix was arrived at should be provided in the summary for each site.	Noted. A summary of the assumptions made will be included in the appendix as it is considered this is the most appropriate location to minimise repetition throughout the document. Action: Include a short summary of assumptions made in the calculation of floorspaces in Appendix A.
408	SA4337	Mario Petrou	Office development	Concerned the new lower average office floorspace figures for Haringey will result in an inability for the market to expand and is being used as a means to release more space for residential use. It will result in cramming workers into smaller workspaces	The economic growth target in the London Plan will inevitably mean that employment densities will be higher. The Council is keen to see an increase in knowledge-based employment within the borough which complements the existing lower density uses. The reduction in office target is due to there not being a significant market for office stock in the borough.
414	SA4338	GLA	Site capacities	The proposed refinements to designation boundaries and opportunity site allocations are largely supported in strategic planning terms. Nevertheless, specific comments with respect to various allocations are provided below. In addition, the Council is encouraged to provide indicative figures for residential capacity and/or employment generating potential (as relevant) as part of the	Noted. Capacities will be included within the Site Profiles themselves. Action: Include capacities in the individual site allocations

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				various site allocation profiles. Whilst it is acknowledged that this information currently resides in Appendix B of the draft plan, the aforementioned approach is likely to assist with the practical implementation of the plan.	
419	SA4339	Haringey Liberal Democrat Group	Infrastructure	On a number of these sites the housing proposed is overly dense and tall and that not enough has been done to ensure community facilities (such as playgrounds, doctor surgeries, schools and nurseries) will be provided for the expanded communities	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.
419	SA4340	Haringey Liberal Democrat Group	MOL	<p>There are 5 sites in the allocation which include Metropolitan Open Land (MOL), this type of land is usually parkland or important green space and we believe these areas should be protected.</p> <p>Some of the site allocations include plans for development on MOL:</p> <ul style="list-style-type: none"> • Hornsey Water Treatment Works • Broadwater Farm site (SA63) • Rowan’s Bowling Alley <p>We are concerned that the special nature of Metropolitan Open Land is not being respected. The need for open public space, sport areas, parks and green spaces increases with development.</p> <p>It is not enough to say that MOL will be replaced with open or green spaces when there are no guarantees these spaces will be open to the public in the same way MOL is. The council should be making every effort to avoid development on MOL.</p>	<p>The MOL components of both the Broadwater Farm and Finsbury Park Bowling Alley site allocations have been removed. Hornsey Water Treatment Works will be removed from the Plan in its entirety</p> <p>Action: Amend site allocations to remove MOL from Broadwater Farm and Finsbury Park Bowling Alley</p> <p>Action: Remove Hornsey Water Treatment Works from the document</p>
419	SA4341	Haringey Liberal Democrat Group	Tall buildings	We are concerned that this document proposes allowing buildings of between 10 and 15 storeys plus in many residential areas. We do not think this vision of high-rise housing across so many parts of what is in many ways an outer-London borough is right or acceptable to local people.	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, and specific height limits will be removed from the Site Allocations contained in the Plan.
419	SA4342	Haringey Liberal Democrat Group	Wood Green: Infrastructure	<p>Large parts of Wood Green are included in this document which sets out what the council believes the land should be used for. In particular, the area around Station Road, the Library, Mall, bus garage and the area around the chocolate Factory are all included in the plans.</p> <p>The Lib Dems are concerned that the council wants to see much more housing in Wood Green from the proposals put forward in this document. In particular, the area around station road has been identified as somewhere that could take dense developments of 10 storeys.</p> <p>We are worried that all of the this new housing on top of the Haringey Heartlands will put a great strain on local communities resources such as doctors surgeries and playgrounds.</p> <p>We believe that small and less dense development in this area would be better and that more efforts must be made to include more community facilities in any development.</p> <p>We also believe that more efforts must be made to create and retain open spaces.</p>	<p>Open spaces will be protected, with new open spaces being created through Site Allocations in Wood Green.</p> <p>The housing allocated for Wood Green is necessary to meet objectively identified needs, as set out through the London Plan.</p> <p>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.</p>

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				Buildings themselves should provide also green spaces, not just at ground but as part of terraces and building greening.	
421	SA4343	Historic England	Site Allocations	The following comments have been provided in the context of our previous letter (dated 7th March 2015) to the draft Site Allocation Development Plan Document (DPD). As previously expressed it would be helpful if the individual maps used in the DPD were supported by a 'key' to explain the various annotations, clearer street names and designated heritage assets annotations. It is noted that the maps provided this time around appear less clear in their orientation within the wider context. This information would then help us to assess the potential impacts of the site allocations. However it is clear that many of the points raised in our previous letter have not been addressed. For example our overarching comments relating to archaeology and the need to ensure that the potential archaeological interest of all sites is understood; and identifying heritage assets at risk, and referencing their future repair and re-use as part of a positive strategy for the historic environment, have not be taken on board in this latest version.	Noted. It is acknowledged that improvements could be made to maps and image resolutions and the Council will seek to improve this in future documents. Action: Improve the quality of maps and images used in the document
421	SA4344	Historic England	Site Allocations	Before looking at the specific sites we would like to highlight that the prefixes and site names to each site allocation has been radically changed from the previous version. This is compounded by the change in the names of the broad areas. For example the Civic Centre has changed from WG1 to SA10, and no longer identified as being in the Haringey Heartland but within the Wood Green Metropolitan Town Centre. This change in the coding system and names hinders ours, and possibly others, ability to monitor the alterations made to the details of the site allocations following our previous comments. We would urge you to maintain a consistent approach throughout the development plan process in order to help consultees and interested parties engage effectively and efficiently with the Council. To do so will enable us and others to understand better the opportunities for development and policies on what will or will not be permitted and where (NPPF paragraph 154).	We will attempt to keep the numbering consistent in the next version. Action: Ensure numbering is consistent
421	SA4345	Historic England	Site Allocations	Within these constraints we would suggest that site allocations provide the opportunity to positively address heritage assets at risk, and help ensure that future planned developments respond to and reflect local character. This includes ensuring development proposals avoid causing unnecessary harm to the significance of heritage assets (including effects on their setting). For these benefits to be realised it is essential the evidence base for each site should include heritage assets where they may be affected, and analysis of any potential effects on their significance. In addition we would advise that the site allocations provide an opportunity to set out design parameters for new developments that respect the historic context of sites, including the significance of any heritage assets. Our previous letter provided detailed suggestions on this point and due to the changes of the coding of sites it difficult to ascertain whether these were integrated into this latest version. With this in mind we would wish to discuss further with you the details supporting the site allocations post the closing date of this consultation.	We will arrange further discussions with Historic England to discuss opportunities for existing heritage assets to be appropriately referenced in Site Allocations.
422	SA4346	Environment Agency	Allocations	For clarity and to avoid repetition where possible we have commented on all the sites which have been allocation in both the Site Allocations DPD and Tottenham AAP within the next section. Thank you for providing shapefiles for us to check the environmental constraints of the allocated sites more efficiently. The revised layout of the allocated sites in both documents is clearer and much easier to navigate. We welcome the	Noted.

				implementation of site requirements and development guidelines sections and offer site specific comments in the next section. Where necessary we have proposed additional or alternative wording to improve the robustness, supported by the recommendations of the Sustainability Appraisals.	
422	SA4347	Environment Agency	De-culverting	The Moselle Brook and Stonebridge brook are both heavily modified waterbodies, which are largely in culvert. They are both tributaries of the Lower Lee River, classified as 'poor' ecological status and failing to meet 'Good ecological potential' under the Water Framework Directive. The allocated sites should support objectives within the River Basin Management Plan to re-open existing culverts within these areas, where feasible, as supported by strategic policy SP5 of Haringey's Local Plan which encourages all development to restore and enhance the Blue Ribbon Network.	Noted. This is included as an aspiration in relevant allocations.
422	SA4348	Environment Agency	De-culverting	All development on sites with culverted watercourses will be expected to investigate the feasibility of deculverting. Deculverting not only provides opportunities to reduce sewage pollution through rectification of misconnections but can also deliver the following wider benefits to the area: Enhancing the Blue Ribbon Network by providing valuable aquatic habitat, aiding fish passage, and significantly adding to the visual attractions of an area. ☑ Offering educational and play opportunities for children, enhancing pedestrian and cycle routes and giving people a touch of the countryside and its seasons in the town. ☑ Using water in motion to mask city noise and provide an atmosphere of quiet and calm. ☑ Complementing other urban regeneration initiatives, giving a place a sense of identity and bringing commercial benefits such as enhanced image for properties and up to 20% increase in land values or rents. ☑ Reducing maintenance and construction costs by using natural bioengineering techniques rather than concrete constructions. ☑ Reducing flood risk, and creating balancing ponds to help reduce flooding downstream. ² 2 Source: http://www.ciwem.org/policy-and-international/policy-position-statements/de-culverting-of-watercourses.aspx	Noted. This is included as an aspiration in relevant allocations.
422	SA4349	Environment Agency	De-culverting	Where it is adequately demonstrated that deculverting will be unachievable, the design principles should include a robust SuDS scheme to secure alternative environmental enhancements that provide multiple benefits. Water quality improvement is a primary aim of WFD and should be acknowledged and prioritised in all plans. This can be addressed in the AAP through greater reference to need for SUDS and dealing with misconnections. This is supported by Sustainability Appraisal paragraph 17.15.7.	The provision of SuDS in new developments is applicable to all developments, and will be set out in the DMDPD.
422	SA4350	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording: <i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG</i>	Noted. Action: Include "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."

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				<p><i>and London Plan.</i></p> <p>We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum:</p> <p><i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	
422	SA4351	Environment Agency	Potentially Contaminated Sites	<p>National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken</p>	<p>Noted.</p> <p>Action: Add a recommendation that a groundwater Source Protection Zone study should be undertaken to ensure water quality is not compromised within the relevant sites.</p>
424	SA4352	The Highgate Neighbourhood Forum	Cross - referencing	<p>The Highgate Neighbourhood Forum welcomes the statement on p 115 "For the avoidance of doubt, the requirements of both the future Allocations in this document when adopted, and the guidance provided in the Highgate Neighbourhood Forum Plan should be taken into account when bringing forward development proposals."</p>	<p>Support is noted.</p>
426	SA4353	Thames Water	Development Guidelines	<p>A number of the site allocation development requirements set out that: <i>"Thames Water should be consulted with regards the capacity of existing drains to move waste water from the site. Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents."</i></p> <p>For the sites listed we request that the development guidelines require the developer provide a detailed drainage strategy for foul and/or surface water, informing what infrastructure is required, where, when and how it will be funded. This assessment will determine if there is any available capacity. In many cases, development flows can be adjusted to account for available capacity through variations to the on-site drainage strategy. If infrastructure upgrades are required, the assessment will determine the scope (not cost) of these upgrades. This could be funded either by the developer (through the Requisition process), or if the upgrades are of a strategic nature and address multiple sites, can be funded by Thames Water. We would expect an implementation window in the order of 3 years to design and construct appropriate upgrades. Thames Water has very limited funding in the period 2015-2020 to upgrade the public sewer system for increase in capacity due to growth. We prioritise our investment based on a risk approach with the consequence and likelihood of increased flow adversely affecting the sewer system. We prefer to fund strategic upgrades where known pinch points in the sewer system restrict the ability to accommodate multiple sites.</p> <p>At the time planning permission is sought for development at these sites we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the drainage strategy are implemented ahead of occupation of the development.</p>	<p>Noted, appropriate development guidelines will be created for each site, based on Thames Water's comments.</p> <p>Action: Update requirements for developers to consult Thames Water when submitting planning applications.</p>
426	SA4354	Thames Water	Drainage	<p>As set out on the enclosed table, we have similar concerns regarding a number of sites in relation to water supply. For these sites we request that the developer</p>	<p>Noted.</p>

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				also provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. Again, at the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.	
562	SA4355	Cllr John Bevan	Affordable housing	That all of the sites listed in this consultation document clearly state on an individual site basis the % level and type of social housing that will be provided. This to prevent future confusion / disputes over land values and viability issues.	Noted. Although it is possible to express the target on a site-by-site basis, it will not be possible to state what will be provided. To do so would not be in accordance with the NPPF.
730	SA4356	Parkside Malvern – Marcus Ballard	Green corridor	The preservation of the green corridor following the line of Moselle Brook should be made an objective at the back of Hornsey Park Road.	The Council supports deculverting in principle but does not believe that a buffer zone on culverts is consistent with meeting the borough's housing targets.
730	SA4357	Parkside Malvern – Marcus Ballard	Green Link	The green-links are weakly described	Noted, further detail will be provided in the DMDPD Action: Enhance green links policy within the DMDPD.
730	SA4358	Parkside Malvern – Marcus Ballard	Green space	objective for creating a local community park in or adjacent to the Hornsey Park area, an area of open space deprivation.	Noted, the draft DMDPD policy will support improving open space in areas of open space deprivation. Action: Ensure DM26 offers opportunities to improve existing open spaces in areas of deficiency.
730	SA4359	Parkside Malvern – Marcus Ballard	Housing; Heartlands	The reference to 300 homes and 2000 jobs on page 44 makes no sense: the section needs explaining and re consulting on.	Note, this is a typo in the document, it should read "3,000 new homes and 2,000 new jobs. This is consistent with the totals in Appendix B of the document. Action: Amend text on P44 to change 3,00 to 3,000.
730	SA4360	Parkside Malvern – Marcus Ballard	Moselle	The desirability of de culverting the Moselle Brook in the Wood Green sites is so weakly described that there is not possibility of this important environmental objective ever happening. associated drafting should be revised to make this a firm objective	It has to be recognised that while deculverting of the Moselle is an aspiration enshrined in the Local Plan, it will be subject to feasibility and viability on a site-by-site basis. The wording is considered appropriate for this issue to be investigated as part of a planning application in the future.
730	SA4361	Parkside Malvern – Marcus Ballard	Noise; pollution	New development must deliver reduced noise, pollution and other environmental stress on our area.	A key aim of the Plan is to locate new development in the most sustainable areas, generally where people can travel to and from the site using public transport. This, and making provision for greater cycle use, and strengthening pedestrian links, will minimise the adverse effects on air quality and noise pollution from new development.
730	SA4362	Parkside Malvern – Marcus Ballard	Open Space	We object to valuable open space in our area being included in sites for redevelopment, e.g. the open space in the vicinity of Clarendon Road, Hornsey Park Road and the Afro Caribbean centre. New development must have its own open space and not appropriate ours.	There is no designated open space in the sites listed.
730	SA4363	Parkside Malvern – Marcus Ballard	Open Space	The protection, non encroachment and preservation of Wood Green Common must be a prime objective of the LDP: it could even be expanded	It is considered that the appropriate level of protection is already granted.
730	SA4364	Parkside Malvern – Marcus Ballard	Pedestrian paths	Proposals for the improvement of the Penstock path are so weak that a change is unlikely to ever happen. Proper robust proposals should be introduced to ensure the improvement is made before any new development takes place.	The Council has expressed full support for the improvement of the Penstock foot tunnel.
730	SA4365	Parkside Malvern	Privacy; light	Much greater emphasis should be given to the avoidance of overlooking and	This issue will be addressed through the design policies in the DMDPD.

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		– Marcus Ballard		overshadowing of existing communities by any proposal for taller buildings.	
730	SA4366	Parkside Malvern – Marcus Ballard	Scale; density	scale up the development of the Wood green sites by first ensuring the West Heartlands (National Grid) site is an exemplar created without pressure to increase density or the number of housing units.	Noted. The Wood Green capacities will be determined through planning application, and as they are part of a designated growth area, capacities will be maximised, subject to acceptable design. The same is the case for the Clarendon Square site on any additional application that comes in.
730	SA4367	Parkside Malvern – Marcus Ballard	Traffic	the LDF must have a much clearer plan for the delivery of a permanent solution to traffic passing through the area. create a permanent shift in traffic from Hornsey Park Road to Mary Neuner Way, Wood Green High Road and other main roads in the locality.	Noted. There is an Area Action Plan for Wood Green being created, which will be an appropriate document to explore this in more detail.
810	SA4368	Margaret Fowler	Amenities	I very much appreciate receiving Tottenham News to keep up to date with progress but I am very disheartened that it does not include any news of the area where I live. St Ann's and Harringay Wards are very desolate places. Great park but nothing else and just dissatisfaction about St Ann's hospital site. Where are our new houses and shopping areas and new ideas in the park?	Sites have been identified in the Green Lanes area, which provide new homes, the potential renewal of the existing Arena Retail Park, which has implications for enhancing Finsbury Park.
812	SA4369	Mark Brearley	Sites	I object to the failure to adequately identify a supply of specific, developable sites or broad locations for housing growth (as required in NPPF para 47, 156, 159), and the allocation of several sites for housing even though with the suggestion that they are deliverable even though they are in fact not available now, and the failure to integrate strategies for housing, employment and other uses.	It is considered that there are an appropriate pipeline of deliverable and developable housing sites included in the Site Allocations and Tottenham AAP as required by the NPPF. Additionally there is a combination of protection and intensification of existing employment assets in the borough to meet objectively identified employment need.
818	SA4370	Our Tottenham	Consultation	Due to the very short time period for public consultation and the flaws in the process (outlined in our overall response to the SA DPD), we have only been able to review and comment about a small proportion of the sites located East of the rail line. The site allocation proposals which we have been able to review are highlighted in YELLOW in this table of content. They have been assessed against the principles derived from the Our Tottenham Charter and outlined in our overall response to the SA DPD.	Noted.
818	SA4371	Our Tottenham	Edit	The numbering of sites used here does not correspond to the numbering of sites in the subsequent sections. The list should start with SA57 Park Grove... and finish with SA66 Leabank...	Noted. Action: Update SA numbers on p 149
818	SA4372	Our Tottenham	Housing target	See our comment about that in our response to the Tottenham AAP. Unrealistic target with potentially negative impacts on existing residents and businesses. We contest the fact that Tottenham has to absorb half of that growth. It is the poorest part of the Borough, the most dense, and includes 30% of the Borough's population.	Noted, but this is a comment in relation to the growth allocated to Tottenham, not this part of the document. The growth allocated to Tottenham is consistent with the overall spatial vision for the Borough set out in the Local Plan: Strategic Policies.

New Sites proposed for inclusion within the Local Plan as part of the consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
698	SA4381	Savills on behalf of the London Diocesan Fund	Hornsey	Submission of the vacant land between Hornsey Bowling Club and Camfrey Court for enabling development for improvement of the Bowling Club through residential development on the vacant land.	This site is not considered large enough to be granted an Allocation.
579	SA4382	Laura Harrison, resident	Industrial uses in Tottenham Hale	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	Noted, at the current time this site is not being allocated. It currently has licensed and safeguarded waste capacity.

				residential development.	
609	SA4383	Apcar Smith Planning on behalf of Wedge Investments Ltd	New Site	Site nominated for allocation.	This site was identified in the January 2014 site allocations document as a housing trajectory site. Housing trajectory sites are ones that do not require an allocation because the site either holds planning consent or because the council believes development can be adequately managed through the development management policies. Having reviewed this site it does not create sufficient uplift to be considered strategic enough for an Allocation.
261	SA4384	Trustees for Methodist Church Purposes (DP9)	SA Addition	 <p>In Muswell Hill adjacent to Pages Lane. Includes Chester House and tennis courts. Request site is included in Site Allocations Plan. See representation for justification.</p>	It is considered that as the majority of this site has a SINC designation, and the uplift on the remainder of the site is not of a sufficient scale to be considered overtly strategic, this site will not be included in this edition of the Site Allocations.
624	SA4385	Tottenham & Wood Green Friends of the Earth	New Site	The green area between the Holy Trinity School, the top of Fairbanks Rd and the High Road should be designated as public open space to prevent the school closing it to public access. This has been mooted in association with a planning application to build a new footpath between the bus stop on Monument Way and Fairbanks Road reference HGY/2015/0438.	This site is not considered appropriate for allocation at this time.
655	SA4386	Mark Lewis, Levitt Bernstein	Bruce Castle	<p>Bruce Castle Museum and Park is an important community, heritage and cultural hub as well as being a remarkable heritage asset for the Bruce Grove neighbourhood. As you may know the building is in much need of repairs (leaks in the roof frequently put the building and its irreplaceable contents at great risk) and it has the potential to be every bit as remarkable as Walthamstow's William Morris Gallery which has transformed perceptions of the Lloyd Park area. The museum is one of only two grade I listed buildings in Haringey, whereas WMG is grade II* listed. With improved transport links from Bruce Grove and an improved High Street, the Museum's future could be similar to the Horniman Museum in Forest Hill - a real 'family' attraction combining Park and Museum which is now firmly 'on-the-map' being more accessible by London Overground.</p> <p>I would like to see a commitment to securing improvements to Bruce Castle and Park adopted within the AAP. Bruce Castle could be seen as the centrepiece of community pride and regeneration of the Bruce grove neighbourhood, whereas it seems to be shown outside the 'red line' of the AAP?</p>	Noted, Bruce Castle Museum and Park will be protected by conservation, and open space designations. There is not the case for a significant regeneration scheme as at Alexandra Palace, and as such no Allocation is needed.

674	SA4387	Vaughan Melzer, Chettle Court resident	Alternatives	Why take land from two estates which are working as good social communities with good social amenities when there are patches of land which are not built on and un-used, for example the green area in Granville Road, which although is enjoyed by dog walkers never has the use that our play areas have, and the unused 'car park' next to Hornsey library – an eyesore and empty for years?	This proposed new site is already included within proposals for SA8.
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Comments on Sustainability Appraisal of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
567	SA4373	Page Green Resident's Association	Policy too flexible	<p>We oppose 23.14 Open space because there are too many let out clauses such as, '...that development is not to lead to adverse effects on designated sites and will be protected unless the benefits of new development outweigh nature conservation or scientific interest'; ...' ensure that development proposals do not lead to the whole or partial loss of open spaces without an assessment of the current level of provision', etc. Who is to decide 'the benefits'? No, there is too much wiggle room here and we believe it will be taken advantage of. There is too little Open Space already and with so many new homes without gardens, Open Spaces needs to be absolutely ring-fenced.</p> <p>In the SA of the Site Allocations DPD report, section 'Open Space' it states 'Haringey's 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces. The recommendations include improving provision of small local parks and amenity green spaces as well as access to them and securing new open space in new developments'. Section 23.14 is in contraction to this statement by allowing development on Open spaces in 'some cases'.</p>	Objection noted. The Council seeks to protect and enhance open space across the borough, as well as improve access to it. The Council considers that adopted Strategic Policy SP13 and proposed policy DM26 together provide robust policy protection for open space, and further reflect recommendations of the Open Space and Biodiversity Study. The DM policy clearly sets out that the Council will not grant planning permission for proposals that would result in a loss of open space unless it can be demonstrated that the open space is surplus to function. Further, the policy also provides that in areas of open space deficiency, as identified by the Council's latest evidence, all development proposals will be required to make provision for open space. The SA has referred the Open Space and Biodiversity Study in setting the SA framework for assessing the Local Plan, and Open Space is a criterion against which the Local Plan policies are appraised for likely effects.
567	SA4374	Page Green Resident's Association	Building on Open Space	<p>SA of the Site Allocations DPD, page 64, Appendix IV – Open Space, states under housing, Option 2 would certainly constrain the ability to deliver on the ambitious London Plan housing targets. Significant negative effects are predicted. Our interpretation of this bold admission is that Haringey Council has every intention of building houses on Open Space. We strongly oppose the use of the limited space we have for housing development. Again, we oppose Option 1 here and support Option 2 which would not allow development on Open Space.</p>	Disagree. The Council seeks to protect and enhance open space across the borough, as well as improve access to it. The Council considers that adopted Strategic Policy SP13 and proposed policy DM26 together provide robust policy protection for open space. The Sustainability Appraisal (SA) has informed the process of selecting preferred policy options against reasonable alternatives. For site allocations, a number of potential site uses (including open space) were considered for the identified strategic sites and assessed against the Council's SA framework. The SA indicates that allocating these strategic sites exclusively for open space (Option 1) would inhibit the Council's ability to meet London Plan housing and employment targets. It suggests that the plan policies should focus on improving the function, quality, usage and accessibility of existing open space especially by applying the Green Grid approach. The proposed Local Plan policies reflect this approach and the Council will use the SA findings on Open Space to further identify opportunities for strategic sites to improve and enhance the Green Grid network.
567	SA4375	Page Green Resident's	Create new open space	<p>SA of the Site Allocations DPD, Open Space, page 33. We oppose Option 1, which states; Do not allocate sites for purely open space. We support Option 2 here for the reasons stated above. We need to create more Open Space to support</p>	Support for Option 2 of the Sustainability Appraisal reasonable alternatives assessed is noted. The Council will progress with Option 1 for strategic sites on the basis of sustainability appraisal findings

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		Association		additional population. Tottenham already has far less Open space than other boroughs and, supposedly Haringey has a commitment for creating more.	and for reasons set out in the Interim SA report. The Council's Local Plan policies seek to protect and enhance open space across the borough, as well as improve access to it. The Tottenham AAP proposes a Green Link policy recognising the need to address local issues in respect of access to open space.
567	SA4376	Page Green Resident's Association	Bulge classes	SA of the Site Allocations DPD, 14, 3.1 Education, states, 'where need for additional capacity has been identified, this might be delivered in one of three ways: bulge classes (not sustainable for long term increased provision), expansions and new (free) schools as a part of major sites. We oppose the idea that 'bulge classes' are even considered by the Council as a possible short term solution. Would the officers in Planning or the councillors themselves even consider this an option for their children? More school places will obviously be needed if over 30,000 or more people are moving into Tottenham. The schools need to be sorted before the housing, yet this appears to be a minor consideration. Does the Council think that the middle class families they hope to attract will move into the area if there are no new school places?	The Council recognises the importance of social and community infrastructure in supporting sustainable communities. The Council has prepared and will regularly update an Infrastructure Delivery Plan (IDP), which identifies the service areas where investment will be needed to meet additional demand from growth and development, including for education. School place demand is dynamic and affected by a range of factors and bulge classes are used across London as a short term measure to help meet fluctuations in demand. The Council will continue to track pupil numbers to ensure that it continues to have enough places to meet demand.
661	SA4377	Tottenham Business Group	Reasonable alternative	It is surprising that the Scoping Reports for both the Allocations DPD and The Area Action Plans provide no information as to "reasonable alternatives" to the present proposed scheme. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that 'sustainability which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment, economic and social factors. The continual representations of the Tottenham Business Group to the Council Cabinet and the basis of its local community petition of 28 th November 2013 was to request public consideration of reasonable alternatives to the devastating local impact of the level of demolitions currently proposed. The response from Cabinet was to promise to look at ways of providing alternatives to demolition, but this was never delivered to the community.	The Council is undertaking Sustainability Appraisal in line with requirements of the Strategic Environmental Assessment (SEA) Directive (2001), the Environmental Assessment of Plans and Programmes Regulations (2004) and the National Planning Policy Framework. Reasonable alternatives have been considered as part of the SA process and further information is set out in the Interim SA Reports of the respective Local Plans. The Site Allocations and Tottenham AAP give a fit to the spatial distribution agreed in the Strategic Policies. The alternatives are therefore limited in respect of deliverability. The SA will however at Regulation 19 stage consider this in further detail.
375	SA4378	Hillcrest Residents Association	Open space, Sustainability appraisal	Haringey's interim Sustainability Appraisal for the SA DPD recognises that Hillcrest fits the 'rules' for allocation as an 'Open Space' (it is within an area of deficiency). (SA table 10.1)	Noted. The Site Allocations Interim Sustainability Appraisal sets out several criteria in identifying potential site uses for the purpose of considering reasonable policy alternatives.
375	SA4379	Hillcrest Residents Association	Open space, Local green space, NPPF consistency	The council's options appraisal concluded that the council would not allocate sites purely for Open Space. The options appraisal recognised that there were negative effects associated with this decision, and noted that there are 'theoretical opportunities to do more to reduce open space deficiencies' Allowing the allocation of Local Green Space would help the council reduce these deficiencies while retaining a commitment to the presumption in favour of sustainable development.	Noted. The Council will include a policy to reflect the potential for designating Local Green Spaces. Action: Policy point to reflect Local Green Space designation in line with NPPG.
567	SA4380	Page Green Resident's Association	Open Space	We also support Option 2 as compared to the Council's preferred strategy Option 1 that states: 'Do not allocate sites for purely open space is on balance preferred. Priority considerations include the need to avoid any approach that would compromise the Council's ability to meet its housing and jobs targets'. It should be obvious that with such an increase in population and so many more people living in homes without gardens, we must have more open space. Yet option 1 allows Haringey Council to do away with the very limited green space Tottenham already has. We support Option 2 aspect that seeks to allocate sites as open space.	The Council seeks to protect and enhance open space across the borough, as well as improve access to it. The Council considers that adopted Strategic Policy SP13 and proposed policy DM26 together provide robust policy protection for open space. The Sustainability Appraisal (SA) has informed the process of selecting preferred policy options against reasonable alternatives. For site allocations, a number of potential site uses (including open space) were considered for the identified strategic sites and assessed against the Council's SA framework. The SA indicates that allocating these strategic sites exclusively for open space (Option 1) would inhibit the

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					<p>Council's ability to meet London Plan housing and employment targets. It suggests that the plan policies should focus on improving the function, quality, usage and accessibility of existing open space especially by applying the Green Grid approach. The proposed Local Plan policies reflect this approach and the Council will use the SA findings on Open Space to further identify opportunities for strategic sites to improve and enhance the Green Grid network. In addition, the Council will seek to increase provision of open space in line with DM26.</p>
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