

## Appendix 2.2 Comments on SA1-SA4 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

## Comments on SA1 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
574	SA1	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Support	Wood Green Investments Ltd supports this policy to protect sites required for the construction of Crossrail 2 and ensuring that a mix of uses and potentially enhanced infrastructure are required from future proposals in these areas.	Support is noted.
414	SA2	GLA	Support	The proposed approach to Crossrail 2 safeguarding and impact assessment in draft SA1 is strongly supported in principle. However, TfL recommends that the 'wider impact area' (currently an 800 metre radius) is extended to a 1km radius from Crossrail 2 stations. This would reflect the expected zone of influence of Crossrail 2, based on experience with impacts associated with Crossrail 1.	Noted. <b>Action Amend 800m radius to 1km.</b>
415	SA3	Transport for London	Crossrail	Draft SA1 (Indicative Crossrail 2 Areas) the approach to safeguarding here is strongly welcomed however, it is requested that the wider impact area (currently 800m) is extended to 1km from Crossrail 2 stations. This would reflect the expected zone of influence from Crossrail 2 around the stations as evidenced by impacts associated with Crossrail 1 which has been evidenced by GVA.	Noted. <b>Action Amend 800m radius to 1km.</b>
410	SA4	North London Waste Authority	Crossrail 2	NLWA has a Re-use and Recycling Centre (RRC) at Western Road in Wood Green and is within 400-800 radius of the proposed Alexandra Park Crossrail station. NLWA would be pleased to be involved in the scrutiny of sites as proposed in the DPD to ensure redevelopment of the former Haringey Heartlands area is conducive to the RRC being able to continue to serve local residents as it does now.	Agreed. The Council has identified the premises as licensed waste capacity, and has allocated it in a subsequent policy,
818	SA5	Our Tottenham	Map	A proper title and legend for the map should be included, explaining what the colours correspond to.	We recognise improvements could be made to our map and image resolutions, and we will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future.
268	SA6	Colin Kerr and Simon Fedida	Size	The draft SA1 proposes two circular areas of 400m and 800m radii around Alexandra Palace Railway Station to be subject to enhanced scrutiny and unspecified extra infrastructure and access requirements. These areas represent 0.5 km <sup>2</sup> and 2.0 km <sup>2</sup> around the Station. The SA1 areas are much larger than the 'safeguarded route' requirements and 'area of surface interest' for the Alexandra Palace area, as indicated by Sheet 42 of the Crossrail 2 consultation November 2014 to January 2015. The SA1 areas are also much larger than the proposed Draft AP1 site allocation in the earlier (2014) consultation of this Site Allocations DPD. The area of the earlier site allocation was a single	This site allocation seeks to optimize development around future Crossrail stations. The 400m radius and 800m radius represent approximations of 5 and 10 minute walking distances to each potential future Crossrail station. The Council considers that there should be a policy that aims to ensure that any development parcels coming forward in these areas should ensure that opportunities to locate uses that would benefit from good access to a Crossrail Station are exploited.

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				250m radius circle centred on Alexandra Palace Railway Station. No specific reason is given for the unprecedented scale and increase in size of the SA1 allocation. It is vastly greater than the safeguarded areas requested by Crossrail 2. Only the most general of reasoning has been given to justify the expansion of this site allocation.	
268	SA7	Colin Kerr and Simon Fedida	Site characteristics	The character of the Draft Site is exceptional. The site includes the valuable green space of Avenue Gardens and Alexandra Palace Park. The special nature of these community facilities cannot be over-emphasised. The Draft Site is substantially within the Wood Green Common Conservation Area and the Alexandra Palace & Park Conservation Area. The proposed Site includes two Statutorily Listed Grade II buildings and many residential dwellings.	Noted. There are specific policies regarding the management of conservation, open space, and existing residential assets in the borough. This policy will complement, not override these policies.
268	SA8	Colin Kerr and Simon Fedida	PTAL	Further, the PTAL rating of most of the SA1 area is already in the 5-6 range, and subject to density and access policies to the transport infrastructure, not least in the Draft DM-DPD and Local Plan Strategic Policies and its proposed alterations.	Noted.
268	SA9	Colin Kerr and Simon Fedida	Size	The SA1 site allocation is unreasonable. There exists substantial railway land just north of Alexandra Palace Railway Station at the Palace Gates servicing yards, and to the sides of the railway north and south for enhanced infrastructure. It is incumbent upon Crossrail to make their intent known, so that sensible policies may be made.	Crossrail is an emerging infrastructure investment which not only requires land for operational use, but will also bring enhanced property values to areas in which stations are located. It is therefore necessary that a policy is created which facilitates both the construction, and manages development in station-proximate areas to ensure that all new development is optimized for the future increased accessibility.
268	SA10	Colin Kerr and Simon Fedida	Planning	Planning blight on this scale is administrative overreach and an unacceptable burden on residents who live in the zone.	Crossrail is an emerging infrastructure investment which not only requires land for operational use, but will also bring enhanced property values to areas in which stations are located. It is therefore necessary that a policy is created which facilitates both the construction, and manages development in station-proximate areas to ensure that all new development is optimized for the future increased accessibility.
268	SA11	Colin Kerr and Simon Fedida	Size	<b>Recommendation: These concerns could be addressed if the Borough were to put forward a site proposal with a new, smaller and properly considered site boundary, and which envisages a more intensive use of existing railway land.</b>	Noted.

Comments on SA2 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
609	SA12	Apcar Smith Planning on behalf of Wedge Investments Ltd	LSIS17	The deletion of White Hart Lane as a locally significant industrial site is supported.	Noted. This was not identified in this policy, but was stated in the Alterations to the Local Plan. As the ELS recommends that this be retained as employment stock, the Alteration to the Strategic Policies will be corrected.  <b>Action: Reinstate LSIS17 in the Alterations to the Local Plan: Strategic Policies.</b>
568	SA13	CgMs on behalf of LB Barnet	Incorrect referencing	It will be noted here that the reference to the site under draft Policy SA2 is incorrect in that it refers to site SA49 that is Cross Lane. It should read SA52 Pinkham Way.	Noted.  <b>Action: Amend LEA6 reference to site SA52 instead of SA49</b>
268	SA14	Colin Kerr and Simon Fedida	Employment	The text states that the anticipated new employment premises stock will accommodate employment at higher densities, giving office uses	Noted, the Site Allocations make provision for targeted regeneration within Wood Green, linked to the introduction of Crossrail. The workspace viability study sets out the relative values

				<p>as an example.</p> <p>It is questioned whether such higher density employment will materialise. There is a limit to how many retail jobs can be created, no matter how aggressively the Wood Green Town Centre is re-developed. The Borough's own Retail and Town Centres Study 2013 warns specifically against over-reliance on the projected retail floor space projections (p89).</p> <p>Further, it is understood from the 'Alterations to Strategic Policies', page 11, bullet 4, that the London Plan has downgraded the WGTC proposition in the office market on the basis of the London Office Policy review 2012.</p> <p>Given the importance of a viable employment base to Haringey, and its apparently weak and failing position, an element of caution should be adopted in the wholesale redevelopment of employment areas with high density employment space. It may not be taken up</p>	<p>of different types of workspace, and the site-specific requirements that occupants would need to fill workspace in the Wood Green/Haringey Heartlands area.</p> <p>While that assertion that there is not a market for large-scale office development in Wood Green, there is potential for a number of employment uses, which will be occupied if high levels of access and amenity can be created through new developments.</p>
268	SA15	Colin Kerr and Simon Fedida	Employment	<p>The Haringey Employment Land Study 2015 is equivocal on the growth of high intensity B1a/b versus other uses, B8 in particular. It is only the 'Business as Usual' scenario that shows decline in B1c/B2/B8 floorspace requirements and growth in high intensity B1a/b uses (HELS, table 6.9 and table 7.2). The two other scenarios investigated, including the GLA Economics employment projections for the London Plan Further Alterations (HELS, page 40, para 6.3), show as much need for extra B8 (storage and distribution) floorspace as for B1a/b (HELS, tables 6.3, 6.6, 7.2).</p>	<p>The Employment land Study shows that there is a need for identifying growth in employment stock in Haringey. The approach taken is to locate new knowledge-based (B1a-b) employment floorspace in highly accessible, high amenity areas, to give it the best chance of being filled. This aligns with both the ELS and Workspace Viability Study.</p>
268	SA16	Colin Kerr and Simon Fedida	Mixed use	<p>The effectiveness of the mixed use planning policies in force in recent years needs to be assessed and related to the proposed policy. Have they delivered employment as expected? For example, it has been shown that the 'Live/Work' policies, much in favour in recent years and in Haringey, are an employment failure (Haringey Employment Land Study 2015, page 51, para 8.20-8.27).</p>	<p>The criticism of live/work development is that the work element often becomes ancillary, or lost, to the live function, due to the significant imbalance in values between residential and employment in Haringey. This can be observed as an erosion of employment stock. The Council is allocating "warehouse living" in targeted areas, but not live/work.</p>
268	SA17	Colin Kerr and Simon Fedida	London Plan targets	<p>The site allocation proposals seem to be planning for the London Plan Haringey population projections, but not the London Plan Haringey job projections. On this basis, the indicated plans may be unsound.</p>	<p>The site allocations consulted on (excluding Tottenham), if developed, would create a potential for 100,000+m2 of new employment space.</p> <p>The Council has a target for all objectively identified need, including employment, and allocations will be provided that accommodate development to meet them.</p>
268	SA18	Colin Kerr and Simon Fedida	Employment	<p>Recommendation: The Council should put forward a more subtle and nuanced set of site allocations and accompanying policy that could accommodate the retention or creation of more spacious employment premises, if needed.</p>	<p>It is considered that the proposed policy protects lower density employment uses in suitable locations.</p>
430	SA19	Derek Horne & Associates for Majorlink	SP policy	<p>Changes to Designated Employment Areas are proposed to include SSP29 (Omega Works) within LSIS1 (Crusader Industrial Estate). This proposal conflicts with figure 5.1 and policy SP2 which</p>	<p>Omega's future designation as a part of a mixed use area with employment, and warehouse living elements mean that the only suitable designation is as a Regeneration Area. SP2 will be</p>

		Ltd		specifically exclude Omega Works from all of their employment designations. No justification is given for the intended inclusion of Omega Works within SA2. If this amendment were to go ahead it would be in direct contradiction to the Council's recently published Local Plan: Strategic Policies. The exclusion of Omega Works from SA2 within the strategic policies by the Council was, no doubt, carefully considered and should not be changed without detailed justification. The omission from SA2 of Omega Works would not have any material impact upon the other sites listed within the proposed policy, given the previous planning history of the site, which includes planning permission for a mixed use development, which is separately identified under SA36 from Crusader Industrial Estate SA35. Moreover, it is noted that whilst Crusader Industrial Estate was identified as being within a Defined Employment Area, Omega Works was not. We believe that the two industrial areas should remain separately identified as per figure 5.1 of the Local Plan.	updated to conform to this.  The two sites will be separately identified as Site Allocations due to their separate existing uses and ownerships.
430	SA20	Derek Horne & Associates for Majorlink Ltd	Vision	The Council states that it will work with local land owners and residents to produce master plans and potentially a SPD to help guide development in the area, Our client owns the Freehold of a substantial area of commercial land within the Haringey Warehouse District and Also within Tottenham action plan area. The client's properties have been subject of planning applications and appeals and are, therefore, well known to officers. Yet, to date, we are not aware of our client having been invited to be involved in any dialogue with officers. It is regretted that the council has failed to engage with client in preparation of local Plan documents. Clients only became aware of them because of tenants.	It is noted that this opportunity to engage has been taken. The Council will expect any development on Omega Works, or Crusader to be masterplanned, identifying how the development of one would affect the other.  The consultation letter was sent to occupants with specific note to inform the landowner.
400	SA21	Derek Horne & Associates OBO Ms J Hancher (owner, part of Omega Works)	DEA changes	Changes to DEA are proposed to include SSP29 within LSIS. This proposal conflicts with figure 5.1 and policy SP2 of Strategic Policies Local Plan, which specifically exclude Omega Works from all employment designations. No justification is given for intended inclusion of Omega Works within SA2. The exclusion of Omega Works from SA2 within the Strategic Policies by the Council was, no doubt, carefully considered and should not be changed without detailed justification.	Omega Works is proposed to be allocated as a Regeneration Area in the draft document. This is to ensure a balanced approach to providing warehouse living and employment uses in the future can be achieved, as set out in the ELS. It is noted that additional justification can be provided. Omega Works is not mentioned in the Strategic Policies amendments.  The Site Allocations map on page 16 of the Site Allocations draft document replaces Figure 5.1 of the Local Plan: Strategic Policies 2013.
414	SA22	GLA	SA2	The Council proposes revisions to a number of areas of employment land in the borough (outside the Tottenham AAP area). The overarching approach is set out within the Council's alterations to the Strategic Policies DPD and draft policies DM48-52 of the draft Development Policies DPD, with the strategy feeding through into the site allocations within this draft plan. Broadly the revisions seek to: identify new employment-led 'Regeneration Areas' to create new jobs as part of mixed use development; pragmatically respond to instances of 'warehouse living' by rationalising/intensifying employment areas whilst jointly supporting creative live/work communities; and, encourage existing industrial sites to modernise for greater efficiencies and economic output. Having regard to the conclusions of the 2015 Haringey employment land review, the proposed allocations are supported in principle. Nevertheless, in line with overarching comments made in respect to the Council's alterations to the Strategic Policies DPD, GLA officers would	Noted, the Council will continue to consult with GLA in regard this matter.

				welcome further discussion on how, at a borough-wide level, the proposals for employment land management relate to the strategic benchmarks for industrial land release within the Mayor's Land for Industry and Transport SPG.	
685	SA23	London Gypsy & Traveller Unit	Gypsy pitch provision	<p>Firstly, as a site allocations policy it is included under SA2 'Changes to designated employment areas'. This is not appropriate because Traveller sites are a type of accommodation and should be considered as such in policy terms.</p> <p>At the moment, the policy approach to Traveller provision seems to be that only industrial sites which are being released will be considered for meeting the needs of this community. We would argue this is not sufficiently robust and the Local Plan should provide a range of options to ensure greater flexibility. We are aware that other community organisations in Haringey are opposing the release of industrial land as this threatens the livelihood of the borough's local economy. Policy SA2 does not clearly state which industrial sites might be considered for Gypsy and Traveller provision and how pitch provision might be incorporated on these sites in a balanced way which protects existing employment.</p>	This is not the case. It is recognised that these sites have the highest value uplift, and therefore potential to accommodate new pitches. Any sites such as this on which redevelopment for higher value uses are acceptable would need to consider the appropriateness for pitches from a design-led basis using SP3 of the Local Plan.
400	SA24	Ms J Hancher		The omission from SA2 of Omega Works would not have any material impact upon the other sites listed within the proposed policy, given the previous planning history of the site, which includes planning permission for a mixed use development, which is separately identified under SA36 from the Crusader Industrial Estate SA35.	Noted.
565	SA25	Nick	Save industrial land	The council should also acknowledge its local business community and keep the industrial sites it craves to kill for the quest of housing and the fat cats. Support your local businesses, support local people that are employed by these local businesses. You have not considered any businesses and tried to save any, you just want to wipe us all out in the high road west regen	The regeneration of lower density employment uses within growth areas is required in order to fulfil the spatial vision of the plan, and to meet objectively identified housing and employment needs in the borough.
818	SA26	Our Tottenham	Employment; employment floorspace;	<p>See our comment with regard to Policy SP8 in the overall response to the Alterations to Strategic Policies. We have serious concerns about the evidence based presented in the Employment Land Study.</p> <p>Besides, It is unsound and damaging to Tottenham's economy to be reducing targets for industrial floorspace and downgrading protected industrial areas while another part of Haringey Council is promoting the borough as being at 'the centre of the British manufacturing boom' (Haringey Council Press Release, Thursday 26 March). As this press release noted, employment in fashion and textiles manufacturing went up by 15% between 2009 and 2012, while it fell by 13% in London during the same period.</p>	A carefully managed combination of release and protection of industrial land is required in order to fulfil the spatial vision for the borough and meet the objectively identified needs for jobs and housing set out in the London Plan.
818	SA27	Our Tottenham	Haringey Warehouse District; employment	<p>See comments made in our response to the Alternations to Strategic Policies in relation to Employment Land.</p> <p>We strongly disagree with the proposed downgrading of the employment land status of Crusader Industrial Estate N15; part of</p>	As recognised in the consultation report for the Strategic Policies Alterations, a balanced approach to providing for the needs of industry, other employment, and the existing warehouse community. The only suitable designation to achieve this is regeneration area.

				<p>Vale Road/Tewksbury Road N15.</p> <p>Crusader Industrial Estate is the site of Haringey Council's investment in fashion and textiles; both sectors requiring industrial workspace. [Elsewhere, it is mentioned that 'some industrial estates are at risk of being converted to alternative uses. This is evidenced with Crusader Industrial Premises not providing leases of more than 5 years, which indicates that the landowner may have other intentions for the site's future use' (p.18). Retaining this site as employment space will therefore require strong planning policy protection to prevent owners driving out existing uses and preventing investment through the use of short term leases.]</p>	
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#### Comments on SA3 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
616	SA28	CgMs on behalf of Parkstock Ltd	Primary/Secondary frontage query	Appendix C and SA3 confirms the primary frontage and secondary frontages within the proposed Finsbury Park District Centre. We are very supportive of the primary designation from the corner of Seven Sisters Road (no. 263) to 10 Stroud Green Road. We also note that a secondary frontage is proposed along 263 to 271 Seven Sisters Road and along the new route proposed through the Finsbury Park Bowling Alley site to the Park. We welcome these frontage designations although question why 263 to 271 is a secondary, rather than primary, frontage given the level of activity and footfall along this part of Seven Sisters Road. Further explanation for this rationale would be welcomed.	When developed, the Stroud Green Road frontage will create a strong sense of place, enclosing a precinct focused around Finsbury Park station. It is not considered that this is the same for the Seven Sisters Rd element of the site, which is on the edge, while remaining inside, the town centre boundary.
414	SA29	GLA	Support	The Council's proposed changes to town centre boundaries are pragmatic and supported.	Support is noted.
574	SA30	GL Hearn on behalf of Wood Green Investments Ltd, landowner 8-14 High Rd	Supports policy	Wood Green Investments Ltd welcomes the Town Centre boundary to Wood Green and the extent of the Primary Shopping Frontage. The extension of the Primary Shopping Frontage is critical in bringing forward a viable and successful Town Centre.	Support is noted.

#### Comments on SA4 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
628	SA31	DP9 on behalf of Tottenham Hotspur	Licensed waste capacity	Objects to the safeguarding of 44 White Hart Lane as licensed waste capacity. Willing to work with the Council on this issue.	The principle that waste capacity is to be retained is in line with London Plan policy and must be upheld. The Council will work with developers where there are wider strategic benefits to be delivered from sites with an existing waste capacity.

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		Football Club			
629	SA32	DP9 on behalf of undisclosed	Licensed waste capacity	Objects to the safeguarding of 44 White Hart Lane as licensed waste capacity.	The principle that waste capacity is to be retained is in line with London Plan policy and must be upheld. The Council will work with developers where there are wider strategic benefits to be delivered from sites with an existing waste capacity.
414	SA33	GLA	SA4	The safeguarding of Western Road Depot, 81 Garman Road, 100a Markfield Road, 44 White Hart Lane, 175 Willoughby Lane, 82 Markfield Road and Civic Amenity Site (Park View Road) is supported in line with London Plan Policy 5.17.	Support is noted.

Comments on SA5 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA34	Savills on behalf of Thames Water	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. 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.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b></p>
697	SA35	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. 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.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>
697	SA36	Savills on behalf of	Sewers	<p>There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be</p>	Noted.

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		Thames Water		possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.	
610	SA37	Turley on behalf of St. William	Site size	The current allocation indicates that the site size is 4.55 Ha which would restrict and limit any future redevelopment of the site. We would like to highlight that the Outline Planning Consent for Clarendon 2 Square covers 4.83 Ha and includes land and buildings owned by National Grid Property Holdings Limited (NPG) and the Greater London Authority (GLA). The site area is further identified in the Greater London Authority (GLA) report dated to 2011 and 2014 (PDU/0130/01, PDU/0130/02 and D&P/0130b/02) as being 4.83 Ha. Therefore, we consider that this figure should be revised to include all areas of the site which will enable developers to have sufficient flexibility in their approach to the redevelopment of Clarendon Square. Additionally, this will encourage a more comprehensive redevelopment of the site and allow for the provision of more housing, residential amenity and employment floorspace. We do not consider that the policy needs to restrict the site area and suggest that this should be appropriately amended to reflect the entirety of Clarendon Square.	Noted.  <b>Action: Update site area.</b>
610	SA38	Turley on behalf of St. William	PTAL	We note that SA 5 indicates the site has a Public Transport Accessibility Level (PTAL) rating of 3. Where this may be the case in some areas of the site, the vast majority of Clarendon Square benefits from being highly accessible with an overall PTAL rating of 4, as stated in the GLA Reports. This assertion is also supported on the Transport for London website, which identifies PTAL ratings across London ( <a href="http://www.webptals.org.uk/">http://www.webptals.org.uk/</a> ). The site is in close proximity to both Wood Green and Turnpike Lane Underground Stations which serve the Piccadilly line and provides links to major rail stations such as King's Cross. Furthermore, the site benefits from being nearby both Alexandra Palace and Hornsey Rail Stations. It is also close to a number of bus routes. The current PTAL rating specified for Clarendon Square (PTAL 3 is quoted) is not an accurate reflection of the site's accessibility levels. Furthermore, this rating should consider the emerging context of the area and the introduction of Crossrail stations at Turnpike Lane and Alexandra Palace, which will further increase the transport capacity of the site and Wood Green as a whole. We recommend that this rating be amended to accurately reflect the site's accessibility levels as well as the current transport proposals that will improve the public transport accessibility of the site in the future. In doing so, this will allow the site to benefit from higher housing density levels and will optimise its housing potential	Noted.  <b>Action: Update PTAL details.</b>
610	SA39	Turley on behalf of St. William	Mixed use	The site allocation identifies 'future planning requirements'. Should a revised planning application come forward we suggest that the text which refers to "Increase B1 / reduce or retain C3", should be amended to "Increase C3 / maintain or reduce B1". Specifically, this approach would recognise the relevant planning policy requirements within the London Plan and the emerging Haringey Local Plan. The site has been identified as a 'central' area by the council and this allocation will promote higher densities to optimise the development potential at the site. We consider that the current wording is overly restrictive and does not adhere to current and emerging policy guidance.	This site was granted planning consent in the absence of a clear narrative for the wider place and the role of the individual sites in that context. It is clear that the objectively identified housing and employment need, and location of this site in close proximity to Wood Green town centre, and its former employment use mean that a mix of employment and housing uses on this site should be provided. This will be in line with other policies in the DMDPD.
610	SA40	Turley on behalf of St. William	Suitable taller building location	We also consider that the northern and western parts of the site could be appropriate for a tall building. Given the potential for a tall building at the site, we consider that the following bullet point should be added to the 'Future Planning Requirements' section of the Site Allocation as stated below: <i>"Provision of a taller building(s) at the north and north western sections of the site."</i>	The Council's aspiration is to use tall buildings as a marker for key public transport access points, in the case of the site mentioned, the foot tunnel linking Alexandra Palace with the greater Wood Green area. Confusing this urban form with additional buildings is not something the Council is considering.
610	SA41	Turley on behalf of St. William	Support "Central" designation	We consider that the site displays many characteristics of a 'central' setting rather than that of an 'urban' one. Policy 3.4 in The London Plan describes a 'central' setting as: <i>'Central – Areas with very dense development, a mix of different uses, large</i>	Support is noted.

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				<p><i>building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major Town Centre.</i></p> <p>Wood Green is classified within the London Plan as a Metropolitan Centre and the boundary of this designation on the proposals map is adjacent to the site. The entire site is within 800 metres walking distance of Wood Green Metropolitan Town Centre. The site lends itself to many of the attributes of the characteristics of a Central setting and we consider that this should be revised to better reflect the local context of the area. The vast majority of the buildings to the north, north east, south and west of the site are four to six storeys in height (or above). Such schemes include New River Village to the West, the Chocolate Factory and Alexandra Park School to the north and Shopping City to the north east. This correct definition of the site as a 'central' location would enable the development potential of the site to be optimised as such a definition would permit residential density levels of up to 1,100 hrha in accordance with the London Plan. Such an approach would also assist Haringey Council in meeting its ambitious housing targets, which are now 1,502 residential units per annum, as noted in the London Plan.</p> <p>It should also be noted that our suggested approach is further supported by both the Urban Characterisation Study (see below for the relevant extract) and Map 2.1. 'Haringey Character Setting Map', within the Preferred Options of the Development Management Policies Document (DMPD) at p.7, which clearly identifies the site as a 'central' area.</p>	
610	SA42	Turley on behalf of St. William	Density	<p>Making the appropriate amendments to both the PTAL rating and setting of Haringey Heartlands is crucial to realising the optimum potential of the site. Further to this, Policy 2.13 in The London Plan identifies the wider area of Clarendon Square, Haringey Heartland/Wood Green, as being an Intensification Area. As a designated area, it has been recognised for its potential to support redevelopment at higher densities as well as having the capacity to accommodate new jobs and homes. By enabling the site to achieve higher densities, Clarendon Square and the wider Haringey Heartlands will be able to significantly aid the council in meeting its housing and employment targets within the London Plan.</p>	Noted. The Council agrees that this is a growth area, as identified in SP1 of the Local Plan, and a central character setting as identified in the UCS.
414	SA43	GLA	Planning permission	<p>The recognition of existing planning permissions at: Clarendon Square, Hornsey Depot, St. Luke's Hospital site, Hornsey Town Hall and Highgate Magistrates Court is supported. It is noted that the Council seeks to establish principles for future consideration in the event that financial viability improves, and revisions to these approvals are sought by a developer. The site specific guidance proposed is supported in principle.</p>	Support is noted.
411	SA44	National Grid Property	Future Planning Requirements	<p>The draft allocation sets out a number of future planning requirements should a revised application come forward. National Grid propose that these requirements be amended as follows:</p> <p>"Increase B1/ reduce or retain C3"</p> <p>Current permission is for 1,080 residential units and accords with the London Plan density matrix and considered acceptable by the Council in granting permission in 2012. The density matrix has not altered since permission was granted. The NPPF places increased emphasis on optimising the potential of brownfield land to meet development needs. The FALP places greater emphasis on delivery of increased housing across London, in particular, Policy 3.3 requires boroughs to identify opportunities for additional housing capacity. Haringey's minimum housing target has increased from 820 to 1,502. Given the site also sits within an Intensification Area, there is even more expectation that the most should be made of development opportunities. In this context, National Grid strongly opposes the proposed future planning requirement to 'reduce'</p>	This site was granted planning consent in the absence of a clear narrative for the wider place and the role of the individual sites in that context. It is clear that the objectively identified housing and employment need, and location of this site in close proximity to Wood Green town centre, and its former employment use mean that a mix of employment and housing uses on this site should be provided. This will be in line with other policies in the DMDPD.

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				residential development on the Site. Suggests “reduce or retain C3” is deleted and replaced by a new bullet point: “Increase C3”	
411	SA45	National Grid Property	Future Planning Requirements	<p>“Straighten the existing kink in Clarendon Road / Mary Neuner Road”</p> <p>Mary Neuner Road links Western Road and Clarendon Road and was built in 2008 to ease congestion on Hornsey Park Road. The extant permission has been designed around the road with the kink providing for the development of a new civic space in the north of the site. Whilst acknowledged that straightening the Road would have benefits further design analysis is required and flexibility needed. We therefore suggest the following amendment:</p> <p>“Potential to straighten the existing kink in Clarendon Road / Mary Neuner Road”</p>	<p>The suggested amended wording is agreed for the reasons set out in the representation.</p> <p><b>Action: Amend allocation to reflect text</b></p>
411	SA46	National Grid Property	Tall Buildings	<p>The future planning requirements seek to establish Clarendon Square to the north of the Site as ‘a destination’ which is supported by National Grid. Site Allocation SA29: L/a Coronation Sidings is identified for mixed use development including provision for a landmark building (12 storeys) to mark the entrance to Wood Green from Alexandra Palace. On this basis, it is considered that Clarendon Square, as a destination and key linkage to Alexandra Palace could accommodate tall buildings to e416asise the new square and act as landmarks within the east / west link. We consider that the following wording be included in the future planning requirements for the site:</p> <p>“Provision of tall buildings to the north of the site in conjunction with Clarendon Square”</p>	<p>The suggested additional text is not agreed. The Council’s aspiration is to use tall buildings as a marker for key public transport access points, in the case of the site mentioned, the foot tunnel linking Alexandra Palace with the greater Wood Green area. Confusing this urban form with additional buildings is not something the Council is considering.</p>
411	SA47	National Grid Property	Gas Infrastructure	<p>The existing permission includes provision of two ‘utility compounds’, which are required to house gas infrastructure (Pressure Reduction Stations), which are essential to the continued provision of gas for homes in Haringey. It is considered that this requirement should be acknowledged in the site allocation. We suggest the follow wording is added:</p> <p>“Provision of necessary gas infrastructure”</p>	<p>The suggested amended wording is agreed for the reasons set out in the representation.</p> <p><b>Action: Add “Provision of necessary gas infrastructure”</b></p>
411	SA48	National Grid Property	Factual updates	<p>The site area is not 4.55ha but 4.83ha and the PTAL rating for part of the site is 3 but for a significant portion it is 4, so suggest this is changes from 3 to ‘3/4’.</p>	<p>Noted.</p> <p><b>Action: Update PTAL details and site area.</b></p>

Comments on SA6 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA49	Savills on behalf of Thames Water	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b></p>

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				<p>Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. 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.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	
697	SA50	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. 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.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>
414	SA51	GLA	SA5-SA9	<p>The recognition of existing planning permissions at: Clarendon Square, Hornsey Depot, St. Luke's Hospital site, Hornsey Town Hall and Highgate Magistrates Court is supported. It is noted that the Council seeks to establish principles for future consideration in the event that financial viability improves, and revisions to these approvals are sought by a developer. The site specific guidance proposed is supported in principle.</p>	<p>Support is noted.</p>

**Comments on SA7 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA52	Savills on behalf of Thames Water	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. 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</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b></p>

				<p>recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	
697	SA53	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. 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.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>
414	SA54	GLA	Planning permissions	<p>The recognition of existing planning permissions at: Clarendon Square, Hornsey Depot, St. Luke's Hospital site, Hornsey Town Hall and Highgate Magistrates Court is supported. It is noted that the Council seeks to establish principles for future consideration in the event that financial viability improves, and revisions to these approvals are sought by a developer. The site specific guidance proposed is supported in principle.</p>	<p>Support is noted.</p>

#### Comments on SA8 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA55	Savills on behalf of Thames Water	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. 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</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b></p>

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				<p>recommendations of the strategy are implemented ahead of occupation of the development.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	
697	SA56	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. 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.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>
414	SA57	GLA	Planning permissions	<p>The recognition of existing planning permissions at: Clarendon Square, Hornsey Depot, St. Luke's Hospital site, Hornsey Town Hall and Highgate Magistrates Court is supported. It is noted that the Council seeks to establish principles for future consideration in the event that financial viability improves, and revisions to these approvals are sought by a developer. The site specific guidance proposed is supported in principle.</p>	<p>Support is noted.</p>

**Comments on SA9 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA58	Savills on behalf of Thames Water	Waste water	<p>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be funded. 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.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b></p>

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				months to 3 years to design and deliver.	
697	SA59	Savills on behalf of Thames Water	Water	<p>We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. 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.</p> <p>It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Noted, reference will be included in this site allocation.</p> <p><b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b></p>
414	SA60	GLA	SA5-SA9	The recognition of existing planning permissions at: Clarendon Square, Hornsey Depot, St. Luke's Hospital site, Hornsey Town Hall and Highgate Magistrates Court is supported. It is noted that the Council seeks to establish principles for future consideration in the event that financial viability improves, and revisions to these approvals are sought by a developer. The site specific guidance proposed is supported in principle.	Support is noted.
415	SA61	Transport for London	SA9: Site Requirements	This site is located on Archway Road which forms part of the Transport for London Road Network (TLRN). Therefore, TfL would expect to see vehicle and servicing access located off the TLRN, and to be car-free or have low levels of parking provided, given the high PTAL rating of 4. This should be incorporated into the development guidelines.	<p>Noted.</p> <p><b>Action: Add reference to car-free/ low level of parking in this site allocation.</b></p>