

## Appendix 2.6 - Comments on SA34-SA39 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

## Comments on SA34 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
264	SA348	Gardens Residents' Association	Access	With reference to opening up the Railway Arch 2019 in St Ann's Hospital site to the southern Ashfield Road site, caution should be considered to this proposal as this may cause issues of crime routes especially with the proposal of opening up St Anns Hospital site to Warwick Gardens.	Any access route in this area would be assessed against the development management policies which require the use of Secured By Design principles to reduce the likelihood of crime.
264	SA349	Gardens Residents' Association	Capped rents	Welcomes the retention and support of the creative industries in the area, and agree with the proposal for capped rents for artists and designers in the area.	Support is noted.
264	SA350	Gardens Residents' Association	Height	6 story development is far too high for the area and would request 4 stories being the maximum	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.
264	SA351	Gardens Residents' Association	Traffic	Suggest the introduction of live work units for historical reasons and due to the presence of other industrial units around the local area. The development would without doubt bring increased traffic to the local area. This area has 3 road closures in place, which has displaced the traffic through the Gardens, Tiverton Estate, St Ann's Road, Green Lanes and Wightman Road causing massive congestion issues and community tension over the 15 years since these closures were put in place. Haringey Council must consider these issues and how to deal with them in the long term.	As part of the planning process we would be seeking to minimise traffic generation arising from new developments by promoting travel plan measures such as car clubs, cycle parking and information on public transport services, as well as seeking to reduce car parking provision. The road closures on Hermitage Road, Eade Road and Vale Road are aimed at deterring through traffic and directing commercial traffic for the industrial areas away from residential streets onto roads more suited to carrying traffic such as Seven Sisters Road and St Ann's Road. The Council does not consider it appropriate to review these closures at the present time.
509	SA352	CgMs on behalf of Parkstock Ltd	Current uses obsolete	Not possible to rent the stone cutters as an employment use, and current use doesn't make a significant economic benefit.	Noted, the stonecutters site has some economic value, but this could be improved through redevelopment.
509	SA353	CgMs on behalf of Parkstock Ltd	Current uses obsolete	Cites 2014 Sites Reg 18 Document's assertion that "a return to commercial use is not considered likely" on Arena.	Noted, this relates to the condition of the existing stock. The Viability study clearly demonstrates there is a market for delivery of new workspace stock.
509	SA354	CgMs on behalf of Parkstock Ltd	Effect of PD changes	From 15 <sup>th</sup> April Unit E will benefit from permitted development rights to change from B8 to C3.	Noted.
509	SA355	CgMs on behalf of Parkstock Ltd	ELR	8.17 states that non fit-for-purpose sites should be used for regenerative purposes.	Noted.
509	SA356	CgMs on behalf of Parkstock Ltd	ELR evidence not sufficient	ELR doesn't survey the quality of the stock at Arena Design Centre.	The Employment Land Study was carried out in line with standard practice for a study of this type. The recommendations it makes are with regard to the use of the land, as much as with the current use of the stock.

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509	SA357	CgMs on behalf of Parkstock Ltd	Existing floorspace estimates	Contentends that the lawful quantum of employment floorspace on Arena is 1,000m <sup>2</sup> and on Eade/Overbury is (approx) 3,925m <sup>2</sup> compared to the 4,600m <sup>2</sup> and 17,900m <sup>2</sup> quoted in the sites DPD.	<p>The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.</p> <p><b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out in the DMDPD.</b></p>
509	SA358	CgMs on behalf of Parkstock Ltd	Height	6 storeys is unduly restrictive and inflexible	<p>The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.</p> <p>Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.</p>
509	SA359	CgMs on behalf of Parkstock Ltd	Not Designated Employment Land	Arena Design Centre is not currently designated as an employment area of any kind, and only employs 5 people across the site (stone cutters).	<p>This is incorrect, it has a Site Specific Proposal for mixed residential and employment use.</p> <p>Furthermore the assertion that only 5 people are employed across the whole site implies the respondent doesn't consider any of the warehouse living to have any employment value whatsoever.</p>
509	SA360	CgMs on behalf of Parkstock Ltd	Objects DEA	Site wasn't a DEA in 2006, and now has less employment, so shouldn't be a DEA.	The Council has a challenging housing and jobs target, and needs to allocate land that is capable to deliver these uses. This area is identified as one that can contribute to both of these challenges. It is on this base that the Council will allocate land, rather than simply its historical use.
509	SA361	CgMs on behalf of Parkstock Ltd	Original floorspace	Object to proposal to require "original" floorspace to be reprovided.	<p>The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.</p> <p><b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out in the DMDPD.</b></p>
509	SA362	CgMs on behalf of Parkstock Ltd	RA Status	Object to all sites having the same RA status, despite differences between the sites. Suggest this should be on the lawful quantum of employment floorspace.	The RA designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future.
509	SA363	CgMs on behalf of Parkstock Ltd	Resi Units	Support 140 net residential units as a minimum after reprovision of existing warehouse community.	Support is noted, But 140 residential units is a high capacity for this site, with its current access. The 140 units figure stated in Appendix B is based on the current configuration (ie 140 bedrooms in a non-conventional housing typology). There may be potential for more, but access needs to be improved to justify it.
509	SA364	CgMs on behalf of Parkstock Ltd	Vision for Arena Design Centre	The long term vision for this estate is for a residential led mixed use redevelopment of the site to be delivered through a masterplan. The intention is for an improvement in the existing employment offer through denser reprovision and intensifying existing levels of employment. In addition the vision is for retention of the existing	The Council broadly supports this vision.

				warehouse community through the re-provision of innovative creative living solutions. The vision includes maximising delivery of Private Rented Sector Housing, creating a sustainable community as well as creating an architecturally interesting and distinctive place. The vision also includes improving access and connectivity of the site to improve the public transport accessibility level.	
527	SA365	Tom Peters, Warehouse Residents Group (WHAT)	Against residential designation	We do not wish to see the sites changed to an overall designation of residential, as we recognise that this would create a large uplift in the value of the land, which would threaten our continuing existence on the sites. We support the application of planning policies which allow a continuation of live/work across all inhabited units of the sites.	It is considered that the deallocation of this site from employment use altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future. The Council wishes to see this area contribute to meeting its employment need, and as such a RA designation can facilitate this aim while enabling an element of residential use, such as already exists on the site, to continue.
527	SA366	Tom Peters, Warehouse Residents Group (WHAT)	Too much employment floorspace	<p>The development required to accommodate such an increase in employment land, while retaining the residential provision for the current community (an objective stated by the site allocations) would necessarily undermine the industrial aesthetic and flexible space that is appealing to residents of the site. Large scale interference into this unique aesthetic -cum -spatial characteristic is likely to impact upon its appeal as a creative and cultural hub, undermining a key foundation of the existing community.</p> <p>We believe that aspirations for increases in employment land should be based upon the current m2 of employment floor space on site, rather than an unevicenced assumption from an unspecified point in the past, which does not recognise the differences in density between previous and current employment activity.</p> <p>We wish to see the balance of live and work currently on the sites retained, by a policy that neither drives an uplift in value of land, nor forces its wholesale redevelopment to accommodate an overwhelming increase in commercial floorspace.</p>	<p>The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.</p> <p><b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out for DM50.</b></p>
528	SA367	Bethany Gardiner-Smith on behalf of WHAT	Against separation of live & work	Development to introduce an artificial structural division between the live and work floorspace would undermine the flexibility that inhabitants of the community currently have to utilise space in a creative, and collaborative way. This is a key feature of current warehouse living, and something we believe is integral to the function of the sites as creative live/work hubs evidenced by the academic study referred to above.	<p>The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. While this is encouraged as it has the potential to yield positive economic benefits resulting from collaboration, the Council also want to promote other firms to use this area as an employment location. Clearly to achieve this second aim, a degree of separation, be it within a building, or in separate buildings, will be required.</p> <p>This Allocation will not contain detailed specifics on how this can be achieved, but rather seeks to establish a framework in which it can happen over the longer term.</p>
528	SA368	Bethany Gardiner-Smith on behalf of WHAT	Appeal Condition	We believe that an extension of the conditions placed upon Unit 4, 199 Eade Road in its recent planning hearing to other units would support retention of active commercial floorspace for the purposes of economic activity, complementing the current commercial/residential mix that is so essential to the unique character of the site. These planning conditions ensured that a significant proportion of the floorspace was available for commercial activity within working hours, without requiring large structural changes to the space to create an artificial divide	The Council does not support the condition established by the Inspector in relation to this appeal. It is considered to be unenforceable, and does not guarantee any employment activity will happen on the site.

				between live and work space.	
528	SA369	Bethany Gardiner-Smith on behalf of WHAT	Decentralised Energy	We strongly support the development of decentralised clean energy schemes, and would advocate that these be done in partnership with existing residents and the local community in order to provide new opportunities for meeting local energy	We will consider all decentralised energy requirements in line with the Council's emerging decentralised energy masterplan.
528	SA370	Bethany Gardiner-Smith on behalf of WHAT	Development Guidelines	We note that guidelines for site SA 34 omit a requirement included within the development guidelines for site SA 38 that: <i>"Developments that continue to support the principles of communal living will be supported"</i> .  We are concerned about the implication of the omission of this requirement from the Arena site requirements, that communal living is not something envisaged for the future of residential use on the site. For the reasons discussed above we would wish that this requirement was also included within the SA 34 Development Guidelines.	Noted. This will be added.  <b>Action: Add "Developments that continue to support the principles of communal living will be supported"</b>
528	SA371	Bethany Gardiner-Smith on behalf of WHAT	Ecological Corridor	We fully support the requirement for the conservation and enhancement of the ecological corridor. These slopes represent an important 'Green Lung' for species of birdlife, insect and larger mammals in this area and connect to the nature corridor which runs along the Barking-Gospel Oak Overground Line.	Support is noted.
528	SA372	Bethany Gardiner-Smith on behalf of WHAT	Site Requirements	One interpretation of these requirements would be that it allows for complete removal of existing live/work warehouse spaces as discussed above, to be supplanted by high-density residential units and distinct purpose-built employment spaces.	The allocations for the Warehouse District seek to enable protection of the needs of the existing residents, and promote opportunities to capitalise on the benefits that the existing community bring, without displacement of the existing community. Where buildings can be retained, they will be, but it needs to be demonstrated that each building can make a positive contribution to the Borough's spatial vision.
528	SA373	Bethany Gardiner-Smith on behalf of WHAT	The Slopes	This site was previously overcome by invasive species such as Japanese Knotweed and Bramble, as well as evidence of fly-tipping. Action from local residents has seen certain patches on the slopes cleared of invasive species and tipped rubbish removed from the site. We are concerned that the introduction of a pedestrian link between Omega Works and Finsbury Park Avenue, and the increased pedestrian traffic that this would encourage, would threaten the sensitive biodiversity and ecological value of the slopes.	Noted, this area will remain as a SINC.
528	SA374	Bethany Gardiner-Smith on behalf of WHAT	Too much employment floorspace	The development required to accommodate such an increase in employment land, while retaining the residential provision for the current community (an objective stated by the site allocations) would necessarily undermine the industrial aesthetic and flexible space that has attracted existing residents to the site. Large scale interference into this unique aesthetic/spatial characteristic is likely to impact upon its appeal as a creative and cultural hub, undermining a key foundation of the existing community.  We believe that aspirations for increases in employment land should be based upon the current m2 of employment floor space on site.  We wish to see the balance of live and work currently on the sites retained, by a policy that neither drives an uplift in value of land, nor	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.  <b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out for DM50.</b>

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				forces its wholesale redevelopment to accommodate an overwhelming increase in commercial floorspace.	
532	SA375	Shelly Jones, warehouse resident	Affordability	Living in the warehouse community has provided me with the space possible to create my art and to meet and collaborate with a vast array of other artists in an affordable space.	Noted. The Council's policy seeks to retain and create new space for these types of outcomes.
532	SA376	Shelly Jones, warehouse resident	International collaboration	For us this is a way to meet new people, people who have come from all over the world and chosen to live in Haringey because of the warehouse community, for us to work together, support each other and live as a community, and as a family	The ability to foster collaboration will be an important part of the Council's thinking in this area.
535	SA377	Ellis Gardiner, warehouse resident	Decentralised Energy	welcome the opportunity for both sites (SA34 and SA38) to be part of the Council's proposed "decentralised energy hub". There is significant potential for the installation of solar panels on many of the rooftops, as well as an opportunity to showcase some less common forms of energy production such as wind turbines	Support is noted. We will consider all decentralised energy requirements in line with the Council's emerging decentralised energy masterplan.
538	SA378	Abi Sehmi, warehouse resident	Protect SINC	Behind Omega Works, The Crusader Industrial Estate and Arena runs an ecological corridor which should most definitely be preserved. These slopes act as a significant green area, creating ecological sites for birdlife, insects and larger animals to harmoniously thrive, and connect to the nature corridor which runs along the Overground Line from Barking to Gospel Oak. Local residents have actively worked to clear this area of invasive species and tipped rubbish, and this hard work should not be negated, nor the positive effects for the environment and animals that inhabit it.	Noted, this area will remain as a SINC.
538	SA379	Abi Sehmi, warehouse resident	Retain existing buildings	I have also noted that in Omega Works, Arena Design Centre and Overbury/ Eade Road (where I currently reside) there appear to be plans for large scale re-development. Any mass re-development negates the will to retain the existing environment. There is a history and character to the existing sites that is integral to their current use and essence of the community which should not be overlooked. As such, sites should only be re-developed if absolutely necessary after exhausted attempts to retain, improve and regularise the buildings that already exist, and any developments which do occur should be done with current residents in mind.	The Allocations for the Warehouse District seek to enable protection of the needs of the existing residents, and promote opportunities to capitalise on the benefits that the existing community bring, without displacement of the existing community. Where buildings can be retained, they will be, but it needs to be demonstrated that each building can make a positive contribution to the Borough's spatial vision.
548	SA380	Selina Mayer, warehouse resident	Affordability	I am a photographer who is reliant on access to affordable live/work space for my business, and in 9 years of living independently in London the only place I have lived which has met those needs is my home in Arena	Noted, provision of affordable housing and workspace are important to the Council.
548	SA381	Selina Mayer, warehouse resident	Anti- business	I feel that your plan to evict us in order to return our homes to commercial spaces disregards the needs of the businesses and individuals that already exist in Haringey within these warehouses. We live here and we work here and so many of us are dependent on these warehouses for our businesses to even survive in an economic climate that is harsh and cruel to small businesses, especially those in the creative industries	Haringey supports small businesses and is seeking to create a framework within which these can thrive in the Haringay Warehouse District. It is important to note this is seeking to benefit businesses whose employees do not live within the District as well as those that do.
548	SA382	Selina Mayer, warehouse resident	Supports warehouse community	My business has flourished thanks to the access to workspace which is so rarely found in London without an exorbitant price-tag attached to it, and thanks to the wonderful, nurturing community of creative people that has formed here.	Support for retention of the existing community is noted.
561	SA383	Tim Dodd, warehouse	History	As the first residential tenant, I have witnessed all the changes to date, which have been a quite remarkable record of improvement; where there were originally "sweat shops" employing hundreds of	Noted.

		resident		clothing workers in miserable conditions and, parking areas the nightly haunt of prostitutes, a community has now grown up of hard working, productive, artistic and creative people all contributing to this community. The Arena Design Centre is now clean and tidy with security gates, lighting and paving. I am proud of my home and it's location within this vibrant, creative, active and friendly community, a qualities unusual to find in "modern" London, and Cities in general.	
561	SA384	Tim Dodd, warehouse resident	Supports warehouse community	<p>As the first residential tenant, I have witnessed all the changes to date, which have been a quite remarkable record of improvement; where there were originally "sweat shops" employing hundreds of clothing workers in miserable conditions and, parking areas the nightly haunt of prostitutes, a community has now grown up of hard working, productive, artistic and creative people all contributing to this community. The Arena Design Centre is now clean and tidy with security gates, lighting and paving. I am proud of my home and it's location within this vibrant, creative, active and friendly community, a qualities unusual to find in "modern" London, and Cities in general.</p> <p>Their existence contributes to the environment and community in so many rich, caring and varied ways their destruction and replacement with something cold, stark and unrelated - and purely residential, would be utterly detrimental to the area.</p> <p>This community has evolved through enthusiasm, care and concern for a better way of living over the last 15 years - for this I am aware as I was the first live/work resident at The Arena Design Centre over 15 years ago.</p> <p>I have witnessed it progress from a sad dilapidated state of sex workers and sweat shops to a clean and respectful place and community with creative energy and positive goals an exciting community.</p> <p>These warehouse communities have grown and developed into a truly sincere contribution to this area and to destroy them and all that has gone in to nurturing them would be a careless and regrettable act indeed.</p> <p>Upgrade, encourage, make safe and be proud and part of this precious opportunity to develop this special community with this special community</p>	Support for retention of the existing community is noted.
579	SA385	Laura Harrison, resident	Community Value	The existing creative and community resources in this building are of significant value, and these spaces should be retained in any redevelopment	Provision of community resources will be addressed in the update to the infrastructure delivery plan.
697	SA386	Savills on behalf of Thames Water	Cumulative impact	We are concerned about the cumulative impact of development in this area.	Noted.

697	SA387	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted.  <b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b>
697	SA388	Savills on behalf of Thames Water	Sewers	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 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.	Noted.
697	SA389	Savills on behalf of Thames Water	Waste water	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.  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.	Noted, reference will be included in this site allocation.  <b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b>
697	SA390	Savills on behalf of Thames Water	Water	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.  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.	Noted, reference will be included in this site allocation.  <b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b>

422	SA391	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording: <i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i> We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum: <i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i>	Noted.  <b>Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</b>
422	SA392	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted.  <b>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</b>

## Comments on SA35 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
264	SA393	Gardens Residents' Association	Access	With reference to opening up the Railway Arch 2019 in St Ann's Hospital site to the southern Ashfield Road site, caution should be considered to this proposal as this may cause issues of crime routes especially with the proposal of opening up St Anns Hospital site to Warwick Gardens.	Any access route in this area would be assessed against the development management policies which require the use of Secured By Design principles to reduce the likelihood of crime.
264	SA394	Gardens Residents' Association	Capped rents	Welcomes the retention and support of the creative industries in the area, and agree with the proposal for capped rents for artists and designers in the area.	Support is noted.
697	SA395	Savills on behalf of Thames Water	Cumulative impact	We are concerned about the cumulative impact of development in this area.	Noted, this will be addressed through the infrastructure delivery plan.
818	SA396	Our Tottenham	Employment	We strongly disagree with the proposed downgrading of the employment land status of Crusader Industrial Estate N15. Crusader Industrial Estate is the site of Haringey Council's investment in fashion and textiles; both sectors requiring industrial	The investment in a fashion academy in this area is considered a suitable use within a Regeneration Area. As such the Council expects this use to continue on this site, as per the policy.

				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.]	
818	SA397	Our Tottenham	Employment designation	See comments made in our response to the Alternations to Strategic Policies in relation to Employment Land.  We strongly disagree with the proposed downgrading of the employment land status of Crusader Industrial Estate N15; part of Vale Road/Tewksbury Road N15.	It is noted that Crusader is in operational employment use. However, the Council believes that the full potential of this area will only be realized through providing flexibility for Crusader to complement the warehouse living areas at Arena Design Centre and Omega Works.
422	SA398	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording: <i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i> We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum: <i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i>	Noted.  <b>Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</b>
264	SA399	Gardens Residents' Association	Height	6 story development is far too high for the area and would request 4 stories being the maximum	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.
697	SA400	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted.  <b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b>
422	SA401	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination.	Noted.  <b>Action: Add a design guideline setting out that the site lies in a</b>

				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	<b>Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</b>
538	SA402	Abi Sehmi, warehouse resident	Retain existing buildings	I have also noted that in Omega Works, Arena Design Centre and Overbury/ Eade Road (where I currently reside) there appear to be plans for large scale re-development. Any mass re-development negates the will to retain the existing environment. There is a history and character to the existing sites that is integral to their current use and essence of the community which should not be overlooked. As such, sites should only be re-developed if absolutely necessary after exhausted attempts to retain, improve and regularise the buildings that already exist, and any developments which do occur should be done with current residents in mind.	The allocations for the Warehouse District seek to enable protection of the needs of the existing residents, and promote opportunities to capitalise on the benefits that the existing community bring, without displacement of the existing community. Where buildings can be retained, they will be, but it needs to be demonstrated that each building can make a positive contribution to the borough's spatial vision.
697	SA403	Savills on behalf of Thames Water	Sewers	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 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.	Noted.
538	SA404	Abi Sehmi, warehouse resident	SINC	Behind Omega Works, The Crusader Industrial Estate and Arena runs an ecological corridor which should most definitely be preserved. These slopes act as a significant green area, creating ecological sites for birdlife, insects and larger animals to harmoniously thrive, and connect to the nature corridor which runs along the Overground Line from Barking to Gospel Oak. Local residents have actively worked to clear this area of invasive species and tipped rubbish, and this hard work should not be negated, nor the positive effects for the environment and animals that inhabit it.	Noted, this area will remain as a SINC.
400	SA405	Ms J Hancher	Site boundaries	It is noted that whilst the Crusader industrial estate was identified as being within a DEA, Omega works was not. We believe that the two industrial areas should remain separately identified as per Figure 5.1 of the Local Plan.	The Council believes that the full potential of this area will only be realized through providing flexibility for Crusader to complement the warehouse living areas at Arena Design Centre and Omega Works.
400	SA406	Ms J Hancher	Site boundary	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.
264	SA407	Gardens Residents' Association	Traffic	Suggest the introduction of live work units for historical reasons and due to the presence of other industrial units around the local area. The development would without doubt bring increased traffic to the local area. This area has 3 road closures in place, which has displaced the traffic through the Gardens, Tiverton Estate, St Ann's Road, Green Lanes and Wightman Road causing massive congestion issues and community tension over the 15 years since these closures were put in place. Haringey Council must consider these issues and how to deal with them in the long term.	As part of the planning process we would be seeking to minimise traffic generation arising from new developments by promoting travel plan measures such as car clubs, cycle parking and information on public transport services, as well as seeking to reduce car parking provision. The road closures on Hermitage Road, Eade Road and Vale Road are aimed at deterring through traffic and directing commercial traffic for the industrial areas away from residential streets onto roads more suited to carrying traffic such as Seven

					Sisters Road and St Ann's Road. The Council does not consider it appropriate to review these closures at the present time.
697	SA408	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	SA409	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>

## Comments on SA36 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
400	SA410	Ms J Hancher	Omega Works	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.	This site is included in the list of proposed designated employment sites in SA2.

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				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.	
264	SA411	Gardens Residents' Association	Access	With reference to opening up the Railway Arch 2019 in St Ann's Hospital site to the southern Ashfield Road site, caution should be considered to this proposal as this may cause issues of crime routes especially with the proposal of opening up St Anns Hospital site to Warwick Gardens.	Any access route in this area would be assessed against the development management policies which require the use of Secured By Design principles to reduce the likelihood of crime.
527	SA412	Tom Peters, Warehouse Residents Group (WHAT)	Against residential designation	We do not wish to see the sites changed to an overall designation of residential, as we recognise that this would create a large uplift in the value of the land, which would threaten our continuing existence on the sites. We support the application of planning policies which allow a continuation of live/work across all inhabited units of the sites.	It is considered that the deallocation of this site from employment use altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future. The Council wishes to see this area contribute to meeting its employment need, and as such a RA designation can facilitate this aim while enabling an element of residential use, such as already exists on the site, to continue.
528	SA413	Bethany Gardiner-Smith on behalf of WHAT	Against residential designation	We do not wish to see the sites changed to an overall designation of residential, as we recognise that this would create a large uplift in the value of the land, which would threaten our continuing existence on the sites. We support the application of planning policies which allow a continuation of live/work across all inhabited units of the sites.	It is considered that the deallocation of this site from employment use altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future. The Council wishes to see this area contribute to meeting its employment need, and as such a RA designation can facilitate this aim while enabling an element of residential use, such as already exists on the site, to continue.
264	SA414	Gardens Residents' Association	Capped rents	Welcomes the retention and support of the creative industries in the area, and agree with the proposal for capped rents for artists and designers in the area.	Support is noted.
611	SA415	Omega Works Tenants' Assoc.	Conservation	Historically, Omega Works was the Challons piano factory and then HK furniture and as such represents an important connection to Harringay's manufacturing history.  We support the principles that the heritage façade of Omega Works is retained, that the height and design of any new buildings are very sensitive to the unique warehouse character of the area and our neighbours along Hermitage Road.	Noted.
400	SA416	Ms J Hancher	Consultation, Haringey warehouse district	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 area. As freeholder of substantial part of Omega Works, which has been the subject of planning appeal, and is known to officers, have not been invited to be part of any dialogue with officers.	The Council will require any development proposed on this site to show how it meets the policy through the provision of a masterplan.
697	SA417	Savills on behalf of Thames Water	Cumulative impact	We are concerned about the cumulative impact of development in this area.	Noted, this will be managed through the infrastructure delivery plan.
400	SA418	Ms J Hancher	Current use clarification	The current use of the site as having significant residential use is incorrect, with planning permission recently been granted on appeal, for a significant level of live/work usage.	The current live/work use is considered to be predominantly a residential use.
400	SA419	Ms J Hancher	Development guidelines	The requirement to retain the central facade of the existing building and a pedestrian link to Finsbury Park Ave are proposed without any justification and would prejudice the development of Omega Works, in respect of which planning permission has already been	It is considered that the façade presents a unique opportunity to link to the area's past on this site, and how it could be incorporated into any future design should be considered. The proposal here is to create a set of links that interact, and

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				granted for a mix of commercial floor space and residential.	rejuvenate what is presently a low-PTAL area. The connection underneath the railway line will form part of a link from Lordship Rec through to Stoke Newington which will provide an alternative to cycling on Green Lanes.
400	SA420	Derek Horne & Associates OBO Ms J Hancher (owner, part of Omega Works)	Employment designation	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 proposal is to include this site within an expanded Regeneration Area designation.
264	SA421	Gardens Residents' Association	Height	6 story development is far too high for the area and would request 4 stories being the maximum	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.
611	SA422	Omega Works Tenants' Assoc.	Height	However, we believe that a development 5 storeys would be far too high for the surrounding area – there is simply not a precedent for a 5 storey building on Hermitage Road and that this will significantly impact upon the visual amenity of the area for residents. Hermitage Road consists largely of 2 storey Victorian terraced housing. And such a scale would be out of character. We would suggest that the maximum height of any re-development would be 3 stories, with the majority of the massing built to the rear (north side) of the site to minimise the disruption to the visual and architectural amenity of the area.	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.
611	SA423	Omega Works Tenants' Assoc.	Objection	In response to the Site Allocations DPD Consultation Document, we, the Omega Works Tenants' Association, would firmly recommend that the Omega Works is removed from the list of Proposed Site Allocations.	Objection is noted.
611	SA424	Omega Works Tenants' Assoc.	Objects to route through yard	Our rear yard is used for many different purposes, many of which are integral to the businesses in the units. Therefore we are concerned about establishing a through-road for vehicles would compromise the ability of residents and tenants to use the rear yard.	Noted, the proposal here is to create a set of links that interact, and rejuvenate what is presently a low-PTAL area. The connection underneath the railway line will create a link from Lordship Rec through to Stoke Newington which will provide an alternative to cycling on Green Lanes. Opportunities to create passive surveillance at the entrances to the tunnel will be supported.  It is considered that DM51 offers sufficient flexibility to ensure that the needs of existing residents are considered in the masterplanning of the area.
697	SA425	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted.  <b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b>
423	SA426	National Grid	SA36 Site Requirements	The site is crossed by, or located within close proximity to, National Grid's high voltage underground electricity transmission cables. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. National Grid prefers that buildings are not built directly beneath its overhead lines. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ.	Noted.
697	SA427	Savills on behalf of Thames	Sewers	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	Noted.

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		Water		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 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.	
400	SA428	Ms J Hancher	Site boundaries	It is noted that whilst the Crusader industrial estate was identified as being within a DEA, Omega works was not. We believe that the two industrial areas should remain separately identified as per Figure 5.1 of the Local Plan.	The Council believes that the RA designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future
400	SA429	Ms J Hancher	Site requirement for capped commercial rents	No justification is given for the imposition of capped commercial rents. Such restrictions are likely to deter rather than encourage investment in employment.	The workspace viability study supports the requirement for new workspace to be affordable.
400	SA430	Ms J Hancher	Site requirement, objections to access arrangement	Objections are raised to the provision of pedestrian and cycle connections through the site of Omega Works. This would preclude the development of the site in the manner previously approved by the Council and no justification is given as to its necessity. There are already adequate pedestrian and cycle links from Hermitage Road through to the Crusader Estate, at the rear.	Noted, the proposal here is to create a set of links that interact, and rejuvenate what is presently a low-PTAL area. The connection underneath the railway line will create a link from Lordship Rec through to Stoke Newington which will provide an alternative to cycling on Green Lanes. Opportunities to create passive surveillance at the entrances to the tunnel will be supported.
611	SA431	Omega Works Tenants' Assoc.	Supports connectivity	We generally support the need for greater connectivity on this site. It would be sensible to link the Omega Works site with the Crusader Industrial estate to the north. Where possible, we would support the provision for greater pedestrian and cycling connections.	Support is noted.
611	SA432	Omega Works Tenants' Assoc.	Supports warehouse community	Today, the building houses a vibrant mixture of units where many people now live and work. Like other warehouses in the area, the site contains a diverse array of businesses, start-ups, project spaces and art galleries and has a huge creative output. We are grateful that " <i>the existing community's needs are reprovided/retained,</i> " is mentioned and recognised. However we still believe that any development will almost certainly disrupt and displace the fragile eco-system of live/work spaces and affordable rent which has led to the formation of its particular mixture of residents and businesses. A mixture we feel is integral to the atmosphere of the area and has established an enormous amount of cultural capital which brings people from all over London and the globe.	Noted, there is a clear objective to create a mix of uses on this site, and that is the principle applied through the recommendation of a regeneration area designation.
527	SA433	Tom Peters, Warehouse Residents Group (WHAT)	The slopes	We strongly support the retention and preservation of the 'SINC' ecological corridor which runs behind Omega Works, the Crusader Industrial Estate and Arena. These slopes represent an important 'Green Lung' for species of birdlife, insect and larger mammals in this area and connect to the nature corridor which runs along the Barking-Gospel Oak Overground Line. This site was previously overcome by invasive species such as Japanese Knotweed and Bramble, as well as evidence of fly-tipping. Action from local residents has seen certain patches on the slopes cleared of invasive species and tipped rubbish removed from the site. We are concerned that the introduction of a pedestrian link between Omega Works and Finsbury Park Avenue, and the increased	Noted, this area will remain as a SINC.

				pedestrian traffic that this would encourage, would threaten the sensitive biodiversity and ecological value of the slopes.	
528	SA434	Bethany Gardiner-Smith on behalf of WHAT	The slopes	This site was previously overcome by invasive species such as Japanese Knotweed and Bramble, as well as evidence of fly-tipping. Action from local residents has seen certain patches on the slopes cleared of invasive species and tipped rubbish removed from the site. We are concerned that the introduction of a pedestrian link between Omega Works and Finsbury Park Avenue, and the increased pedestrian traffic that this would encourage, would threaten the sensitive biodiversity and ecological value of the slopes.	Noted, this area will remain as a SINC.
611	SA435	Omega Works Tenants' Assoc.	The slopes	Predominantly, we are very very concerned about the possibilities of building anything on the "slopes" behind Finsbury Park Avenue. These used to be covered by Japanese Knotweed ( <i>Falopia japonica</i> ) and brambles ( <i>Rubus fruticosus</i> ) and litter and refuse, the majority of which was fly-tipped from Finsbury Park Avenue. These weeds and the litter have largely been cleared by local residents and the biodiversity of the slopes has increased massively to the extent that the slopes now house a particular and very sensitive ecology. We are concerned that any re-development could have significant impact upon this land and the biomass which exists here. One might argue that there are many green spaces in the area such as Finsbury Park and Chestnuts Park. However, these are all maintained parkland and recreation space - it is the relatively wild and untouched nature of the slopes which is so essential for the wildlife which exists here. At this point, we would therefore oppose the development of a new pedestrian link from Omega Works to Finsbury Park Avenue.	Noted, this area will remain as a SINC.
527	SA436	Tom Peters, Warehouse Residents Group (WHAT)	Too much employment floorspace	<p>The development required to accommodate such an increase in employment land, while retaining the residential provision for the current community (an objective stated by the site allocations) would necessarily undermine the industrial aesthetic and flexible space that is appealing to residents of the site. Large scale interference into this unique aesthetic -cum -spatial characteristic is likely to impact upon its appeal as a creative and cultural hub, undermining a key foundation of the existing community.</p> <p>We believe that aspirations for increases in employment land should be based upon the current m2 of employment floor space on site, rather than an unevicenced assumption from an unspecified point in the past, which does not recognise the differences in density between previous and current employment activity.</p> <p>We wish to see the balance of live and work currently on the sites retained, by a policy that neither drives an uplift in value of land, nor forces its wholesale redevelopment to accommodate an overwhelming increase in commercial floorspace.</p>	<p>The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.</p> <p><b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out for DM50.</b></p>
264	SA437	Gardens Residents' Association	Traffic	Suggest the introduction of live work units for historical reasons and due to the presence of other industrial units around the local area. The development would without doubt bring increased traffic to the local area. This area has 3 road closures in place, which has displaced the traffic through the Gardens, Tiverton Estate, St Ann's Road, Green Lanes and Wightman Road causing massive	As part of the planning process we would be seeking to minimise traffic generation arising from new developments by promoting travel plan measures such as car clubs, cycle parking and information on public transport services, as well as seeking to reduce car parking provision. The road closures on Hermitage Road, Eade Road and

				congestion issues and community tension over the 15 years since these closures were put in place. Haringey Council must consider these issues and how to deal with them in the long term.	Vale Road are aimed at deterring through traffic and directing commercial traffic for the industrial areas away from residential streets onto roads more suited to carrying traffic such as Seven Sisters Road and St Ann's Road. The Council does not consider it appropriate to review these closures at the present time.
697	SA438	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	SA439	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>
422	SA440	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a	<p>Noted.</p> <p><b>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</b></p>

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				Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	
430	SA441	Derek Horne & Associates for Majorlink Ltd	Connections	Objections are raised to provision of pedestrian and cycle connections through the site of Omega Works. This would preclude the development of the site in the manner previously approved by council and no justification is given to its necessity. There are already adequate pedestrian and cycle links from hermitage Road through to the Crusader Estate, at the rear.	It will be incumbent upon the applicant to demonstrate how a legible and accessible network will be established between this site and Crusader Industrial Estate.
430	SA442	Derek Horne & Associates for Majorlink Ltd	Use	The current use as having significant residential is incorrect, with planning permission recently been granted on appeal, for a significant level of live/work usage.	The current live/work use is considered to be predominantly a residential use.
430	SA443	Derek Horne & Associates for Majorlink Ltd	Capped commercial rents	No justification is given for the imposition of capped commercial rents. Such restrictions are likely to deter, rather than encourage, investment in employment.	The Council considers the provision of affordable workspace to be an important factor in encouraging economic development in Haringey. The Council also recognises that there are a number of methods of providing affordable workspace. The council is cognisant of the need for developments to be viable, and welcomes a range of approaches to delivering workspace that enables economic growth in Haringey.
430	SA444	Derek Horne & Associates for Majorlink Ltd	Facade retention	The requirement to retain the central facade of the existing building and a pedestrian park link to Finsbury Park Avenue are proposed without any justification and would prejudice the development of Omega Works, in respect of which planning permission has already been granted for a mixture of commercial floor space and residential.	It is considered that the façade presents a unique opportunity to link to the areas past on this site, and how it could be incorporated into any future design should be considered.

Comments on SA37 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
264	SA445	Gardens Residents' Association	Access	With reference to opening up the Railway Arch 2019 in St Ann's Hospital site to the southern Ashfield Road site, caution should be considered to this proposal as this may cause issues of crime routes especially with the proposal of opening up St Anns Hospital site to Warwick Gardens.	Any access route in this area would be assessed against the development management policies which require the use of Secured By Design principles to reduce the likelihood of crime.
264	SA446	Gardens Residents' Association	Capped rents	Welcomes the retention and support of the creative industries in the area, and agree with the proposal for capped rents for artists and designers in the area.	Support is noted.
697	SA447	Savills on behalf of Thames Water	Cumulative impact	We are concerned about the cumulative impact of development in this area.	Noted, this is an issue to be managed through the IDP.
426	SA448	Thames Water	Drainage	Proposed allocations SA22; SA37 and SA38 include within the Development Guidelines an aspiration to open up access to the New River. The New River is an operational asset used for water supply and maintaining security and operational safety are Thames Water's key priority. However, Thames Water is willing to work with the Council to explore the opportunity of improving access.	Noted, this will be addressed through the IDP.
818	SA449	Our Tottenham	Employment designation	Vale Road/Tewksbury Road is the site of unplanned warehouse conversion as well as 'significant swathes of the site are still in active employment use however and should be protected for ongoing employment use' (p.30).	Noted. This approach has been taken. Industrial areas are being protected as such, while areas with warehouse living, and where significant engineering works have recently taken place have been given a regeneration area designation to aid with placemaking developments.

				<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 Vale Road/Tewksbury Road N15.</p> <p>If the protections of these sites are removed, it is likely that their functions will be damaged through housing and mixed use development. Indeed, it is clear that this is the intention in the case of areas being proposed to be given the status of 'Regeneration Area' rather than Locally Significant Industrial Site (LSIS). There is a strong need for industrial land in London, and these well performing areas should continue to be protected as required by the London Plan. The Council risks its aspirations for regeneration damaging the strengths of its existing local economy – these strengths are acknowledged in regeneration and economic development strategies but not in its planning policies. All of the strengths mentioned in the Opportunity Investment Fund for Tottenham Factsheet, for instance, require industrial workspace which the Strategic Policies do not sufficiently protect: 'artisan bakers, craft breweries, gourmet popcorn manufacturers, royal uniform makers and high end furniture makers'</p>	
422	SA450	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	<p>The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording:  <i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i></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:  <i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i></p>	<p>Noted.</p> <p><b>Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</b></p>
264	SA451	Gardens Residents' Association	Height	<p>6 story development is far too high for the area and would request 4 stories being the maximum</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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697	SA452	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted.  <b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b>
422	SA453	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted.  <b>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</b>
423	SA454	National Grid	SA37 Site Requirements	The site is crossed by, or located within close proximity to, National Grid's high voltage underground electricity transmission cables. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. National Grid prefers that buildings are not built directly beneath its overhead lines. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ.	Noted.
697	SA455	Savills on behalf of Thames Water	Sewers	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 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.	Noted.
264	SA456	Gardens Residents' Association	Traffic	Suggest the introduction of live work units for historical reasons and due to the presence of other industrial units around the local area. The development would without doubt bring increased traffic to the local area. This area has 3 road closures in place, which has displaced the traffic through the Gardens, Tiverton Estate, St Ann's Road, Green Lanes and Wightman Road causing massive congestion issues and community tension over the 15 years since these closures were put in place. Haringey Council must consider these issues and how to deal with them in the long term.	As part of the planning process we would be seeking to minimise traffic generation arising from new developments by promoting travel plan measures such as car clubs, cycle parking and information on public transport services, as well as seeking to reduce car parking provision. The road closures on Hermitage Road, Eade Road and Vale Road are aimed at deterring through traffic and directing commercial traffic for the industrial areas away from residential streets onto roads more suited to carrying traffic such as Seven Sisters Road and St Ann's Road. The Council does not consider it appropriate to review these closures at the present time.
697	SA457	Savills on behalf of Thames Water	Waste water	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	Noted, reference will be included in this site allocation.  <b>Action: Make reference to the need to consult with Thames Water with regards waste water capacity upon preparation of a planning application.</b>

				likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.  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.	
697	SA458	Savills on behalf of Thames Water	Water	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.  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.	Noted, reference will be included in this site allocation.  <b>Action: Make reference to the need to consult with Thames Water with regards water supply upon preparation of a planning application.</b>

## Comments on SA38 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
264	SA459	Gardens Residents' Association	Access	With reference to opening up the Railway Arch 2019 in St Ann's Hospital site to the southern Ashfield Road site, caution should be considered to this proposal as this may cause issues of crime routes especially with the proposal of opening up St Anns Hospital site to Warwick Gardens.	Any access route in this area would be assessed against the development management policies which require the use of Secured By Design principles to reduce the likelihood of crime.
535	SA460	Ellis Gardiner, warehouse resident	Affordability	A reduction in residential and warehouse-living type uses directly equates to a reduction in the potential for affordable living and working spaces.	Noted, provision of affordable housing and workspace are important to the Council
558	SA461	Roddy Skeaping, warehouse resident	Affordability	The (current) affordability makes it possible for people with less money to avail themselves of this life-style, helping to create a diverse and rich social mix.	Noted, provision of affordable housing and workspace are important to the Council
531	SA462	Sam Elie, warehouse resident	Affordable commercial	If too much of the land in the warehouse community is turned from live/work spaces to strictly commercial spaces or if rents become unaffordable, the people who can turn the area towards an arts & cultural hub will be forced to leave	Noted, provision of affordable housing and workspace are important to the Council
504	SA463	Polly Robbins, Overbury Rd Warehouse	Affordable housing	Current residential price is seen as "affordable"	Noted, provision of affordable housing and workspace are important to the Council

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		Resident			
563	SA464	Rosha Fitzhowle, warehouse resident	Affordable housing	<p>I come from a working class family in Scotland, I work very hard in order to live in London. I can have up to three jobs at one time, just to make rent. Unfortunately many employers do not pay the London living wage and the minimum wage for living in London is not affordable. The prevalence of unpaid internships makes it difficult to break into a more professional sphere of work.</p> <p>People like me don't stand any chance of getting social housing and the private rental landscape in London is insane. Every year prices increase, whilst wages do not and it is harder and harder to stay near the center of London.</p> <p>People like me are at risk of falling through the housing gap, we can not afford to live where we want and do not qualify for social housing. This forces people to live in cramped conditions and under sometimes less than legal arrangements.</p> <p>The warehouse community provided a long sought after relief for me. Although it is not dirt cheap, it is not extortionate when compared with other housing in the area. It is relatively affordable, especially compared with the wider privately rented spaces in London.</p> <p>By changing the way that our land is used and therefore making us move. You would be actually adding to the problem that London is experiencing of social cleansing. London is steadily becoming void of creativity and artists, as we are forced further and further out. London is becoming a clean and oiled playground for the wealthy.</p>	Noted, provision of affordable housing and workspace are important to the Council
515	SA465	Annette Kammerer, warehouse resident	Affordable living	This is the key to the feel of the area and must be retained.	Noted, provision of affordable housing and workspace are important to the Council.
504	SA466	Polly Robbins, Overbury Rd Warehouse Resident	Against new build	Existing residents won't go for it.	Objection is noted.
563	SA467	Rosha Fitzhowle, warehouse resident	Agents	This alternative way of living cuts out agents, which London and England in general has a problem with, going unregulated. They can and do charge exorbitant fees and rip people off, treating them very badly. I myself have had firsthand experience of this. We have landlords who care and do things for us.	This is outside of the scope of the Plan.
527	SA468	Tom Peters, Warehouse Residents Group (WHAT)	Appeal Condition	Following the above point, we believe that an extension of the conditions placed upon Unit 4, 199 Eade Road in its recent planning hearing to other units would support retention of active commercial floorspace for the purposes of economic activity, complimenting the current commercial/residential mix that is so essential to the unique character of the site. These planning conditions ensured that a significant proportion of the floorspace was available for commercial activity within working hours, without requiring large structural changes to the space such as a division	<p>The Council does not support the condition established by the Inspector in relation to this appeal. It is considered to be unenforceable, and does not guarantee any employment activity will happen on the site.</p> <p>The Council needs to protect and/or build new employment floorspace in order to meet the spatial vision for the borough.</p>

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				between commercial and residential floorspace in the form of floors for different purposes.	
264	SA469	Gardens Residents' Association	Capped rents	Welcomes the retention and support of the creative industries in the area, and agree with the proposal for capped rents for artists and designers in the area.	Support is noted.
550	SA470	Agata Rogowska, warehouse resident	Character	I do believe that the local brick architecture is crucial for the specific character of the area	Noted.
506	SA471	Johannes Kaufhold, Eade Rd resident	Collaborative enterprise	Living communally breeds innovation.	The Council notes that this is happening, and wishes to create opportunities for further employment opportunities in knowledge-driven sectors in this area.
527	SA472	Tom Peters, Warehouse Residents Group (WHAT)	Community allotment	The residents of the warehouses would be keen for the space to be developed into a community allotment garden, which could be used to grow organic produce, and to provide training in horticulture and the growing of food to the wider community. This would extend the outreach currently taking place directly opposite at New River Studios. We would be keen to discuss this plan further with the relevant parties should the Council wish to consider.	Noted. This will be managed through the infrastructure delivery plan.
563	SA473	Rosha Fitzhowle, warehouse resident	Community allotment	I am fully on board with the council re-purposing the south bank of New River as a community space. We could create an allotment area where the community can grow their own food. This has been done to success in other boroughs and has helped to educate and bring together communities.	Support is noted, This will be managed through the infrastructure delivery plan.
602	SA474	Jay Jaye, warehouse resident	Community allotment	In addition, the re-purposing of the south bank of the New River to create a community asset seems like a very positive move. I would support the development of the land into a community allotment garden which could be used for teaching the wider community about horticulture and organic farming.	Support is noted, This will be managed through the infrastructure delivery plan.
697	SA475	Savills on behalf of Thames Water	Cumulative impact	We are concerned about the cumulative impact of development in this area.	Noted, this is an issue to be managed through the infrastructure delivery plan.
509	SA476	CgMs on behalf of Parkstock Ltd	Current uses obsolete	Cites Inspectors statement that the site is no longer suitable for business.	The buildings may not be suitable for their originally intended employment use, but there exists potential for them to be repurposed, including consideration of demolition and redevelopment to create new employment floorspace which is attractive to contemporary firms.
563	SA477	Rosha Fitzhowle, warehouse resident	Cycling	The reason that is it so important to me to be fairly close to the center is because I only cycle as a mode of transport, as do many others living in the warehouses. We need to be able to cycle to work. And by doing this we are cutting down, in a small and personal, but by no means unimportant way, on carbon emission and keeping personal costs down.	Noted, cycling is supported in the Plan.
535	SA478	Ellis Gardiner, warehouse	Decentralised Energy	welcome the opportunity for both sites (SA34 and SA38) to be part of the Council's proposed "decentralised energy hub". There is significant	Support is noted.

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		resident		potential for the installation of solar panels on many of the rooftops, as well as an opportunity to showcase some less common forms of energy production such as wind turbines	
535	SA479	Ellis Gardiner, warehouse resident	Destination location	Support the use of the site as an accessible destination location, and notes there are a number of destinations emerging on the site.	Noted.
426	SA480	Thames Water	Drainage	Proposed allocations SA22; SA37 and SA38 include within the Development Guidelines an aspiration to open up access to the New River. The New River is an operational asset used for water supply and maintaining security and operational safety are Thames Water's key priority. However, Thames Water is willing to work with the Council to explore the opportunity of improving access.	Noted, this will be addressed through the infrastructure delivery plan.
509	SA481	CgMs on behalf of Parkstock Ltd	ELR evidence inaccurate	Over half the floorspace in SA38 has lawful certificate for use (ELR states "there is considerable unplanned, unlicensed occupation of parts of the Site")	Noted.
509	SA482	CgMs on behalf of Parkstock Ltd	ELR evidence not sufficient	ELR doesn't survey the non-designated part (Overbury Rd), therefore offers no evidence to the proposed RA designation. Alternative survey information provided.	The Employment Land Study was carried out in line with standard practice for a study of this type. The recommendations it makes are with regard to the use of the land, as much as with the current use of the stock.
535	SA483	Ellis Gardiner, warehouse resident	Employment densities	Former uses have very low employment densities (1 employee per 138-204m <sup>2</sup> ), New River Studios operates presently at 1 employee per 30m <sup>2</sup> , with potential to increase to 1/21m <sup>2</sup> . Much higher numbers of employment can be brought forward on smaller floorspaces using modern densities.	Noted.
509	SA484	CgMs on behalf of Parkstock Ltd	Employment designation	Contends that this area has established residential use, and therefore it is inappropriate to allocate an employment designation.	The historical use of the site, and there remain employment uses on part of the site. The Council has a challenging growth target, including increasing jobs as well as housing numbers.
509	SA485	CgMs on behalf of Parkstock Ltd	Employment designation	Support redesignation of southern part of the site (currently LSIS) to RA to recognise mix of uses existing on the site.	The redevelopment of this part of the industrial area is not required to meet growth objectives at this time.
515	SA486	Annette Kammerer, warehouse resident	Employment floorspace	Increased employment floorspace cannot be reconciled with the creation of an "alternative" area.	Disagree. There is employment on the site, and a mix of uses is envisaged, in order to make a contribution to both the borough's housing and employment needs.
535	SA487	Ellis Gardiner, warehouse resident	Employment floorspace	Support the "Eade Road condition" and maintain that 25% of the floorspace of a warehouse living unit should be available for work from Monday to Friday, then this figure should count towards the employment floorspace total for the estates. Many workplaces are inaccessible during evenings and weekends (even if the staff were to want to work overtime), making them in essence no different to the multi-function space warehouses offer.	The Council does not support the condition established by the Inspector in relation to this appeal. It is considered to be unenforceable, and does not guarantee any employment activity will happen on the site.
509	SA488	CgMs on behalf of Parkstock Ltd	Employment floorspace	Contends that the lawful quantum of employment floorspace on Arena is 1,000m <sup>2</sup> and on Eade/Overbury is (approx) 3,925m <sup>2</sup> compared to the 4,600m <sup>2</sup> and 17,900m <sup>2</sup> quoted in the sites DPD.	Noted, the figures quoted relate to the original employment floorspace of the existing buildings.
557	SA489	Jo Bee, warehouse resident	Existing buildings	The site allocations stipulations, for my home of the last 6 years on Fountayne Road, appear to place increased emphasis on large scale re-development, despite the positive stipulations for retention of the existing community also included. As residents of the site, we would prefer to see existing buildings retained, improved and regularised, and where evidence suggests that this is not possible we would seek assurances that the essential character, the flexible	The Council is required to meet objectively identified needs to create new housing and employment opportunities in the borough. There will therefore be some development required in order to meet these needs. It is considered that the appropriate provisions to protect and build on existing strengths within the area are contained within the policy

				live/work space, the industrial aesthetic and the needs of the current community are preserved, particularly the need for affordable rents. We would like any plans for re-development to be considered in full partnership with the inhabitants of the sites	
422	SA490	Environment Agency	Flood Risk Assessment of Sites of 1ha or more	The development guidelines for these sites should be amended to reflect the fact that a Flood Risk Assessment will be required, as stipulated by footnote 20 to National Planning Policy Framework paragraph 103. It is also a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS), which should also be included in the site requirements or the development guidelines. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity. We suggest the following wording: <i>A Flood Risk Assessment (FRA) must be undertaken to understand the flood risks of the site pre and post development. Development must be safe for future users, not increase flood risk on or off site, and utilise SuDS in accordance with NPPG and London Plan.</i> We are pleased that the SWMP designated Critical Drainage Areas (CDAs) have been included within the considerations for the allocated sites where they are present. Where CDAs are present you may also wish to consider the inclusion of more stringent design guidelines to make it clearer to developers what this means for the design of the development. We suggest the following additional wording as a minimum: <i>This site falls within a Critical Drainage Area (CDA). Development of this site must be shown, in a Flood Risk Assessment, to achieve a runoff rate of Greenfield or lower.</i>	Noted.  <b>Action: Addition of a development guideline noting that a flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.</b>
531	SA491	Sam Elie, warehouse resident	Gateway	Supports this point marking the gateway to the area.	Support is noted.
509	SA492	CgMs on behalf of Parkstock Ltd	Gateway building	Supports a gateway building to the warehouse area on the corner of Eade & Seven Sisters Rd. Want this to be called a "tall" building.	It is noted that this is the gateway to the area from Seven Sisters Rd. The provision of a "gateway" building is not necessarily the same as a "tall" building as contended.
504	SA493	Polly Robbins, Overbury Rd Warehouse Resident	Governance	Supports community management arrangement.	Noted, the management arrangement of the units is outside the scope of the plan.
264	SA494	Gardens Residents' Association	Height	6 story development is far too high for the area and would request 4 stories being the maximum	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.
550	SA495	Agata Rogowska, warehouse resident	Height	Concerned "6 storeys buildings on site" and "potential for a building on the corner of Eade and Seven Sisters Rds marking the gateway to the warehouse district from Seven Sisters Rd" (p. 107) can easily become a trigger for a large scale and commercial developments not respecting the local community and specific character of surrounding architecture - the example of which we have already	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site

				on Woodberry Grove	Allocations, with all developments expected to respond appropriately to their context.
509	SA496	CgMs on behalf of Parkstock Ltd	Inconsistent with LP:SP	Proposed changes to DEA designation in Sites DPD are not included in Amendments to the Local Plan: Strategic Policies consultation document.	Noted. This will be amended to ensure both documents are in conformity.  <b>Action: Update Local Plan: Strategic Policies document to ensure conformity between the documents.</b>
506	SA497	Johannes Kaufhold, Eade Rd resident	Increasing skills	Living communally allows transfer of skills between individuals within the group.	The Council notes that this is happening, and wishes to create opportunities for further employment opportunities in knowledge-driven sectors in this area.
818	SA498	Our Tottenham	Industrial land	Vale Road/Tewksbury Road is the site of unplanned warehouse conversion as well as 'significant swathes of the site are still in active employment use however and should be protected for ongoing employment use' (p.30).  If the protections of these sites are removed, it is likely that their functions will be damaged through housing and mixed use development. Indeed, it is clear that this is the intention in the case of areas being proposed to be given the status of 'Regeneration Area' rather than Locally Significant Industrial Site (LSIS). There is a strong need for industrial land in London, and these well performing areas should continue to be protected as required by the London Plan. The Council risks its aspirations for regeneration damaging the strengths of its existing local economy – these strengths are acknowledged in regeneration and economic development strategies but not in its planning policies. All of the strengths mentioned in the Opportunity Investment Fund for Tottenham Factsheet, for instance, require industrial workspace which the Strategic Policies do not sufficiently protect: 'artisan bakers, craft breweries, gourmet popcorn manufacturers, royal uniform makers and high end furniture makers'	Noted. This approach has been taken. Industrial areas are being protected as such, while areas with warehouse living, and where significant engineering works have recently taken place have been given a regeneration area designation to aid with placemaking developments.
602	SA499	Jay Jaye, warehouse resident	Live/work	I applaud noticeable shift in the Haringey Council's recognition of the warehouse community, and it's contribution to the wider South Tottenham community, since the last consultation in 2014. I think it is important that the area remain classified as a live/work area rather than changed to a strictly residential one, in order to continue to provide affordable accommodations for artists and creatives. A change to residential status would bring with it a price rise that would be unaffordable for the current residents.	The regeneration area designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future.
528	SA500	Bethany Gardiner-Smith on behalf of WHAT	Live/work	We do not wish to see the sites changed to an overall designation of residential, as we recognise that this would create a large uplift in the value of the land, which would threaten our continuing existence on the sites. We support the application of planning policies which allow a continuation of live/work across all inhabited units of the sites.	The regeneration area designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future.
527	SA501	Tom Peters, Warehouse Residents Group (WHAT)	Live/work	Development to introduce a structural division between the live and work floorspace would undermine the flexibility that inhabitants of the community find both useful to their employment activity and an appealing environment in which to live. The current spatial arrangement supports a flexible, social environment of residential habitation and creative entrepreneurship and collaboration. These benefits are evidenced by qualitative interviews with site inhabitants collated in the independent LSE University report attached	The Council needs to protect and/or build new employment floorspace in order to meet the spatial vision for the borough.

				alongside this submission.	
558	SA502	Roddy Skeaping, warehouse resident	Live/work	I am personally very concerned that meddling with the naturally evolved balance between work and residential living - towards a decrease in business use - 'Work' against an increase in the residential - 'Live' element, will result in a Hackney Wick style self conscious 'Artistic Ghetto' with the result that property values will increase dramatically over time, with disastrous effect upon the rich ecology of residential and business - Live/Work balance that has come about very naturally. I am also concerned that too much interference in the natural development of this vibrant community will stifle its capacity to continue to throw up new ways of putting communities together, which comes from its having a healthy degree of autonomy over its development	The Council notes that it is generally seeking to introduce more employment into the area, in the hope that a sustainable mix of uses can be created in the area.
535	SA503	Ellis Gardiner, warehouse resident	Live/work	It is my belief that these estates can support comparable numbers of jobs to their former uses in a way that does not destroy the fabric of what exists. Of course, far more people live in Haringey than twenty years ago, so the demand for jobs is greater, and it is my hope that by increasing density rather than floorspace, and by striking a sustainable balance of uses, these estates could actually support more and better jobs than they ever did.	Noted, it is expected that land will be used more intensively in order to meet the spatial objectives for the borough.
535	SA504	Ellis Gardiner, warehouse resident	Live/work	A reduction in the warehouse community of over 60% would completely alter the complexion and fabric of the estates and would not help to "retain" the current community at all. There are over 600 residential units in the area to which the current proposal allocates only 220 units. This removes almost two-thirds of the community	This policy makes provision for meeting the needs of the existing residential population.
531	SA505	Sam Elie, warehouse resident	Live/work	If too much of the land in the warehouse community is turned from live/work spaces to strictly commercial spaces or if rents become unaffordable, the people who can turn the area towards an arts & cultural hub will be forced to leave	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.  <b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out for DM50.</b>
535	SA506	Ellis Gardiner, warehouse resident	Live/work	The proposed reallocation of floorspace to 17,900 square metres of purely commercial space and 220 residential units makes it impossible to "retain" the current community in any meaningful form. I believe it is possible to increase its employment capacity in line with its reallocation to a DEA Regeneration area, and that actually a higher number of jobs could be based in the estates than were here twenty years ago. However, I also believe that the ratios stated in the DPD would adversely impact on the estates to such an extent that much of what is of value would be lost  At the same time, the proposed reintroduction of 17,900 square metres of purely commercial space would mean that the "warehouse-living" and residential components of the estates would be outweighed by commercial uses by a factor of 4:1 or more. For a community that is based on networks and proximity of uses, this would be devastating.  Requirement to reprovide original employment floorspace would have negative consequence due to loss of warehouse living	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.  <b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out for DM50.</b>

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				floorspace.	
527	SA507	Tom Peters, Warehouse Residents Group (WHAT)	Live/work	As per the above comment relating to pg. 15 we do not wish to see the enforcement of a large-scale increase of employment land on the site. This would undermine the fragile ecosystem of creative enterprise and affordable accommodation which makes the site unique. We believe that the existence of this creative hub is a huge asset to the attractiveness of the borough to other creative enterprises, stimulating future job-creation alongside the dense	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.  <b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out for DM50.</b>
535	SA508	Ellis Gardiner, warehouse resident	Live/work	the Site Allocations DPD identifies that residential uses would have to financially support the commercial and mixed uses, but this is not sustainable if so much of the (existing, warehouse living) residential community is removed. It does not make sense to reduce the source of funding, and simultaneously increase the need for that funding.	In order to meet the housing and employment needs in the borough, high value use, such as residential to cross subsidise less valuable, such as affordable housing and employment.
602	SA509	Jay Jaye, warehouse resident	Management model	I would definitely favour a resident controlled, not-for-profit co-operative management model for more of the units across the sites so that the needs of the residents and the management are more in line with each other. This would also keep rents under control.	Noted, the management arrangement of the units is outside the scope of the plan.
563	SA510	Rosha Fitzhowle, warehouse resident	Objection	Objects to redevelopment	Objection is noted.
535	SA511	Ellis Gardiner, warehouse resident	Open space	We would enthusiastically pursue any opportunity "to open up the south bank of the New River and institute a linear park" and would welcome the Council's support in securing public access to this immensely valuable piece of green space	Support is noted.
509	SA512	CgMs on behalf of Parkstock Ltd	Original floorspace	Object to proposal to require "original" floorspace to be reprovided.	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.  <b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set in the DMDPD.</b>
527	SA513	Tom Peters, Warehouse Residents Group (WHAT)	Original floorspace	We do not believe that a full return of 'original' employment land to the site is feasible or desirable. The employment now taking place on the site has a higher density, and makes a more valuable contribution to the social and economic life of the borough. The pressure placed upon the sites by a requirement of a full return of employment land would undermine the unique balance of live/work existing there, which has developed over time to meet the requirements of a mix of creative enterprise and affordable living. This organic development is not replicable through the blunt instrument of sweeping external intervention.	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. It is noted that the requirement to simply replace old with new employment floorspace may not be possible on all sites, so a method requiring a proportion of employment floorspace proportionate to the size of the site will be appropriate.  <b>Action: Revise the requirement for replacement of original floorspace with a site specific model, as set out in the DMDPD.</b>
535	SA514	Ellis Gardiner, warehouse	Parking	Current car parking seen as an obstacle to using existing car parking/yard space for use as a destination space. Suggests	Parking levels will be set out in the DMDPD policy on parking standards.

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		resident		redesignation of Eade Rd for resident's parking to free up the area.	
697	SA515	Savills on behalf of Thames Water	Piling	No impact piling shall take place until a piling method statement is submitted and approved.	Noted. <b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b>
422	SA516	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted. <b>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</b>
602	SA517	Jay Jaye, warehouse resident	Problems with current management	It's difficult to live with constant threat of redevelopment hanging over our heads. The residents are currently discouraged from reporting any infringements of their rights by unscrupulous landlords, or problems with the maintenance, health and safety aspects of the dwellings for fear that it will be used against them in the plans to redevelop the site.	Noted, however management arrangements of the units is outside the scope of the plan.
509	SA518	CgMs on behalf of Parkstock Ltd	RA Status	Object to all sites having the same RA status, despite differences between the sites. Suggest this should be on the lawful quantum of employment floorspace.	The regeneration area designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future.
553	SA519	Ellis Gardiner on behalf of New River Studios CIC	Regeneration potential	The pool of talent that exists in the Manor House warehouse community also offers the potential to attract outside business to Haringey. At the start of the last decade, the large pool of creative talent that existed in Shoreditch attracted a number of leading tech firms to Tower Hamlets, specifically to the so-called "silicon roundabout". In the same way, a thousand-strong community of some of the most employable people in the capital would be a significant draw to the right kind of creative business, as the recent Site Allocations DPD acknowledges. We hope the Council agrees that New River Studios is one means by which this important economic cluster can be safeguarded in this new stage of our development.	Noted.
602	SA520	Jay Jaye, warehouse resident	Retain current/smaller unit sizes	In addition, the site allocation stipulations seem to favour large scale redevelopment which would take away the unique character of the area. I would definitely prefer the current buildings to remain intact and that any redevelopment be done in full partnership with the current residents of the sites.	The Council is required to meet objectively identified needs to create new housing and employment opportunities in the borough. There will therefore be some development required in order to meet these needs. It is considered that the appropriate provisions to protect and build on existing strengths within the area are contained within the policy.
697	SA521	Savills on behalf of Thames Water	Sewers	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 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.	Noted.

## Appendix F (10) Site Allocations consultation report

506	SA522	Johannes Kaufhold, Eade Rd resident	Social mix	Living communally brings people from a wide range of backgrounds together to share ideas	Noted.
553	SA523	Ellis Gardiner on behalf of New River Studios CIC	Support cultural output	New River Studios is intended to meet this need. We run exhibitions, performances, workshops, youth programmes and a host of other activities for both warehouse residents and our local community	Noted.
535	SA524	Ellis Gardiner, warehouse resident	Supports warehouse community	Not only is the financial cross-investment essential, but also the investment of social capital which comes from the people who live here. We welcome the opportunity to share the some of our artistic output with the local community, but that prospect becomes significantly less attractive when the community is reduced by two-thirds.	Support for retention of the existing community is noted.
550	SA525	Agata Rogowska, warehouse resident	Supports warehouse community	I do believe that the area can become an interesting, well maintained and proud part of Haringey. Knowing that the community is full of young, creative residents I would rather see redevelopment being a part of social involvement projects than new build developer scheme	Support for retention of the existing community is noted.
551	SA526	Alay Paun, warehouse resident	Supports warehouse community	I currently live in one of the live-work warehouses in Catwalk Place and its the main reason I love Haringey. Its a very welcoming borough when it comes to alternative communities and encouraging artistic endeavour. The warehouse community is a fairly unique place with a great sense of community, a village-feel, that draws people in and keeps them here. I hope that our artistic community is seen for what it is, a benefit to the wider community, and that it is afforded some protection in these turbulent times.	Support for retention of the existing community is noted.
558	SA527	Roddy Skeaping, warehouse resident	Supports warehouse community	<p>Warehouse living is socially desirable and healthy, since it requires people to respect their neighbours (housemates in this situation).</p> <p>The work live ethic is healthy in that is ensures a mixed social ecology</p> <p>The work live ethic is healthy in that it creates opportunities and networking possibilities that encourage the development of new project and small businesses.</p> <p>The nature of this form of shared living demands that people come together to overcome all manner of social difficulties and learn tolerance in the process of evolving (for each individual warehouse community) a unique form of internal 'democracy' based on compromises between household members. This is extremely beneficial socially and is a form of alternative living that should be encouraged - especially in this area where an alarming number of almost 'gated communities' have been allowed to develop, though some of these, which affect our community are in the borough of Camden Council, which seems shameless and amoral about its</p>	Support for retention of the existing community is noted.

				<p>development plans, unlike Haringey.</p> <p>In my experience, shared living helps greatly in promoting an awareness of social and ecological good manners and efficacy (e.g. waste disposal, noise pollution, general social responsibility etc.).</p> <p>In my experience of living here, LIFE STYLE CHOICE has consistently been the main reason for people from all walks of life choosing to live in this Warehouse community. People who live in this community value it on many levels and are prepared to defend it.</p>	
563	SA528	Rosha Fitzhowle, warehouse resident	Supports warehouse community	<p>I and others who I live with in the warehouses value community, we want to further develop ties with the wider Haringey community. I know that there is already outreach work being done and by moving us you would end that. The arts receives less and less funding and opportunities for those from lower income backgrounds to have access are decreasing. I know in your report that you say that this area is one of the most deprived, studies have shown that in areas of deprivation culture is one the first things to be cut. However when it is introduced, art and music making has transformative properties. It can really fuse a community, give joy and purpose to people.</p> <p>The live-work space that we have in the warehouses creates the climate of art making. We can and will contribute to the wider community through our art. The live-work lifestyle is unique and wonderful, creating jobs and more for the community and Haringay and London.</p> <p>London and the UK more broadly needs more affordable housing, however it would be a mistake to destroy some that already exists to create it differently. Please don't try and fix one problem, but at the expense of another community, to create another.</p>	Support for retention of the existing community is noted.
264	SA529	Gardens Residents' Association	Traffic	<p>Suggest the introduction of live work units for historical reasons and due to the presence of other industrial units around the local area. The development would without doubt bring increased traffic to the local area. This area has 3 road closures in place, which has displaced the traffic through the Gardens, Tiverton Estate, St Ann's Road, Green Lanes and Wightman Road causing massive congestion issues and community tension over the 15 years since these closures were put in place. Haringey Council must consider these issues and how to deal with them in the long term.</p>	As part of the planning process we would be seeking to minimise traffic generation arising from new developments by promoting travel plan measures such as car clubs, cycle parking and information on public transport services, as well as seeking to reduce car parking provision. The road closures on Hermitage Road, Eade Road and Vale Road are aimed at deterring through traffic and directing commercial traffic for the industrial areas away from residential streets onto roads more suited to carrying traffic such as Seven Sisters Road and St Ann's Road. The Council does not consider it appropriate to review these closures at the present time.
553	SA530	Ellis Gardiner on behalf of New River Studios CIC	Vision	<p>Our preferred outcome to this process would be that Haringey's planning policy for SA38 creates a framework within which the existing community can continue to evolve at the levels currently seen, and that any commercial uses that are introduced are of the kind that will complement the existing community. In our view, there is huge potential in the coexistence of residential, commercial and</p>	It is agreed that there is potential for a mix of uses.

				warehouse-living style accommodation in these estates.	
509	SA531	CgMs on behalf of Parkstock Ltd	Vision	The long term vision for this estate is for a mixed use re-development of the site to be delivered through a masterplan. The intention is for an improvement in the existing employment offer through denser re-provision and intensifying existing levels of employment. In addition the vision is for retention of the existing warehouse community through the re-provision of innovative creative living solutions. The vision includes maximising delivery of Private Rented Sector Housing, creating a sustainable community as well as creating an architecturally interesting and distinctive place, with a landmark building marking the gateway to the area on the corner of Eade Road and Seven Sisters Road.	The Council broadly supports this vision.
553	SA532	Ellis Gardiner on behalf of New River Studios CIC	Warehouse community supports facility	Any reduction or removal of the residential community in SA38 would dramatically impact on the business activities of New River Studios, as well as a number of other businesses in similar circumstances. We chose to launch this venture specifically because of the residential community that had existed for many years and even though we are a not-for profit company, our future success still depends on its patronage.	Noted, the Council is seeking to create additional employment opportunities in this area.
697	SA533	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	SA534	Savills on behalf of Thames Water	Water	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	<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>

				<p>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>	
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## Comments on SA39 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
422	SA535	Environment Agency	Potentially contaminated sites	National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. We note that some of the above sites highlight that a study into potential contamination should be undertaken. The design guidelines would be improved highlighting that these sites lie in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken	Noted.  <b>Action: Add a design guideline setting out that the site lies in a Source Protection Zone as we will expect such sites to consider this receptor in any studies undertaken.</b>
264	SA536	Gardens Residents' Association	Capped rents	Welcomes the retention and support of the creative industries in the area, and agree with the proposal for capped rents for artists and designers in the area.	Support is noted.
264	SA537	Gardens Residents' Association	Traffic	Suggest the introduction of live work units for historical reasons and due to the presence of other industrial units around the local area. The development would without doubt bring increased traffic to the local area. This area has 3 road closures in place, which has displaced the traffic through the Gardens, Tiverton Estate, St Ann's Road, Green Lanes and Wightman Road causing massive congestion issues and community tension over the 15 years since these closures were put in place. Haringey Council must consider these issues and how to deal with them in the long term.	As part of the planning process we would be seeking to minimise traffic generation arising from new developments by promoting travel plan measures such as car clubs, cycle parking and information on public transport services, as well as seeking to reduce car parking provision. The road closures on Hermitage Road, Eade Road and Vale Road are aimed at deterring through traffic and directing commercial traffic for the industrial areas away from residential streets onto roads more suited to carrying traffic such as Seven Sisters Road and St Ann's Road. The Council does not consider it appropriate to review these closures at the present time.
264	SA538	Gardens Residents' Association	Height	6 story development is far too high for the area and would request 4 stories being the maximum	The height requirements set out in the draft policy were drawn from the analysis of urban form contained within the UCS, and are suitable to deliver the spatial vision for the area.  Detailed design will be required on all sites to gain planning permission, and specific height limits will not be included in Site Allocations, with all developments expected to respond appropriately to their context.
697	SA539	Savills on behalf of Thames Water	Waste water	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	Noted, reference will be included in this site allocation.  <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>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	SA540	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	SA541	Savills on behalf of Thames Water	Cumulative impact	<p>We are concerned about the cumulative impact of development in this area.</p>	<p>Noted, this will be managed through the IDP.</p>
697	SA542	Savills on behalf of Thames Water	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 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.</p>	<p>Noted.</p>
697	SA543	Savills on behalf of Thames Water	Piling	<p>No impact piling shall take place until a piling method statement is submitted and approved.</p>	<p>Noted.</p> <p><b>Action: Include reference to a piling statement being needed prior to any piling taking place.</b></p>