

## Appendix 2.7 - Comments on SA40 and SA41 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

## Comments on SA40 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
616	SA544	CgMs on behalf of Parkstock Ltd	265-267 Seven Sisters Rd	Site Requirements, 1st bullet point: although not part of Parkstock Ltd's freehold we question whether the reference to 265 and 267 Seven Sisters Road is correct and whether it is really the Council's intention that these existing fast food premises are retained. We therefore question whether this reference should refer to the buildings attached to the Twelve Pins pub rather than the separate units at 265 and 267 Seven Sisters Road. If the above reference is correct we question whether the demolition of 265 and 267 Seven Sisters Road would enable the delivery a wider, more comprehensive development in the future.	There is a clear presumption that the period buildings should be retained, but the fast food frontages can be replaced in line with the town centre policies in the DMDPD.
419	SA545	Haringey Liberal Democrat Group	Building design	Planning briefs for buildings in this area need to respect the park. We would recommend that any new building includes measures such as significant 'built-in' greening of the building and private balcony spaces in residential units.	Noted, these issues will be picked up in the DMDPD design policy.
616	SA546	CgMs on behalf of Parkstock Ltd	Clarification	<p>The 'Proposed Site Allocation' text on page 110 refers to "... a new leisure facility ..." whilst the text on page 112 under 'Site Requirements' refers to an "... appropriate leisure / community facility use to replace the existing Rowan's bowling alley." Furthermore, text under 'Development Guidelines' notes that "Any future proposal to replace the existing bowling alley should show how the new development will reprovide the current leisure function."</p> <p>The above statements are all contradictory and it is important to ensure consistency between all of these statements so future requirements are clear.</p> <p>We consider policy should provide the flexibility to allow the provision of an appropriate leisure or community facility, depending on demand and commercial requirements at a future date.</p>	<p>Noted, clarity will be added that a replacement leisure facility is expected on this site.</p> <p><b>Action: Clarify that a replacement leisure facility will be expected to replace Rowans Bowling Alley.</b></p>
422	SA547	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:</p> <p><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</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>

Appendix F (11) Site Allocations consultation report

				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>	
415	SA548	Transport for London	Footway	It should be noted that any demolition or reprovision associated with this site should seek to increase the width of the footway here.	Noted, this is the principal aim of allowing development on this site.
264	SA549	Gardens Residents' Association	Height	Great concern is also expressed at the possibility of buildings up to 15 stories high, and we would oppose this. A 15 storey building will be totally disproportionate to 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.  Further evidence looking into the most appropriate locations for tall buildings in the borough will be set out to inform the next version of the Plan.
419	SA550	Haringey Liberal Democrat Group	Height	We are concerned that buildings of 15 storeys would dominate the local park and nearby low-rise Victorian buildings, and would have negative impact on the area. We are also concerned that there does not seem to be any commitment to extra community facilities such as doctor surgeries in this document for all these new people. The impact on Finsbury Park Station needs to be considered. The station already suffers from overcrowding.	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.  Further evidence looking into the most appropriate locations for tall buildings in the borough will be set out to inform the next version of the Plan.
572	SA551	Beatrice Murray, resident	Height	15 storeys is out of character for the area, and would overshadow, and loom over, both the park and the main road unacceptably.  "Building heights should respect the sensitive nature of the site adjacent to the significant area of open parkland to the north" this means no more than 4-6 storeys anywhere on the site, and no more than 3-4 along the edge. Originally the plan stated 'Design and materials will be expected to enhance the historic character of the area' and this should be retained. This also means no 15 storey building.	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.  Further evidence looking into the most appropriate locations for tall buildings in the borough will be set out to inform the next version of the Plan.
616	SA552	CgMs on behalf of Parkstock Ltd	Height	Development Guidelines, 4th / 5th / 6th bullet point: we note that these bullet points relate to possible storey heights of up to 15 storeys, with development directly facing the Park limited to 6 storeys and heights restricted to 5 storeys on Seven Sisters Road.  It is acknowledged that a transition in height across the site is an appropriate aspiration and the heritage setting needs to be carefully considered for any development options. However, it is considered that given the opportunities the site presents to deliver large scale regeneration, the opportunity for a taller development should be included within the site allocations. It is also considered that taller structures in this zone of the Park should be acceptable, reinforcing the urban edge,	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.  Further evidence looking into the most appropriate locations for tall buildings in the borough will be set out to inform the next version of the Plan.

Appendix F (11) Site Allocations consultation report

				<p>pointing towards the transport hub and still respecting the setting of the Park.</p> <p>A more ambitious scheme, providing a clear step change to the centre, pushing beyond established architecture and providing a point of marked differentiation between existing development should be reflected in the proposed storey heights.</p> <p>It is therefore considered that c. 14 – 22 storeys on the Stroud Green Road site and c. 3 – 6 storeys on the Seven Sisters Road site is achievable</p>	
264	SA553	Gardens Residents' Association	Leisure	Concerned that any development on this site would lose this important leisure facility.	The Site Allocation will require a replacement leisure facility.
419	SA554	Haringey Liberal Democrat Group	Leisure	We are concerned that the council is willing to allow such tall buildings to be constructed in Finsbury Park and allow the loss of a local institution, Rowans Bowling Alley. Many residents view Rowans as a local amenity and would mourn its loss. If Rowans does close then the any new development should include substantial leisure use to encourage people to come to the area, and provide activities for young people.	<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> <p>Further evidence looking into the most appropriate locations for tall buildings in the borough will be set out to inform the next version of the Plan.</p>
579	SA555	Laura Harrison, resident	Leisure	This facility is a huge asset to this area, and provides a much-needed venue for young people. It should be protected at all costs.	Noted, this is included in the policy.
419	SA556	Haringey Liberal Democrat Group	MOL	We are also concerned that the allocation includes Metropolitan Open Land (circa 5600 sq. m) and believe that MOL should not be included in the allocation and should not be developed.	<p>There will be no net loss of MOL, and access to the MOL, through the site will be enhanced.</p> <p><b>Action: Remove MOL from Site Plan</b></p>
616	SA557	CgMs on behalf of Parkstock Ltd	Regeneration	<p>We consider the site can play a pivotal role in the regeneration of Finsbury Park and offers a development opportunity to:</p> <ul style="list-style-type: none"> <li>☑ Provide an appropriate high density development in close proximity to a major transport hub (PTAL 6);</li> <li>☑ Create a visual connection between Finsbury Park and the transport hub whilst respecting the heritage setting of the Park;</li> <li>☑ Provide a landmark development which signposts Finsbury Park as a centre for investment;</li> <li>☑ Provide a new, high quality public realm with active ground floor uses.</li> </ul> <p>In the context of these aspirations, we are encouraged that the Parkstock sites are identified as part of a key development site and are generally supportive of the preferred options site allocation including aspirations for a mixed use, high rise development.</p>	Support is noted.
616	SA558	CgMs on behalf of Parkstock Ltd	Timeframe	We are also supportive of the timeframe delivery identified (2015 – 2020).	Support is noted.

Appendix F (11) Site Allocations consultation report

616	SA559	CgMs on behalf of Parkstock Ltd	Urban realm	Site Requirements, 6th bullet point: policy seeks an improved urban realm around the public house, with the design integrated into the improved park entrance. We would welcome some further clarification detailing what these improvements are seeking to achieve and / or what the overall aspirations of this requirement are.	Noted. The link will be between Station Place and Finsbury Park, and should be as legible as possible, as set out in the Site Allocation.  <b>Action: Add greater detail around the provision of the new link into Finsbury Park.</b>
697	SA560	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	SA561	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 SA41 of the Local Plan: Site Allocations Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
697	SA562	Savills on behalf of	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	Noted, reference will be included in this site allocation.  <b>Action: Make reference to the need to consult with Thames Water with</b>

		Thames Water		<p>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>	<b>regards waste water capacity upon preparation of a planning application.</b>
697	SA563	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>