

Appendix 2.2 - Comments on AAP1-5 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Comments on AAP1 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
408	AAP132.	Mario Petrou	Approach to comprehensive redevelopment	Offended and insulted to read that development cooperating with the Council will be rewarded with fast-tracking their planning permission. Development proposals should be radical, innovative and far exceed any building standards.	The Council's intention is to take a proactive approach to working with relevant stakeholders to ensure development delivers positive regeneration in Tottenham. The design of developments will be in line with relevant design policies.
414	AAP133.	GLA	Regeneration	The Council's stated intention to take a proactive approach to working with relevant stakeholders in order to ensure that redevelopment proposals would positively contribute towards comprehensive regeneration in Tottenham is supported in principle.	Noted
562	AAP134.	Cllr John Bevan	Compulsory Purchase	I fully support use of compulsory purchase to enable site assembly and to prevent the piecemeal development that has often taken place in the past. The use of compulsory purchase should be more greatly emphasised in this document.	Noted. The 'supporting site assembly' section of AAP1 is now a separate policy. Action: Separate supporting site assembly from AAP1
624	AAP135.	Tottenham & Wood Green Friends of the Earth	Support	We welcome <i>"D. Development proposals will be expected to maximise the use of public and private sector investment to provide a range of types and sizes of homes, create mixed and balanced communities, create economic opportunities for local residents and businesses, improve and enhance the local environment, reduce carbon emissions and adapt to climate change, in accordance with the other policies of this AAP and Haringey's Local Plan."</i>	Noted.
629	AAP136.	DP9 on behalf of undisclosed	Supports	Supports thrust of this policy, and in particular reference to potential use of CPO powers at point G.	Noted.
643	AAP137.	Giota Alevizou, local resident	Involving local residents	A new paragraph should be added to Policy AAP1 (Regeneration) to require that regeneration schemes benefit and involve existing communities, and a commitment to working in partnership with the community to plan, deliver and manage projects, with reference to the Localism Act and London Plan requirements in relation to the management of town centres.	The vision and objectives of the plan sets out the importance of consultation and involvement of the community in the delivery of the Plan. It is considered that the policy and supporting text sufficiently set out the requirements to work with the community. Action: Amend supporting text to include reference to local communities
643	AAP138.	Giota Alevizou, local resident	Against comprehensive development	Policy AAP1.E and para 4.8 propose a 'comprehensive' approach to development. We disagree that a 'comprehensive' approach necessarily discounts 'incremental' development (as para 4.8 suggests), nor that the latter is inappropriate for Tottenham. Incremental development can be comprehensive by considering a particular development in its wider context. A step by step approach is better able to include and incorporate existing residents, businesses and community uses than large scale major redevelopment schemes. An incremental approach can build on and support existing strengths and diversity, while large scale major development is more likely to wipe them out. We therefore propose that para 4.8 is re-written to clarify this.	Supporting text regarding comprehensive redevelopment sets out when it is appropriate to achieve the Plan's objectives in the public interest and to avoid piecemeal development.

644	AAP139.	Wards Corner Coalition	Involving local residents	A new paragraph should be added to Policy AAP1 (Regeneration) to require that regeneration schemes benefit and involve existing communities, and a commitment to working in partnership with the community to plan, deliver and manage projects, with reference to the Localism Act and London Plan requirements in relation to the management of town centres.	The vision and objectives of the plan sets out the importance of consultation and involvement of the community in the delivery of the Plan. It is considered that the policy and supporting text sufficiently set out the requirements to work with the community. Action: Amend supporting text to include reference to local communities
644	AAP140.	Wards Corner Coalition	Development	Policy AAP1.E and para 4.8 propose a 'comprehensive' approach to development. We disagree that a 'comprehensive' approach necessarily discounts 'incremental' development (as para 4.8 suggests), nor that the latter is inappropriate for Tottenham. Incremental development can be comprehensive by considering a particular development in its wider context. A step by step approach is better able to include and incorporate existing residents, businesses and community uses than large scale major redevelopment schemes. An incremental approach can build on and support existing strengths and diversity, while large scale major development is more likely to wipe them out. We therefore propose that para 4.8 is re-written to clarify this.	Supporting text re: comprehensive redevelopment sets out when it is appropriate to achieve the Plan's objectives in the public interest and to avoid piecemeal development.
644	AAP141.	Wards Corner Coalition	Compulsory purchase	Policy AAP1.G on the use of compulsory purchase powers to support site assembly is weak and provides little guarantee that the use of such powers would be in the public interest. Acquiring authorities need to be able to defend their use of compulsory purchase powers in the event of an enquiry and are advised to take certain issues into account when considering use of such powers (para 16 of ODPM Circular 06/2004 on Compulsory Purchase and the Crichel Down Rules). This includes whether use of the powers is in the public interest and whether the reasons for using the powers justify sufficiently interfering with the human rights of those affected (para 17). The ODPM Circular advises that 'the more comprehensive the justification which the acquiring authority can present, the stronger its case is likely to be' (para 18). No mention is made of the public interest in Policy AAP1.G. A vague mention of contributing to the delivery of the Tottenham AAP objectives does not seem to be sufficient or comprehensive. Explicit mention to 'a compelling case in the public interest' was made in the report to Haringey Council Cabinet (dated 15 July 2014) in relation to the potential future use of CPO powers in relation to Wards Corner (para 5.44, page 11). At a minimum, Policy AAP1.G should make a similar declaration.	Policy AAP1.G will be a separate policy AAP2 'Supporting Site Assembly'. AAP2.Ab sets out the requirement of developers to demonstrate CPO and comprehensive redevelopment is in the public interest. Action: Separate site assembly into its own area wide policy. Outline the requirement that compulsory purchase and redevelopment are in the public interest
659	AAP142.	Haringey Federation of Residents Associations (HFRA)	Our Tottenham Charter	PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE: - Protect Tottenham's listed buildings, conservation areas and general positive architectural characteristics, and ensure any new development is of good quality	Noted. A new policy on conservation and heritage will be added to the document. Action: Addition of a new area wide policy
669	AAP143.	HTA Design LLP on behalf of The Woodgate Group	Supports policy	It is positive that the Council will work with landowners to help deliver the changes needed in Tottenham (Emerging AAP1). Our client strongly supports our involvement in any masterplanning exercise which takes place. Our client has proactively been in discussion with the Council and adjoining landowners since June 2014.	Noted.
818	AAP144.	Our Tottenham	Regeneration	A new paragraph should be added to Policy AAP1 (Regeneration) to require that regeneration schemes benefit and involve existing	The vision and objectives of the plan sets out the importance of consultation and involvement of the community in the delivery of

				communities, and a commitment to working in partnership with the community to plan, deliver and manage projects, with reference to the Localism Act and London Plan requirements in relation to the management of town centres.	the Plan. It is considered that the policy and supporting text sufficiently set out the requirements to work with the community. Action: Amend supporting text to include reference to local communities
818	AAP145.	Our Tottenham	Community	What does 'positive' mean? Against which criteria will the positive nature of a proposal be assessed? This is vague and therefore not a sound basis for a policy. It is not clear how 'positive' will reflect the needs and aspiration of local communities.	Noted. This will be clarified in the policy. Action: For clarity add "in line with the principles of the Strategic Regeneration Framework" to the policy.
818	AAP146.	Our Tottenham	Criteria	Will this actually be explicitly required in planning applications? Can these considerations count as 'material considerations'?	Noted. This will be clarified in the policy. Action: For clarity add "in line with the principles of the Strategic Regeneration Framework" to the policy.
818	AAP147.	Our Tottenham	Development approach	Policy AAP1.E and para 4.8 proposes a 'comprehensive' approach to development. We disagree that a 'comprehensive' approach necessarily discounts 'incremental' development, nor that the latter is inappropriate for Tottenham. Incremental development can be comprehensive by considering a particular development in its wider context. A step by step approach is better able to include and incorporate existing residents, businesses and community uses than large scale major redevelopment schemes. An incremental approach can build on and support existing strengths and diversity, while large scale major development is more likely to wipe them out.	Supporting text regarding comprehensive redevelopment sets out when it is appropriate to achieve the Plan's objectives in the public interest and to avoid piecemeal development.
818	AAP148.	Our Tottenham	Community; local businesses	Many proposals in this AAP are highly controversial and opposed by the residents and businesses of the affected areas.	Noted.
818	AAP149.	Our Tottenham	Safeguarding; housing	There is uncertainty that the democratic safeguard of local authority planning application procedures will be maintained and not made 'lite' to speed up the delivery of the Housing Zone agenda.	The Council will maintain all statutory processes and be in line with relevant policies in the processing and decision making of all planning applications.
818	AAP150.	Our Tottenham	Sustainability	'sustainable development outcomes' - Vague/imprecise	Sustainable development principles are set out in the Strategic Policies, against which the objectives and outcomes in this Plan are based.
818	AAP151.	Our Tottenham	Development; scale	Policy AAP1.E and para 4.8 proposes a 'comprehensive' approach to development. We disagree that a 'comprehensive' approach necessarily discounts 'incremental' development, nor that the latter is inappropriate for Tottenham. Incremental development can be comprehensive by considering a particular development in its wider context. A step by step approach is better able to include and incorporate existing residents, businesses and community uses than large scale major redevelopment schemes. An incremental approach can build on and support existing strengths and diversity, while large scale major development is more likely to wipe them out.	Supporting text regarding comprehensive redevelopment sets out when it is appropriate to achieve the Plan's objectives in the public interest and to avoid piecemeal development.

Comments on AAP2 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
653	AAP152.	CBRE on behalf of Hermes and	Affordable housing	We recommend that the Council adds further text to make clear that the delivery of affordable housing is dependent on viability, and that	The policy refers to SP2 of the Local Plan: Strategic Policies and therefore it is not necessary to repeat it.

		Argent		schemes should include the 'maximum reasonable proportion' of affordable housing, up to 50% of the total, informed in each case by viability analysis. This is consistent with the approach set out at Policy SP2 of the Local Plan Strategic Policies.	
818	AAP153.	Our Tottenham	Affordable housing	See comments about that in our responses to these 2 documents.	Noted.
818	AAP154.	Our Tottenham	Affordable housing	Affordable rented accommodation is NOT socially rented accommodation. Does this mean that NO socially rented accommodation at all is to be foreseen in the Tottenham AAP? We strongly contest that and demand the inclusion of a clear target to optimise the % of desperately needed NEW socially rented housing in all new developments.	The Council is setting out a policy to maximise affordable housing in new developments, but this is constrained by viability and the grants available to provide different types of affordable housing.
818	AAP155.	Our Tottenham	Affordable housing	'Affordable' should mean genuinely affordable – and this % should be optimised to the maximum. Within any 'affordable' target a clear figure for SOCIALLY RENTED housing needs to be included.	The Council is setting out a policy to maximise affordable housing in new developments, but this is constrained by viability and the grants available to provide different types of affordable housing.
414	AAP156.	GLA	Housing	The target to deliver 10,000 new homes across the AAP area over the plan period represents 67% of Haringey's London Plan housing target up to 2025. This level of provision reflects Tottenham's status as one of the Mayor's Housing Zones, and is supported in line with London Plan Policy 3.3 and in broad accordance with the objectives of the Upper Lee Valley Opportunity Area Planning Framework (OAPF).	Noted.
414	AAP157.	GLA	Housing	It is noted that whilst the Council's proposed alterations to strategic policies seek to revise Haringey's affordable housing target from 50% to 40% for the majority of the borough (in response to up to date market data), it is proposed to retain a 50% target for the Tottenham AAP area. Mindful of the Housing Zone package for Tottenham, and the proposed locally specific variation to Haringey's strategic residential tenure split target (discussed in comment 5 below), GLA officers support the higher affordable housing target for Tottenham.	The policy has been amended to ensure Tottenham Hale is in line with the rest of the borough in its affordable housing targets. Action: Amend policy to align Tottenham Hale with the rest of the borough
414	AAP158.	GLA	Housing	The Council proposes a strategic tenure split target for Tottenham of 40% affordable rent and 60% intermediate. This represents a notable localised departure from the pan-London tenure split within London Plan Policy 3.11. The Council's reasoned justification makes clear that this is intended to rebalance existing high levels of social rented accommodation in Tottenham (which currently accommodates more than 60% of Haringey's total social rented stock). London Plan Policy 3.9 makes clear that a more balanced mix of tenures should be sought in all parts of London, particularly in neighbourhoods where social renting predominates. Accordingly, having regard to the existing balance of residential tenures in Tottenham, GLA officers are satisfied that the tenure split within draft Policy AAP2 is in general conformity with the London Plan. It is also acknowledged that, in practice, discussions around the balance of tenure at any given site will be negotiated and considered on a case by case basis.	Agreed.
414	AAP159.	GLA	Housing	The principle of promoting higher density housing redevelopment (including the introduction of private and intermediate tenures) to assist with financially enabling estate renewal is strongly supported. Related to this matter it is noted that the Council's proposed alterations to strategic policies introduce the principle of re-provision of housing on a habitable room (rather than unit) basis. This approach is in broad accordance with	Support is noted.

				London Plan Policy 3.14 (which effectively seeks to allow a degree of flexibility with respect to the assessment of re-provision, in order to facilitate the delivery of units which meet current needs). The Council is, nevertheless, invited to consider whether a specific reference to the approach to re-provision in Tottenham (either in the policy or supporting text) may assist with the reading and implementation of this policy in practice.	
818	AAP160.	Our Tottenham	Housing	See overall comment about the scale of housing growth.	Noted.
669	AAP161.	HTA Design LLP on behalf of The Woodgate Group	Housing Zone	Policy AAP2 Part (B) (a) expects allocated sites within the Tottenham Hale AAP Neighbourhood area (the Housing Zone) to deliver 50% market housing and 50% affordable housing. The Woodgate Group would like to see the viability of delivering a 50% affordable housing target tested on sites within the Housing Zone that are brought forward by landowners without public subsidy . The Site Allocation Viability Assessment by GVA (February 2015) notes the following with regard to sites outside of the Housing Zone, and at this stage it is questionable that the situation would be different within the Housing Zone	The policy has been amended to ensure Tottenham Hale is in line with the rest of the borough in its affordable housing targets. Action: Amend policy to align Tottenham Hale with the rest of the borough.
644	AAP162.	Wards Corner Coalition	Marketing new homes overseas	Attracting wealthier people to live in the area should not require the removal of existing residents. For example, homes built by Bellway in Lawrence Rd, do not appear to be marketed to residents of Tottenham. They are currently being advertised in China. Therefore it is unclear how this new housing, if it is expensive is going to do anything to alleviate the local housing problem.	Marketing of housing is beyond the remit of planning and this Plan.
628	AAP163.	DP9 on behalf of Tottenham Hotspur Football Club	Minimum housing targets	Request Part A of this policy is amended to state a minimum of 10,000 new homes	This figure is based on up to date evidence and it is not deemed necessary to set it as a minimum target.
629	AAP164.	DP9 on behalf of undisclosed	Minimum housing targets	Request Part A of this policy is amended to state a minimum of 10,000 new homes	This figure is based on up to date evidence and it is not deemed necessary to set it as a minimum target.
644	AAP165.	Wards Corner Coalition	Object to overall target	Delivering 10,000 homes in Tottenham (para 4.9) is not realistic and will place incredible stress on the community, especially given the existing lack of social, community and public facilities and services.	This figure is based on up to date evidence and the impact of this growth is considered by the Local Plan through planning for supporting infrastructure and services.
644	AAP166.	Wards Corner Coalition	Rebalancing housing stock	Rebalancing the high levels of social housing in Tottenham (para 4.10) is a euphemism for social cleansing and highly offensive. Council and social housing should not be removed from Tottenham at a time of housing crisis and yet at the moment, the policy approach will mean that this happens. We do not consider that this policy approach has the support of residents and has not come up in public consultations.	The Council is setting out a policy to maximise affordable housing in new developments, but this is constrained by viability and the grants available to provide different types of affordable housing.
644	AAP167.	Wards Corner Coalition	Social housing	Policy AAP2 and supporting text does not address the need to alleviate the severe shortage of social housing, nor ensuring that council tenants are not displaced from council estates in Tottenham. Compulsory purchase is moving former council tenants out of London. There are many cases of this happening all over London (Elephant and Castle, Woodberry Down Estate, Carpenters Estate). There is nothing in any of Haringey's policy to ensure that this does not happen here. Infact the policy approach rather poses a threat to the security of existing Council tenants, with no assurance that they	The Council is setting out a policy to maximise affordable housing in new developments, but this is constrained by viability and the grants available to provide different types of affordable housing.

				will be able to return. A hugely flawed consultation on the Love Lane estate makes one doubt that this estate will be for the existing tenants after it is rebuilt. Private tenants are also under threat of eviction through major development schemes e.g. at Suffield Road. If there is no mention of social housing then rent rises will price existing tenants out of Haringey.	
799	AAP168.	Bob Lindsay-Smith	Social housing	This can be compared with 24% over the borough as a whole. Having less social housing in the East implies a reversal of the current East-West poverty/prosperity trend. No-one has been asked whether that is desirable, or if so, achievable.	London Plan policy 3.9 makes clear that a more balanced mix of tenures should be sought in all parts of London, particularly in neighbourhoods where social renting predominates. Accordingly, having regard to the existing balance of residential tenures in Tottenham, the tenure split within draft the draft policy is in general conformity with the London Plan. It is also acknowledged that, in practice, discussions around the balance of tenure at any given site will be negotiated and considered on a case by case basis.
818	AAP169.	Our Tottenham	Social housing	What is the evidence for this claim? The expert evidence is that the opposite is generally the case.	London Plan policy 3.9 makes clear that a more balanced mix of tenures should be sought in all parts of London, particularly in neighbourhoods where social renting predominates. Accordingly, having regard to the existing balance of residential tenures in Tottenham, the tenure split within the draft policy is in general conformity with the London Plan. It is also acknowledged that, in practice, discussions around the balance of tenure at any given site will be negotiated and considered on a case by case basis.
799	AAP170.	Bob Lindsay-Smith	Social housing; affordability	What does 'better mix of social housing' in Section 3.15 mean? If it means that the total number of social housing units would be reduced, that is a kick in the teeth for people who have been waiting for a place for years. Intermediate housing is promised, but NO social housing is mentioned in Policy AAP2 Housing, paragraph B subsection b. Maybe it contains a misprint: It says 'the affordable tenure split (DM17 A(c)) which in the case of development in the Tottenham AAP area will result in an overall tenure mix of 60% intermediate accommodation and 40% affordable rented accommodation.' Perhaps it should read '... development in the Tottenham AAP area will result in an overall tenure mix of 60% intermediate accommodation and 40% social rented accommodation.' That would make social housing 40% of 50% of the total - ie 20% of all housing.	London Plan policy 3.9 makes clear that a more balanced mix of tenures should be sought in all parts of London, particularly in neighbourhoods where social renting predominates. Accordingly, having regard to the existing balance of residential tenures in Tottenham, the tenure split within the draft policy is in general conformity with the London Plan. It is also acknowledged that, in practice, discussions around the balance of tenure at any given site will be negotiated and considered on a case by case basis.
628	AAP171.	DP9 on behalf of Tottenham Hotspur Football Club	Support	Supports higher densities in town centre locations and areas with good facilities and amenities.	Noted.
629	AAP172.	DP9 on behalf of undisclosed	Support	Supports higher densities in town centre locations and areas with good facilities and amenities.	Noted.
644	AAP173.	Wards Corner Coalition	Tall buildings	AAP2 should provide a policy framework for where tall buildings will be acceptable in Tottenham and the supporting text should provide the evidence base for this. There is currently no policy on this and yet it is likely that Tottenham will be the main location for tall buildings in Haringey – as the draft Development Management DPD says (para 2.28). The Development Management DPD cross refers to the Tottenham AAP (par 2.29) but no policy is provided here. This is a significant omission because more locations are being earmarked for tall buildings in the Tottenham AAP than are identified in the local plan (Haringey Heartlands/Wood Green and Tottenham Hale). Para 2.29 of the Development Management DPD confirms	A new policy addressing design and tall buildings has been included in the Plan. Action: Addition of a policy on tall buildings

				that tall buildings were found to be 'inappropriate to Haringey's predominately 2-6 storey prevailing heights and character' in all other locations. Without a policy or an evidence base set out in the AAP for other locations having been identified as suitable for tall buildings, the local plan is unsound on this matter.	
644	AAP174.	Wards Corner Coalition	Temporary accommodation	The AAP does not address the problem of high numbers of people in temporary accommodation	This is a borough wide issue and addressed in the Strategic Policies.
818	AAP175.	Our Tottenham	Tenure; social housing	This policy is discriminatory if only applied to social housing residents. Where are the clauses elsewhere in the document which similarly call for optimising social housing % in all proposed developments in areas where market housing is in the majority? It also must not lead to any net loss of social housing units.	The Council is setting out a policy to maximise affordable housing in new developments, but this is constrained by viability and the grants available to provide different types of affordable housing.
669	AAP176.	HTA Design LLP on behalf of The Woodgate Group	Town Centre densities on affordable %	Part (C) of Policy AAP2 on Housing should emphasise the link between high density, housing led redevelopment and the vitality of town centres . At present it states that higher densities and capacities 'may' be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities in areas well served by public transport. In the accompanying Interim Sustainability Appraisal by URS (February 2015) , high density housing performs well against all sustainability objectives, providing supporting infrastructure for health and community can be provided in the borough. The detailed Sustainability Appraisal of the Development Management DPD (Appendix II, 2015) states that land is restricted in Haringey and allowing higher density in some circumstances will help increase the amount of housing provision in the area. It should be recognised that a significant quantum of development would be required in order to support and fund public realm improvements which would be essential to the vitality of a new district centre, and not publicly funded in all instances. The Development Guidelines within the AAP in relation to Site B, for example, suggests that: "...each development will be expected to contribute to a comprehensive public realm strategy through the use of pooled S106 contributions". It is not made clear, however, which specific portions of public realm is expected to be funded in each instance. Simultaneously, these contributions could also affect the amount of affordable housing that would be deliverable	Noted.
818	AAP177.	Our Tottenham	Viability; density; mix tenure	See comment in the overall response to the AAP.	Noted.

Comments on AAP3 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
625	AAP178.	Stride Treglown on behalf of Micuber Estates and Berkely Square	Ashley Rd	In THDCF, the Ashley Road area is firmly placed as the heart of the District Centre; an approach we fully support and believe is critical to realising the full potential for Tottenham Hale.	Support is noted.

		Developments			
625	AAP179.	Stride Treglown on behalf of Micuber Estates and Berkely Square Developments	Ashley Rd North/South	We do not concur with the AAP's reclassification of the Ashley Road into Ashley Road North and Ashley Road South, such an approach is detrimental to the aspirations of the Housing Zone and Council objectives to create a place with a single identity, and moves away from the principles established in the District Centre Framework	Noted: It is noted that the District Centre at the present time is expected to only extend to the Green Link, with the area north of the Green Link being a Regeneration Area. The Green Link would act as a boundary between the two sites.
653	AAP180.	CBRE on behalf of Hermes and Argent	Clarity	Add further text to make clear that applications which are consistent with the district centre designation will be approved We suggest: <i>The Council will support planning applications for <u>appropriate</u> development within the Tottenham Hale District Centre as indicated in Map 4.1 (<u>that is, development consistent with the district centre designation</u>) to promote the positive regeneration of Tottenham Hale.</i>	The policy will set the parameters for development in the area, but further detail will be set out in the District Centre Framework. The framework will be used as an implementation tool to deliver the strategic objectives of the Local Plan.
653	AAP181.	CBRE on behalf of Hermes and Argent	Core District Centre	Retain proposed district centre boundary but add a new 'core district centre'	"Core district centre" is not a planning designation in the Local Plan.
634	AAP182.	Alan Stanton, local resident	District Centre	There are serious concerns about Tottenham Hale being designated a district centre. The proposals for development do not mention the impact of a night time economy which can be detrimental to a community's quality of life and this is largely a residential area. This is a serious omission and needs to be rectified and spelt out so local people can make an informed judgement.	The policy will set the parameters for development in the area, but further detail will be set out in the District Centre Framework. The framework will be used as an implementation tool to deliver the strategic objectives of the Local Plan.
625	AAP183.	Stride Treglown on behalf of Micuber Estates and Berkely Square Developments	District Centre focus on Green Link	A more northern, than southern orientation for key town centre uses would reflect the geographical disposition of the area, and the relationship with the key public realm improvements (namely the Green Link) and the public amenity space (Down Lane Park and the Lea Valley water park).	The Council believes strongly that the district centre should be centred on Tottenham Hale station.
625	AAP184.	Stride Treglown on behalf of Micuber Estates and Berkely Square Developments	District Centre vision	We therefore believe that Station Square West as a destination/arrival point should form the central hub of the District Centre, with Ashley Road increasing its commercial profile by assisting more promptly in bringing forward District Centre uses alongside the ability of TH5 to re-provide larger scale town centre / retail uses in the future when such a development can be delivered.	Noted, it is expected that the station square area will be the centre of the new District Centre and Ashley Rd will also have an important role to play.
623	AAP185.	Cllr Felicia Opoku, and separate identical response as local resident	District Centres	There are multiple District Centres proposed in the document however no thought has been given to the existing businesses along Tottenham High Road between Tottenham Green/Tottenham Hale and Northumberland Park. This could prove detrimental to these businesses and result in an increase to unemployment.	The policy will set the parameters for development in the area, but further detail will be set out in the District Centre Framework. The framework will be used as an implementation tool to deliver the strategic objectives of the Local Plan.

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625	AAP186.	Stride Treglown on behalf of Micuber Estates and Berkely Square Developments	District-wide approach	With the Housing Zone status now applied to Tottenham Hale and the rapidity required to ensure complimentary services such as retail, healthcare and community uses are provided alongside these new homes, we believe that the Ashley Road area, alongside Station Square West (TH1) and the retail park TH5 should be jointly considered to provide these complementary services and therefore encourage a broader mix of use and movement through the District Centre	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.
421	AAP187.	Historic England	Heritage	The Council's Urban Characterization Study 2015 identifies potential local heritage assets which should be formerly identified. The Council should seek to identify opportunities to better reveal their significance and their contribution to local character and distinctiveness. In addition we would recommend that new developments should ensure that they avoid a wall of development blocking views into the Lee Valley and seek opportunities to expand visual permeability and access to one of Tottenham's great assets, the Lee Valley Park.	Noted.
654	AAP188.	Latin Elephant on behalf of Pueblito Paisa Ltd	Impact assessment	The proposed town centre appears as isolated and fragmented from its current context. We feel the proposal of a new town centre at Tottenham Hale merits an impact assessment of existing town centres so that threats and opportunities for small migrant and ethnic businesses could be identified.	The District Centre is allocated in both the London Plan and in the Council's adopted Strategic Policies DPD. These documents have already made the case for this allocation. It is noted that the types of business, including taking into account the local town centre offer at Seven Sisters/West Green Rd, and Tottenham High Rd/Bruce Grove can be expanded in the District Centre Framework, but the overarching policy framework will be set out in the AAP.
653	AAP189.	CBRE on behalf of Hermes and Argent	Jobs targets	Make clear that references to numbers of jobs are simply overall targets	The floorspace and jobs estimates will expect to be delivered.
818	AAP190.	Our Tottenham	Local businesses	Many proposals (see detailed comments below for individual sites) threaten the survival of existing businesses and residents.	It is not considered that industrial uses are being put at risk by this particular policy. Additionally, lower density B2/B8 uses are not suitable for areas highly accessible by public transport. Where there are existing lower density businesses on potential development sites, the Council will strive to relocate them on more suitable industrial locations within the borough.
624	AAP191.	Tottenham & Wood Green Friends of the Earth	Support	We welcome <i>"B. Development proposals should provide: a. A substantially improved public realm that unifies the streets and spaces around the gyratory, improves access to the station and prioritises pedestrian and cyclist circulation and safety;"</i>	Support is noted.
669	AAP192.	HTA Design LLP on behalf of The Woodgate Group	Support	The Woodgate Groups supports the Council's ambition to create new urban form within the Tottenham Hale District Centre, supporting navigation, permeability and legibility of streets (Policy AAP3). Urban form and massing of Tottenham Hale centre needs to be considered. In particular, how schemes coming forward will impact on a new skyline for the area. The impact of taller buildings on a three dimensional scale needs to be considered from close and far	Support is noted.
414	AAP193.	GLA	District centre	The proposed policy approach at Tottenham Hale is supported, and accords with the principles of the Upper Lee Valley Opportunity Area Planning Framework in terms of promoting the creation of a new	Support is noted.

				mixed use district town centre.	
815	AAP194.	Zena Brabazon	District centre	Concerns about developing a new district centre have also been set out above. I re-iterate that the document is silent on the matter of the night time economy which is a glaring and unacceptable omission.	Noted, the development of an evening/ night time economy is essential for any District Centre.

Comments on AAP4 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
632	AAP195.	The Friends of Down Lane Park	Alternative link	There is no case made for the need for a new green road link from the Tottenham High Road to the Tottenham Hale station. There is already a good route along Monument Way and along Hale Road. This is a route with a wide cycle lane on the pavement along Hale Road, and a set-back path along Monument Way. Both are safe and the Monument Way stretch is picturesque. In addition, the proposed green road link takes no account that people from the residential areas close the Tottenham High Road actually pass through Down Lane Park to use Ashley Road to get to the station. That is the desired walking and cycling route of importance from the residential streets through Down Lane Park to the transport station.	The existing link along Monument Way is not considered to be of a high quality. It is considered that it can be improved by adding passive surveillance to the road itself. A new link will offer an improved dedicated pedestrian and cycle route to Tottenham Hale from the High Rd.
632	AAP196.	The Friends of Down Lane Park	Alternative route	The impetus for linking green areas and building bridges would be better applied to improving access points at the northern edge of Down Lane Park for people to get to the Tottenham Marshes and the Lea Valley. In addition, there should be improvement of the walking bridge further north linking the 'avenues area of N17 via a walking bridge over the tube lines and Watermead Way to the Tottenham Marshes. This would further open the Lea Valley to people from that residential area	Noted; the options to proliferate the number of access routes into Lee Valley Regional Park will be considered.
648	AAP197.	Jennifer Williams, local resident	Bridge	If there are going to be bridges across the Lea, are there also plans to improve and clean up the access from Down Lane Park to the Marshes under Meridian Way / the railway (now next door to a school). Can there be a footbridge from the south end of Cavendish Marsh across Pymm's brook to th Lea Tow path, thus improving choices for walking and cycling routes? (suspect this is a q. for LVPA)	The Green Link will not be the only route around the area linking green spaces, but the Green Link also has an important place making function in the new District Centre (marking its northern boundary), and linking the High Rd with Lee Valley Regional Park.
634	AAP198.	Alan Stanton, local resident	Children's play area	This proposal includes a 'green link' from Hale Village to the Tottenham High Road. This cuts directly across Down Lane Park and specifically across the children's play area. We object to this since the play area is sited near to the families living on Chesnuts Estate, Warren Court and the flats around Monument Way. No account is taken of their needs or wants or of this loss of amenity. At the same time the development guidelines say the 'interface with Down Lane Park should be treated with care'. The development of the green link would not do so.	The Green Link connects Tottenham High Rd with Lee Valley, via Down Lane Park. Work is ongoing to reconcile how the green link can positively benefit Down Lane Park.
818	AAP199.	Our Tottenham	Children's play area	See comment made about TH2: This plan proposes a green link which cuts directly across Down Lane Park, and specifically through the children's play area. We object to this proposal. Down Lane Park	The Green Link connects Tottenham High Rd with the Lee Valley, via Down Lane Park. Work is ongoing to reconcile how the green link can positively benefit Down Lane Park.

				is one of the very few amenities for people living in Tottenham Hale's residential roads and estates. This is treasured and valued, and its development has been fought for by the local community and we now have a thriving green flag park with new tennis courts, a recently installed outdoor gym and children's playground, and other facilities.	
818	AAP200.	Our Tottenham	Cost	The proposed green link is very expensive and could be seen as an unnecessary project since there are many ways people living in Hale Village and Ferry Lane can reach Tottenham High Road should they wish to do so. There are existing and used routes to Lea Valley and Marshes from the residential area north of Down Lane Park.	The Green Link will not be the only route around the area connecting green spaces. The Green Link has an important place making function in the new District Centre (marking its northern boundary), and connecting the High Rd with Lee Valley Regional Park.
632	AAP201.	The Friends of Down Lane Park	Down Lane Park	The green road link will damage Down Lane Park with a thoughtless planned straight link throughway. It pushes through the new fence secured by the Friends through negotiation with Transport for London, at a point where there is play equipment and a natural play area plus some trees. The route will cut through the large grassed mound that is a distinctive feature of the park and a popular play feature for younger children.	The Green link connects Tottenham High Rd with the Lee Valley, via Down Lane Park. Work is ongoing to reconcile how the green link can positively benefit Down Lane Park.
632	AAP202.	The Friends of Down Lane Park	Down Lane Park	The first thing to mention is that the Tottenham Area Action Plan section on the green road link doesn't actually refer to it passing through Down Lane Park. The park is the significant bit of green land along the way and it is bizarre that it is not mentioned. That creates the suspicion that the proposals avoid any reference the route going through the park because Haringey Council is seeking to avoid any public discussion of the damaging impact of the route going through the park.	The Green Link connects Tottenham High Rd with the Lee Valley, via Down Lane Park. Work is ongoing to reconcile how the green link can positively benefit Down Lane Park.
634	AAP203.	Alan Stanton	Down Lane Park	The Green Link referred to in this introduction does not mention its proposed route through Down Lane Park. The Park is a vital local amenity fought for by local people when there were previous proposals to build houses on it. This was opposed by the community, who then worked to secure funding for the new children's playground. This is a lifeline for families living locally, especially those in temporary housing or in flats. The green link will cut through this and it is entirely unacceptable to us that this should go ahead at vast public cost, and at great social cost to the community living in the areas to the north west of Tottenham Hale Station	The Green link connects Tottenham High Rd with the Lee Valley, via Down Lane Park. Work is ongoing to reconcile how the green link can positively benefit Down Lane Park.
669	AAP204.	HTA Design LLP on behalf of The Woodgate Group	Ferry Lane	Haringey should also consider the east-west connection along Ferry Lane and how the new District Centre as a vibrant heart of activity will be viewed from the park as a destination.	Ferry Lane is an important asset for the District Centre. Details about how it will function as part of the new District Centre will be explored in the DCF.
625	AAP205.	Stride Treglown on behalf of Micuber Estates and Berkely Square Developments	Further detail	The Green Link as a principle is supported by Micuber Estates and Berkeley Square Developments, however, further information is required to ensure it delivers the promised connectivity. Notwithstanding this, the potential to connect the residential areas on Ashley Roads to both the Tottenham High Road and Lea Valley Water Park will be a significant contributor to the sense of place and overall identity of Tottenham Hale when considered against other destinations in London.	Support is noted.
414	AAP206.	GLA	Green Infrastructure	The principle of the proposed east-west 'green link' – envisaged to comprise a high quality landscaped connection between Tottenham High Road and the Lee Valley Regional Park (via Tottenham Hale District Centre) is strongly supported.	Support is noted.

422	AAP207.	Environment Agency	Green infrastructure	Green infrastructure should be a key aim of the AAP because a network of green spaces, green roofs and river corridors can not only provide flood storage and provide habitat for wildlife, but also increase resilience to future climate change and recreational spaces for people. Paragraphs 114 and 117 of the NPPF advocate this approach and the link with climate change adaptation is highlighted in paragraph 004 (Climate Change) in the National Planning Practice Guidance.	Noted.
579	AAP208.	Laura Harrison, resident	Access	Providing better access to high quality green spaces should be a priority for regeneration. There are many small green areas, such as along Tottenham High road, and along Monument way, where better design and management of existing strips of public 'green' space could significantly include the quality and character of the area. Providing better connections to the significant asset of the Lea Valley could also beneficially improve quality of life for residents. The proposed green route from Tottenham Police station and through Down Lanes park is a good suggestion.	Support is noted. The establishment of a network of green spaces in Tottenham, and Haringey, is also noted, and further work will explore how these can be created.
648	AAP209.	Jennifer Williams, local resident	Traffic	What will this look like? Will buildings along Chesnut Way need to be demolished? Will traffic on Park view Road go across it? If so this is already a busy residential road, with queues during the rush hour and after football matches, any more traffic lights could make the queues worse.	Noted, the green link will not be a new road, and will be designed to have a minimal impact on traffic in the area.
624	AAP210.	Tottenham & Wood Green Friends of the Earth	Habitat	This should be green as in providing SUDS and linear habitat (esp if green open space is lost to development long Monument Way) not just green as in walking and cycling	Noted, policy will be amended to reflect this. Action: Amend policy to include SuDS and habitats.
422	AAP211.	Environment Agency	Meaning	We welcome a policy in the plan to encourage the retention of existing and promotion of new green infrastructure in the borough. However it is not clear as to the aim of the green link identified in this policy or specifically what is meant by "green". We agree with the statements within the Sustainability Appraisal which highlights uncertainty as to what the potential impacts of the link are and its value in terms of biodiversity (paragraph 17.12.9.).	The principal aim of the green link is to connect open spaces, increasing utility by increasing local people's ability to access them. It is noted that the potential sustainability impact on biodiversity could be more complex therefore this will be assessed through the Sustainability Appraisal of the Plan.
632	AAP212.	The Friends of Down Lane Park	Misleading objectives	The green road link is not about linking Tottenham to the Lea Valley. Rather, it is about claiming that the developers' zone that is Hale Village has connectivity to a number of places for base marketing reasons. So, the future advertising puff for the new flats will have great illustrations of what 'vibrant' retail and entertainment areas you can reach if you choose to leave your flat using the link. The green road link idea has been dismissed in the past by the community as irrelevant to the needs of local people. It is wrong to remove existing successful businesses such as Murphy Ltd on Ashley Road from the area to enable the green road link to pass through. For a designers folly the area will lose jobs and employment land. If the existing businesses on Ashley Road are not immediately going then the green link road is going nowhere for a number of years. The dangers of starting it in stretches is that the project might be dropped and then the community is left with an unfinished and useless green road adding problems to the area.	Disagree; the Green Link is about connecting the High Rd with the Lee Valley. It also has an important place shaping function, as noted in the response. The Council is putting forward a Local Plan that seeks to locate higher density mixed use development in the most accessible locations in the borough. This is required in order to meet the spatial objectives of the Plan in terms of job creation, and to be in conformity with the London Plan. Higher density uses such as managed workspace, offices, and potentially some light industry will be sought in these areas. While it is noted that lower density employment (ie industrial) uses are important to economic growth, it is no longer suitable that they are located in highly accessible regeneration areas. The Council is hopeful that affected industrial enterprises will remain in the borough, and is willing to work with businesses to achieve this.
632	AAP213.	The Friends of Down Lane Park	Park assets	The route also involves re-positioning or removing altogether the new play and other facilities positioned there in the past few years. The route is bizarre given that there is an existing gateway, recently	The Green Link connects Tottenham High Rd with the Lee Valley, via Down Lane Park. Work is ongoing to reconcile how the green link can positively benefit Down Lane Park.

				restored, where people can access the playground area of the park. It is stupid to introduce a new gate a very short distance from a well-established gate, where those entering and leaving the park can be observed by those in the playgrounds	
632	AAP214.	The Friends of Down Lane Park	Park loss	The route will also result in the loss of actual park land and effectively isolate the southern edge of the park along Hale Road. The intention in isolating that part of the land might be to come back at a later date with plans to build flats there because of alleged under-use.	The Green Link connects Tottenham High Rd with the Lee Valley, via Down Lane Park. Work is ongoing to reconcile how the green link can positively benefit Down Lane Park. Additionally there is a principle against loss of open space in draft policy DM26.
632	AAP215.	The Friends of Down Lane Park	Security	The green road link will result in security problems both for parks users and the managers of the park. At present the southern section of the park is fenced off, with access being through a gate on Park View Road and then through internal fencing to the children's playground. It is this enclosed aspect that means toddlers and young children can roam safely. They can't get out onto the road and the public can't simply wander in unseen. A new route through here ends that safety feature as well as creating management of the park issues	The Green Link connects Tottenham High Rd with the Lee Valley, via Down Lane Park. Work is ongoing to reconcile how the green link can positively benefit Down Lane Park.
657	AAP216.	Canal & River Trust	Support	The Trust supports the provision of the axial Green Link, which will provide an east-west connection to the Lee Valley Regional Park and the River Lee. We think that there should be greater recognition of the existing Blue Ribbon Network, which provides an important north-south route that continues to central London. As part of the regeneration of Tottenham there should be improved signage and connections to the River Lee towpath.	Support is noted. The importance of the blue ribbon network to the borough is outlined in Local Plan: Strategic Policies. The vision for Tottenham Hale will also outline the importance of the Lee Valley's waterways for the area. Action: Addition of a vision for Tottenham Hale which sets out importance of waterways to the area.
669	AAP217.	HTA Design LLP on behalf of The Woodgate Group	Support	The Woodgate Group is of the view that there is a significant opportunity to increase connections to the Lee Valley Regional Park and the wider green grid of Haringey (AAP4). The new east-west link along the axis of Chesnut Road will improve access	Support is noted.
422	AAP218.	Environment Agency	Thames River Basin Management Plan	Given that the proposed link is proposed to cross at least two main waterbodies and link to the sites adjacent to the Walthamstow Wetlands (designated RAMSAR and SSSI) it is disappointing that the Thames River Basin Management Plan has not been utilised to support this policy. There should also be greater recognition within this policy of biodiversity and in particular the Blue Ribbon Network Policies of the London Plan which is supported by paragraph 17.12.2 of the Sustainability Appraisal).	The policy has been amended and includes reference to nature conservation. Where relevant, the Blue Ribbon Network is highlighted as a planning designation in specific site allocations. Action: Highlight blue ribbon network in site allocations
634	AAP219.	Alan Stanton, local resident	Unnecessary project	The proposed green link is a very expensive and unnecessary project since there are many ways people living in Hale Village and Ferry Lane can reach Tottenham High Road should they wish to do so. The millions proposed for this could be better spent on social housing or local environmental improvements.	It is argued that this project is a local environmental improvement by virtue of improving access to local open space assets.
669	AAP220.	HTA Design LLP on behalf of The Woodgate Group	Wetlands	The Upper Lee Valley Opportunity Area Planning Framework (2013) highlights a number of links which need to be considered and reviewed as alternatives or secondary green links routes for the District Centre, linking to Waltham Forest Council's ambition for the restoration of the wetlands. The main entrance to the Wetlands will be from Forest Road south leading to the Marine Engine House Visitor Centre. The AAP green link should connect to the Walthamstow Wetland Project. This is absent from the AAP (2015) and DCF (2014). This is a missed opportunity to extend the green	It is noted that the Green Link will not be the only route around the area connecting green spaces, but it has an important place making function in the new District Centre (marking its northern boundary), and linking the High Rd with the Lee Valley Regional Park, including the Wetlands Centre.

				grid particularly as the DCF (2014) highlights Forest Road bridge may need to be widened as result of Cross rail (Page 34, DCF, 2014). The works at the Ferry Lane Bridge could provide an ideal opportunity to create a primary green link to the Lee Valley Regional Park from Station Square West and Tottenham Hale.	
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Comments on AAP5 of the Tottenham Area Action Plan Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
414	AAP221	GLA	Designated Employment Areas	The Council proposes revisions to a number of areas of employment land in Tottenham. The revisions strengthen protection at Constable Road (proposed to be recognised as 'Local Employment Area: Regeneration Area') and Willoughby Lane (proposed to be promoted to 'Locally Significant Industrial Site' status); maintain the existing level of protection at High Road East; provide greater flexibility for employment led mixed use regeneration at High Road West and (part of) South Tottenham; and, de-designate two local employment sites (southern part of Tottenham Hale 'Regeneration Area' and 784 to 788 High Road) so that these may contribute towards urban renewal at Tottenham Hale and Tottenham High Road respectively. The 2015 Haringey Employment Land Review acknowledges the intention to nurture and protect a diverse local employment base in Tottenham for the long-term, as well as strategic objectives for the promotion of regeneration through revisions to the designation of selected employment sites - where these are well placed to contribute towards urban renewal in accordance with the London Plan and Upper Lee Valley OAPF. These principles feed through accordingly into the strategic approach of the draft Tottenham AAP. Having regard to the conclusions of the employment land review, and the proposed allocations within the draft AAP, the proposed approach to managing employment land within the Tottenham AAP area is supported in principle. Nevertheless, in line with overarching comments made in respect to the Council's alterations to the Strategic Policies DPD, GLA officers would welcome further discussion on how, at a borough-wide level, the proposals for employment land management relate to the strategic benchmarks for industrial land release within the Mayor's Land for Industry and Transport SPG.	Support is noted. Engagement with GLA will be ongoing.
415	AAP222	Transport for London	Clarification	Please note that the Department for Transport, not TfL, have issued the safeguarding directions. These have been provided separately to Haringey Council.	Noted, however the guidance note has been removed. Action: Delete guidance note on cross rail 2.
428	AAP223	Mr Green (CgMs)	Local Employment Area	Supports the re-designation of RA14b (Fountayne Road and Markfield Road) to a Local Employment Area: Regeneration Area. This more accurately reflects and acknowledges the site is no longer locally significant comprising entirely commercial uses, but more accurately recognises the mix of uses present at the site and the poor quality of the site for traditional employment provision. The re-designation of the site from a LSIS to LEA Regeneration Area, will allow for a mixture of uses on the site including retaining the existing warehouse community, employment provision and the provision of private rented sector residential use.	Support is noted.

661	AAP224	Tottenham Business Group	Evidence	The description of the economy (2.14/2.15/2.16) demonstrates a shocking misunderstanding of the existing Tottenham Economy. There is no reference to an evidence base. Where is the evidence base and when was it carried out? Why is it not included in the evidence base consultation documents? AAP 5 deals with changes to designated employment areas. All designated employment should be listed. The high density of housing will restrict employment space. There is no provision of industrial use contrary to the recommendations in the evidence base (7.19 Employment Land Study) These proposals (2.19 /2.20) on employment were particularly stressed and a key focus during public consultations. However they are not followed through into any policies (example DM 57) Strategic Objective 2 shows no commitment to celebrating existing local strengths. Intensification of employment workspace makes the recommended protection of existing B2/B8 uses (particularly in High Road West) untenable. No consideration has been given to small businesses. Existing small businesses do not have a role. This conflicts with recommendations in the evidence base (Retail and Town Centres study): “Local shopping Centres will continue to be supported in providing core local shopping facilities and services. for their prospective local communities” Current proposals for High Road West will constrict rather than strengthen the High Road. Retail offer will be limited to a visitor economy rather than a residential community. Core local shopping for the existing community (particularly specialist ethnic) will be virtually eliminated	Concerns are noted. The policy has been amended to demonstrate a clear direction for employment and business growth. Action: Amend policy in line with comments
818	AAP225	Our Tottenham	Employment	Policy AAP5 should list all designated employment areas, not just the designations which are being proposed to change, for ease of reference and clarity. It should also be affirmed within the AAP that the Council is seeking to protect all non-designated employment land also, as per its Development Management DPD and Strategic Policies amendments. See also previous comments on the proposed changes to the designations.	Noted/ A full list of designated employment sites will be included. Action: Include a full list of all employment designations in the Plan.
818	AAP226	Our Tottenham	Employment	Policy AAP5 warrants much more detailed consideration of how the Council's policies as regards employment land are to be given effect in Tottenham. Just listing changes to employment land designations does not amount to a strategic policy for Tottenham. We also need to know how the site allocations as a whole add up to the vision for Tottenham's economy. All employment areas that are active and viable should be protected and supported.	Concern is noted. Action: Amend policy to reflect role of designated sites in regeneration of Tottenham.
818	AAP227	Our Tottenham	Map size	Map key unreadable	Noted, the maps will be updated to ensure they are clearer and easier to understand. Action: Amend map key to make clearer