

Appendix 2.4 - Comments on the North Tottenham Section of the Tottenham AAP Regulation 18 consultation Feb-Mar 2015

General comments on the North Tottenham Section of the Tottenham AAP Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
421	AAP525.	Historic England	Heritage	Given the production separate Masterplans for Northumberland Park and High Road West we would question whether the section for High Road West would be better located at page 73 next to its site allocation. The section does not adequately define the different character areas with the relationship to the High Road with its extensive conservation area and historic building concentrations (some at risk) in the west and the different character areas towards the Lee Valley. There are significant opportunities for the enhancement of designated and undesignated heritage assets across the neighbourhoods, with the need to develop an up to date evidence base informed by the Urban Characterization Study 2015.	Noted. Action: Explore opportunities to make the neighbourhood chapters of the AAP more user-friendly.
629	AAP526.	DP9 on behalf of undisclosed	Housing targets	Request Part A of this policy is amended to state a minimum of 10,000 new homes	Noted. The current ambition is for 10,000 new homes, adding that this is a minimum offers nothing to this policy.
628	AAP527.	DP9 on behalf of Tottenham Hotspur Football Club	Public square	Support the creation of a new direct link from a modified White Hart Lane Station to the new stadium. This wording should recognise the role and function of the public space provided within the podium of the new stadium development, and ensure that any new square is complementary to the consented public space at the stadium.	Support is noted. The Council is committed to securing a new public square to link the new entrance to White Hart Lane Station. The Council notes the point about the public space within the podium and agrees that all public space within north Tottenham should be well connected and complementary of each other.
415	AAP528.	Transport for London	Bus station	References a Northumberland Park bus station however this should be revised to read “... <i>Northumberland Park station and bus garage</i> ...”.	Noted. Action: Amend text to read “Northumberland Park station and bus garage...”
421	AAP529.	Historic England	Conservation area	The existing football stadium is set back from the High Road and conservation area. It is considered to detract from the character and appearance of the conservation area although historically and culturally it is an important part of the character of the area. The “match day economy” does effect the area and the Club holds a significant number of buildings including designated heritage assets which are in need of repair and reuse. The impact on the area will change significantly with the construction of the new stadium. The wider regeneration and redevelopment project should seek opportunities to address the disuse of properties owned by the club and seek wider opportunities to enhance the character of the conservation area and the aspiration for a major new cultural destination. We would consider a key objective for this neighbourhood area should be to address the at risk status of designated heritage assets and enhance the historic character of the area. Reference to the proposed HLF scheme for north Tottenham would help to demonstrate the council is taking a proactive approach in this respect, and could be developed to set out a positive complimentary conservation-led regeneration approach alongside new development.	It is noted that the redevelopment of the stadium presents an opportunity for the site to make a more positive contribution to the Conservation Area as a whole. Accordingly we are amenable to looking at ways to strengthen how heritage considerations will need to be considered in applications through the AAP. Action: Include reference to the need for new development to forge a positive relationship with existing heritage assets in the area.
628	AAP530.	DP9 on behalf of Tottenham Hotspur Football Club	Support	Supports the vision as set out on p23.	Support is noted.

661	AAP531.	Tottenham Business Group	Vision for area	The Consultation Document states that the THFC has the potential to transform the area into a sports and leisure destination (5.15) The THFC scheme was already in the pipeline. This objective was not the focus of the recent CPO case. A development in the pipeline does not justify the AAP being prepared on the back of it or adopting it as if it was set in stone. If aspirations for the area have changed such as the council now thinks it should be a sport and leisure area then that in itself should be tested through Consultation and not presented as a fait accompli.	The Tottenham AAP was prepared to meet the strategic objective, and objectively identified needs required in the Plan.
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Comments on NT1 of the Tottenham AAP Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
414	AAP532.	GLA	Strategic aspirations	This site allocation accords with the strategic aspirations for Northumberland Park within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies the opportunity for major estate renewal. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.	Support is noted. The AAP has been amended to emphasise that future development opportunities and proposals should be considered in consultation with the local community.
562	AAP533.	Cllr John Bevan	Anti demolition	I fully support the wording “improvements to existing housing stock” and would request that this intention be strengthened. There is a perception among many of the public that everything is going to be demolished. This is very disturbing to residents even more so as much of the existing housing is in a good condition.	In the face of challenging housing (including affordable housing) and employment needs, there is a requirement to consider a number of approaches to best address these needs, and thus fulfil the spatial objectives for the borough through the Local Plan. This includes making the best use of land, including the Council’s existing stock of land for housing. Some housing estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, and poor quality construction. It is, therefore, the Council’s position that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents. When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.
818	AAP534.	Our Tottenham	Estate regeneration	See above comments on the massive problems with the proposed ‘estate regeneration’ in Northumberland Park as a whole. Extra point: We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.	In the face of challenging housing (including affordable housing) and employment needs, there is a requirement to consider a number of approaches to best address these needs, and thus fulfil the spatial objectives for the borough through the Local Plan. This includes making the best use of land, including the Council’s existing stock of land for housing.

				Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.	Some housing estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, and poor quality construction. It is, therefore, the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents. When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.
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Comments on NT2 of the Tottenham AAP Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
414	AAP535.	GLA	Strategic aspirations	This site allocation accords with the strategic aspirations for Northumberland Park within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies the opportunity for major estate renewal. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14. It is further noted that the allocation identifies the opportunity for taller buildings at the south east corner of the site – contributing towards a wider collection of tall buildings proposed in this part of Northumberland Park. GLA officers are satisfied that this is a suitable location for tall buildings in principle, subject to the requirements of London Plan Policy 7.7. With respect to the envisaged education infrastructure, the Council is encouraged to consider including development guidelines promoting the co-location of school and housing - in order to maximise land use and reduce costs in accordance with London Plan Policy 3.8.	Support is noted.
624	AAP536.	Tottenham & Wood Green Friends of the Earth	Accessibility	We welcome <i>“5.14 New pedestrian and cycling bridge at Northumberland Station and new and enhanced routes into the Lee Valley Regional Park.”</i>	Support is noted.
415	AAP537.	Transport for London	Buses	The third bullet point of site requirements should be revised to read <i>“Work in conjunction with TfL to investigate improving bus routes through the area and links with Northumberland Park Station.”</i>	Agreed. Action: Amend to read: “Work in conjunction with TfL to investigate improving bus routes through the area and links with Northumberland Park Station.”
670	AAP538.	Hannah Devenaux, Northumberland	Community facilities	List of external desire improvements: 1. Gym containing swimming pool	Noted. These improvements and issues will be discussed in any future masterplanning work for Northumberland Park.

		d Park Tenant		2. Children's play area 3. Library 4. Parks 5. Out door police posts 6. Banks and post offices 7. Out door toilet facilities 8. Community centre 9. Flower beds	
799	AAP539.	Bob Lindsay-Smith	Existing communities	The AAP fails in the preservation of existing communities, with their existing character of buildings. High Road West with its mix of residential and business would be destroyed. The residential blocks there could have been improved with concierges, as local Councillors have argued for years. Northumberland Park would be transformed completely - the residential blocks there also have plenty of life left in them and do not need to be demolished. Extra point: We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents. Instread landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.	In the face of challenging housing (including affordable housing) and employment needs, there is a requirement to consider a number of approaches to best address these needs, and thus fulfil the spatial objectives for the borough through the Local Plan. This includes making the best use of land, including the Council's existing stock of land for housing. Some housing estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, and poor quality construction. It is, therefore, the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents. When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.
818	AAP540.	Our Tottenham	Council housing	The Northumberland Park Strategic Framework Report only provides for the preservation of a very small percentage of the existing council homes in any of the scenarios. Even in the 'Minimal Intervention' scenario (page 104) only 183 council homes are preserved with 1154 council homes (909 tenanted and 245 leasehold) being demolished. It is therefore dishonest to argue that good quality homes will be preserved when actually the emphasis is on mass demolition and new provision of mainly high density non-social housing. Nowhere in the Northumberland Park Strategic Framework Consultation Report does it indicate that the residents of Northumberland Park were told by any representative of the Council that the Council's plans would mean the mass demolition of council housing. It is grossly unacceptable to consult about a regeneration plan without informing residents of the scale of demolitions contemplated. Our Tottenham therefore believes that a lawful consultation into the demolition of such a large quantity of council housing has not taken place.	The Northumberland Park Strategic Framework was developed following two stages of community engagement where the Council engaged with over 400 people. The feedback from these consultations, which directly informed the 'Key Principles for Change' and 'Place Structure Principles' in the Framework, showed strong support for wide-ranging regeneration, the creation of safe and high-quality places, making better use of space and creating new streets and better connections. Therefore, the Council concluded that physical change, including the potential redevelopment of parts of the local housing estates, is necessary to deliver the economic, social and physical regeneration that existing communities have told us they want. It is important to note that the Council has taken no decisions whatsoever on the scale, or actuality, of potential redevelopment of the Northumberland Park housing estates. However, in principle, its emerging policy position is that it would like to see comprehensive regeneration which could include physical redevelopment of parts of the local housing estates. The Council will continue to work in partnership with the local community to develop options and plans for future change in Northumberland Park.

670	AAP541.	Hannah Deveneaux, Northumberland Park Tenant	Flat design	List of indoor desired improvements: 1. Front veranda for each flat 2. Springs on fire doors to avoid slamming 3. CCTV 4. Store cupboards in each flat 5. Windows in corridors and lobbies 6. Not wooden flooring	Noted. These improvements and issues will be discussed in any future masterplanning work for Northumberland Park.
818	AAP542.	Our Tottenham	Estate regeneration	The Alterations to Strategic Policies (2011-2026) document (dated February 2015) states clearly that estate regeneration will not lead to the re-provision of social housing in the same quantities. Alteration 64 on page 27 states of estate regeneration : '...re-provision of low quality existing council housing with an equal quantum (on a habitable rooms basis) of higher quality modern social housing is not a financially viable option. The building of higher density mixed tenure developments, which increase the quality and range of the affordable housing options for local people is likely to be the only realistic options [sic], and even then, will require significant public subsidy may require flexible application of normal planning policy expectations for affordable housing provision.'	Disagree. The Alterations to the Strategic Policies document states that there will be a reprovision of affordable stock on a habitable room basis. This is not a loss in terms of quantity. How those habitable rooms are delivered in terms of sizes of units will reflect current need.
809	AAP543.	Thakor Tandel	Housing	I live in, since 1981-2, and own, 8 Willoughby Grove, Tottenham, London , N17 0RS, It falls in Development Plan. Where can I go?, I am worried and upset. What can I do?	The Council will contact you regarding your enquiry.
818	AAP544.	Our Tottenham	Housing	The Northumberland Park Masterplan- the <i>Northumberland Park Strategic Framework Report</i> states (page 97) that new homes in the area will be between 3-10 stories. Our Tottenham believes that Tottenham's existing pattern of low-rise housing (2-3 stories) in residential suburban development should be respected. The high-density plans for Northumberland Park sound nightmarish.	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. Future master planning work will set out in more detail how and where high quality housing, which would include a mix of heights across the area, could be delivered if redevelopment were to come forward. 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.
661	AAP545.	Tottenham Business Group	Stadium	The evidence available as to the needs of the London Borough of Haringey as outlined in the documents now out for consultation do not support a strategy based on a stadium scheme. A scheme, which delivers such paltry benefits against the tremendous adverse effects for established local business. The documents currently out for consultation are seriously flawed in many ways.	We note the areas are contiguous and inter-related. 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.
799	AAP546.	Bob Lindsay-	Local	The AAP does retain some local employment sites, but loses	The Council is putting forward a Local Plan that seeks to locate

		Smith	employment	employment in others: NT2 - but existing businesses in Park Lane are not mentioned, NT3 - how can 'modern, flexible workspaces' get your car fixed?, BG2, BG4, TH10. Also in TH3 the 'intensification of current employment uses' (with the implication of higher rents) would appear to put the excellent social enterprise Restore at risk.	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.
421	AAP547.	Historic England	Design	We would suggest that a guideline that new development should contribute to greater permeability and legible streets should be included.	Noted. It is considered that this point is covered in the site requirements already.
421	AAP548.	Historic England	Masterplan	It may be helpful to refer to the Northumberland Park Masterplan in this section.	Noted. The findings of the Northumberland Park Strategic Framework, which established key place principles will be used as evidence in the preparation of the Local Plan. It may be that a number of different masterplans come forward for this area, and therefore it is more prudent to require conformity with a Council-adopted masterplan. Action: Require development to be in conformity with a Council-adopted Masterplan.
818	AAP549.	Our Tottenham	Phrasing; housing	It is very misleading to refer to the plans in this way. It is clear that the whole process of developing the plan for Northumberland Park has used very misleading language. The <i>Northumberland Park Strategic Framework Consultation Report</i> suggests that respondents wanted homes with gardens to be built (page 6). The 'traditional street pattern principle here seems to relate to such aspirations. The high-density plans, however, are clearly about housing most residents in blocks not houses (see the plan for the new blocks on page 97 of the Strategic Framework Report.) The gardens referred to are therefore communal which is not what most residents imagined when they agreed with an aspiration for homes with gardens. Existing council estates have communal gardens. The 'home with a garden' promise appears to have been used to deceive residents into supporting Council demolition plans.	The Council is working to create a fine grained, legible street pattern to improve permeability and legibility in this area. High quality private and communal open space will be provided for new residential units in line with the appropriate design standards. Given the level of need development is required to meet, it is unlikely that new private gardens will be included in new developments.
661	AAP550.	Tottenham Business Group	Should be considered with NT3	NT2 and NT3 have to be considered together due to the functional relationship between the two. NT3 is inherently linked to the stadium by virtue of the fact that access to the stadium is through the site NT3. It has been misleading to separate the two. NT3 is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. Despite local proposals involving modest changes to allow local business to remain no alternatives have been considered as alternatives to extensive demolition. This is a profoundly flawed methodology and an unsound basis for land use allocations within site allocations DPD under part 2 of the Planning and Compulsory Purchase Act 2004 (as amended), the regulations, and	The proposals for NT3 (the High Road West regeneration scheme) have been developed following two and a half years of community engagement that has informed all stages of the regeneration plans. The proposals meet the aspirations of the community (including their priorities for a better mix of housing choices, more job opportunities and improved open spaces) for positive change. The AAP sites in north Tottenham do need to be considered together spatially as they each play a key part in delivering our overall vision for north Tottenham and they complement one another in terms of land uses, agglomeration of non-residential uses and the creation of distinct neighbourhoods.

				the NPPF	
823	AAP551.	Susan Smith, leaseholder	Some retention	However I have concerns about the rumours that the estate will be demolished and new properties built in conjunction with a private developer and could find no clear information on the councils plans regarding this. Where this has been tried in other Boroughs many of the properties have been brought by private landlords, often overseas and the result has done little for the existing community and the local people leading to greater social divisions. There is strong and vibrant local community which will be damaged if the area is demolished and handed over to private developers. In particular the flats on Northumberland Park and the Scotswood Walk houses are of good quality (although there is refurbishment needed) ad well designed with plenty of open space and a variety of different accommodation. These should not be demolished, I know from talking to my neighbours that most of them feel the same way, many people have lived here for decades and do not have any desire to move home.	In the face of challenging housing (including affordable housing) and employment needs, there is a requirement to consider a number of approaches to best address these needs, and thus fulfil the spatial objectives for the borough through the Local Plan. This includes making the best use of land, including the Council's existing stock of land for housing. Some housing estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity and legibility, socioeconomic disadvantage for existing residents, and poor quality construction. It is, therefore, the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents. When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.
823	AAP552.	Susan Smith, leaseholder	Supports overarching aims	I have looked at the various documents on the website and in general feel the plans are positive. Increased employment, better transport links and reducing the impact of the Spurs ground in the form of less betting shops and takeaways. As stated I am a Haringey leaseholder and have lived in my flat for 15 years, I enjoy living in the area despite its many problems as and welcome the plans recognition of and attempt to tackle the issues of poverty and social deprivation.	Support is noted.

Comments on NT3 of the Tottenham AAP Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
414	AAP553.	GLA	Strategic aspirations	This site allocation accords with the strategic aspirations for High Road West within the Upper Lee Valley OAPF and is broadly supported. It is noted that part of the allocation includes a licensed waste site. Accordingly, requirement for equivalent waste capacity to be re-provided is supported in accordance with London Plan Policy 5.17. It is further noted that the allocation identifies opportunities for tall buildings along the railway corridor. GLA officers are satisfied that this would be a suitable location for a tall buildings in principle, subject to the requirements of London Plan Policy 7.7.	Support is noted.
646	AAP554.	Headcorn Tenterden Beaufoy Gretton Residents	Boundary query	We have participated and commented on High Road West Consultations. These have resulted in the area west of the railway line and the proposals for the land adjacent to our homes increasing in size and number of units proposed at every step, until this edition which appears to suggest that some of our homes are now earmarked for redevelopment.	Noted. This is a mapping error. Action: Amend boundary to remove 21-35 Headcorn Rd.

		Association			
628	AAP555.	DP9 on behalf of Tottenham Hotspur Football Club	Community facilities	THFC support policy provision for new leisure facilities associated with the redevelopment of the stadium. However the policy should be amended to allow for other social and community infrastructure to be accommodated within the stadium development such as library, education, health care and pharmacy uses. This will reflect the extant planning permissions for the site, which have partly been implemented, that already provide for D1 and D2 use classes.	Whilst the Council supports any additional and complementary social and community uses in the stadium development, we consider that there is a need to provide the library, learning centre in the new local centre area linking White Hart Lane Station with the High Road and the stadium The liubrary learning centre will contribute to creating activity within the proposed public square.
799	AAP556.	Bob Lindsay-Smith	Community; regeneration	The AAP fails in the preservation of existing communities, with their existing character of buildings. High Road West with its mix of residential and business would be destroyed. The residential blocks there could have been improved with concierges, as local Councillors have argued for years. Northumberland Park would be transformed completely - the residential blocks there also have plenty of life left in them and do not need to be demolished.	In the face of challenging housing (including affordable housing) and employment needs, there is a requirement to consider a number of approaches to meet these, and thus fulfil the spatial objectives for the borough through the Local Plan. This includes making the best use of land, including the Council's existing stock of land for housing. Some estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity, low socioeconomic indicators, and poor quality construction. It is therefore the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents. When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.
526	AAP557.	Peter Sherlock on behalf of the owners of 745, 747, 749, 755 & 757 Tottenham High Rd	Conservation Area	The loss of these shops will be detrimental to the local economy. This retail trade provides local employment and the provision of goods and services to this diverse community. The proposals contained within NT3: High Road West are likely to led to wholesale demolition of these properties which is not consistent with the Council's own Character Appraisal adopted on 26th February 2017. Further the demolition of such historic properties is contrary to the preservation and enhancement of this important Conservation Area	Decisions of the future of listed and locally listed buildings must be taken within the context of the benefits regeneration will bring to the area. Retention of heritage assets, and to the overall character of the Conservation Area, is an important consideration in Local Plan-making, and deciding planning applications. Considerable weight must also be given to the ability of new development to meet the objectively identified housing and employment needs in the borough. The Council agrees that smaller footplate units should be provided in the Local Centre, but disagrees with the assertion that significant numbers of small town-centre traders will be forced out. The majority of shop fronts on the High Rd will be retained, with new town centre uses created in the area through new development.
565	AAP558.	Nick	Consultation concern	Concerned that the Council doesn't listen to consultation responses of local businesses.	The Local Plan consultation was carried out in line with the Council's adopted Statement of Community Involvement and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
646	AAP559.	Headcorn Tenterden Beaufoy	Consultation issue	Please note 21-35 Headcorn Road is a large part of a continuous terrace, buildings which are timber-framed construction. There was no warning or discussion of the inclusion of these properties and no direct contact with the said residents alerting them to the changes, so the plan comes as a	Noted. This is a mapping error. Action: Amend boundary to remove 21-35 Headcorn Rd.

		Gretton Residents Association		shock to those affected. Can we please have public meetings organised for our residents to explain the inclusion of the residential properties west of the railway line. We would also comment on the poor spelling of documents issued as part of this consultation. These are presumably prepared by consultants on behalf of the local authority and we expect and request that the documents are fit for purpose.	
818	AAP560.	Our Tottenham	Council housing	The High Road West Consultation Feedback states clearly that Love Lane residents wanted to remain as Council tenants (page 33). Yet as noted in our response to the 'Key Objectives for Northumberland Park section (above) the Council are clear that re-providing social housing in its existing quantity as part of estate regeneration schemes is not financially viable. The Council should never have let the residents of Love Lane believe that new council homes would be built on the Love Lane site if they went along with the demolition of existing homes. Consulting on something that the Council was never going to let happen without making this clear to residents was dishonest and invalidates the results of the consultation. We believe this was unlawful. Whilst being opposed to the demolition of Love Lane Estate, should such go ahead we support the report of the LLE Residents Association calling, amongst other things, for all residents to be able to be rehoused back onto the redeveloped estate. Extra point: We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents. Instread landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.	The Council has worked with Love Lane residents and the Love Lane Resident Association for over three years and has produced a Resident Charter and a Tenant Guide, both of which were agreed at Cabinet on December 16 th 2014. Within these documents the Council commits to all secure Council tenants on the Love Lane Estate being offered a replacement social rented home within the High Road West regeneration area.
646	AAP561.	Headcorn Tenterden Beaufoy Gretton Residents Association	Decent Homes	In Years 2013-14 and the current year we have been included in Decent Homes works. At the time of writing the first contract remains incomplete, due to outstanding snagging and rectification of installations which we consider to be design faults by contractors and lack of monitoring by Homes for Haringey. We are currently the only contract of that year not completed. Our estate is timber framed construction and suffers particularly from sound insulation problems. The works have not addressed this issue. The AAP and plans for High Road West will leave our members remaining in homes that remain difficult to heat and lack of sound insulation affording little privacy. We also lack estate amenities.	Noted. The Decent Homes programme is outside of the scope of the Local Plan.
422	AAP562.	Environment Agency	De-culverting	The Moselle Brook culvert is correctly identified as running through the site under the road. Your SFRA has identified the culvert at this location	The Council supports deculverting in principle, where viable.

				as being in a potentially poor condition with bulging brickwork, tree roots intruding, loss of mortar to joints and brickwork missing in places. De-culverting and carrying out improvement works to the culvert must be thoroughly explored and expressed within the design guidelines. Our suggested wording is below: <i>The Moselle Brook runs in a culvert under White Hart Lane across the site. Development proposals must explore opportunities to de-culvert the Moselle Brook, with clear and robust justification provided if considered unachievable. No new buildings will be permitted within 8m of the edge of the culvert and it's condition must be commensurate with the lifetime of the development.</i> Due to the presence of the culvert and potential flooding impacts, this site should be included in your SFRA and Appendix A.	Haringey Council does not believe that an 8metre buffer zone on culverts is consistent with meeting the borough's housing targets. Where deculverting is considered viable as part of a development, an 8metre buffer zone to the open watercourse could be acceptable.
629	AAP563.	DP9 on behalf of undisclosed	Flexibility	Need for flexibility given the development will be built out over a 15-year timeframe. AAP policy should identify the key principles within the Masterplan Framework that should be delivered. This requirement should be amended to: "Development will need to conform to <i>should accord with the principles of</i> the Masterplan Framework agreed by the Council's Cabinet in December 2014"	The Council notes that the Arup masterplan is only one way in which the principles within the masterplan framework could be delivered. Action: Amend this wording to state: Development should accord with the principles set out in the High Road West Masterplan Framework agreed by the Council's Cabinet in December 2014.
818	AAP564.	Our Tottenham	Housing; density; height	The plans for the new housing completely contradict the results of the Council's own survey and, we believe they are therefore unlawful. The <i>High Road West Consultation Feedback Report</i> of August 2013 clearly states that respondents on the Love Lane estate want 'traditional homes with gardens, built to low density' (page 32 also see page 33 and 37). Love Lane residents are clear they do not want high rise blocks being built (see page 37). The <i>Consultation Feedback Report</i> is quite clear that residents in the wider High Road West area did not want high-rise residential blocks, preferring low rise blocks of 3-5 stories. The <i>Tottenham High Road West Masterplan Framework</i> indicates clearly, however, that there is an intention to build a large number of urban blocks at 5-6 levels and towers at 12-14 levels (see page 148 and 152 for example). 12-14 levels is higher than any of the council blocks currently in the High Road West area (the highest currently being 3 towers which are ten levels.) It is quite clear that the High Road West plans completely contradict the wishes of the residents as expressed in the consultation documents.	In the face of challenging housing (including affordable housing) and employment needs, there is a requirement to consider a number of approaches to meet these, and thus fulfil the spatial objectives for the borough through the Local Plan. This includes making the best use of land, including the Council's existing stock of land for housing. Some estates are not currently configured in such a way that they make the maximum contribution to these needs, variously experiencing issues such as poor connectivity, low socioeconomic indicators, and poor quality construction. It is therefore the Council's conclusion that some estate renewal projects will be required in order to meet objectively identified needs while simultaneously improving the quality of lives for local residents. When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order to enable these projects financially, some cross subsidy of new affordable stock from market housing may be necessary. The Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents. On this site, the Council has agreed a Residents charter, all High Rd West residents will have the opportunity to be re-housed on the site.
646	AAP565.	Headcorn Tenterden Beaufoy Gretton Residents	Impact of construction	The proposed development offers no improvements for ageing estates on the fringes of allocated sites but our residents will suffer years of being adjacent to construction sites, access routes impeded and the impact of environmental pollution during works.	This is an issue across the borough. Draft policy DM1 provides an appropriate basis on which to manage this issue, with additional, regularly updated guidance in the Council's Sustainable Design and Construction SPD.

		Association			
629	AAP566.	DP9 on behalf of undisclosed	Improved services	Requests that the expansion of the town centre is not confined to the High Rd, proposing: “Expand the local shopping centre along <u>around</u> the High Rd fronting the new football stadium including the new public square.” This amendment would ensure that the policy is consistent with the Masterplan Framework objective for a new public square to become a destination for shops.	The Local Centre boundary will be set in the Local Plan. The Council considers that the term around the High Rd is too ambiguous, and that town centre uses should be focused on the west side of the High Rd, as a football/sports-oriented local centre offer is not appropriate given the (generally) one day a week activity cycle for this type of use. The Council considers that the emphasis should be on how any new spaces, such as that proposed between White Hart Lane Station, and the new stadium, can be filled with activity on a 7 day a week basis, and it is more logical that a range of town centre uses are located there.
661	AAP567.	Tottenham Business Group	Justification	The Draft Site application (NT3) did not consider the merits of alternative schemes and is based solely on the scheme being promoted by THFC.	The allocation is put forward for consultation by the Council, not by Tottenham Hotspur Football Club. It accords with the spatial vision set out in the Local Plan: Strategic Policies. The AAP allocation is informed by the agreed High Road West Masterplan Framework which underwent 2.5 years of consultation, including the consideration of 3 options.
628	AAP568.	DP9 on behalf of Tottenham Hotspur Football Club	Licensed waste capacity	Objects to the safeguarding of 44 White Hart Lane as licensed waste capacity. Willing to work with the Council on this issue.	The principle that waste capacity is to be retained is in line with London Plan policy and must be upheld. The Council will work with developers where there are wider strategic benefits to be delivered from sites with an existing waste capacity.
629	AAP569.	DP9 on behalf of undisclosed	Licensed waste capacity	Objects to the safeguarding of 44 White Hart Lane as licensed waste capacity.	The principle that waste capacity is to be retained is in line with London Plan policy and must be upheld. The Council will work with developers where there are wider strategic benefits to be delivered from sites with an existing waste capacity.
799	AAP570.	Bob Lindsay-Smith	Local businesses	The AAP does not support the local independent traders that would lose their businesses in the High Road West scheme, and doesn't mention the independent traders in Park Lane.	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. The Council is also seeking anew increase in jobs in the High Road West area. 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. As set out in the High Road West Business Charter, the Council is committed to working closely with affected industrial enterprises to help them identify alternative sites within the borough.
818	AAP571.	Our Tottenham	Local businesses	NT3 is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. Despite local proposals involving modest changes to allow local business to remain no alternatives have been considered as alternatives to extensive demolition. This is a profoundly flawed methodology and an unsound basis for land	The proposals for the High Road West Site have developed from the High Road West Masterplan Framework, which was subjected to two and a half years of public consultation and aligns with the spatial strategy for the borough. The proposals for this site meet the identified employment and housing needs for the borough.

				use allocations.	
818	AAP572.	Our Tottenham	Local businesses	We support the position expressed by the Tottenham Business Group in the submission they sent to the Council as part of the public consultation for the present AAP. The NT3 proposal does not consider the merits of alternative schemes and is based solely on the scheme being promoted by THFC. It fails to protect and support the interests of not only our local businesses but the present and future residents of the borough. We have strenuously objected to the demolition of the High Road shops and the Peacock Estate Industrial Estate.	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. The Council is also seeking anew increase in jobs in the High Road West area. 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. As set out in the High Road West Business Charter, the Council is committed to working closely with affected industrial enterprises to help them identify alternative sites within the borough.
799	AAP573.	Bob Lindsay-Smith	Local employment	The AAP does retain some local employment sites, but loses employment in others: NT2 - but existing businesses in Park Lane are not mentioned, NT3 - how can 'modern, flexible workspaces' get your car fixed?, BG2, BG4, TH10. Also in TH3 the 'intensification of current employment uses' (with the implication of higher rents) would appear to put the excellent social enterprise Restore at risk.	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. The Council is also seeking anew increase in jobs in the High Road West area. 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. As set out in the High Road West Business Charter, the Council is committed to working closely with affected industrial enterprises to help them identify alternative sites within the borough.
661	AAP574.	Tottenham Business Group	Loss of employment land	Haringey has an obligation to understand and provide support for its economy Locally significant employment sites in particular High Road West (RA9) have been removed despite their strengths and against evidence in the Employment Land Study 5.51 "HRW is described as a locally significant site providing a range of B2 uses. It is recognized as well occupied, actively marketed with good internal circulation and parking on site." It is viewed as important as safeguarding B2/B8 uses and recommended as vital that "any B class use jobs affected are either relocated to ne suitable premises or to existing employment sites that have potential for further intensification"	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. The Council is also seeking anew increase in jobs in the High Road West area. 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. As set out in the High Road West Business Charter, the Council is committed to working closely with affected industrial enterprises to help them identify alternative sites within the borough.

				Current plans show more floor space lost in B class use where evidence (5.136) shows a strong demand with growth forecast, while delivering growth in B2 class where demand is shown to be weak 7.19 Recommends that any release of employment land should not be to the detriment of successful B2/B8 businesses. The promise of replacing and resituating displaced sites to protect B 2/B8 uses has not been carried through to the policy.	
640	AAP575.	George Soteris, owner 6-8 Peacock Estate	Loss of industry	A key priority in Haringey's Local Plan is that economic prosperity should be shared by all. But at the same time, they have said that some locally significant industrial sites will be removed, which will inevitably cause the loss of businesses and jobs. These industrial sites must not be lost: they should remain a key part of Tottenham	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. The Council is also seeking anew increase in jobs in the High Road West area. 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. As set out in the High Road West Business Charter, the Council is committed to working closely with affected industrial enterprises to help them identify alternative sites within the borough.
640	AAP576.	George Soteris, owner 6-8 Peacock Estate	Loss of land for business	The plan says that housing should replace the business areas. Affordable housing is of course needed, but new housing should not replace business and employment space: other areas to build housing must be found.	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. The Council is also seeking anew increase in jobs in the High Road West area. 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. As set out in the High Road West Business Charter, the Council is committed to working closely with affected industrial enterprises to help them identify alternative sites within the borough.
629	AAP577.	DP9 on behalf of undisclosed	Masterplan Framework	Requirement for development to conform to the Masterplan Framework is too vague, and indeed the Masterplan Framework is in parts overly prescriptive and identifies only one way in which the regeneration vision for High Rd West can be delivered.	The Council notes that the Arup masterplan is only one way in which the principles within the masterplan framework could be delivered. Action: Amend this wording to state: Development should accord with the principles set out in the High Road West Masterplan Framework agreed by the Council's Cabinet in

					December 2014.
624	AAP578.	Tottenham & Wood Green Friends of the Earth	Moselle River	<i>"A major tributary of the Lee, the River Moselle and the culverted section runs along White Hart Lane."</i> The aim should be to use every opportunity to deculvert the river when development takes place. This should be part of the brief for this site	The Council supports deculverting in principle, where viable. Haringey Council do not believe that an 8m buffer zone on culverts is consistent with meeting the borough's housing targets. Where deculverting is considered viable as part of a development, an 8m buffer zone to the open watercourse could be acceptable.
421	AAP579.	Historic England	Conservation area	The height of new development on the High Road should enhance the character of the conservation area, and the setting of designated heritage assets. Whilst new development potentially needs to respond positively to the new environment created by the proposed new stadium, this is not yet built. In addition its scale and harmful impact on heritage assets, was justified by the promised, exceptional, wider public benefits and design mitigation. Other proposals for the High Road therefore need to be considered in respect of their own merits and should be subject to rigorous design review and clear guidance to ensure that they strengthen local character and enhance the conservation area. This will require proactive involvement of the council and its partners to help coordinate development in a positive manner.	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.
421	AAP580.	Historic England	NPPF	In our response to the Masterplan framework for High Road West we raised concerns in respect of potential conflict with the NPPF and the principles for demolition of heritage assets, and its failure to promote a positive strategy for the historic environment. The AAP is an opportunity to set out a more positive vision which supports all aspects of sustainability. The aspirations also need to be balanced with the economic viability of the High Road retail offer and the provision of a coherent and attractive new communities and retail opportunities. The requirement to "regenerate heritage assets where the benefits of change and development can enhance overall viability for future investment of heritage benefits" does not make sense and appears restrictive. The NPPF does not include policies which make a presumption against investment in the historic environment on the basis of future investment opportunities. This needs clarification and should not prevent opportunities to address long term neglect or "at risk" status of heritage assets.	Decisions of the future of listed and locally listed buildings must be taken within the context of the benefits regeneration will bring to the area. Protection of heritage assets, and of the overall character of the Conservation Area, is important considerations in Local Plan-making, and deciding planning applications. Considerable weight must also be given to the ability of new development to meet the objectively identified housing and employment needs in the borough. Action: Change wording to reflect overall feasibility and benefit rather than viability.
661	AAP581.	Tottenham Business Group	Petition	Request that 4,000 person petition be considered alongside this representation.	Noted.
661	AAP582.	Tottenham Business Group	Policy conflict	Development Management DPD (Policy DM48) pledges a safeguard for employment in locally significant sites Policy DM49 (5.120) states all proposals need to demonstrate that new uses will not prejudice the continuation of existing industrial and business activities. These policies have not been sustained in High Road West proposals and the evidence in the Employment Land Study is ignored.	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. The Council is also seeking anew increase in jobs in the High Road West area. 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. As set out in the High Road West Business Charter, the Council is committed to working closely with affected industrial enterprises to help them identify alternative sites within the borough.
646	AAP583.	Headcorn Tenterden Beaufoy Gretton Residents Association	Private open space	The plans for High Road West include open space and play areas exclusive to the new homes but proposed development on our estate would be on the fourth side of green space funded by the existing residents, via rents and service charges	Private and communal open space will be provided in new developments as required by relevant regional and national space standards. Public open spaces will be available to existing and new residents, and this represents an approximate doubling within the local area.
640	AAP584.	George Soteris, owner 6-8 Peacock Estate	Pro industrial	The kind of development favoured by the Council is retail and office space. They must understand that manufacturing and industrial-type businesses are equally important in Tottenham, now and in the future	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. The Council is also seeking anew increase in jobs in the High Road West area. 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. As set out in the High Road West Business Charter, the Council is committed to working closely with affected industrial enterprises to help them identify alternative sites within the borough.
629	AAP585.	DP9 on behalf of undisclosed	Retail expansion	Evidence provided (High Rd West Retail Assessment) to support an expansion of the retail and leisure offer in the High Rd West area in the region of 30,000m ² to complement growth in the area, and redevelopment of the stadium.	Evidence provided not sufficient to justify this level of retail. The Council sees no reason to change the current retail hierarchy, that retail must be subservient to Bruce Grove. It is noted that leisure uses are bulky, and may have large floorspace requirements. No specific target/limit will be set for these uses, which the Council considers are consistent with the overall aims for the area.
565	AAP586.	Nick	Save industrial land	The council should also acknowledge its local bussiness community and keep the industrial sites it craves to kill for the quest of housing and the fatcats. Support your local businesses ,support local people that are employed by these local businesses. You have not considered any businesses and tried to save any ,you just want to wipe us all out in the high road west regen	The 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. It is expected that this site will yield a net increase in jobs overall. 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. As set out in the High Road West Business Charter, the Council is committed to working closely with affected industrial enterprises to help them identify alternative sites within the borough.

					Where industrial stock is to be retained, it is protected using DMDPD and Strategic Policies, as well as the London Plan. A local approach to the reservoir of industrial land in north Tottenham will be drafted. Action: Include a policy on SIL in North Tottenham
818	AAP587.	Our Tottenham	Small businesses; Local businesses	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	The Council is committed to small businesses and supports the provision of smaller footplate units in the Local Centre. The Council disagrees with the assertion that significant numbers of small town-centre traders will be forced out. The majority of shop fronts on the High Rd will be retained, with new town centre uses created in the area through new development. Those retail units which are required for regeneration will be supported and there will be opportunities for relocation within the area.
629	AAP588.	DP9 on behalf of undisclosed	Supports policy	Supports requirement for there to be tall buildings in the HREW area.	Support noted.
629	AAP589.	DP9 on behalf of undisclosed	Tall buildings	Policy should not constrain the height of tall buildings to be lower than Brook House. There appears to be no evidence to support this requirement. Proposes <i>“Tall buildings <u>will be supported where they comply with part (B) of Policy DM5 in the Development Management Policies document</u> be placed along the railway corridor to create a legible tall building spine. The buildings should use Brook House as a reference point and <u>Buildings should</u> descend in height as they approach the North Tottenham Conservation Area.”</i>	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.
565	AAP590.	Nick	Type of employment	The loss of bussiness that people study at school go to college and learn a trade are being disregarded for the statstic for the costa coffee / worker behind the counter in the gym	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.
629	AAP591.	DP9 on behalf of undisclosed	Wider retail area	Needs to be amended to allow for expansion of the shopping centre top occur in a wider area than just the High Rd. Proposed amendment: “Masterplanned comprehensive development creating residential led mixed use neighbourhood including a new public realm linking White Hart Lane Station and a redeveloped football stadium and an expanded local shopping centre <u>on around</u> the High Road opposite the football stadium including the new public square.”	The Local Centre boundary will be set in the Local Plan. The Council considers that the term around the High Rd is too ambiguous, and that town centre uses should be focused on the west side of the High Rd, as a football/sports-oriented local centre offer is not appropriate given the (generally) one day a week activity cycle for this type of use. The Council considers that the emphasis should be on how any new spaces, such as that proposed between White Hart Lane Station, and the new stadium, can be filled with activity on a 7 day a week basis, and it is more

					logical that a range of town centre uses are located there.
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Comments on NT4 of the Tottenham AAP Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
579	AAP592.	Laura Harrison, resident	Community Value	There are numerous extremely beneficial activities and enterprises operating from this site, and any development should seek to retain and enhance this activity.	The allocation seeks to optimise uses on the site in order to deliver the spatial strategy for Tottenham and the borough. The allocation sets a requirement for site masterplanning, taking account of existing buildings, extant planning permissions and other policy requirements. The Council considers that the Local Plan will ensure a sufficient supply of employment land and premises within the borough to meet identified need however recognising that some reconfiguration, supported by site allocations, may be necessary to deliver the spatial strategy. The site allocation identifies that the site should deliver community uses, recognising the existing community use on site and need for its appropriate re-provision.
422	AAP593.	Environment Agency	De-culverting	The Moselle Brook culvert runs south of the allocation under the road of White Hart Lane. Although it is outside the red line boundary the culvert should be identified in the design guidelines. This is because if the culvert were to collapse then the development would be at an increased flood risk. The access is most likely to cross the culvert and drainage of the site is likely to utilise the culvert, therefore failure of the culvert will have an impact on the development. Applicants will therefore need to consider this and there should be scope to carry out improvement works to the culvert as part of the development. Suggested wording is below: <i>The Moselle Brook runs in a culvert under White Hart Lane to the south of the site. The condition of the culvert must be commensurate with the lifetime of the development. A condition survey will need to be undertaken and repair works identified carried out. No new buildings will be permitted within 8m of the culvert.</i> Due to the proximity of the culvert and potential flooding impacts due to culvert failure, this site should be included in your SFRA and Appendix A.	The Council supports deculverting in principle. However it is not considered that the requirement for an 8m buffer zone will be financially viable or technically feasible in all circumstances, nor is the approach consistent with maximising the use of land to meet the borough's housing targets. Where deculverting is considered viable and feasible as part of a development, an 8m buffer zone to the open watercourse could be acceptable. Further detailed requirements in this respect will be set out in the Development Management Policies.
818	AAP594.	Our Tottenham	Amenities	'Re-provided' - What does this mean? On site? Off site? We strongly oppose the loss or displacement of a community facility and employment land. The continuous existence of the Irish Centre needs to be guaranteed in the site requirements, not 'the potential to accommodate community uses'.	The site allocation seeks to provide sufficient flexibility for approaches to re-provision of the existing community facility, including potential for re-provision as part of a multi-functional facility. The supporting text has been amended to set out that future development proposals will be subject to the needs of the occupants of the Irish Centre being suitably met.

Comments on NT5 of the Tottenham AAP Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
414	AAP595.	GLA	Strategic aspirations	This site allocation accords with the strategic aspirations for High Road West within the Upper Lee Valley OAPF and is broadly supported.	Support is noted.
810	AAP596.	Tynemouth Area Residents	Affordable housing	The Council failed to secure any of the housing and other benefits to local communities provided for in the original planning application.	Noted, but changing extant planning consents is outside the scope of the plan.

		Association (TARA)			
661	AAP597.	Tottenham Business Group	Better alternative available	The draft site allocation NT2 was based on the NDP scheme promoted by THFC. Permissions were granted on the basis of planning policies contained in the UDP, which have been withdrawn. It makes no sense to perpetuate developments based on a former planning regime when new more sustainable policies have been prepared which secure more sustainable planning outcomes than were achievable under expired policies There are a number of schemes/alternatives that are significantly better than the NDP scheme but the site allocation is not flexible enough to capture these enhanced benefits from different options The proposed scheme would not significantly improve the economic and social wellbeing of the area. It was made clear in the recent CPO inquiry that converting the NDP scheme to a site allocation would depend on public sector funding which could be more effectively invested in more appropriate regeneration and environmental purposes	The AAP will set the Local Planning policy for the determination of planning application in the future. It is considered that the principles set out in the AAP will meet the spatial objectives regarding provision of new homes and jobs in Haringey.
656	AAP598.	Mark Panton, stadium development academic	Claw-back mechanisms	That strong contractually obliged claw-back provisions are inserted in to any agreements with private companies over public money put in to 'stadium-led regeneration' schemes if the stadium, football club or any associated company is sold.	Any planning agreements will be managed in accordance with national regulations. Obligations within planning applications will be inserted where they are viable, and relevant to the scheme in question.
628	AAP599.	DP9 on behalf of Tottenham Hotspur Football Club	Community facilities	THFC support policy provision for new leisure facilities associated with the redevelopment of the stadium. However the policy should be amended to allow for other social and community infrastructure to be accommodated within the stadium development such as library, education, health care and pharmacy uses. This will reflect the extant planning permissions for the site, which have partly been implemented, that already provide for D1 and D2 use classes.	Whilst the Council supports any additional and complementary social and community uses in the stadium development, we consider that there is a need to provide the library, learning centre in the new local centre area linking White Hart Lane Station with the High Road and the stadium. The library learning centre will contribute to creating activity within the proposed public square.
656	AAP600.	Mark Panton, stadium development academic	Community facilities	That the Mayor and local authorities prevent the loss of existing community assets. These would include public houses, libraries, markets, community centres, etc, which also fulfil social and economic roles	Noted, the need for community facilities will be picked up in the IDP.
656	AAP601.	Mark Panton, stadium development academic	Community involvement	A series of pre-requisites to developing stadia for the benefit of communities and football clubs were put forward by Brown <i>et al.</i> in their 2006 report for the Football Foundation. It was stressed that football clubs need to minimize the negative effects of events at the stadium on local communities. As a minimum, clubs need to have in place means of regular consultation, problem solving and decision making to overcome difficulties suffered by local residents. These could include: - Local steering groups, incorporating club, local authority, residents representatives, local business groups, agencies (such as transport). - An active and meaningful involvement in decision making by local	Noted.

				community representatives and other residents and businesses – as well as supporter communities - facilitated by the football club and local authorities - Developments designed with local communities to meet their needs, as well as other parties such as clubs. - Regular and accurate information sharing about developments, plans and options. - Independent monitoring of community involvement in developments. - Regular open/public consultation meetings. - Stadium open days - A defined member of staff able to tackle issues for local residents across different departments of the club. - Outreach work, especially on match days, to observe and to make connections with local people. - Schemes for the removal of litter. Where football facilities are developed as part of local regeneration strategies, it must be ensured that they are accessible and useful to local people. A Community Involvement Plan could help achieve this.	
661	AAP602.	Tottenham Business Group	CPO process	The site was allocated to reflect approved planning application when it was in fact the subject of a prolonged CPO inquiry. This was surely putting the cart before the horse. It should have been selected on the basis of a legally compliant SEA and Sustainability Appraisal. This surely is unlawful and unsound practice The Draft Site Allocation again did not consider the merits of alternative schemes and is solely based on a scheme promoted by THFC It shows a profoundly flawed methodology which is not a sound basis for established land use allocations within a Site Allocations DPD under part 2 of the Planning and Compulsory Purchase Act 2004(as amended), the regulations and the NPPF	On this site there is an extant planning consent which is already implemented. This has been subject to an EA and SEA, The site allocation in the AAP is designed to create a policy that enables development to meet the spatial objectives for the area, and not vice-versa. In light of the extant planning consent, it is not considered that there are other deliverable options apart from the current permission on this site.
422	AAP603.	Environment Agency	Deculverting	This site has been included in your SFRA under a different name- Lawrence Road (Appendix A1, Table 1-26). Although the maps in the SFRA show the Flood zones and presence of a culvert, this has not been noted in the text or translated into the Future Planning Requirements within the AAP. The Moselle Brook culvert runs along the western boundary of the allocation under the road. If the culvert were to collapse then the development would be at an increased flood risk. There should be scope carry out improvement works to the culvert as part of development of this site and this must be thoroughly explored. This must be reflected in your site allocation. The access is most likely to cross the culvert and drainage of the site is also likely to utilise the culvert, therefore failure of the culvert will have an impact on the development. Therefore if it fails there will be large impacts on the development. The Future Planning Requirements must include a comment like the following: <i>The Moselle Brook runs in a culvert under High Road to the West of the site. The condition of the culvert must be commensurate with the lifetime of the development. A condition survey will need to be undertaken and repair works identified carried out. No new buildings will be permitted</i>	Noted. We will look into the SFRA regarding this issue. The Council supports deculverting in principle, where viable. Haringey Council do not believe that an 8m buffer zone on culverts is consistent with meeting the borough's housing targets. Where deculverting is considered viable as part of a development, an 8m buffer zone to the open watercourse could be acceptable.

				<i>within 8m of the culvert.</i>	
810	AAP604.	Tynemouth Area Residents Association (TARA)	Delivery	There is strong evidence that the Council is not competent to ensure the proper delivery of major projects, as evidenced by two major developments in our area: Hale Village and Spurs. The Council has been out-manoeuvred by property developers, and singularly failed to provide the expected outcomes for its local constituents.	This is not within the scope of the Plan.
818	AAP605.	Our Tottenham	Stadium led regeneration	The Tottenham AAP DPD does not consider research on stadium led development and regeneration, which finds very little contribution to the local economy – jobs provided are generally small scale and part time and arguments about local multiplier effects do not take place in practice. Therefore, the new Spurs stadium should not be presented as a driver of economic development in Tottenham. See separate submission from Mark Panton, Birkbeck University, on this point for more information, and the recent London Assembly Regeneration Committee report on this topic.	The first planning permission for the stadium has already realised a technical college and a supermarket which are contributing to creating new jobs in the area, and improving the skills base for local residents.
656	AAP606.	Mark Panton, stadium development academic	Maximise local regeneration benefits	That commitments to work with existing residents and businesses by the Mayor and the local authorities are strengthened to prevent damaging outcomes. For example, in Tottenham, over 2000 jobs have already been lost with the demolition of large industrial estates in Northumberland Park. Plans for the High Road West Scheme in Tottenham would demolish an existing industrial estate, described by the Tottenham Business Group in their response to the Tottenham Area Action Plans (AAPs) consultation as ‘one of London’s workshops’, resulting in the loss of 200 jobs, as well as ‘the loss of manufacturing and industrial units that could provide valuable skilled training and apprenticeships for our local youth’. In this instance, the planning framework associated with this ‘stadium-led regeneration’ seems to offer insufficient protections for existing employment land, risking its destruction through developments that do not recognise or value existing economic activities. In relation to High Road West, the Tottenham Business Group point out that ‘The jobs, the training and the varied established units of Peacock Estate and its surroundings could not be replaced elsewhere.’ ¹ Such proposals as part of ‘stadium-led regeneration’ do not ‘deliver a genuine regeneration legacy for local communities’.	Noted.
421	AAP607.	Historic England	Restoring heritage assets	We would recommend a positive strategy for restoring and enhancing heritage assets and addressing the economic uncertainty that has blighted the area. (rather than the un-proactive phrasing in respect of simply “addressing a statutory presumption in favour of retaining heritage assets unless justifiable”). A number of heritage assets, including the conservation area itself are at risk. As such there should be a presumption for restoring and bringing these heritage assets into viable use.	Decisions of the future of listed and locally listed buildings must be taken within the context of the benefits regeneration will bring to the area. Protection of heritage assets, and of the overall character of the Conservation Area, is an important consideration in Local Plan-making, and deciding planning applications. Considerable weight must also be given to the ability of new development to meet the objectively identified housing and employment needs in the borough. 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

¹ OT response to proposed alterations to the London Plan, page 5.

					development that brings change while having an acceptable impact on the rest of the borough.
656	AAP608.	Mark Panton, stadium development academic	Transparency	Due to the massive impact stadia development has on the local surrounding communities, and the wealth of modern clubs (especially those in the top divisions), ensure that the maximum 'planning gain' agreements are secured for the benefit of the existing communities. That the Mayor follows the recommendation of the previous GLA study on London football stadiums to ensure that football clubs adopt an open book policy with the local and regional planning authority throughout an application. In order to fulfil the public right of transparency over the arrangements between Haringey Council and the football and recent legislation that requires local authorities commit to the principles of open data and transparency, in line with the Local government transparency code 2014, Haringey Council should disclose the Publicly commissioned Grant Thornton report into the viability of the stadium proposals.	Noted.
656	AAP609.	Mark Panton, stadium development academic	Stadium charter	It is recommended that the London Borough of Haringey takes a proactive approach to the Charter for Stadium Development and adopts its principles immediately. They provide a starting point towards sustainable stadium-led development. Charter for effective stadium-led regeneration Football clubs and relevant local authorities seeking to develop a stadium-led regeneration scheme should commit to: • A clear vision and policies for place-making around the new (or expanded) stadium, including public transport connectivity and permeability between the stadium and surrounding area. • Undertake a skills mapping exercise to assess local capacity to take advantage of new jobs. The results should inform a skills and employment strategy, including measures to prepare and upskill local communities in order that they can access the new jobs. • Pay the London Living Wage to all stadium employees. • Support the Mayor's housing targets in all stadium-led regeneration schemes, where practical. Any new housing developed as part of, or around, a new stadium, should aim to be mixed tenure, to include both family and social rented affordable housing. • Demonstrate how they have consulted with a diverse range of local community and stakeholder groups to: – identify effective uses of the stadium scheme as a community asset; – communicate what social infrastructure will be provided; and – establish an ongoing relationship with the community. In addition, in cases of a stadium financed or part-financed with public funds, the Mayor should:	Noted.

				• Require a community forum to be set up to involve the public and communities in a football stadium before the new venue is built. This would give communities a say on how the stadium is used, and what social infrastructure is provided.²	
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² The regeneration Game, P. 21