

Tottenham Area Action Plan
Regulation 21(1)(c) Consultation Statement

February 2015



Haringey Council

1. Introduction

- 1.1 Consultation on the Tottenham Area Action Plan Issues and Options document took place between 17th January and 7th March 2014. The consultation was **undertaken in accordance with the Council's Statement of Community Involvement and in line with** the requirements of the Town and Country Planning (Local Planning)(England) Regulations 2012. These regulations required the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken in the course of preparing the Area Action Plan, a summary of the main issues raised to consultation, and to detail **how the Council's** took account of the comments received in preparing subsequent versions of the plan, including the latest version - the Preferred Option Area Action Plan.
- 1.2 This Consultation Statement therefore fulfils the requirements under the new Regulation 22(1)(c)(i-iv) to produce a statement **of the plan's** production.

2. Summary of consultation undertaken on the Area Action Plan Issues and Options consultation document

- 2.1 On 28th November 2013, Haringey's Cabinet considered a report on the draft Tottenham AAP (see <http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=6667&Ver=4>). At that meeting Cabinet endorsed the Draft document and resolved to publish the document for consultation for a period of six weeks.
- 2.2 In summary, the document highlighted the main issues and challenges affecting Tottenham, the scale of change envisaged for the area, and the opportunities and potential for development and change within the two sub-areas of North Tottenham (which included High Road West, Tottenham Hotspurs FC Stadium sites, and Northumberland Park) and South Tottenham (which included Tottenham Hale, Bruce Grove, and Tottenham Green).

- 2.3 Formal notification of the publication of the draft Tottenham AAP Issues and Options document Publication was given on 17th January 2013, and representations were invited for a six week period ending 10th May 2013. Representations were also invited on the Sustainability Appraisal Scoping Report during this period.
- 2.4 **A formal notice setting out the proposals matters and representations procedure was placed in the ‘Haringey Independent’ newspaper** on the 23rd January 2014 (see **Appendix A**). In addition, on 17th January 2014 a total of 1,567 letters (see **Appendix B**) were sent by post or email to all contacts on the Local Plan database (see **Appendix C**), including all appropriate general consultation bodies. Those emailed were also provided **with the web link to the documents on the Council’s consultation web pages.**
- 2.5 Hard copies of the draft Tottenham AAP Reg 18 Consultation Document, and the Sustainability Appraisal Scoping Report were made available at the Haringey Civic Centre and all libraries across the Borough. The documents were also made available to view and download from the **Planning Policy web pages of the Council’s website.**
- 2.6 In addition to the above, and in an effort to inform and engage the wider public in the consideration of the draft document, the following further engagement techniques were used:
- Feature in Haringey Independent newspaper;
 - Press release;
 - Drop in sessions were held during the six week consultation period in libraries across the Borough. These were advertised in the newspaper advertisements, the public notices, on the **Council’s website, and in the consultation letter. They offered the opportunity for residents and interested parties to come and learn about the Site Allocations and to ask any questions of Council officers that they might have on the draft as well as planning policy in general;**
 - Presentation on the Site Allocations document were given to all Area Forums;
 - Site notices were placed outside each consultation site;

3. Who responded and number of representations received

- 3.1 34 consultation responses were received to the AAP Issues and Options document. These came from various statutory authorities and local partners (6), developers and agents (8), local businesses & interest groups (15), and individuals (7). Table 3.1 below provides a full list of the respondents. In total, 424 individual comments were made that were considered and responded to by the Council (see **Appendix E**).

Table 3.1: List of Respondents to the Tottenham AAP Issues and Options Consultation

ID no.	Respondent	ID no.	Respondent
1	Alison Armour	18	GVA on behalf of Mr M Hendy
2	Georgina Fletcher	19	Hackney Council
3	Ken Middleton	20	Lee Valley Regional Park Authority
4	Mario Petrou	21	Martin Bates Design Ltd
5	Abigail Stevenson	22	McCartney Joanne Assembly Member Enfield
6	Dr Winskill	23	Natural England
7	Joanna Woolf	24	Network Rail
8	Canal and River Trust	25	Paul Winter & Co on behalf of Archway Sheet Metal Works
9	Church of England Diocese of London	26	Rolfe Judd Planning on Behalf of Berkeley Homes Plc
10	Dalton Warner Davis obo Cannon Street Jersey Fabrics Ltd and Bandon Properties Ltd	27	Selby Trust
11	D W General Wood Machinists Ltd	28	Savills for Thames Water
12	DAH Transport and Storage	29	Theatres Trust
13	Ecogreen – Martin Laheen	30	Tottenham Business Group
14	English Heritage	31	Tottenham Hotspur FC
15	Environment Agency	32	Tottenham Network Planning Policy Working Group
16	Euroart	33	Victorian Society
17	Greater London Authority	34	Wards Corner Community Coalition

4. Summary of main comments / issues raised and Council's response to these

4.1 At the close of consultation on the draft Development Management Policies DPD: Issues and Options document, officers considered the representations. Provided below is a summary of the main issues raised and Council officer's consideration and initial response to these.

Infrastructure deficiency

- 4.2 Several representations sought clarification of how infrastructure would be provided in order to meet the needs of Tottenham's growing population. The Council will continue to work with service providers to inform them of the anticipated growth, and help to co-ordinate sufficient land being made available to meet their needs. Details of the outcome of this work will be set out in updated Infrastructure Delivery Plans which will build upon the baseline findings of the Council's Community Infrastructure Study (2010)

The designation and quantum of employment land

- 4.3 There was concern expressed both from incumbent businesses, and more widely, that sufficient land be provided to enable businesses to operate, and grow within the borough. The Council recognises that the growth outlined in the Mayors draft targets require land to be used more intensively, to increase both jobs and housing densities in growth areas within the borough. It is important that a balanced approach is taken, with protection and intensification based on appropriate evidence. To this end an Employment Land Study will be commissioned to review existing designations, and suggest appropriate interventions to spur economic growth in the borough.

Affordable workspace

- 4.4 Within workspace it was considered important that rents were not increased to a point which would hinder ongoing business taking place, and new businesses forming. The Council will investigate viability on employment sites to understand what preconditions are necessary to spur growth in the Borough.

Design and Heritage

- 4.5 There was concern that the consultation document lacked sufficient detail regarding the design principles for creating places, and ensuring protection of heritage assets. While noting that there was more detail in the Site Allocations document which was consulted on at the same time, **it is the Council's intention to do more. We will commission an Urban Characterisation Study to ensure that the physical characteristics of the local areas in the borough are understood and incorporated into emerging policy.**

Tall building locations

- 4.6 Representors were concerned that the introduction of tall buildings into the borough would change the character of the area. It is important to note in this regard that there are already a number of tall buildings in the borough, including recently proposed tall buildings at Brook House and Hale Village. The Council feel that the appropriate location of tall buildings can have a place making benefit if appropriately located and designed. The Urban Characterisation Study will help to provide guidance on the most suitable location for these.

Lack of genuine consultation with residents (particularly in the HRW area)

4.7 Concern was expressed that local residents did not feel that they were sufficiently involved in the production of plan making in the borough. This consultation was carried out in line with all of the statutory and SCI requirements, and the Council reacted positively to requests for additional meetings or information during the consultation. Additionally there are a number of non-Local Plan meetings which the Council holds into regeneration projects. It is noted that improvements can always **be made to the Council's consultation programme, and we will seek to improve** where possible on the next consultation.

The gentrification of Tottenham

4.8 It was responded that the regeneration proposals that the Council has commenced on will result in the gentrification of the area which will not benefit local residents, and potentially lead to some people being priced out of the area. The Council is striving to improve Tottenham, and the quality of life that residents enjoy. It is considered that new investment is required in order to improve the area, but the Council is committed to ensuring that local people are at the heart of change, and that new jobs, skills enhancement, and affordable houses are created as part of any redevelopment.

Development growth not evenly distributed in the borough

4.9 There was concern expressed that the majority of growth is being allocated in the east of the borough, and belief that this was not fair. The strategic pattern of growth was established in the Local Plan: Strategic Policies DPD, which was adopted in 2013. This included a consideration of which areas were the most suitable for growth based on land availability, socioeconomic, heritage, and environmental evidence. As such the AAP document is required to add detail, and enable the pattern of growth established through the 2013 document.

Appendix A – Public Notice of the AAP Issues and Options consultation

Haringey Local Plan: Site Allocations Development Plan Document and Tottenham Area Action Plans

Consultation 17th January – 7th March 2014

The Council is consulting on its emerging Local Plan documents.

This consultation is an initial consultation (Regulation 18 under the Town and Country Planning Regulations 2012) introducing the content that the documents will cover.

The Site Allocations consultation document identifies 54 of the most strategic sites in the borough that may be developed over the next 20 years. The Tottenham Area Action Plans aim to co-ordinate major change which is expected to happen in Tottenham over the same period.

The documents are available to view at 6th Floor, River Park House, N22 8HQ, the Civic Centre, High Road, Wood Green, N22 8LE, in local libraries and online at www.haringey.gov.uk/ldf

Responses should be made by email to ldf@haringey.gov.uk or in writing to Planning Policy, 6th Floor, River Park House, Wood Green, N22 8HQ. Responses should be received by **5pm Friday, 7th March 2014**.

For further details please contact the Planning Policy Team on 020 8489 1479 or email ldf@haringey.gov.uk.

Appendix B – Letter of Notification sent to consultees on the LDF database

Local Plan: Site Allocations Development Plan Document (DPD) and Tottenham Area Action Plans (AAPs)

The Council is in the process of producing a Site Allocations DPD which will set out the location, scale, and timeframe for the most strategic sites in the borough. It is envisaged that these sites will accommodate the majority of new development in the borough over the next 20 years.

Tottenham AAP Consultation

This document sets out the main challenges to be addressed through the preparation of the Tottenham Area Action Plans. When complete this document will strengthen our control over development in this area, **as well as strengthening the Council's hand in bringing forward** development where necessary.

The document is at an early stage, and this is your opportunity to influence what issues they should address in your area. The responses to this consultation will be included in the next version of these documents, which will come forward for another consultation in Autumn 2014. After being examined in public by a qualified planning inspector, the documents are anticipated to be adopted by the Council in 2015.

How to get in touch

The consultation document is available [here](#). **The documents are also available to be viewed at local libraries, the Council's Civic Centre, and at Council Offices.** The consultation is open from 17th Jan-28th Feb 2014, and there are a range of ways you can get involved:

- Presentations with Q&A sessions will be given by Council officers at your local Area Forum
- Filling in an online survey
- Drop-in events will be held at local libraries (please contact your local library for dates)
- By phone on 0208 489 1479
- By email at ldf@haringey.gov.uk

We would encourage you to make written representations to these documents, and in order to save paper, would like to encourage these to be submitted electronically. All written representations will be responded to and both the representation and Council response will be published online.

Sustainability Appraisal

A scoping report setting out the process for carrying out a Sustainability Appraisal for this document can be found [here](#). This report is part of the current consultation, and if you wish to make comments, please direct these to the contact addresses above.

Site Allocation DPD

For information relating to this consultation, please go to www.haringey.gov.uk/site_allocations

Appendix C – List of Contacts on the Council’s LDF Database

Individual First Name	Individual Family Name
Lynne	Zilkha
Jasper	Woodcock
Heather	Wood
Kitty	Wong
John	Wise
Teresa	Wing
Carolyn	Whitehead
Edward	Webb
Julia	Warburton
Jonathan	Vellapah
Nick	Triviais
Max	Tomlinson
Joey	Toller
Jane	Thompson
Rachel	Tedesco
Alison	Taylor-Smith
Elizabeth	Sutton-Klein
Henriette	Stuchtey
Celeste	Menich
Margaret	Stoves
Kevin	Stanfield
Michael	Edwards
Evelyn	Ryan
Tara	Ryan
Nicholas	Rusz
Joyce	Rosser
Jeff	Rollings
Chris	Roberts
Lorna	Reith

Councillor/MP Name
Cllr Adamou Gina
Cllr Adje Charles
Cllr Ahmet Peray
Cllr Akwasi-Ayisi Eugene
Cllr Amin Kaushika
Cllr Arthur Jason
Cllr Basu Dhiren
Cllr Beacham David
Cllr Berryman Patrick
Cllr Bevan John
Cllr Blake Barbara
Cllr Blake Mark
Cllr Bull Clare
Cllr Bull Gideon
Cllr Carroll Vincent
Cllr Carter Clive
Cllr Christophides Joanna
Cllr Connor Pippa
Cllr Demirci Ali
Cllr Diakides Isidoros
Cllr Doron Natan
Cllr Ejiofor Joseph
Cllr Elliott Sarah
Cllr Engert Gail
Cllr Gallagher Tim
Cllr Goldberg Joe
Cllr Griffith Eddie
Cllr Gunes Makbule
Cllr Hare Bob

Barry	Rawlings
Kimberley	Pyper
Annabruna	Poli
Karl-Dirk	Plutz
Richard	Perry
Andrew	Papadopoulos
Pavel	Pachovský
Christopher	Owen
Stephen	Overell
Gerrit	Ormel
Christian	Ogilvie-Browne
Juliet	Oerton
Carol	Norton
Joseph	Nicholas
Ollie.	Natelson
Jill	Naeem
Eleni	Murphy
Dave	Morris
Said	Moridi
Faye	Morgan
Mary	Mitchell
Simon	Miller
Chris	McNamara
Chris	McNamara
Louise	McNamara
Peter	McNamara
Richard	Max
Kim	Mason
Colin	Marr
Jason	MacKay
Stephen	Lubell
John	Long

Cllr Hearn Kirsten
Cllr Ibrahim Emine
Cllr Jogee Adam
Cllr Kober Claire
Cllr Mallett Antonia
Cllr Mann Jennifer
Cllr Marshall Denise
Cllr McNamara Stuart
Cllr McShane Liz
Cllr Meehan George
Cllr Morris Liz
Cllr Morton Peter
Cllr Newton Martin
Cllr Opoku Felicia
Cllr Ozbek Ali Gul
Cllr Patterson James
Cllr Peacock Sheila
Cllr Reith Lorna
Cllr Rice Reg
Cllr Ross Viv
Cllr Ryan James
Cllr Sahota Raj
Cllr Stennett Anne
Cllr Strickland Alan
Cllr Vanier Bernice
Cllr Waters Ann
Cllr Weston Elin
David Lammy MP
Lynne Featherstone MP

Company/Organisation
A Anva Ltd

Alison	Lister
Barry and Louise	Lewis
Rebecca	Lellis Ferreira
Ethan	Lazell
Charlie	Kronick
Heather	Kinnersley
Angie	Kikkides
Gabrielle	Kagan
Petal	Caddu
Francois	Joubert
Nick	Jenkins
Tony	Hopkins
Marian	Hone
Elaine & Ben	Holgado
Susie	Holden
Michael	Herbert
Frances	Heigham
Claudia	Hawkins
Lauritz	Hansen-Bay
Paul	Hancock
Laura and Marcus	Graham
Marcos	Godinho
Joe	Friedman
Hannah	French
Elaine	Graham
Sean	Fewlass
Carla	Ferrarello
Pasco	Fearon
Cindy	Evans

A P T Consulting
A S Z Partners Ltd
A. E. Butler & Partners
A.C.H. Turkish Speaking Pensioners Club
Abbeyfield (North London) Society
Abbeyfield Society
ACHE (Action for Crouch End & Hornsey Environment)
Adult Literature Group
Adult Literature Group
Adult Literature Group
African Caribbean Association
African Cultural Voluntary Organisation
African Women's Welfare Group
Africans & Descendants Counselling Services Ltd
Age UK
Agudas Israel
AH Architects
Air Transport Users Council
Aitch Group
AJ Architects
Alan Cox Associates
Albany & Culross Close Residents Association
Alexander Elliot Ltd
Alexandra Mansions Tenants Association
Alexandra Palace Action Group
Alexandra Palace Residents Association
Alexandra Park/Grove Lodge Meadow Allotments
Alexandra Primary School

Sue	Ettinger
Chris	Elser
Kieron	Edwards
Johnny	Dixon
Angharad	Davies
Felipe	Da Rocha
Ruth	Cowan
Stephen	Cook
Kenneth	Connelly
Anastasia	Christofis
David	Burrowes MP
Paul	Bumstead
Paul	Brown
Stephen	Brice
Jill	Bowden
Tim	Blake
Anna	Blackburn
Matthias	Bauss
Frances	Basham
Miles	Attenborough
James	Athanassiou
Ruth	Antoniades
Paulette	Amadi
Linda	Alliston
Andreas	Adamides
Leila	Sifri
Eliza	Kaczynska-Nay
Cynthia	Jenkins
Robert	Franks
Selina & Dan	Egerton
Tinu	Cornish
Lucia	Brusati

Alexandra Residents Association
Alexandra Tenants Association Group
Allenson House Medical Centre
Ally Pally Allotment Society
Al-Rasheed Dauda Architect
Altaras Architecture
Anatolitis Associates
Ancient Monuments Society
Andrew Kellock Architects
Andrew Mulroy Architects Ltd
Anglo Asian Women's Association
Apcar Smith Planning
Arbours Association
Architectural Heritage Fund
Architectyourhome-Highgate
Archi-Tone Ltd
Archway Road Residents Association
Archway Road Tenants Association
Archway Road Tenants Association
ARHAG Housing Association
Arnold Road Residents Association
Arnos Grove Medical Centre
Arta Architectural
Ashdown Court Residents Association
Asian Carers Support Group
Asian Community Centre
Asian Community Group
Asian Family Group
Aspire Design & Survey Ltd
ASRA (GLHA)
Avenue Mews Tenants Association
Aztech Architecture Ltd

Tim	Brierley
Arthur	Leigh
Beatrice	Hyams
Valerie Rose	Berry
Bill	Temple-Pediani
Laura	Forrest-Hay
Sarah	Lane
Elizabeth	Gray
Nicola	Venning
Panos	Nicolaides
Poppy	Rose
Christopher	Chadwick
Barry	James
Bob	Maltz
Flavio	Poli
Reuben	Payne
Hannah	Redler Hawes
John	Murray
Christine	King
Jon	Brooks
Chris	Warburton
David	Lichtenstein
Nick	Oparvar
Ruth	Ortiz
Ursula	Riniker
David	Baker
Michele	Eastmond
Chris	Mayled
Jeremy	Munday
Nicholas	Embling

Bahai Community
Bangladesh Muslim Organisation
Bangladeshi Cultural Society
Bangladeshi Women's Association
Baptist Church
Barnet, Enfield and Haringey Health Authority
Bashkal & Associates
Bedford Road Tenants Association
Belcher Hall Associates
Bell Residents Association
Belmont Infant & Junior School
Bethel United Church of Jesus Christ
Bhagwati Sai Culture & Social Centre
Bibles Christian's Assembly
Bicknell Associates Chartered Architects
Blitzgold Ltd
Born Again Evangelistic
Bostall Architecture Services
Bounds Green & District Residents Association
Bounds Green Group Practice
Bounds Green Health Centre
Bounds Green Infant & Junior School
Bounds Green Owner/Occupier Ass. & Neighbourhood Watch
Bowes Park Community Association
Bowes Park Community Association
Bracknell Close/Winkfield Road Residents Association
Brendan Woods Architects
Bridge House Health Care Centre
Briffa Phillips Architects
Britannia Hindu Temple Trust

Andrew	Tiffney
Elizabeth	Barnett
Angela	Rossi Carter
Tony	Baker
Gordon	Forbes
Huub	Nieuwstadt
Bill	Nottage
Frederick	Limbaya
Feolezico	Calboli
Sue	Penny
J N	Douglas
David	Rennie
Steve	Roe
Katy	Andrews
Sophie	Cattell
Statutory Consultee	
Greater London Authority	
LB Enfield	
LB Waltham Forest Spatial Planning	
London Borough of Barnet	
London Borough of Camden	
London Borough of Hackney	
London Borough of Islington	
Natural England	
Environment Agency	
English Heritage - London Region	
Highways Agency	
Departments for Communities and Local Government	
Network Rail	

Broadwater Farm Community Centre
Broadwater Farm Community Health Centre
Broadwater Farm Residents Association
Broadwater Residents Association
Brown & Co (Surveyors) Ltd
Bruce Castle Village Residents Association
Brunswick Park Health Centre
Buckingham Lodge Residents Association
Building Design Consultants
CA (UK) Ltd
CAAC Highgate
CABE
Campbell Court Residents Association
Campsbourne Baptist Church
Campsbourne Centre
Campsbourne Infant School
Calvary Church of God in Christ
Capital Architecture Ltd
Carolyn Squire
Carr Gomm Society
Carter Surveying Associates
Caryatid Architects
Casa de la Salud Hispano Americana CASAHA
CASCH
CASCH
Casch
CASE
Causeway Irish
CB Architects
Cemex (UK) Operation Ltd

Haringey Fire Service
London Ambulance Service
NHS London
Company / Organisation
Corporation of London
London Borough of Haringey
London Borough of Sutton Planning and Transportation
London Borough of Redbridge
London Borough of Brent Planning Services
London Borough of Barking & Dagenham
London Borough of Barnet Planning Department
London Borough of Bexley
London Borough of Croydon
London Borough of Enfield
London Borough of Hammersmith and Fulham
London Borough of Harrow
London Borough of Hillingdon
London Borough of Hounslow
RB Kensington & Chelsea
RB Kingston upon Thames
London Borough of Lambeth
London Borough of Lewisham
London Borough of Merton
London Borough of Newham
London Borough of Richmond Upon Thames Policy and Design
London Borough of Tower Hamlets Strategic Planning
London Borough of Waltham Forest
Westminster City Council Planning and City Development
London Borough of Havering

Central & Cecil
Centre for Accessible Environments
Charisma Baptist Church
Charlton House Medical Centre
Cherry Tree House Residents
Chestnut Area Residents Association (CARA)
Chestnut Northside Residents Association
Chestnuts Community Centre
Chinese Community Centre
Chomley & Causton Residents Association
Christ Apostolic Church Kingswell
Christ Church
Christchurch West Green
Christopher Wickham Associates
Church Commissioners
Church Crescent Residents Association
Circle 33 Home Ownership Ltd
Circle 33 Home Ownership Ltd
Circle 33 Housing Group
Clark Designs Ltd
Clarke Desai Ltd
Claudio Novello Architects
Client Design Services Ltd
Clyde Area Residents Association
Coldfall Community Centre
Coldfall Primary School
Coleraine Park Primary School
Collage Arts
Commerce Road Tenants Association
Community Action Sport

London Borough of Wandsworth
London Borough of Ealing
London Borough of Hackney
City of London
London Borough of Camden
London Borough of Camden
London Borough of Camden
Name
Alexandra Park Library
Coombes Croft Library
Highgate Library
Hornsey Library
Marcus Garvey Library
Muswell Hill Library
St. Ann's Library
Stroud Green Library
Wood Green Central Library
Reception
Company/Organisation
Albany & Culross Close Residents Association
Alexandra Mansions Tenants Association
Alexandra Palace Action Group
Alexandra Palace Residents Association
Alexandra Park/Grove Lodge Meadow Allotments
Alexandra Residents Association
Alexandra Residents Association
Alexandra Tenants Association Group
Archway Road Residents Association
Archway Road Tenants Association
Archway Road Tenants Association

Community Church of God
Community Gay & Lesbian Association
Community Response Unit
Community Safety Unit
Confederation of British Industry
Co-op Homes
Coppetts Residents Association
Corporation of London
Council for British Archaeology
Crammond Browne Architects
Crawford Partnership
Crouch End open Space (CREOS)
CRH Tenants Association
Cromwell Avenue Residents Association
Crouch End Dental Practice
Crouch End Health Centre
Crouch End Health Centre
Crouch End Traders Association
Crouch End URC Church
Crouch Hall Road Surgery
Crowland Primary School
Cube Building Consultancy
CUE
CUFOS Community Centre
Cypriot Centre
Cypriot Women's League
Cyprus Turkey Democratic Association
D R M Associates
DASH
David Langan Architects
Dental Health Centre
Dental Practice

Arnold Road Residents Association
Ashdown Court Residents Association
Avenue Mews Tenants Association
Bedford Road Tenants Association
Bell Residents Association
Bounds Green Owner/Occupier Ass. & Neighbourhood Watch
Bowes Park Community Association
Bowes Park Community Association
Bracknell Close/Winkfield Road Residents Association
Broadwater Farm Residents Association
Broadwater Residents Association
Bruce Castle Village Residents Association
Buckingham Lodge Residents Association
Campbell Court Residents Association
Cherry Tree House Residents
Chestnut Area Residents Association (CARA)
Chestnut Northside Residents Association
Chomley & Causton Residents Association
Church Crescent Residents Association
Clyde Area Residents Association
Commerce Road Tenants Association
Coppetts Residents Association
CRH Tenants Association
Cromwell Avenue Residents Association
Eastbourne Ward Residents Association
Edgcott Grove Residents Association
Ermine House Residents Association
Ermine Road Residents Association
Ferry Lane Estate Residents Association
Fortismere Residents Association
Garden Residents Association

Dental Surgery
Department for Culture Media and Sport
Department for Transport
Devonshire Hill Primary School
Direct Planning Ltd
Discount Plans Ltd
Downhills Infant & Junior School
DPA (London) Ltd
DPDS Consulting Group
Duckett Dental Surgery
Earlsmead Primary School
Eastbourne Ward Residents Association
Ebenezer Foundation Advisory Association
Ecodomus
Edgcott Grove Residents Association
Eldon Road Baptist Church
EMJCC Community Side
ENKI Architectural Design
Eritrean Community in Haringey
Ermine House Residents Association
Ermine Road Residents Association
Evering Pentecostal Church
FA Drawing Service
Faith Baptist Church
Faith Mosque
Faith Restoration Ministry
Family Health Service Authority
Family/Landmark Housing Association
Federation of African Peoples Organisation
Ferry Lane Estate Residents Association
Finsbury Park Track & Gym

Garden Residents Association
Grosvenor Road Residents Association
Hale Estate Residents Association
Harmony Close Residents Association
Hillcrest Tenants & Residents Association
Hillside Road Residents Group
Hilltop House Residents Association
Hornsey Lane/Colwick Close Residents Association
HTBG Residents Association
Jackson's Lane Residents Association
James Place/Church Road Residents Association
Kingsley Place Residents Association
Lancaster Road Residents Association
Lomond Close & Brunswick Road RA
Lomond Close Residents Association
Love Lane Residents Association
Millicent Fawcett Tenants Association
Moselle Close Residents Association
Muswell Colney Residents Association
Nelson Mandela Residents Association
Noel Park North Area Residents Association
North Grove Residents Association
Northumberland Park Tenants & Community Association
Oakdale Resident Association / South Tottenham RA
Palace Gates Residents Association
Palace View Residents Association
Park Lane Close Residents Association
Partridge Way Residents Association
Plevna Crescent Residents Association
Remington Road Residents Association
Resident Association

Flower Michelin Ltd
Forestry Commission England
Fortismere Residents Association
Fortismere School
FQW
Frederick Knight Sports Ground
Freight Transport Association
Friends of Albert Road Recreation Ground
Friends of Bowes Park Garden
Friends of Bruce Castle
Friends of Bruce Castle
Friends of Brunswick Road Open Space
Friends of Cherry Tree Wood
Friends of Chestnut Park
Friends of Crouch End Open Space
Friends of Downhills Park
Friends of Downhills Park
Friends of Hornsey Church Tower
Friends of Ivatt Way
Friends of Lordship Rec
Friends of Markfield Recreation Ground
Friends of Muswell Hill Playing Fields
Friends of Muswell Hill Playing Fields & Coldfall Wood
Friends of Noel Park
Friends of Paignton Road
Friends of Queen's Wood
Friends of Railway Fields
Friends of Railway Fields
Friends of Stationer's Park
Friends of the Earth (London Region)
Friends of Tottenham Cemetery

Resident Association
Robert Burns Residents Association
Seymour Road Residents Association
Sophia House Residents Association
South Hornsey Residents Association
Southwood Lane Residents Association
Springfield Avenue Residents Association
Stokley Court Residents Association
Stroud Green Residents Association
Suffolk Road Residents' Association
Summersby Road Residents Association
The Chine & Cascade Residents Association
The Weymarks Residents Association
Tiverton Tewkesbury Residents Association
Tower Gardens Residents Network
Turner Avenue Residents Association
Veryan Court Residents Association
Wood Green Black Tenants Group
Wood Green Central Area Tenants & Community Assoc.
Woodridings Court Residents Association
Woodside Residents Association
The Queens Mansions Residents Association
Avenue Gardens Residents Association
Avenue Gardens Residents Association
Beresford Road Residents Association
Burghley Road Residents Association
Chestnuts Northsid Residents Assn
Chitts Hill Residents Association
Glasslyn, Montenotte Tivoli Road Residents Assoc.
HFRA (Haringey Federation of Residents Association)
Morrish Residents Association
Noel Park North Area Residents Association/Noel Park Conservation Area Advisory

Friends of Wood Green Common
G T Project Management
Gage Limited
Garden Drive Neighbourhood Watch
Garden Residents Association
Garden Residents Association
Gf Planning Limited
Gladesmore Community School
Gladesmore Girl's & Young Women's Club
Gladesmore Youth Club
Globe Projects Ltd
Goan Community Centre
Grace Baptist Chapel
Greek Community Care
Greek Orthodox Church
Greek Parents Association
Green City Landscapes Ltd
Greig City Academy
Gridline Architecture
Grosvenor Road Residents Association
Groundwork London
Gus Alexander Architects
Guyana People's Congress
Habinteg Housing Association
Haines Philip Architects
Hale Estate Residents Association
Hamilton Bishop Ltd.
Hancock Architects
Haringey African Organisation
Haringey Area Youth Project
Haringey Arts Council
Haringey Asian Women Aid

Committee/Friends of Noel Park
Parkside & Malvern Residents Association
Parkside Malvern Residents Association
Rookfield Estate Residents Association
Sandlings Residents Association
The Alexandra Residents Association
Warner Estate Residents Association
West Green Residents' Association
West Green Residents' Association
Woodlands Park Residents Association
Woodstock Road Residents Association
Cranley Gardens Residents' Association
Wood Lane Residents Association
Gardens Residents Association (GRA)
Grovelands, Lemsford & Leabank Residents Assoc.
Torrington Park Residents Association
Tynemouth Area Residents' Association
Friern Village Residents' Association
The Bounds Green and District Residents Association
Dowset Road Residents Association.
Haselmere Residents Association
Haselmere Residents Association
Haringey Federation of Residents Associations
Palace Gates Residents' Association
Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth
Crouch End Forum
Fountayne Residents Association

Company/Organisation
Office of Government Commerce

Haringey Autism
Haringey Breastfeeding Centre
Haringey Community Volunteer
Haringey Deaf Group
Haringey Faith Forum
Haringey Ghanaian Community
Haringey Group London Wildlife Trust
Haringey Irish Cultural & Community Centre
Haringey Leaseholders Association
Haringey Mencap
Haringey Pakistan Cultural Society
Haringey Phoenix Group
Haringey Police
Haringey Solidarity Group
Haringey Sports Council
Haringey United Church
Haringey Women's Aid
Harmony Close Residents Association
HART Architecture
Hartleys Projects Ltd
Health and Safety Executive
High Cross Church
High Cross United Reformed Church
Highgate Group Practice
Highgate Library Action Group
Highgate Newton Community Centre
Highgate Primary School
Highgate United Synagogue
Highgate Wood School

Cornerstone Trading
Barratt Development PLC
Inland Waterways Association
LB Greenwich
Metropolitan Development Service
London TravelWatch
St. Peter in Chains RC Infant School
Aarogya Medical Centre
London Ambulance Service
3 Valleys
African Caribbean Leadership Council
Alexandra Palace & Park CAAC
Alexandra Palace Charitable Trust
Al-Hijra Somali Community Association
Alliance Planning
Angolan Community Association
Arriva London
Asian Action Group
Asian Women's Association
Avenue Gardens Residents Association
Avenue Gardens Residents Association
Barnard Hill Association
Barton Willmore
Barton Willmore
Bellway Homes
Beresford Road Residents Association
Black & Ethnic Minority Carers Support Service
BME Community Services - Selby Centre
BPTW
British Waterways

Highpoint Dental Surgery
Highway Youth Club
Hill Homes
Hillcrest Tenants & Residents Association
Hillside Road Residents Group
Hilltop House Residents Association
Hollickwood Park Campaign
Holly Park Clinic
Holmes Design Ltd
Holmesdale Road & Orchard Road Neighbourhood Watch
Holy Innocents
Holy Trinity Church
Home Craft Consultant
Homebase Ltd
Homebound Social & Luncheon Group
Homes & Community Agency
Hornsey Dental Practice
Hornsey Housing Trust
Hornsey Housing Trust
Hornsey Lane & Colwick Close RA
Hornsey Lane Association
Hornsey Lane/Colwick Close Residents Association
Hornsey Moravian Church
Hornsey Mosque
Hornsey Police Station
Hornsey School for Girls
Hornsey YMCA
Housing 21
HPN Ltd
HTBG Residents Association

Canal River Trust Head Office
Bruce Grove Primary School
Burghley Road Residents Association
Buying Solutions
CARA Irish Housing Association
CB RE
CGMS Consulting
CGMS Consulting
CGMS Consulting
CgMS Ltd
CGMS Ltd
Chestnuts Northsid Residents Assn
Chettle Court Ranger Youth (FC)
Cheverim Youth Organisation
Chitts Hill Residents Association
Alderton Associates
Christian Action (Enfield) Housing Association
Christian Action (Enfield) Housing Association
City Planning Group
Civil Engineers Ltd
Cluttons LLP
College of Haringey, Enfield and North East London
Colney Hatch Management Company Ltd.
Connexions
Council of Asian People (Haringey)
Crossover Group
Cypriot Elderly & Disabled Group
Department for Business, Innovation and Skills
Alexandra Park School
Department of Environment Food and Rural Affairs
Derek Horne & Associates

IBI Design Associates
Industrial Dwellings Society
Innisfree Housing Association
Irish Community Centre
Irish in Britain Representation Group
Islamic Community Centre
Islamic Community Centre Women's Group
JA Architecture
Jack Cruickshank Architects
Jacksons Lane Community Centre
Jackson's Lane Residents Association
James Place/Church Road Residents Association
Jason Read Pugh
Jesus for the Word Community Project
Jewish Orthodox Association
John Grooms Housing Association
John L Sims Surveyor
John Perrin & Co
JS Surveying And Design
Julian Cowie Architects
Kings Avenue Dental Practice
Kingsley Place Residents Association
Kurdish Advice Centre
Kurdish Community Centre
Kurdish Housing Association
Kush Housing Association
L & P Consultants
Ladybur Housing Co-operativr
Lancaster Road Residents Association
LB Barking & Dagenham
LB Brent

Dialogue Communicating Planning
DP9 Planning Consultants
Drivers Jonas Deloitte
The Old Surgery
Ethiopian Community Centre
Euroart Studios
Family Mosaic
Fields in Trust
First Plus Planning
FirstPlan
Friends of Priory Park
Friends of Priory Park
Muswell Hill and Hornsey Friends of the Earth
Friends of the Earth Tottenham & Wood Green
Friends, Families and Travellers and Traveller Law Reform Project
Fusion Online Limited
Genesis Housing Group
Glasslyn, Montenotte Tivoli Road Residents Assoc.
GLC-RAG
Grace Organisations - Elderly Care Centre
Greek Cypriot Women's Organisation
GreenN8 Community Group
Gt. Lakes Initiative & Support Project
Haringey Chinese Centre
Haringey Cycling Campaign
Haringey Fire Service
Haringey Peace Alliance
Haringey Play Association
Haringey Racial Equality Council
Haringey Somali Community & Cultural Association
Haringey Womens Forum

LB Croydon
LB Ealing
LB Hammersmith & Fulham
LB Harrow
LB Havering
LB Kensington & Chelsea
LB Lambeth
LB Merton
LB Newham
LB Richmond Upon Thames
LB Sutton
LB Tower Hamlets
LB Wandsworth
Lea Valley Primary School
League of Jewish Women
LETEC
Levvel Ltd
Liberty Church
Lidl UK
Lipton Plant Architects
Living World Temple
Livingstone Youth & Parent Support Centre
Lomond Close & Brunswick Road RA
Lomond Close Residents Association
London Ambulance Service
London Basement Company Ltd
London Bat Group
London City Airport
London Forum of Amenity & Civic Societies
London Historic Parks & Gardens Trust
London Housing Federation

HAVCO
Her Majesty's Court Service
HFRA (Haringey Federation of Residents Association)
Home Builders Federation - London
Home Office
Home-Start Haringey
Hornsey CAAC
Hornsey Historical Society
Hornsey Vale Community Association
Hornsey Vale Community Association
Jala - Johnathan A Law and Associates
Jamait-Al-Nissa
Joint CAAC
Jones Lang LaSalle Planning
King Sturge Llp
Knight Frank
Ladder Community Safety Partnership
Lambert Smith Hampton
LB Bexley
LB Redbridge
Lee Valley Estates
Lee valley Park Authority
London Continental Railway
Dron & Wright
London First
Metropolitan Housing Trust
Metropolitan Police
Metropolitan Police
Methodist Church
Ministry of Justice
Morrish Residents Association
Mount Anvil plc

London Islamic Cultural Society
London Islamic Cultural Society
London Port Health Authority
London Walking Forum
London Waste Ltd
London Wildlife Trust
London Windows Direct Ltd
Lord Morrison Community Centre
Lordship Lane Infant School
Lordship Lane Junior School
Loren Design Ltd
Love Lane Residents Association
M C Dentistry
Manor House Dental Practice
Marianne Davys Architects Ltd
Mario Pilla Architects
Markfield Project
MD Designs
Metropolitan Development Consultancy
Metropolitan Home Ownership
Metropolitan Police
Metropolitan Police Service
Middle Lane Methodist Church
Middlesex Area Probation Service
Millennium Neighbourhood Watch & Residents Association
Millicent Fawcett Tenants Association
Millyard 7th day Baptist Church
Ministry of Praise
Missionaries of Africa
MJW
Moravian Church
More Space

Mulalley and Company Ltd
Nathaniel Lichfields and Partners
National Federation of Gypsy Liaison Groups
AMEC for National Grid
National Market Traders' Federation
New Testament Church of God
NHS London Healthy Urban Development Unit
Noel Park CAAC
Tottenham CAAC
Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park
North London Business
North London Chamber of Commerce
North London Partnership Consortium
North London Waste Authority
North London Waste Authority
North Middlesex Hospital
Caldotec Ltd
Campsbourne School
Parkside & Malvern Residents Association
Parkside Malvern Residents Association
Peacock & Smith for WM Morrison Supermarkets plc
Peacock and Smith
PEEC Family Centre
Planning Perspectives
Pollard Thomas & Edwards Architects
PTEA
Rapleys
Rapleys
Redrow Homes (Eastern) Ltd
Restoration Community Project

Morris House Dental Surgery
Morris House Surgery
Moselle Close Residents Association
Mountview Arts Centre
Mt. Olivet Baptist Church
Murray Graham Architecture Ltd
Murray Mackeson Associates
Muswell Colney Residents Association
Muswell Hill & Fortis Green Association
Muswell Hill & Highgate Handicapped Pensioners Club
Muswell Hill & Highgate Pensioners Action Group
Muswell Hill & Highgate Pensioners Action Group
Muswell Hill Police Station
Muswell Hill Synagogue
Muswell Hill Youth Project
N London Cultural Diversity Group
N.A.G.
National Romany Rights Association
Neelkamal Asian Cultural Centre
Neil Wilson Architects
Nelson Mandela Residents Association
New Deal for Communities
New Image Design
New River Action Group
New River Sports Centre
New Space
New Stroud Green Health Centre
Newton Architecture
NHS London
Nightingale Primary School

Rookfield Estate Residents Association
RPS Planning
Sandlings Residents Association
Savills
Savills
Savills
Savills
Savills Planning
Savills
Selby Trust
Shian Housing Association Ltd
St. James Church
St. Mary's Church
Stapleton Hall Ltd
Stewart Ross Association/Dev Plan
Stock Woolstencroft
Stonewall
Sustrans
Tan Dental Practice
Tetlow King Planning
Thames Water Utilities Ltd
Thames Water Wastewater Services
The Alexandra Residents Association
Haringey Council
The Mulberry Primary School
The Planning Inspectorate
The Ramblers
The Theatres Trust
<u>Sustrans</u>
Tiverton Primary School

Noel Park Infant & Junior School
Noel Park North Area Residents Association
Noel Park Over 55's Club
North Grove Residents Association
North Haringay Infant & Junior School
North London West Indian Association
Northumberland Park Community School
Northumberland Park Tenants & Community Association
Northumberland Park Women's & Childrens Centre
npower
Oakdale Resident Association / South Tottenham RA
Okpanam Women's Association
Oromo Community in Haringey
Osel Architecture
Outline Building Limited
P R P Architects
P. E. Ottery
P.D. Associates
Palace Gardens Association
Palace Gates Residents Association
Palace View Residents Association
Park Lane Close Residents Association
Park Road Dental Practice
Park Road Pool
Park View Academy
My Dental Care
Park Vue Dental Practice
Parsons Brinckerhoff Ltd
Partridge Way Residents Association
Pathmeads

Tottenham CAAC
Tottenham Civic Society + Tottenham CAAC
Transport For London
Tree Trust for Haringey
Triangle Community Centre
Turley Associates
Campaign to Protect Rural England (CPRE)
Turnaround Publisher Services
Turnaround Publisher Services
Unite Group PLC
Veolia Environmental Services (UK) Plc
Wards Corner Community Coalition
Wards Corner Community Development Group
Warner Estate Residents Association
Haringey Citizen's Advice Bureau
West Green Residents' Association
West Green Residents' Association
Woodlands Park Residents Association
Haringey Trades Council
Woodstock Road Residents Association
Workspace Group
YMCA
Cabinda Community Association
Veolia Water Partnership
London Parks and Gardens Trust
Pinkham Way Alliance
Thames Water
Freehold Community Association
Natural England Consultation Service
Office of the Green MEPs,
Member of Parliament for Chipping Barnet
Planner

Patrick Hickey Design
Paul Archer Design
Paul Buxton Associates
Peabody Design Group
Peabody Trust
Peabody Trust
People's Christian Fellowship
Perfect Fit Kitchen & Interiors Ltd
Peter Brades Architects
Phoenix Group
Plevna Crescent Residents Association
Police & Community Working Group
Port of London Authority
Post Office
Post Office Counters Ltd
Powergen plc
Pride of Ferry Lane
Propel Projects
Protect Bruce Castle Area (PBCA)
Pyramid Counselling Services
Quorum Associates
Randall Shaw Billingham
Redemption Church of God
Remington Road Residents Association
Rennie & Partners
Resident Association
Resident Association
Rhodes Avenue Primary School
Richard S McCarthy Architect
Rie Nijo Architecture
Risley Avenue Infant & Junior School
Robert Burns Residents Association

One Housing Group
One Housing Group
Hyde Housing
Viridian Housing
Viridian Housing
Tamil Community Housing Association Ltd
London & Quadrant
London & Quadrant
London & Quadrant
London and Quadrant
British Waterways Board (London Office)
Friends of Parkland Walk
Friends of Woodside Park
The Highgate Society
LB Southwark
Lee Valley Regional Park Authority
Martineau
Milmead Industrial Management Ltd.
Mobile Operators Association
Muswell Hill CAAC
Planning Potential
Shire Consulting
Sunlight Lofts Ltd
Haringey Allotments Forum
Montagu Evans
Newlon Housing Trust
Newlon Housing Trust
CG Architects
Tottenham Police Station

Robert Harrison Property
Rolfe Judd Planning Ltd
Royal Mail Property Holdings
Royal Society for the Protection of Birds
Rutland House Surgery
Saheli Asian Girls & Young Womens Group
Sakumoh Dance Group
Sanctuary Housing Association
Sanctuary Youth Club
Save Britain's Heritage
Save the Environment of Park & Palace (STEPP)
Savills Plc
Scenario Architecture
Schamroth + Harriss Architects
Servite Houses
Seven Sisters Infant & Junior School
Seventh Day Adventist Church
Seymour Road Residents Association
SGI Sokagakkia
Sierra Leone Community Empowerment Project
Sierra Leone Family Welfare Association
Sigma Design Build UK
Simon Bocking Building Services
Simon Levy Associates
Society for the Protection of Ancient Buildings (SPAB)
Solon Housing Co-operative Housing Services
Somali Community Group
Somali Welfare Association
Somerset Gardens Family Health Care

Methodist Homes
Network Housing
Network Housing
Arhag HA
Lee Valley Estates
Lee Valley Estates
Innisfree HA
Karin Housing Association
Karin Housing Association
Circle Houing Group
Circle Houing Group
Highgate CAAC
Highgate CAAC
Highgate CAAC
Apna Ghar Housing Association
Carr-Gomm
Circle 33 Housing Trust
Community HT (One HG)
Grainger PLC
Guinness Trust
Habinteg Housing Association Ltd
Hornsey Housing Trust
Housing 21
Islington and Shoreditch HA
Lien Viet Housing Association
Logic Homes Ltd
North London Business
North London Sub-Region
Notting Hill Housing Association
Nottinghill Housing Group

Sophia House Residents Association
South Harringay Infant School
South Harringay Junior School
South Hornsey Residents Association
Southwood Lane Residents Association
Spenser Associates
Sport England London Region
Sporting & Education Solution
Springfield Avenue Residents Association
St, Paul's and All Hallows CE Junior School
St. Andrews Vicarage
St. Ann's Primary School
St. Anns Church
St. Benet Fink
St. Cuthbert's Church
St. Francis de Sales RC Infant & Junior School
St. Gildas' RC Junior School
St. Ignatuis RC Primary School
St. James CE Primary School
St. James Dental Surgery
St. John the Baptist Greek Church
St. John Vianney Church
St. John's
St. Marks Methodist Church
St. Marks Methodist Church
St. Mary Community Centre
St. Mary's CE Infant School
St. Mary's CE Junior School
St. Mary's Greek Orthodox Cathedral
St. Mary's RC Infant & Junior School

Origin Housing
Origin Housing
Origin Housing Group
Pocket
Pocket
Pocket Living
Sahil HA
Sahil Housing
Sanctuary Group
Sanctuary Housing
Shian Housing Association
Southgate Churches & Wood Green
St Mungo
Teachers Housing Association
The Abbeyfield Society
Pinkham Way Alliance
Muswell Hill Sustainability Group
S. Mary's Vicarage
Networked Neighbourhoods
Cranley Gardens Residents' Association
The Hawthorns RA and Neighbourhood Watch
Haringey Forum for Older People
Woodside High School
LB Lewisham
Barker Parry Town Planning Ltd
Lancasterian Primary School
Exposure Organisation
Open Door
Open Door
Open Door
Space Design Consultants Ltd

St. Michael's CE Primary School
St. Paul the Apostle
St. Paul's
St. Paul's and All Hallows CE Infant School
St. Paul's Church
St. Peter Le Poer
St. Thomas More School
St. Vincent Social & Economic Association
Stagecoach - SELKENT
Stamford Hill Primary School
Stationers Community Centre
Staunton Group Practice
Stephen Donald Architects
Stokley Court Residents Association
Stroud Green Baptist Church
Stroud Green Housing Co-operative
Stroud Green Residents Association
STS Structural Engineering
Stuart Crescent Health Centre
Stuart Henley & Partners
Studio 11 Design Ltd
Studio 136 Architects
Suffolk Road Residents' Association
Summersby Road Residents Association
Sunshine Garden Centre
Sure Youth Foundation Project
Symon Smith & Partners
T.B.F.H.A
Tasou Associates
Temple of Refuge
Templeton Associates

LB Bromley
St. Martin of Porres RC Primary School
Turkish Cypriot Community Association
Iceni Projects Limited
Mind In Haringey
Pellings Llp
Oliver Burston Architects
Highgate URC Church
Earlham Primary School
John Rowe-Parr Architects
The Garden History Society
Westminster City Council
Wood Lane Residents Association
Gardens Residents Association (GRA)
Royal Borough of Kingston upon Thames
St. John the Baptist Greek Church
Grovelands, Lemsford & Leabank Residents Assoc.
Muswell Hill Primary School
Family Mediation Service
Sovereign Group Ltd
St. Francis de Sales
Leads Design Partnership
St. Aidan's VC Primary School
Keeping it Simple Training (KIS) Ltd
Home Group
The Parish of Wood Green
Ferry Lane Primary School
St. John Vianney School
Action for Kids Charitable Trust
Muswell Hill Centre
Coleridge Primary School

Tenants Association
Tetherdown Primary School
Thames Gateway London Partnership
The Alexandra Surgery
The Bowes Road Dental Practice
The Chine & Cascade Residents Association
The Christchurch Hall Surgery
The Clock Tower Practice
The Gainsborough Clinic
The Georgian Group
The Green CE Primary School
The Gypsy Council
8 Stuart Crescent Health Centre,
The John Loughborough School
The North London Gay & Lesbian Association
The Surgery
The Surgery
The Surgery
The Surgery
Spur Road Surgery
The Surgery
The Surgery
St John's Road Surgery
The Surgery
The Surgery
The Surgery
The Surgery
Myddleton Road Surgery
The Surgery
The Surgery
The Surgery

Stroud Green Primary School
Barnet, Enfield and Haringey Mental Health Trust
Our Lady of Muswell Hill Primary School
Torrington Park Residents Association
The Willow Primary School
Millennium Dental Practice
St. Paul's Catholic Primary School
Rokesly Junior School
Tynemouth Area Residents' Association
Papa Architects Ltd
Friern Village Residents' Association
Enfield, Haringey and Barnet Samaritans
Dixon Searle LLP
Mario Pilla Architects Ltd
LB Merton
LB Merton
The Bounds Green and District Residents Association
Rapleys LLP
Savills,
Mario Pilla Architects Ltd
Planning Bureau - McCarthy and Stone
Dowset Road Residents Association.
Bridge Renewal Trust
Winbourne Martin French (chartered surveyors).
Muswell Hill & Fortis Green CAAC
Transition Crouch End
Hornsey Historical Society member.
MHFGA
CgMs Consulting
London borough of Enfield

The Surgery
The Surgery
The Surgery
The Surgery
The Tree Council
The Tree Trust for Haringey
The United Reformed Church
The Victorian Society
The Weymarks Residents Association
Affinity Water Limited
Tibbalds TM2
Tiverton Tewkesbury Residents Association
Tomlinson Tree Surgeons
Tottenham & Wood Green Pensioners Group
Tottenham Baptist Church
Tottenham Community Sports Centre
Tottenham Green Sports Centre
Tottenham Green Taskforce
Tottenham Irish Women's Group
Tottenham Peoples Initiative
Tottenham Police Station
Tottenham Traders Association
Tottenham Trust
Tottenham Women's Aid
Tower Gardens CAAC
Tower Gardens Residents Network
Town & Country Planning Limited
Trafalgar Christian Centre
Transco
Trinity at Bowes Methodist Church

London Borough of Enfield
Collins & Coward
Hornsey Historical Society member
A2 Dominion Group
The Highgate Society
Greater London Authority
Urban Vision Partnership Limited Regulatory Services
Planware Ltd
Mayor's Office for Policing and Crime
Haringey Young Carers Project
We Love Myddleton Road
Architectural Heritage Fund
Smith Jenkins Town Planning Consultants
Levvel Ltd
SSA Planning Ltd
London Gypsy and Traveller Unit
Met Police – Safer Transport Team - Haringey
Met Police – Safer Transport Team - Haringey
DSO Edmonton London Ambulance Service
London Ambulance Service
Arriva
Metroline
First Capital Connect
First Capital Connect
TfL
TfL
TfL
TfL
TfL London Rail
LOROL
Metroline

Turkish Cypriot Counselling Group
Turkish Cypriot Elderly Group
Turkish Cypriot Forum
Turkish Cypriot Peace Movement in Britain
Turkish Cypriot Women's Project
Turkish Parents Association
Turkish Youth Association
Turner Avenue Residents Association
Turnpike Lane Citizens Advice Bureau
Twentieth Century Society
TWG FoE/FoE London
Tynemouth Medical Practice
Uganda Welfare Association
Umfreville Road Neighbourhood Watch
Unit One Architects
United Apostolic Faith Church
Universal Church of the Kingdom of God
Urban Futures London Ltd
Urban Homes Ltd
Van Rooyen Design
Veryan Court Residents Association
Victim Support Haringey
Visit London
Vivendi Architects LLP
Voluntary Action Haringey
W. A. Shersby
Warham Road Neighbourhood Watch
Charalambous Architectural Consultant
Welbourne Primary School
West Green Neighbourhood Watch
West Green Primary School

Abellio
Go Ahead
Greater Anglia
Haselmere Residents Association
Haselmere Residents Association
London Travel Watch - Chair of Consumer Affairs
London Travel Watch
Haringey Cycling Campaign
Age UK
Mobility Forum/ Age Concern Haringey
Haringey Disability First Consortium (Access & Transport sub-group)
Haringey Disability First Consortium
Haringey Disability First Consortium
Haringey Federation of Residents Associations
Palace Gates Residents' Association
Highgate Neighbourhood Forum
Sustainable Haringey/ Muswell Hill and Fortis Green Association
Sustainable Haringey Transport Group
Barking-Gospel Oak line users group
Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth
HAVCO
London at BT Group and Chair, Haringey Business Board
Hackney Community Transport Group
Living Under One Sun
Boyer Planning London
Berkeley Homes (North East London) Ltd
Crouch End Forum
Fairview New Homes
Amec Foster Wheeler on behalf of National Grid
NHS Property Services Ltd

West Green Regeneration Group
Westbury Dental Practice
Westbury Medical Centre
Weston Park Primary School
White Young Green Planning
Whitehall Community Centre
Willoughby Road Methodist Church
Wilson & Bell
Winkfield Road Community Centre
Wise thoughts - gaywise
Women & Medical Practice
Wood Green Area Youth Project
Wood Green Black Tenants Group
Wood Green Central Area Tenants & Community Assoc.
Wood Green Community Link
Wood Green Dental Practice
Wood Green Police Station
Wood Green Regeneration
The Archdeacon of Hampstead
Wood Green Youth Club
Woodberry Down Baptist Church
Woodlands Park Infant & Junior School
Woodridings Court Residents Association
Woodside Residents Association
Xeva Design Concepts
Yabsley Stevens Architects
Young Lesbian Group
Youth One Stop Shop
Youth Theatre Project
Zatkhon Construction Co. Ltd.

Fairview
Persimmon
Persimmon
Persimmon
DP9 Planning Consultants
Chartered Landscape Architect
Fountayne Residents Association

The Queens Mansions Residents Association
Ladder Community Safety Partnership
Department for Education
Chris Thomas Ltd
Haringey NHS
Haringey Teaching Primary Care Trust
Whittington Hospital Trust

Appendix D – Individual Comments Received and the Council’s Response to Each

ID	Summary of Comments	Topic / Change	Council Response
1	<p>First principles: This site is the only open space in the Bruce Grove Ward. The Bruce Grove Ward is the smallest Ward in LBH and has by far the highest population density at 155 persons per hectare. Bruce Grove Ward consists mainly of 2 and 3 storey Victorian and Edwardian terrace houses which are very efficient is providing high density housing and gardens with clearly defined boundaries. The result is that the Bruce Grove Ward is almost fully built up and has very little space for any further small scale development. This site, THR2, is in the highest category of open space deficiency (see UDP map). THIS SITE IS IN THE BRUCE CASTLE CONSERVATION AREA.</p>	THR2 Tottenham Delivery Office & Back of Bruce Grove	<p>It is noted that this site has a valued local open space value, and it will be protected as per the 2006 UDP.</p> <p>The redevelopment of this site has the potential to enhance the Conservation Area, if designed with sufficient care, as delivered through the DMDPD.</p>
1	<p>There will be a continuing need for the Post Office Sorting Office for the foreseeable future. It will not be possible to transfer the operation to the PO site at Mount Pleasant in Clerkenwell in view of the plans for redevelopment in that location. There are no other alternative sites for this operation. The timber yard next to it should not be closed down/ CPO /relocated just to make a larger development site.</p>	THR2 - the present/recent usage of the Site	<p>Royal Mail have nominated this site for disposal, suggesting that there may not be a need for a delivery office at this location, or that it could be reconfigured.</p>
1	<p>The area to the north of the site, north of Champa Close, has been designated as “Bruce Grove Wood”, a site of local ecological interest and was supposed to have had a management plan by the LBH under the UDP. In the past it was a used as a nature reserve by Bruce Grove Primary School in Sperling Road. In recent years there has been a loss of trees from storms and from illegal felling. Japanese knotweed started to grow on the illegally cleared parts. Champa Close was formerly an area of workshops which were the subject of complaints from</p>	‘Bruce Grove Wood’ – SINC site	<p>It is noted that this site has held a SINC designation, and it will be appraised for inclusion in the</p>

ID	Summary of Comments	Topic / Change	Council Response
	<p>residents about night time metal grinding noises which led to Council enforcement action (shutting down the illegal activities which were going on there) and the redevelopment of that site for housing only. The use of pile drivers in the construction caused damage to properties in Sperling Road as well as to the Grade 2 listed building at No7 Bruce Grove. Despite the site being levelled the pavement of Champa Close is not flat and is unnecessarily undulating and is too narrow for prams. The appearance is amateur and looks like a Toy Town development. I am very surprised that LBH allowed the developer to get away with such shoddy work. It is incorrect to say that this road was carved out of the land at No.5 Bruce Grove for Champa Close as it was done decades earlier for access to the workshops.</p>		<p>Local Plan.</p> <p>Issues of enforcement of noise are not pertinent to the Local Plan.</p>
1	<p>In the unlikely event of the PO and timber yard sites becoming available: Any new buildings should be low rise – 2 storey only to match the surrounding residential houses and prevent overlooking. Either a change of use for housing or stay as light industrial but not to be mixed. Quality housing never incorporates workshops. (Health and safety issues and noise and pollution and fire risk - especially with informal, unregulated workshop activity and higher insurance premiums for residents because of the risks associated with the workshops) Design and layout/pattern of development should respect the surrounding area (Conservation Area and woodland site of local ecological importance) and the quiet enjoyment of their properties by existing residential neighbours : Woodland ecology (bird, butterfly and plant varieties being woodland ones) Avoid overlooking existing residential properties or blocking their light Low heights Low density given the existing pressure on social and transport infrastructure</p>	Requirement for a delivery office	It is not considered that limiting heights to 2 storeys in the borough will help to meet housing need sufficiently. The design of new buildings will reflect surrounding densities however.
1	<p>Permeability Generally this may be a good thing for many sites but here is unnecessary and undesirable. Both the PO site and the timber yard have vehicular access for HGVs on Moorefield Road. This is more than adequate to serve the proposed development. There is no need to access Bruce Grove or Sperling Road directly even by pedestrian access. To have a variety of entry points does not lead to security for the residents on the site. Nor for the neighbours whose gardens back on to it. Such a provision would lead to this becoming a crime hot spot and a new access to get over the wall into back gardens in Sperling Road where those residents will be extremely vulnerable to burglary. The burglars may not be noticed by neighbours unlike any attempt to break in from the front in a street with a high footfall day and night and regular passing traffic. The present high security fencing attached to the PO wall is likely to be dismantled should the site become residential with disastrous results for Sperling Road residents. Many insurance</p>	Permeability Safety	Any proposals for new access routes through the site will be required to be accompanied by a “Secured by Design” statement to ensure that the new routes are appropriately designed with regards safety.

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	<p>companies no longer insure car owners in N17 and that is likely to affect properties if the LBH proposals are brought into effect.</p> <p>Far from creating a nice place to live the proposals are likely to destroy a nice place to live.</p> <p>“Designing in crime” and loss of security for residents whose gardens back on to the PO site with its high security fencing. In recent years the alleyways in Sperling Road running along the end of the gardens in Moorefield Road up to the PO boundary wall, originally for coal deliveries, were gated and locked which led to a dramatic reduction in burglaries. Now the statistics produced for Safer Neighbourhood Policing meetings in the form of a Ward street map with symbols for specific crimes entered at the exact location of each crime show that burglary is a rare crime in Sperling Road. This situation will be reversed if “permeability” is insisted upon.</p> <p>Also compromising the security of those who would reside in the proposed development. Ignoring a fundamental principle of English law that “an Englishman’s home is his castle”.</p>		
1	<p>I am concerned that the proposed access to Sperling Road (through the school playground and part of Bruce Grove Wood) is really a “code” for CPO opportunities for demolishing houses, without alerting the public to this possibility and thus avoid objections on the ground. I was disappointed that at a public meeting (17/02/14) senior officers from the Planning Department were unable to allay my fears on this issue when this point was put to them in plain terms.</p>	Permeability	<p>There are no plans for CPOs on this site. If a CPO is ever proposed it will be subject to it’s own consultation requirements.</p>
2	<p>Having lived in Tottenham for the last 6 years, I am pleased about the idea of regenerating the area. I do have concerns about the way the council plans to go about this however. In 2011 there were terrible riots. I don't think building more homes and packing another 20,000 (at least ?) people into an already heavily populated area (compare the east to the west of the borough) is a smart idea. Tensions have not gone away and without the proper infrastructure this may make the problem worse. I'm talking about better transport links, less traffic, more healthcare facilities, sports facilities, better schools, more open spaces, more child friendly etc. Any demolition of historical buildings should be avoided.</p>	Distribution of Growth	<p>These plans deliver the strategic pattern of growth identified in the Local Plan: Strategic Policies. Sufficient infrastructure will be identified and delivered through the IDP.</p>
2	<p>I understand you need money to improve the infrastructure, and you probably get this from selling the land to private developers, but please think about whether you would like to live in this area after all these changes! I think the council should be sympathetic to the fabric of Tottenham - please don't make an identikit high st that can be found in any town in the UK. Tottenham is great and can get</p>		<p>The Council is committed to delivering the highest quality new developments</p>

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	better. Think about the locals who live here and you won't go far wrong.		which everybody will benefit from.
3	Location of sites: The location of the majority of the proposed site are to the east of the railway line. We can only presume that this is because residents in the west of the borough (i.e. 'leafy' Crouch End, Muswell Hill and Highgate) are on the whole more affluent, and more likely to be able to organise community involvement in order to influence decisions on any planned sites. Where as in the east, where there is a high ransient and diverse community, there is less likely to be opposition which will lead to proposals not being challenged. The result of this will be over development and overcrowding in parts of the borough, making an even bigger east/west divide to the problem of overcroding one area.	Distribution of Growth	These plans deliver the strategic pattern of growth identified in the Local Plan: Strategic Policies.
3	We strongly oppose the development of the Arena. The local infrastructure is not able to cope with the current level of occupation let alone an influx of more residents. Our schools, doctors, dentist are at saturation point now.	Arena development S4	Infrastructure Requirements will be identified and delivered through the IDP.
3	The volume of traffic on Green Lanes between Manor House and St Ann's Road is grid locked for much of the day causing major problems for motorists and for public transport. There is no feasible way of widening the street to accommodate any extra traffic that the proposed Arena development would bring to the area.	Traffic	It is recognised that the traffic on Green Lanes in this area is an issue, one which the reconfiguration of the shopping centre can improve.
3	The extra traffic the proposals in this document wil bring to the area will havbe an adverse effect on the quality of air and subsequently the health of local residents. An online search has shown that Haringey (as a borough) is already 88% above the European approved levels of are qaulity: we dread to think what the percentage is on Green Lanes now.	Air Pollution	It is recognised that the traffic (which leads to poor air quality) on Green Lanes in this area is an issue, one which the reconfiguration of the shopping centre can improve.
3	The proposal to build up to eight storey buildings would be out of place and will not fit in with the local landscape, which is generally a mixture of late Victorian/early Edwardian houses. To create a mish-mash of buildings would render the area unattractive.	Type of Buildings	Design will complement the sites surrounding

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			area.
3	Although we realise that Haringey Council have no control over this proposal, we feel that to bury this in a 140 page document on page 68 is unethically. Those residents living within the circle shown on your map, and this is a very large residential area, may not yet be aware that the value of their property has just plummeted and their properties are now unsalable.	Crossrail 2	It is considered that reference to this proposal is appropriate.
3	We appreciate that Haringey Council do have to build more housing, however we feel that the clustering of the proposed sites in an already over developed ate in the east of the borough, will mean a poorer quality of life for local residents. Please consider all of your residents when planning this sort of development as at the moment it seems obvious that only some are being treated fairly in this matter.	Growth	The Council has a requirement to meet housing need, and this involves planning for 1,502 new homes each year. There is no option to build less.
4	The AAP makes a number of inaccurate, contentious and misleading statements & assumptions. Its main purpose is to legitimise & to blind the intensification of the area. At its heart the AAP is about exploitation & completely disregards emerging evidence that intensification in deprived areas leads to the collapse of vulnerable communities. The AAP also fails to acknowledge the true condition of the state of the borough, like the council, and is in the same zone of denial as the government asserting that the banking crisis, unemployment, austerity, cuts & welfare reform have not caused the growth of food banks. The community would probably be better of forming a neighbourhood forum (No one is against sustainable development).	Neighbourhood Forum	<p>The Council has a requirement to meet housing need, and this involves planning for 1,502 new homes each year. It is considered that this plan sets out a method, which, following changes made in response to this consultation will be the most appropriate way of meeting housing need.</p> <p>The Council will support any community that</p>

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			wishes to establish a neighbourhood forum.
4	In the 2 nd paragraph the AAP claims to reflect the community's aspirations for an area. It became very apparent at the well attended Tottenham Planning Public Consultation meeting on 17 th February, that none wanted development to the extent envisaged and promoted by the AAP. The attendees unanimously opposed the AP. By this demonstration the AAP should be deemed unfit for purpose and made void forthwith. The 3 rd paragraph refers to a consensus – from genuinely informed public – see above reply to 2 nd paragraph)	Growth	The Council has a requirement to meet housing need, and this involves planning for 1,502 new homes each year. It is considered that this plan sets out a method, which, following changes made in response to this consultation will be the most appropriate way of meeting housing need.
4	While a presentation was made to area forums most, if not all the attendees were unable to meaningfully comment or participate because a) unfamiliar with AAPs b) unfamiliar with the planning system; c) unaware evidence is showing the past 10+ years of intensification has caused worsening health and social inequalities. There are other reasons.	Consultation	The consultation was held in accordance with the Council's SCI and relevant regulations. Every effort was made to engage positively with requests for information regarding the consultation.
4	The council is not being as fair or as open as it should be. Although it quite rightly notifies the public of its intent to develop extensively the area, it has failed to acknowledge the true condition of the site of the borough and the effect intensification has had. In my view one serious impact this has caused is that councillors are the planning committee are incapable of properly determining planning	Consultation	The consultation was held in accordance with the Council's SCI

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	<p>applications since they are ignorant of the borough's true state and the effect of intensification. The council hasn't been open about councilors on development companies boards or how it intends to use 'partners' like the Bridge Renewal Trust to exploit the development of St Ann's Hospital, just as it used its predecessor body, the NDC to bludgeon the community over Wards Corner. On many levels the AAP and those who promote it are disingenuous and manipulative.</p>		<p>and relevant regulations. Every effort was made to engage positively with requests for information regarding the consultation.</p>
4	<p>I made a detailed submission to the consultation scoping request DPD in July 2012, in which I pointed out numerous inconsistencies with Haringey's plans that HMOs out to be included in sustainability appraisals and that life expectancy had worsened. Yet the council hasn't addressed its shortcomings and now, for political reasons, is pushing for more intensification by inserting the AAP into a relationship with other documents promoting development, but which are lettered with flaws and are inherently biased and have skewed outlooks.</p>	<p>Relationship to other Documents</p>	<p>The DMDPD will address issues regarding HMOs. Additionally an Article 4 Direction is in place removing permitted development rights to convert homes into HMOs.</p>
4	<p>This section, typically, begins with a lie, a false point or assertion, or misleading comment or statement, whichever you prefer. It is an attempt to misrepresent Tottenham's character by understating just how populated Tottenham is. In page 6 of the accompanying document the site allocations DPD, the first bullet point informs us the GLA's estimate of Haringey's population as 225,000 (it suited the GLA's purpose). However, the 2011 census showed 254,900 (now in 2014 nearly 260,000). The AAP's claim that Tottenham has 90,000 people around 40% is another deliberate attempt to misinform and to hide how populated Haringey already is. If 90,000 equals 40% then 225,000 = 100%. The AAP uses the old GLA estimate when newer more accurate data is available.</p>	<p>Key Issues, Tottenham's characteristic and socio-economic snapshot</p>	<p>It is recognised that the population in Haringey has increased, which has increased the need for new homes to be built.</p>
5	<p>I think that by putting the pressure of delivering 1000 new homes a year on an already struggling part of the borough is ill founded. The area has already seen civil unrest due to the lack of citizenship and general disenfranchisement of the local community, by putting additional pressure in the form of mass house building would have negative effects on the existing communities. This is outlined very articulately in the response to this document by 'Out Tottenham' and I would like to take this opportunity to echo their sentiments, with regard to the comments on the Area Action Plan.</p>	<p>Growth</p>	<p>The Council has a requirement to meet housing need, and this involves planning for 1,502 new homes each year. It is considered that this plan sets out a method, which,</p>

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			following changes made in response to this consultation will be the most appropriate way of meeting housing need.
5	<p>I ask the council to reconsider and to consider a few alternatives/ideas;</p> <p>Gap sites throughout the borough – how about putting some allowances in the UDP planning documents to facilitate self builders to develop these gap sites, a survey could be carried out to determine the extent of housing units could be made available this way. This would benefit the borough of Haringey in a few strategic ways – reducing the impact on transport and services as new development will be evenly spread throughout the borough – increasing the diversity of our streets, and bringing bespoke design to existing homogenous communities – these homes will also be built to higher environmental standards as part of compliance with part L of the building regulations, maybe there could be additional requirements attached to the development of these sites so that a network of eco-homes are created throughout the borough promoting the 40:20 agenda of the council, these homes could then be included in the open homes events already going on in the borough, raising the awareness of and aspiration of low energy living.</p>	Self build	The Councils' policies support appropriate infill across the borough, including self build.
5	<p>Putting empty buildings back into use – The issue of empty properties is a problem for all of us, they can lead to squatting and be a hazard if not maintained and become structurally unsound. By allowing and facilitating empty properties to be redeveloped, then housing and other vital services can be brought into use throughout the borough. This strategy has the same strategic benefits as the gap sites.</p>	Bringing back empty buildings	Where appropriate, the plan will support bringing empty buildings back into use. It is noted that this may not be possible in all cases however.
5	<p>Creating a development strategy around truly diverse mixed developments – this would involve the rejection of current rigid zoning of employment land and residential land and embracing a truly mixed use approach to development. An example of this type of development is currently underway at Hays in West London by the developer 'Cathedral'.</p> <p>Where historic buildings are incorporated into the development to improve the sense of place. Cinemas, offices, industry and housing are in the same location to create a dynamic and desirable location. One important thing to take from this development is that it is on a car park essentially, existing homes are preserved, along with the derelict factories that are reconditioned and repurposed.</p>	Mixed use development	The Council wishes to see more mixed use developments which deliver new homes and jobs in the borough.

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	Having a more flexible approach allows for more resilient neighbourhoods.		
5	<p>This is a statement in response to the Draft Site Allocations Plan Document (DPD) – (http://www.haringey.gov.uk/site_allocations_dpd_final.pdf) concerning the growth area TH8: South Tottenham Employment Area. Specifically, it is a response drawn together for the warehouse community on Fountayne Road and the wider surrounding areas (Markfield Road/Constable Crescent). The warehouse community will be described hear under the banner ‘Fountayne Creative Collective’ and, thus describing the general nature of the culture that predominantly exists on the road and the wider area.</p> <p>Fountayne Creative Collective can be perceived as a local phenomena generated by the opportunity and increased need of low-cost affordable unit spaces to rent for creative professionals seeking residence for new and emerging creative businesses within the north east region of London. Over the past 10 years this phenomena has increased in attracting the young creative professional to spaces made available by the warehouse/factories on Fountayne Road and the wider area. Filling out spaces that may have otherwise been neglected and therefore maybe have attributed to a dysfunctional and unnecessary wasteland.</p> <p>Instead, an emergence of a sub-culture has physically entered and attributed to the imagination of the local identity of Tottenham Hale and has effectively contributed to the local economy and local community.</p> <p>The aspirations for the larger area in general for Tottenham Hale is to provide a District Centre by 2025. The vision includes a thriving centre with a vibrant mix of commercial, retail, residential and complementary town centre.</p> <p>Over the past 10 years, the emergence of the Fountayne Creative Collective has changed and help improved the local and wider area by not only filling in a void created by the changing industrial and commercial enterprising landscape, where older industries once inhabited the surrounding built environment and landscape, but also introduced relevant possibilities for new types of entrepreneurial use that sought to reengage with the wider community of Tottenham Hale.</p> <p>As stated in the DPD vision for the growth area TH8: South Tottenham Employment Area concerning the increased safety and vibrancy in the local area and support the element of the evening economy which will turn safety and vibrancy in the local district.</p> <p>This is not a community filling in a void for a specific time whilst planning visions seek their anticipatory quest to regenerate an area poised as a decrement to the vitality of place. Instead, what you have here is a phenomena that has partly played a role in keeping the social, economic and cultural aspect to this part of Tottenham industriously alive.</p> <p>The growth, to this growth area outlined in a master plan adopted for Tottenham Hale in 2006 and in</p>	Warehouse community	<p>The Council recognises the warehouse communities at Harringay and in Tottenham Hale, including the positive creative and economic benefits they can bring. The Council will look to work with these communities to ensure these benefits are shared across all local communities.</p> <p>It is imperative that all homes are safe to be lived in, and enforcement action will be taken to ensure this.</p>

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	<p>the process of being refreshed in the Draft Site Allocations Document time frame, has already begun. Stating design changes and identifying additional opportunities should not be conceived with the bequest of emerging qualities and assets that have sustained the fortitude of the South Tottenham Employment Area. Foutayne Creative Collective is an exemplary example of an identifiable hub and densification phenomena that seeks to deliver opportunity for London’s future creative industry professionals whilst attributing additional qualities to the vibrancy of Tottenham as a whole. Over the past 10 years, Foutayne Creative Collective has provided a foundation and continued possibility for emerging creative professionals and businesses to emerge, and the capacity building of this phenomenon should be strategically interwoven into the future anticipatory business enterprise zone. Stated below is a ‘text-book’ example of a creative professional experience through this foundation:</p> <p>Experience of Andrea Ling, Unit 22, 7 Foutayne Road - <i>“There is a great, supportive, creative community at Foutayne road that without would have been increasingly difficult to start my career. The networking that you make, the unlimited amount of resources and employment you can benefit from in this vast art community is special and great for entrepreneurs. In terms of my career development, I was able to meet curators to exhibit my work, I am an Actress and Theatre Director, collaborate with others on producing short films, which built my CV and credentials which then got my noticed by the Young Vic. Last summer, through my experience and amount of creative work I have been able to do within the warehouse; I was hired as the Trainee Assistant Director for the highly acclaimed show ‘A Season in the Congo’ with the Young Vic, by BAFTA winning director Joe Wright. I have a theatre company which can produce work in the studio, a luxury not granted to many due to lack of funding. For me, the warehouse is an important place for growth, sustainability of the arts and innovation and the success of my business.”</i></p> <p>It is well known amongst the wider London creative community as one of the designated areas that provides opportunity for young and start up professionals to find spaces that can accommodate there needs in a financially viable set-up – this is very necessary for not only to the north-east of London but London as a whole.</p> <p>The Foutayne Creative Collective has already led to the possible promotion of the new District Centre for Tottenham Hale. Again, what the collective provides is an existing asset that contributes to the vision of a thriving town centre of mix-use services that can quite seamlessly filter strategically into the vision laid out in the DPD.</p>		
5	<p>The Wards Corner Community Plan (currently submitted to Haringey Council for planning permission and registered as valid) is something I have been working with the Wards Corner Community Coalition on since 2011. This can be viewed here http://www.planningservices.haringey.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=272550</p>	Wards Corner	Noted. The permission sought will be referenced in

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	This is listed in the site allocation document as THR7, I ask that Haringey Council seriously consider this as a sustainable and viable development appropriate for the site. I am more than happy to meet to discuss moving this forward.		the document.
6	<p>My immediate reaction is disappointment that in the entire document there seems to be no reference at all to the health inequalities and health challenges facing Tottenham.</p> <p>The area has had some of the worst health outcomes in the UK for generations and I feel that we should be taking the opportunities offered by the regeneration of Tottenham to hard wire our ambitions for health improvement into any and all plans applicable to the wider regeneration agenda.</p> <p>The Key Issues section of the document prompts consideration of ...</p> <ul style="list-style-type: none"> unemployment training deprivation crime anti-social behaviour low land values housing public perception topology growth investment transport links recreation <p>... but nothing on heath. Why is this?</p>	AAP general	It is noted that the baseline issues can be better set out, and this will be included in the next iteration of the document.
7	<p>I wish to keep the community gardens open and not have the sainsburys tunnel.</p> <p>Gardens are better for the community</p>	S4: Arena	Noted, this part of the proposal will be removed.
8	<p>TH7: Hale Wharf proposes “a new residential quarter with shopfront type mixed use workspace, potential for cafes and restaurants on the waterfront.” We absolutely support a proposed new residential quarter here, but not with other mixed uses. This site needs to provide support to the area’s existing commercial uses. There are more workspace units to be planned around Tottenham Green, and this probably needs to be the focus for this activity. We would probably support some leisure use around the lock, and fronting Ferry Lane, and of course activities on the actual water for example the Business Barges that are already in place.</p>	Hale Wharf	The Employment Land Review will offer more evidence on this site, but as an existing DEA, it is considered that the appropriate starting point should be to include some

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			commercial in the new scheme.
8	<p>Page 24</p> <p>“New residential-led riverside development providing new homes and a completion of the sustainable linkage between Tottenham Hale and the Lee Valley Regional Park. A café should be provided to complement the riverside location, providing for local residents as well as recreational visitors.”</p> <p>The Lock Keeper’s cottages site, the Wharf and Garage site should all consider how linkages and connections could be improved through to Tottenham Hale and beyond. A potential leisure use would probably be better at the Lock Keeper’s cottages at the actual entrance to the park, or on the front by the locks.</p>	Hale Wharf	Noted. This is considered to be a detailed planning matter to be dealt with upon receipt of a planning application.
8	<p>Storey heights</p> <p>We support the proposal for 5 storeys at the reservoir end of the site, but instead stepping up to 10-12 storeys on Ferry Lane. This is responding to the increase in heights now on Hale Village and the new proposed 28 storey tower. LB of Haringey have commissioned a Development Brief to ensure a comprehensive scheme is delivered across the Wharf, the Garage and Lock Keepers Cottages, something both we and ISIS support.</p>	Hale Wharf	Height limits will be set in the forthcoming UCS.
8	<p>Bridge over River Lea</p> <p>We would support the requirement for improving connections around the site and linkages to the wider area. The Green Route is vital to this.</p>	Hale Wharf	Noted.
8	<p>Page 30 - Employment Land in Tottenham Hale</p> <p>We acknowledge that an Employment Land Update is being carried out. The Wharf and Garage site should be removed from the designation of Employment Land.</p>	Employment Land	The ELR will be evidence based, and make recommendations for employment land requirements based on demand and supply.
8	<p>Page 5</p> <p>With regard to the reference to severance from the railway, and the loss of contact with the Lee Valley – this is supported by our objection to the lack of DDA access for the proposed footbridge as part of the Tottenham Hale Station works.</p>	Tottenham Hale Station	Noted.
8	<p>Page 9 South Tottenham</p> <p>The River Lee Navigation should be referred to as another asset to this area.</p>	River Lee	Noted.
8	<p>4. South Tottenham Map</p> <p>We support the description of Tottenham Hale as “...gateway to the wider Haringey area and Tottenham Hale as a place that supports new mixed use housing. new movement projects such as</p>		Noted.

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	bridges and permeable routes to the Walthamstow Wetlands”.		
8	<p>Q15 To what extent do you agree with our description of South Tottenham presented in the AAP?</p> <p>We agree, but we consider there is a balanced housing need, bearing in mind the quantum of student accommodation and affordable housing already delivered on Hale Village.</p>		Noted, the plan will seek to meet all housing need in the borough.
8	<p>Q17 In order to make South Tottenham a more successful place what transport issues or opportunities do you think need to be addressed?</p> <p>The redeveloped Tottenham Hale Station should be fully accessible. This would also be supported by a redeveloped Bus Station, and welcoming Bus Depot.</p> <p>Legible London signage has been introduced in the Lower Lee Valley around the Queen Elizabeth Olympic Park, and is being rolled out elsewhere across the Canal & River Trust’s London network – we would therefore also support this in Tottenham Hale.</p>		Noted.
8	<p>Q18 In order to create successful places in South Tottenham what housing issues or opportunities do you think should be addressed?</p> <p>The provision of a balanced housing provision.</p>		Noted, the plan will seek to meet all housing need in the borough.
8	<p>Q19 What would make town centres in South Tottenham more successful?</p> <p>A balanced housing provision that potentially introduce more local spending power.</p>		Noted, the plan will seek to meet all housing need in the borough.
8	<p>Q20 How do you think sports and leisure needs in South Tottenham could be best met?</p> <p>Support for moorings and waterborne recreation, including boater facilities.</p>		Noted, moorings will be supported.
8	<p>Q21 What design and heritage opportunities and challenges do you think there are in South Tottenham?</p> <p>The River Lee Navigation is a significant heritage feature and focal point of the area, and new development must reflect and enhance the waterside character.</p>		Noted.
8	<p>Q22 What would make movement within and around South Tottenham easier?</p> <p>A DDA compliant access from Tottenham Hale Station, as referred to above.</p>		Noted.
8	<p>Q23 What do you think could be done to increase job opportunities and the skills of local people in South Tottenham? No comments.</p>		Noted.
8	<p>Q24 In light of the regeneration agenda in Tottenham, do you think there is the opportunity to redesignate employment land for other uses in South Tottenham?</p> <p>Yes – we consider that the Hale Wharf site and the adjacent garage site should be redeveloped as residential sites.</p>		Noted.

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8	<p>Q25 How could South Tottenham's open spaces and biodiversity be improved?</p> <p>There are opportunities for improvements to accesses to the Lee Valley Regional Park and the Navigation and its towpath. The towpath was recently resurfaced, but as housing numbers increase and demand for walking and cycling grows, future resurfacing and works will be required. There are also opportunities for biodiversity improvements, such as hedgerow planting and potentially some waterbased planting, subject to navigational requirements.</p>		Noted.
8	<p>Q26 What environmental and sustainability Issues do you think need addressing in South Tottenham?</p> <p>The water quality of the River Lee Navigation is fairly poor because of contamination that feeds in from tributaries, including Pymmes Brook, Salmons Brook and Turkey Brook. The Council could more actively support Thames Water in preventing and overcoming misconnections, and pollution that feeds into the Navigation. There may also be other opportunities for water quality improvements, that our environment team would be happy to advise on.</p>		Noted.
9	<p>We welcome and understand the approach to denoting “character areas” however for most of the population of Tottenham these are the places where they live. The essential importance of each neighbourhood and street being regarded as the place where communities can thrive should not be lost. Communities can quite happily co-exist with business, transport hubs, sports stadia etc but this will not happen by accident. There is a real need for investment in major economic generators to be supported by local places or spaces as well as actions to ensure convivial and cohesive communities. A specific point I would ask is that the listed Holy Trinity Church is included in the Tottenham Green section on important/successful buildings around/on the Green.</p>		Noted.
9	<p>Northumberland Park and Tottenham Hotspur Stadium – we have made the point before that both St Paul the Apostle Church and the Church School are well placed to support the regeneration of the area. These sites are in need of investment and in particular the integrated Church and housing site could play a key role in the provision of community facilities.</p>		Noted.
9	<p>Tottenham High Rd area of change and Tottenham bus garage site – Holy Trinity Parish is already engaged with the Tottenham Green programme and the operation of the Wellside Community project. We have discussed with the Council and the Mayor of London’s representatives further work to open this site (e.g. the café) and further restore this major heritage building.</p>	Holy Trinity Church	Noted.
9	<p>At the Ashley Road sites, where major development is planned, particularly on the north site(s) community facilities will be needed. The historic Good Shepherd Mission Church in Mitchley Road has been re-opened nearby and provides community hall and arts spaces and with some limited further investment could provide improved facilities for local artists, micro-businesses, and community activities.</p>	Ashley Rd	Noted.
9	<p>Finally, there is reference to All Saints Church on Page 77. The correct name for the Church, which is the Medieval Parish Church of Tottenham is All Hallows. You will no doubt be aware that at All Hallows</p>	All Saints	Noted.

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	we are working on a significant heritage project to bring the church into a key role in the heritage area to the West of the Spurs development; incorporating not just the building, but also the Church Yard, with its historic monuments, and the Cemetery, to which the Church Yard is linked.	Church	
9	<p>You will be aware that Holy Trinity Parish with its Church set on Tottenham Green is already the subject of a joint environmental project with the Council to open up the Old School House yard and improve the environment and routes generally for the public.</p> <p>The Parish and ourselves have always seen this as just a first step and there are some further magnificent opportunities to improve community facilities there. In particular addressing the Under5s building which could transform the prospect of the Green if it was renewed with the addition of a cafe on the green or some such thing. There are also plans for further work to enhance the Old School House and its setting for more intense community use and finally the opportunity for a heritage project to restore the setting of the Listed Church.</p> <p>The Parish is keen for these ideas, and others that the Council and partners may have, to be kept alive as together we regenerate the heart of Tottenham.</p>	Holy Trinity Church	Noted.
10	<p>We are instructed by Cannon Street Jersey Fabrics Ltd and Bandon Properties Ltd who are the owners of land identified on the attached plan number DWD1, to consider the above draft DPD and make appropriate representations. These land parcels fall within part of site allocation TH3 and TH4 which are also marked on the plan DWD1.</p> <p>These representations are made in outline at this stage with the intention of facilitating further discussion with Officers on the future of these key sites. We shall be providing our detailed analysis including master planning ideas within the next four weeks and look forward to meeting with Officers thereafter. In the meantime, we can advise that our further analysis is likely to involve:-</p> <p>An examination of the DPD proposals for TH3 and TH4 in the context of national and strategic policy. Consideration of the Upper Lea Valley Opportunity Area Framework and the South Tottenham Area Action Plan, the refresh of the ARUP 2006 Master Plan and the Tottenham Physical Development Framework.</p> <p>Analysis of constraints and opportunities on and around our client's land holdings and an assessment of development capacity in terms of land uses and site density on TH3 and TH4, supported by further master planning ideas.</p> <p>At this stage, we can say that we are generally supportive of the shift away from strict employment land protection to facilitate growth in housing provision and employment diversification subject to deliverable and viable site specific allocations.</p>	Ashley Rd	Noted.
11	In all the consultation literature nothing has been mentioned about the loss of jobs and manufacturing due to the demolition of Peacock Industrial Estate. Anybody who has attended any meetings with regard to HRW would think that the site had already been secured for development. What is the sense in housing over two thousand people on HRW in one of the most deprived areas in England, into high	Employment Land	The Council is concerned with the loss of employment land in the borough,

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	rise buildings and then getting rid of a factory estate that has no empty units and are all busy		and the businesses that reside on it. An Employment Land Review will be produced to support the Local Plan.
12	<p>I have received no text or emails informing me of consultation meetings despite having a meeting with Sarah Lovell and Abdul Qureshi at the Planning Department and giving them my details. We have had no visits from the planning department to my knowledge and we feel that those meetings we have attended have been oriented towards questions which will gather positive responses for the scheme and, until last night, offered us no forum to discuss our situation.</p> <p>These issues together with the behaviour of some council members and planners which seem to present the scheme as a fait accompli give us the impression that we are an unfortunate obstacle in the way of a glamorous scheme that will provide so many new homes for the borough, so much planning gain for Haringey and so much money for the developer that they could not possibly let us impede it.</p> <p>This is further emphasized by the fact that, despite having spent a fortune on consultancy with Arup and generated huge volumes of glamorous literature and web graphics the council has yet to start researching possible sites for relocation.</p> <p>Most of the companies in the Peacock Industrial Estate are small family businesses which have struggled over the last 20, 30 or, in the case of DW General Woodworks, over 60 years to establish themselves, pay off mortgages and grow in a part of London which has often been challenging. Together we provide almost 200 jobs, pay business rates and provide a service to the local community as well as clients further afield. We are faced with an even bigger dilemma than some businesses as we are a transport company that operate vehicles from vans to 18 ton trucks. We currently are compliant with all London conditions operating in or close the city, and this is hard enough, but to have to try and find premises that will allow HGV's to operate is virtually impossible without moving out of the area, and if we do that we risk losing our customers from the city that find our location what they need. We currently employ 9 people all of who are local to Haringey and neighbouring boroughs of Enfield and Barnet.</p> <p>We are now faced with a future where we could be dispersed or, if compulsory purchased, could close down. Any research of industrial premises for sale in the area shows that there is almost nothing available, partly due to the recent demolition and relocation of the Wingate Estate, N17 Studios and the Northumberland Park Businesses.</p>	Relocation	<p>The Council is keen to retain existing businesses within the local area. Unfortunately, as a result of regeneration to meet the local housing need within the borough, some less dense uses will need to be transferred to more suitable locations.</p>

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	<p>So there is a good chance that a substantial number of these thriving manufacturing jobs will be lost and replaced by a few more service jobs (where once we manufactured goods for the world we now sell each other coffee and manicures).</p> <p>The development plan includes provision for new start-up businesses on the site but the proportion of new businesses which survive the first year is small and Haringey may be losing 25 established ones in the Peacock alone plus many more in the shops and other areas under threat.</p> <p>Most of those business bought their own premises because they wanted to end up with an investment. For some of us it is our only pension so to have that forcibly removed without adequate recompense is hard to swallow, particularly since CPO is not being used to clear land for an airport or motorway. More flats will be built which will bring more people to a part of London which will then have less jobs.</p> <p>I understand that the 21st century model for urban redevelopment must often be financed by private interests and there is no way that small businesses like us can offer the same infrastructure improvement offered by Tottenham Hotspur or the developers who will build this project but this doesn't mean we should have no voice and that the hundreds of people, mostly Haringey residents, who are currently supported by the businesses on the estate should be brushed aside.</p> <p>We would welcome visits by councilors, planners and consultants to look at our options and reassure the businesses that we are part of Haringey's plans and hope that the Area Action Plan recognizes the value of the employment we provide.</p>		
13	<p>We the local Tottenham Residents are fully engaged in a complex and very interesting piece of work. "Baby Tottenhams" Future over the next twenty years and beyond.</p> <p>Miriam, Chantelle and Sarah have worked very hard to gain the trust and confidence of the local community.</p> <p>The Community Liason Groups are beginning to gel nicely.</p> <p>(1) NORTH Tottenham West (including High Road West).</p> <p>(2) North Tottenham East (including Northumberland Park).</p> <p>(3) Bruce Grove/ Seven Sisters/ Tottenham Green.</p> <p>(4) Tottenham Hale and South Tottenham).</p> <p>The total number of local Residents, who actually live in Tottenham the best part of 200 human beings ("One Community, Many Cultures"). They all have given their time generously.....WHY.....</p> <p>Tottenham's young people of to-day are to-morrows adults (Leaders, Professionals, Academics, Trades people, all walks of life). Chantelle and her Homes 4 Haringey Resident Engagement Team, Miriam and Brona from Soundings (The Independent Experts). Sarah, Area Regeneration Manager for North Tottenham West. They have all the contacts of over 3,000 Citizens.....</p> <p>By following similar process for the DPD consultation draft document, this will be "hands on"</p>	Consultation	Noted. All consultation activity will be in accordance with the Council's SCI , and the relevant regulations.

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	Community Involvement.		
14	<p>As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and therefore welcomes the opportunity to comment on this planning document. Under consideration is the proposed production of two Area Action Plans; one for South Tottenham and one for Northumberland Park, with submission versions of both documents to be made public in Autumn 2014.</p> <p>As recognised on the plan on page 2 of the document, both Area Action Plan boundaries would contain a number of conservation areas. There are also a number of other heritage assets within the areas, including listed and locally listed buildings.</p> <p>Crucially for English Heritage there are a significant number of heritage assets identified on English Heritage's Register of Heritage at Risk within the Tottenham Area. This includes several listed buildings and other structures at Bruce Grove and on the High Road, and 4 Conservation Areas at Risk: Bruce Grove; Scotland Green; North Tottenham High Road; and Scotland Green.</p>	Heritage	Noted, additional detail will be added at the next stage, and the Council will continue to liaise with English Heritage on this document.
14	<p>Since 1994 English Heritage has spent in excess of £4.5m on area-based regeneration schemes in North Tottenham, targeting late Nineteenth Century shopfronts and the facades above them. The final phases of the scheme focused on Bruce Grove.</p> <p>Paragraph 126 of the National Planning Policy Framework (NPPF) (2012) requires Local Planning Authorities to set out a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>Also of particular relevance is paragraph 137 which requires Local Authorities to look for opportunities for new development within Conservation Areas and within the settings of heritage assets to enhance or better reveal their significance.</p> <p>We therefore see these Area Action Plans as an important opportunity to protect the conservation work that has already been carried out in the area, and to continue the momentum of investment into the area's historic environment. This could be either directly through publicly funded schemes, or through further private investment promoted indirectly through the wider regeneration impacts of the AAPs.</p>	Heritage	Noted
14	<p>We would expect the Area Action Plans to:</p> <ol style="list-style-type: none"> 1. Identify all heritage assets in the area, including those identified as being at risk and to show these on a plan. 2. Clearly identify the heritage issues for the area as a challenge for the Area Action Plans to address. 3. Set out, in broad terms, a positive strategy for the conservation of the historic environment, including heritage assets at risk. This could include: 	Heritage	Noted

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	<p>promoting the repair and re-use of individual structures and resisting loss of original features in conservation areas through development management and enforcement;</p> <p>encouraging conservation and repair of historic structures and buildings within conservation areas amongst owners;</p> <p>Publishing design codes to promote improvements to poor quality and inappropriate shopfronts;</p> <p>Identifying possible sources of investment into the historic environment, such as Community Infrastructure Levy and the Heritage Lottery Fund;</p> <p>Providing urban design guidance to manage the quality of new development and ensure that it enhances the character and appearance of the areas' Conservation Areas, including their settings, for example, in terms of form, scale, height and materials;</p> <p>Maximising opportunities to improve deficiencies in the public realm.</p>		
15	<p>Having reviewed the site allocations document there are 13 sites that lie within Flood Zones 2 and 3. We are very concerned that the allocation of these sites has not been underpinned by a sequential test. For these sites to be acceptable you will need a thorough evidence base in the form of a sequential test supported by your Level 1 and 2 Strategic Flood Risk Assessments (SFRAs). A sequential test is an essential part of your evidence base and without it your site allocations will be found unsound. We acknowledge that a sequential test was undertaken for your Core Strategy in identifying areas of growth. However we advised in our responses at that stage the sequential test would also need to be applied to individual site allocations. This is to determine whether it is possible to deliver new development in areas at low risk of flooding, in preference to areas of medium or high risk of flooding.</p> <p>We recommend you undertake the sequential test considering all sources of flooding as guided by the National Planning Practice Guidance, particularly as many of the sites which are within Flood Zone 1 are also defined as critical drainage areas in your Surface Water Management Plan (SWMP). The sequential test is a requirement under the paragraphs 100 - 104 of the National Planning Policy Framework (NPPF) for Local Plans in allocating sites.</p> <p>You have produced a level 2 SFRA which is referenced within the Sustainability Appraisal; however it does not appear to have informed your site allocations. The level 2 SFRA also states that we were consulted on the document (paragraph 1.6, page 10); however we do not appear to have any records of this consultation. I would be grateful if you can provide further details as to when this happened and who was consulted so that we can check our records.</p>	Sequential Test	Noted. A site specific sequential test will be provided.
15	<p>Within the sustainability appraisal page A-27 (appendix) there is reference to the sequential test which was applied to the growth areas for the Core Strategy and summarises that it is possible to deliver all development required within the borough without the need to develop within Flood Zones 2 and 3. This observation in the SA is not reflected in the draft Site Allocations document which has allocated sites in Flood Zones 2 and 3.</p>	SuDS	A reference to the requirement to provide SuDS will be made on relevant site

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	<p>Our following comments are on the specific sites identified in the document. Please note that even if the changes recommended below are made, we would still find the document unsound without a sequential test covering all your site allocations in Flood Zones 2 and 3 forming part of the evidence base for the document.</p> <p>Sites over 1ha in size; TH1, TH3, TH4, TH5, TH6, TH7, TH8, TH9, HH1, HH2, HH3, HH5, WG1, WG3, WG4, WG5, WG7, NT1, NT2, NT3, THR4, THR6, THR7, THR8, THR9, HG1, HG3, HG4, HG5, MH1, MH3, HO1, HO3, AP1, S1, S2, S3, S4</p> <p>It is a requirement of London Plan policy 5.13 that all sites over 1ha in size shall make use of Sustainable Drainage Systems (SuDS). This needs to be included in the design principles for all site allocations over 1ha. Haringey's Local Plan strategic policy SP5 also places a requirement on all development to implement SuDS to improve water attenuation, quality and amenity.</p> <p>Flood Risk Assessments should show how Sustainable Drainage Systems (SUDS) such as permeable pavements, filter drains and strips, swales, temporary basins, ponds, wetlands and green/brown roofs will be maximised on site, with any obstacles to their use clearly justified. Development should also demonstrate that a reduction in run off rates for all events up to the 1 in 100 year storm (including climate change) has been achieved in accordance with the requirements of the London Plan policy 5.13.</p> <p>We are pleased to see that the SWMP designated Critical Drainage Areas have been included within the considerations for the allocated sites where they are present.</p> <p>Sites with potentially contaminated land in sensitive locations: TH1, TH3, TH4, TH5, TH6, TH7, TH8, Employment Land in Tottenham Hale, HH1, HH2, HH3, HH4, HH5, HH6, HH7, WG7, NT1, NT2, NT3, Employment Land in North Tottenham/Northumberland Park, THR1, THR2, THR3, THR4, THR5, THR6, THR7, THR8, THR9, MH3, HO1, HO2, AP1, S1, S2, S3, S4</p> <p>National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. The supporting text would be improved by including these requirements for the above sites. Sites in these locations will be expected to submit a preliminary risk assessment/desktop study with their planning applications to assess if land contamination may be present at the site, including information on past and current uses and sensitive controlled waters receptors, in line with paragraph 007 of the National Planning Practice Guide. Any sites with former contaminative uses would be subject to land quality conditions and further investigation work depending on the findings of the initial study. Infiltration SUDs will only be permitted where it has been demonstrated that it is through clean ground.</p> <p>Some of these sites also lie within Source Protection Zones 1 and 2. Our Groundwater Protection: Principles and practice (GP3) includes advice and position statements on the appropriateness of</p>		<p>allocations.</p> <p>An appropriate reference to the potential for issues regarding groundwater quality will be included.</p>

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	certain uses within these zones.		
15	<p>Sites in Flood Zone 2: TH1, TH2, TH3, TH4, TH5, TH6, TH8, TH9, NT4, MH3 and HO2 These sites are in Flood Zone 2. Notwithstanding our previous comments on the sequential test, we are pleased that flood risk has been included in the implementation considerations for the majority of the sites listed above. The supporting text would be improved by including opportunities to reduce flood risk by implementing Sustainable Drainage Principles and finished floor levels within the design principles for each of the allocations. The supporting text should also reference the requirement that design, layout and measures to reduce flood risk should be in accordance with the SFRA principles.</p> <p>Sites with Main watercourse: TH7, TH8, HH3, HH4, WG4, WG5, NT2, NT3, THR1, THR8, MH3, HO1, All of the above sites have a main watercourse within the identified red line boundary. The watercourses on all of these sites apart from TH7 are in culvert. We are pleased to see a commitment to deculvert the watercourses for some of these sites and feel that the investigation into the feasibility of deculverting should be incorporated within the design principles for all of these sites, with a view to improving the status of the waterbodies (as designated under the Water Framework Directive). Where it is demonstrated that it is not practically feasible to deculvert, the design principles should include a robust SuDS scheme to secure alternative environmental enhancements that provide multiple benefits. In addition to investigating the feasibility of deculverting development on sites with watercourses are expected to include a set back to incorporate at least an 8m buffer zone. Buffer zones:</p> <ul style="list-style-type: none"> Provide habitat and 'green corridors' for flora and fauna Support the ecology and natural functioning of the watercourse Allow safe access to the watercourse and provide sufficient space for machinery to work alongside the watercourse (e.g. to remove obstructions that could cause flooding) Help prevent chemicals, rubbish and other waste from entering the watercourse (rubbish can block watercourses and thus increase flood risk) Stabilise and maintain the banks of the watercourse Attenuate surface water flows and can contribute to an overall sustainable drainage system (SuDS). <p>Please note that development within these sites may also require Flood Defence Consent under the Land Drainage Byelaws from the Environment Agency.</p>	Flooding SuDS Main watercourses	<p>A reference to SuDS will be provided.</p> <p>Reference to the location of the watercourse within the site allocation boundary will be made, and reference to exploring the opportunities for deculverting in line with adopted Policy SP5.</p>
15	<p>TH7 This site includes an area of Flood Zone 3b as designated in Haringey's Strategic Flood Risk Assessment. Some of the site also lies within the 1 in 100 year flood event including an allowance for</p>	Hale Wharf	The Council agrees that a small portion of the site is in

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	<p>climate change modelled extent. The allocation does reflect the site as being in an area of high flood risk, however Table 3 of the Planning Practice Guidance indicates that more vulnerable development (residential) is not appropriate in Flood Zone 3b. Noting our previous comments on applying the Sequential Test, development on this site should be avoided or less vulnerable alternative uses should be considered for this site.</p> <p>As there is main watercourse on this site the design principles should include a commitment to ensuring that the river banks are re-naturalised and enhanced where necessary to adhere to policy SP5 of Haringey's strategic policy and the objectives of the RBMP.</p>		<p>Flood Zone 3B, but note that the vast majority of the site is in Flood Zone 2. Additionally, it should be noted that subject to the exceptions test, this site may provide an opportunity to improve overall flood risk in the area. The Council will continue to liaise with the Environment Agency regarding the suitability of this site for redevelopment.</p>
15	<p>Employment Land in north Tottenham/ Northumberland Park Some of these sites are in flood zone 2 (listed under the heading 'sites in Flood Zone 2' and 3 (TH7)). Some sites include an area within the 1 in 100 in any given year, including an allowance for climate change floodplain; development in this area should be avoided. If developing this part of the site cannot be avoided then level for level, volume for volume flood storage compensation must be provided. Flood risk must be included in the implementation considerations, based on the principles of the evidence base; SWMP and SFRAs. The site allocation area includes the culverted Moselle Brook. Opportunities to deculvert the brook and other ecological improvements should be explored in the design principles (see further details under comments for sites with main watercourses on the previous page).</p>	Noted.	<p>Flood risk will be identified, and opportunities for management considered on any sites proposed to be allocated in this area.</p>
15	<p>Minor comments on site allocations Sites TH6, TH7, TH8, HH2 & HH3 all appear to have a different site area to the figures given within the document.</p>	Publishing error	<p>Noted, this will be amended for the next version.</p>

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15	<p>Tottenham Area Action Plans</p> <p>This document focuses on the issues and challenges for Tottenham, South Tottenham and Northumberland Park areas. Having reviewed the Area Action Plan (AAP) we are very concerned that there are a number of environmental issues, challenges and opportunities which have not been included within the document. This is of particular concern as we note the next stage of consultation will be the regulation 19 proposed submission consultation timetabled for Autumn this year. We recommend you continue to liaise with us on an informal basis when developing the AAPs objectives, policies and potential strategic sites.</p> <p>Page 2 of the document outlines the relationship of the AAP to other documents and the evidence base documents upon which the AAP will be based. We are pleased to see the council is updating the evidence base particularly with the Open Space and Biodiversity Study. However there are a number of documents which should be used in the preparation of the AAPs which have not been referred to. The sequential test will also be required if any further sites are to be allocated within the AAPs itself, however we have made the assumption that all the sites are to be allocated in the Site Allocations document. We would be grateful if you could provide further clarification on this matter.</p> <p>We strongly recommend that you make reference to the Strategic Flood Risk Assessment (SFRA) and the Surface Water Management Plan (SWMP) within the AAPs. The sustainability appraisal incorporates a large section which draws on both SFRA's which has not been reflected in the AAP. Our main concern is that you should use the findings and recommendations from this evidence to inform your spatial plans for regeneration taking into account the risk of flooding from the River Lee and its tributaries. This is to ensure, where possible, vulnerable development is not located in these areas and developments reduce the risk of flooding. The sequential test will need to be applied if in either of the AAPs, specific sites are allocated in areas of flood zone 2 and 3. We are likely to find the AAPs unsound if the sequential test has not been applied or the evidence from the SFRA's for these areas have not been used to inform the objectives and policies. Evidence from both of these documents including access/egress, warning, emergency planning, flood resilient design, finished floor levels, flood storage surface water management and critical drainage areas should be used to inform the AAPs.</p>	Environment	Noted. The Council will continue to liaise with the Environment Agency to ensure that environmental risks are appropriately managed.
15	<p>A significant proportion of land allocated for development within Tottenham falls within Flood Zone 2 (medium risk of fluvial flooding) and Flood Zone 3 (high risk of fluvial flooding). There are also a number of sites in Flood Zone 1 which also fall within Critical Drainage Areas as identified in Haringey's Surface Water Management Plan. The AAPs should identify these challenges and draw upon the relevant evidence documents.</p> <p>The Thames River Basin Management Plan is another important evidence base which should be used to inform the AAP, as identified in the sustainability appraisal scoping report. Haringey lies within the Lower Lee river catchment. The Lower Lee river system has historically suffered from poor water</p>	Critical Drainage Areas	Noted, the latest findings of the RBMP will be included in the next iteration of the AAP.

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	<p>quality. It has been heavily modified over the last 100 years to cope with urbanisation and reduce flood risk in the Lee Valley. As a result, many tributaries are confined to concrete open channels or in some cases hidden underground in culverts or pipes. This led to widespread pollution from sewage misconnections that went undetected. Urban diffuse pollution is also a big problem in this catchment, as the rivers respond very quickly to rainfall.</p> <p>Within Tottenham and Northumberland Park the Moselle Brook and Stonebridge brook are both heavily modified waterbodies, which are largely in culvert. They are both tributaries of the Lower Lee River, classified as 'poor' ecological status and failing to meet 'Good ecological potential' under the Water Framework Directive. The AAPs should support objectives within the River Basin Management Plan to re-open existing culverts within these areas, where feasible, as supported by strategic policy SP5 of Haringey's Local Plan which encourages all development to restore and enhance the Blue Ribbon Network. All development on sites with culverted watercourses will be expected to investigate the feasibility of deculverting. Deculverting not only provides opportunities to reduce sewage pollution through rectification of misconnections but can also deliver the following wider benefits to the area:</p> <ul style="list-style-type: none"> Enhancing the Blue Ribbon Network by providing valuable aquatic habitat, aiding fish passage, and significantly adding to the visual attractions of an area. Offering educational and play opportunities for children, enhancing pedestrian and cycle routes and giving people a touch of the countryside and its seasons in the town. Using water in motion to mask city noise and provide an atmosphere of quiet and calm. Complementing other urban regeneration initiatives, giving a place a sense of identity and bringing commercial benefits such as enhanced image for properties and up to 20% increase in land values or rents. Reducing maintenance and construction costs by using natural bioengineering techniques rather than concrete constructions. Reducing flood risk, and creating balancing ponds to help reduce flooding downstream. <p>(Source: http://www.ciwem.org/policy-and-international/policy-position-statements/de-culverting-of-watercourses.aspx)</p> <p>Green infrastructure should be a key aim of the AAPs 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.</p>		
15	<p>We are currently scoping the feasibility of works along the Moselle Brook to maintain the current standard of protection offered by the flood defences.</p>		

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	<p>Urban Diffuse Pollution is another key issue within this catchment to which the use of SuDS provides an opportunity to improve water quality. Any improvements will not only provide benefits in the immediate locality but will also have benefits further down the catchment. Developers should be encouraged to incorporate SuDS in any development, which is also supported by strategic policy SP5 of Haringey's Local Plan. There are a wide range of SuDS available which can be used for both new development and retrofitting of existing stock.</p> <p>We note in Northumberland Park and South Tottenham that there are opportunities to improve existing housing stock, which also provides an opportunity to incorporate retrofitting of SuDS. SuDS can not only help reduce flood risk and address water quality issues, but can also improve the urban environment and air quality creating better places to live and work. An example of where this has been achieved in an urban context is Day Brook Rain Gardens in Nottingham http://www.susdrain.org/case-studies/case_studies/nottingham_green_streets_retrofit_rain_garden_project.html. Further advice and examples of retrofitting of SuDS can also be found on http://www.susdrain.org/delivering-suds/retrofitting/why-retrofit/why-change.html.</p> <p>Derek Drew-Smith at Haringey (Lead Local Flood Authority) is currently working with architects in Hornsey on a retrofitting of SuDS project who will also be able to provide further information and advice.</p> <p>We note that the AAPs identifies that new development has the potential to help deliver sustainable forms of energy and promotion of low and zero carbon energy generation. We encourage you to explore whether there is the potential for the development of district heating networks within the AAP areas (http://www.sutton.gov.uk/CHttpHandler.ashx?id=14088&p=0). Water efficiency can also be linked to carbon reduction and reduction in energy use and minimising water use will also decrease the quantity of water that needs to be treated at the Sewage Treatment works. More information on the links between water efficiency and reducing energy use can be found on http://www.waterwise.org.uk/pages/hot-water-and-energy.html.</p> <p>The plan identifies that a significant number of new houses are proposed - over 10,000. The sewage network in this area is currently already stretched, which has not been identified as an issue within the plan. We therefore have concerns surrounding the additional burden which would be created from the number of new houses. We would like to see evidence that there has been some discussion with Thames Water over the ability of the sewage infrastructure to cope with the additional properties. Haringey is located in the Thames Water supply zone and in an area of serious water stress, which has not been identified as an issue or challenge in the plan. It is therefore Thames Water's responsibility to manage the demand for water. Every five years, Thames Water publish a Water Resources Management Plan in which they assess future water demand over the next 25 year period. We review and discuss any proposals to meet additional water requirements. The plan put forward by Thames Water has a strong emphasis on demand management and water efficiency to help meet future water</p>		

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	<p>supply requirements. The Environment Agency does support this approach but it will require others to contribute for these aims to be achieved. With such a significant increase in the number of houses, we would expect the AAPs to include a policy reflecting the requirements of London Plan policy 5.15 water use and supplies, for residential development to be designed so that water consumption would be 105 litres or less per head per day.</p>		
15	<p>Baseline Data, Sustainability Objectives and Indicators</p> <p>We are pleased to see that the number of green roofs has been included as an indicator in protecting and enhancing biodiversity for Sustainability Objective 11 (SO). Unfortunately we do not hold any baseline data ourselves, however page 12 of 'Living Roofs and Walls, Technical Report' by the Greater London Authority has estimates for the potential area available in London for Green roofs and the potential energy saving and rainwater storage this would provide (http://www.london.gov.uk/sites/default/files/living-roofs.pdf). We also understand that the GLA have plans to produce a Green roofs interactive map so they may be able to provide some baseline data to you.</p> <p>The Thames River Basin Management Plan (RBMP) has been identified within the plans and programmes, and should be included as baseline data to reflect aquatic ecology/biodiversity to support sustainability objectives 11 and 14. The RBMP can also be used for indicators for ecological status and chemical status. The RBMP also provides a greater level of detail as to the element that a particular waterbody is failing on. We are currently working on identifying actions to improve waterbodies and their status under WFD which will be published in the next round of RBMPs. The extent of new/existing buffer zones preserved, length of watercourses deculverted/restored, area of new habitat created could also be considered as indicators for enhancing biodiversity.</p> <p>The Thames River Basin Management Plan can be used as baseline data for assessing groundwater quality. You can also obtain reports from our website for baseline groundwater quality information at http://cdn.environment-agency.gov.uk/scho0207blyd-e-e.pdf and datasets from the Geostore website.</p> <p>Sustainability Indicator (SI) 14.2 states that 'Haringey specific data is unavailable for water use' for Sustainability Objective 14 'To protect and enhance the quality of water features and resources'. This information can be obtained from the State of the Environment report for London at http://www.environment-agency.gov.uk/static/documents/Research/Haringey_2013.pdf which states that the average consumption for household water use was 165 litres per head per day (l/p/d) for 2011/12 and the five year average was 163 l/h/d. It is important to recognise that whilst Haringey specific data is useful in some respects, the issue of serious water stress has is an issue with more of a regional focus. Therefore it is also appropriate to use regional evidence bases to measure the impact of policies on water resources.</p> <p>SIs 15.2 & 15.3 for SO15 'To encourage the use of previously developed land' do not have any</p>		Noted.

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	<p>baseline data or comparators and targets. We will be able to provide data to show the amount of contaminated land remediated by Borough in the next couple of weeks. Please contact NETenquiries@environment-agency.gov.uk to obtain this data</p>		
15	<p>SO16 ‘To mitigate and adapt to climate change’ does include indicators for flood risk, however as there is such a significant proportion of growth intended in areas of Flood Zones 2 & 3 we recommend that there is a separate objective for flood risk which looks at reducing flood risk from all sources. The SFRA and SWMP can be used as the evidence base in addition to data and information which we hold.</p> <p>We are pleased to see that SI 16.1 ‘no. properties in flood risk zones’ has been included and that it refers to SFRA 1 and states planning permissions should not be granted contrary to EA advice. The number of planning permissions granted contrary to EA advice can also be included as a separate indicator and we are able to provide you with Haringey specific data to use as a baseline.</p> <p>SI 16.2 ‘no. of flooding incidents’ draws on evidence in SWMP, and should also consider flooding incidents from other sources; not just pluvial flooding.</p> <p>We are pleased to see the inclusion of indicator 16.3 ‘no. of planning applications incorporating SuDS’, although we note there are no comparators or targets. Policy 5.13 could be used to include a target to reduce surface water run-off rates to Greenfield, particularly for sites located in Critical Drainage Areas.</p> <p>SO 19 limit cc by reducing CO2 emissions.</p> <p>SI 19.4 ‘no developments connected to decentralised energy networks’. There may be scope for us to identify sites which we regulate where this opportunity could be promoted.</p>		Noted.
16	<p>South Tottenham Map: There exists a fantastic opportunity to link-up the cultural offerings around Tottenham Green with the nearby “creative quarter around Markfield Road & Fountayne Road (TH8: South Tottenham Employment Area) - facilitated by the current improvements to the gyratory road system, to create an exemplary “creative & cultural destination for tourism”. This would open the corridor from Seven Sisters? Tottenham Green through to Markfield Park (with its lovely Victorian Beam Engine Museum & Café) directly to the Lee Navigation, which is frequented by many visitors.</p> <p>I am unable to find references in either the Site Allocation Document or the Strategic Regeneration Framework to the council’s “Cultural Strategy”, to which Euroart Studios and many colleague creative/cultural organisations contributed many hours of work over the years, whilst the Site Allocation Document calls for facilities to support the growth of the emerging creative quarter around Markfield and Fountayne Roads.</p> <p>I attach for your information, the proposal made by Euroart Studios in January 2012 at the behest of Sir Stuart Lipton (the Mayor’s champion) – “Tottenham Regeneration: A New Cultural Quarter”. Euroart’s proposal foresaw the establishment of:</p>	Creative communities	The Council agrees that there are many opportunities for new development to help spur the creative industries in Tottenham. We particularly note the emerging clusters at Tottenham Green, and within the Fountayne/ Markfield Rd area, and will develop evidence to understand how to

ID	Summary of Comments	Topic / Change	Council Response
	Seminar/Workshop Room - Artist studios - Offices Work shops: woodwork, metal, plastics, sculpture studio & kilns, print room, darkroom Multi Media Laboratory Business enterprise incubator studios Dance/Theatre studio Music/Recording studio Multi Media Laboratory Art materials shop Art & Crafts Market Art Gallery – and associated Café/Lounge Restaurant Community & Social Spaces		continue to grow these sectors.
17	<p>GLA officers acknowledge the need for employment-led regeneration to stimulate growth in Tottenham, and recognise the valuable contribution that industrial land management could make to housing delivery and wider regeneration aims. Accordingly, the intention of Haringey Council to commission an Employment Land Review (ELR) in 2014 to inform the development of the Tottenham Area Action Plan is welcomed. The ELR will be a useful tool to assess the supply and demand for employment and industrial uses in the area and the quantum of industrial land (and selection of sites) that should be released over the Plan period. However, as the review has not yet been carried out, it is strongly recommended that the reference to the potential release of employment land on the Northumberland Park MP map is removed or clarified along the lines of the Employment Land section (page 7) in order to avoid raising hope value. This, as well as the assumptions made on Map 3 that the yellow circled areas will not lose any jobs and facilitate a more diverse housing profile, should be held back until a proper assessment on the viability of the strategic industrial sites has been undertaken. The yellow circle on Map 4 also creates confusion.</p>	Employment land	Noted. It is envisaged that a ELR will be complete by the time of the next iteration of the AAP.
17	The MP reflects the objectives of the Mayor's Upper Lea Valley OAPF and is supported.	Upper Lea Valley OAPF	Support is noted.
17	<p>While Transport for London welcomes the proposed Tottenham MP, the document is currently at an early stage of development, and as such there is little content for TfL to provide any meaningful comments on at present. It should be noted however that there is already a lot of activities in the area, with a number of major transport projects either committed or proposed, which have the potential to help contribute to the successful regeneration of Tottenham. Appendix 1 sets out a list of projects that TfL would like the AAP to reflect as it develops and take into consideration in the document.</p>	Transport	Noted. These projects will be incorporated into the next version of the document.

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17	<p>Given the significant investment through the Mayor's Regeneration Fund, the GLA Regeneration team will be interested in following the work of the borough throughout the development of the MP document to understand how it will build on existing and emerging studies to address the identified issues and challenges, including public image, connectivity, commercial vibrancy, etc. Equally, the team will be interested to understand how the MP will balance competing demands, such as the need to release employment land and to carefully manage the location and form of tall buildings in order to enable the development of a vibrant district centre in Tottenham Hale.</p>	Regeneration of the area	Noted.
17	<p>TfL would therefore expect that as the AAP develops, for the projects listed below, be reflected and taken into consideration in the document.</p> <p>Funded improvements</p> <p>Tottenham Hale Gyratory- works are currently on-site to convert the existing one-way system into two-way operation by 2014. In addition to general traffic, pedestrian accessibility will also be improved and a new bus station will be constructed.</p> <p>Tottenham Hale station redevelopment- works to double the size of the existing ticket hall, improve interchange between National Rail and London Underground services and create a new landmark gateway to Tottenham will be complete in 2016.</p> <p>West Anglia Mainline upgrade- works to facilitate a new four trains per hour local stopping service between Angel Road and Stratford, offering a new 'turn up and go' service at Northumberland Park, is currently planned by 2017.</p> <p>West Anglia suburban rail devolution- TfL will take control of train services and stations on the West Anglia Southbury Loop route, which includes White Hart Lane, Bruce Grove and Seven Sisters by 2015.</p> <p>Barclay's Cycle Superhighway 1- although the exact alignment still to be confirmed, it is expected that this link will be between Tottenham and Liverpool Street, and delivered by 2016.</p> <p>London Overground- electrification of the existing line, the provision of new longer trains along with an uplift in capacity is planned by 2017</p> <p>Bus network enhancements- TfL has plans in place for changes to bus routes following the completion of the Tottenham Hale gyratory works. As such, a number of routes could be diverted to serve the new bus station at Tottenham Hale and frequencies on other routes could be enhanced.</p> <p>Future but currently unfunded opportunities</p> <p>Further Victoria Line enhancements- this improvement could capitalise on the capacity enhancements already made by increasing service frequencies beyond Seven Sisters or increasing connectivity.</p> <p>Further West Anglia Mainline Upgrade- this would offer further improvements in service frequencies from Northumberland Park and Tottenham Hale, and further improve Tottenham's connection with Stratford.</p>		Noted. These projects will be incorporated into the next version of the document.

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	<p>Crossrail 2- this could offer new journey possibilities and a high frequency service from Seven Sisters and possibly Northumberland Park and Tottenham Hale. Further public consultation on the detail of the route options will take place in 2014 in advance of refreshing the safeguarding.</p> <p>Tofttenham wide connectivity enhancements- this could potentially include the introduction of Legible London, along with a range of smarter travel? behavioural change measures.</p> <p>TfL has produced a document entitled 'Transport Investment to Support Growth and Regeneration in Tottenham' (February 2014) which provided more detail on the above schemes, and how they could help to support Tottenham's key growth areas.</p>		
17	<p>Other transport aspects</p> <p>It is noted from the consultation document that a number of key issues relating to transport have been identified, which will need to be addressed, including;</p> <ul style="list-style-type: none"> • Barriers to movement (particularly east / west) produced by the railways' linear routes and; • Poor transport infrastructure in North Tottenham 		Noted.
17	<p>Next Steps</p> <p>Given the above concerns and the range of transport projects already proposed for the area, TfL is however committed to work with the Council on the future development of the AAP, in order to help identify as stated above how the committed transport schemes could potentially help contribute towards the Council's growth aspirations, and also to give consideration to what further improvements may possibly be needed to help improve local connectivity e.g. through improved walking, cycling and bus connections.</p> <p>Whilst currently unfunded, Crossrail 2 is considered to be a project of strategic importance, needed to help facilitate the future growth of London. It would also have local benefits in areas where stations are proposed, including Tottenham along with northeast London more generally. iLL consulted on two potential route alignments, a regional and a metro scheme back in 2013. Further work has since been undertaken, with options for the core tunnel portal in the area being explored. The latest proposals emerging from this work could potentially have an impact on some of the sites highlighted in the 'South Tottenham' area. It is however important to note that all work is currently at an early stage, and a decision on how this is best taken forward is yet to be taken. As things are likely to be evolving over the coming months, TfL would welcome the opportunity to work closely with Haringey Council as both projects develop to ensure a coordinated approach going forward.</p>		Noted.
17	<p>In summary, given the number of major transport projects already committed or proposed for in and around the area, TfL would be keen to work with the Council on the development of the APP to see how the benefits from these can be best realised, alongside identifying any more local improvements which may also be required to support the future growth and development of the area</p>		Noted.
17	Bus Garages		The future inclusion

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	<p>The document makes reference to the possible relocation/ redevelopment of a number of bus garages including those at Wood Green and Tottenham. It should be noted however that bus garages are considered to provide an essential service in supporting the operation of the bus network, and are safeguarded as such in the Land for Industry and Transport SPG, which states in implementing London Plan policy boroughs should ‘resist the loss of any bus garage through redevelopment unless a suitable alternative site that results in no overall loss of capacity can be found in immediately adjacent area, or TfL agrees formally that the particular facility is no longer required’, along with Policy 6.2 of the London Plan.</p> <p>As such, TfL would object to the proposed relocation/ redevelopment of any operational bus garages unless a suitable alternative location (and capacity) was identified and agreed with iLL and other relevant stakeholders, as further detailed below.</p> <p>In addition to the above, it should also be noted that TfL would expect the redevelopment of any existing bus garage site to be appropriately phased, to ensure that a suitable alternative facility was available for use by TfL, in advance of the old one being closed down.</p>		<p>of bus garages for regeneration in the borough will be negotiated with bus service providers and TfL based on ongoing operational requirements.</p>
17	<p>Tottenham</p> <p>Whilst the same comments as above apply for this site, the wording put forward is potentially more concerning to TfL. Whilst the designation for the Arriva garage at Wood Green states there is a ‘long term opportunity to intensify this site, this would require the reprovision of the existing bus function, either on or off site’; the text for the Tottenham garage does not imply retaining the garage on-site and simply states ‘the existing bus station use would need to be relocated’, without giving any indication of where this could potentially be relocated to.</p>		<p>The future inclusion of bus garages for regeneration in the borough will be negotiated with bus service providers and TfL based on ongoing operational requirements.</p>
17	<p>Given the above concerns, TfL would request the text be amended for both sites in accordance with the Land for Industry and Transport SPG, to make it clear that the long term redevelopment aspirations for both bus garages are dependent on i) the relocation of the bus garage facility to an alternative location within LB Haringey to be agreed with TfL and the bus operator, h) the costs of relocating and reconstruction of the bus garage being funded from development of the existing garage site and iN) appropriate phasing to ensure a suitable alternative bus garage facility is available for use in advance of the existing garage site closing down.</p>		<p>The future inclusion of bus garages for regeneration in the borough will be negotiated with bus service providers and TfL based on ongoing operational requirements.</p>
17	<p>Crossrail 2</p> <p>Reference is made in the document to a number of sites which have an interaction with the Crossrail 2 proposed alignment. Given the current status of the design development and option analysis for</p>		<p>Noted.</p>

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	<p>Crossrail 2, it is not proposed to offer particular comment on specific sites at this pre-safeguarding update stage for the project.</p> <p>This is however something Haringey Council is advised to be mindful of, as ILL is set to begin the process of refreshing the safeguarding for Crossrail 2 in 2014, based on the preferred route emerging from the public consultation which took place in 2013. There is therefore the potential that some of the sites identified in the site allocations document could be impacted upon as these plans progress, however at present TfL is not in a position to make a firm statement on this issue.</p>		
17	<p>London Underground</p> <p>The London Underground Infrastructure Protection (LUIP) team will need to be consulted as statutory consultees on any planning applications located within 50 metres of the railway.</p> <p>Where there are intended works in the public highway the LUIP team will also need to be consulted to ensure there is no damage to them which may affect LU's infrastructure.</p>		Noted.
17	<p>Car free development</p> <p>TfL would expect all developments in areas of high public transport accessibility to be car free, except for blue-badge provision. This should be stated in the 'design principles' for all sites this applies to, as it has been done for TH3: Station Square West.</p>		Noted. Parking standards will be referenced in the DMDDP.
17	<p>Quietways</p> <p>The potential for future Quietway cycle routes has been referenced for a number of sites, which is supported. TfL would however recommend that this designation is as comprehensive as possible, and covers all sites where there is future potential for a Quietway to be implemented to ensure that these are capable of being accommodated at as many future developments as appropriate.</p>		Noted, quietways will be incorporated into the next version of the document.
17	<p>THR3: Bruce Grove Snooker Hall</p> <p>Under the design principles it states 'it would be preferable for residential development on the rear of the site to be developed as townhouses.., but the only possible access will be off Bruce Grove which is a Transport for London managed trunk road. It should however be noted that in general TfL is opposed to the introduction of any new accesses onto the TLRN for operational and safety reasons, although it is appreciated that this location may be more problematic given the site's proximity to a junction. If this is to be taken forward with a new access on the TLRN, it will need to be satisfactorily demonstrated through the submission of a Transport Assessment and associated highway modelling that the proposals would not have an unacceptable impact on the capacity/ operation of the strategic road network, or present any road safety issues.</p>		Noted. This is a detailed matter to be addressed at the planning application stage. Due to the high PTAL it is considered likely that this site will be suitable for car free development.
17	<p>Under the design principles it states that there is 'an opportunity to introduce a new tube station entrance on 'the south side of Seven Sisters Road'. It should be noted however that this is not a</p>	THR7: Seven Sisters	Noted. We will continue to

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	<p>measure which is currently contained within the EI business plan, or which TIL plans to take forward as a project as currently unfunded. It may however be worth identifying your aspirations for the new station entrance to potentially be taken forward for further consideration as part of the Crossrail 2 design work.</p>	Regeneration area	negotiate in regards this matter.
18	<p>It relates specifically to the site at 173 - 175 Willoughby Lane which lies within the Central Leaside Strategic Industrial Location (SIL 3). Strategic Industrial Locations (SILs) are identified in the London Plan as important locations for industrial and related employment capacity. London Plan Policy 2.17 requires boroughs to promote and manage Strategic Industrial Locations (SILs), and to consider any release of land as part of a strategic process of consolidation. For the reasons set out in this note we believe there is a strong case for such a review of the Central Leaside SIL to be undertaken through the AAP process, having regard to the amount of surplus industrial land in Haringey, qualitative issues with the site in meeting market demands, and the need to achieve ambitious strategic policy objectives for the Northumberland Park area.</p> <p>This representation provides comments on the initial thoughts presented in the Regulation 18 document. It explores the trends in employment demand and the characteristics of existing supply in Haringey in the context of the current planning policy objectives for the Upper Lea Valley Opportunity Area and the Northumberland Park Area of Change. It highlights an important opportunity to consolidate existing industrial employment land provision within the Northumberland Park AAP and supports the Council's idea of exploring the potential for the phased release of sites within the Central Leaside SIL to help achieve identified growth objectives and a more diverse housing and economic profile.</p>	Employment land	<p>Noted. SIL is identified a regionally significant employment land which should be protected, however recognising the London Plan provides scope for reconfiguration / consolidation through the plan process. The Council will undertake an updated employment land review to help inform considerations for industrial land management in the AAP area, having regard to meeting objectively assessed need and the Borough's strategic jobs target, along with delivering the spatial strategy.</p>

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18	<p>The site at 173 – 175 Willoughby Lane is approximately 0.94 ha and is located within the Central Leaside SIL. It is currently in use as a metal recycling centre and treatment facility for end of life vehicles and contains a single part 2/3 storey building, with the remainder of the site used for recycling and storage purposes.</p>		<p>Current work on the North London Waste Plan demonstrates a significant shortfall of sites to meet north London's waste apportionment within the London Plan and, therefore, the waste management capacity of all existing waste sites, including this site, will need to be safeguarded for continued waste management use, unless provision of at least equal waste capacity can be provided on non-allocated waste site.</p>
18	<p>EMPLOYMENT POLICY AND STRATEGIC OBJECTIVES</p> <p>3.1 The Upper Lee Valley is recognised within the London Plan as an important location for manufacturing and technology-led industry in London, and as such the OAPF seeks to create 'over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities'. Several key locations are identified as being the focus of employment development, including Edmonton Eco-Park which is identified as a key location for an employment hub, along with Brimsdown and Redburn and Meridian Business Park.</p> <p>3.2 London Plan Policy 2.17 seeks to manage and protect SILs where appropriate as locations for industrial related uses including logistics, waste management, utilities, wholesale markets and</p>	Employment land	<p>Noted. SIL is identified a regionally significant employment land which should be protected, however recognising the London Plan provides scope for reconfiguration /</p>

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	<p>transport functions. It directs that alternative development should be resisted unless proposals are part of a 'strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document.' However, while requiring a rigorous approach to industrial land management to ensure sufficient stock is maintained, policy 4.4 also requires LDF preparation to consider opportunities to plan for the release of such land where it is surplus to demand and can contribute to strategic and local planning objectives, especially housing.</p> <p>3.3 The Draft Further Alternations to the London Plan at paragraph 4.21 indicates that, informed by research, there is a case for for release (although limited) of industrial land in north London (including Haringey) to other uses and at 4.23 that the release of surplus industrial land should, as far as possible, be focused around public transport nodes to enable higher density redevelopment, especially for housing.</p> <p>3.4 At a local level Haringey Local Plan Policy SP8 seeks to protect the hierarchy of employment land in the borough, including SILs; however the policy also expresses the Council's commitment to 'support local employment and regeneration aims'.</p> <p>3.5 The NPPF requires local authorities in drawing up development plans to support existing business sectors, taking account of whether they are expanding or contracting and, where possible, to identify and plan for new or emerging sectors likely to locate in their area. It requires policies to be sufficiently flexible to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. For the reasons set out below we believe there is a strong case for policy to be created through the AAP which provides for the release of the Central Leaside SIL having regard to market and economic circumstances, and to meet local regeneration priorities.</p>		<p>consolidation through the plan process. The Council will undertake an updated employment land review to help inform considerations for industrial land management in the AAP area, having regard to meeting objectively assessed need and the Borough's strategic jobs target, along with delivering the spatial strategy.</p>
18	<p>TRENDS IN THE EMPLOYMENT SECTOR, NEED AND SUPPLY</p> <p>3.6 There is evidence over recent years of a decline in the general industrial sector in London which is set to continue in the future and the Industrial Land Demand and Release Benchmarks study (2011) recommends the release of approximately 733 hectares of industrial land across London between 2011 and 2031. The effects of this decline are evident within Haringey where there is a rising surplus of vacant industrial land that is estimated to increase to 41.8 ha by 2031.</p> <p>3.7 The Council's Employment Land Study (2009) acknowledged a reducing requirement for industrial land in the borough, although the 2012 update suggested a potential increase in demand for B1 and B8 land over the period up to 2026 compared to the 2009 ELS (Appendix A). In the Higher Growth</p>	Employment land	<p>Noted. The Council will undertake an updated employment land review and prepare further relevant technical evidence to help inform considerations for industrial land management in the AAP area, having</p>

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	<p>Scenario the B use class land need to 2026 equates to an additional 29.4 hectares.</p> <p>3.8 From a quantitative perspective, the report at Appendix A identifies that there is an adequate supply of alternative industrial accommodation within the Borough and wider market area. From a qualitative perspective, it identifies that there is a reasonable supply of good quality industrial units available in Haringey. The report also judges the Central Leaside SIL as being of low quality when compared with other SILs in Haringey, Enfield and Waltham Forest having regard to criteria including accessibility, quality of buildings, public transport and age.</p> <p>3.9 The general decline in the demand for manufacturing accommodation throughout the country has been coupled by an increase in demand for distribution warehousing. While this may suggest the potential for alternative B class uses of the SIL, it is important to note that all major distribution companies have specific requirements which cannot be met by the Central Leaside SIL, including 'high bay' warehouses on large sites with direct access to the motorway network. It is also said that they will avoid sites adjoining incompatible residential neighbourhoods. The principle B8 market focus within the Lee Valley sector of London is therefore to the north of Enfield, close to the junction of the A10 and M25. In terms of employment floorspace more generally, in addition to the planned mixed-use and commercial developments within the Upper Lee Valley such as Tottenham Hale, Blackhorse Lane and Meridian Water in Enfield which will provide a substantial amount of employment floorspace, the recent call for sites for the Haringey Site Allocations Development Plan Document identified 9 new sites that could potentially be redeveloped to provide an additional 54.48 ha employment land should the Council elect to promote these sites for employment uses. On this basis, it is clear that there is a substantial supply of employment land to meet the identified need within the Borough.</p> <p>3.11 The Central Leaside SIL is classified as a Preferred Industrial Location (PIL) where the current policy compliant uses are traditional B-class uses. However as identified previously, the London Plan policies provide the flexibility for a review of existing industrial land provision having regard to demand through strategically co-ordinated consolidation, and Saved UDP policy EMP4 permits the redevelopment of employment land subject to the suitability of the land for business or industry use and the wider regeneration benefits of redevelopment that retains or increases the number of jobs provided on the site.</p> <p>3.12 Having regard to the changes in the employment sector, the decline in demand for industrial premises and the availability of a plentiful supply of stock that better meets the requirements of the growing employment markets, there is clearly an important opportunity now to consider the</p>		<p>regard to meeting objectively assessed need and the Borough's strategic jobs target, along with delivering the spatial strategy. The Strategic Policies Local Plan sets out the employment land hierarchy for the Borough, which provides land and sites for a range of employment generating uses, with greater flexibility for uses offered on sites at the lower end of the hierarchy. The AAP will help give effect to these policies.</p>

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	consolidation and release of the land within the Central Leaside SIL through the AAP process to help meet strategic and local requirements for more appropriate alternative uses.		
18	<p>The Housing Context</p> <p>4.1 One of the three main roles of the planning system defined in the NPPF is to provide the supply of housing necessary to support existing and future communities. The NPPF requires that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.</p> <p>4.2 The Mayor's London Plan recognises the need for housing and policy 3.3 states that there is a 'pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.'The policy goes on to state that Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target (820 annual monitoring target for Haringey) and should identify and seek to enable development capacity to be brought forward to meet these targets.</p> <p>4.3 There is a clear policy target within the London Plan to achieve a significant amount of housing and job growth in the Upper Lee Valley Opportunity Area over the coming years to 2031. The 2008 version of the London Plan (Consolidated with Alterations since 2004) identified the Upper Lee Valley as an Opportunity Area which could accommodate 15,000 new jobs and a minimum of 7,000 new homes to 2026. Since then however the London Plan (2011) has revised the targets with an increased minimum target of 9,000 new homes to be delivered to 2031, reflecting the scale of housing need in this part of London. The Upper Lee Valley OAPF was adopted in 2013, setting an even higher objective of 'over 20,100 new well designed homes by 2031', signifying the level of transformation envisaged in the area.</p> <p>4.4 Irrespective of the minimum targets set for individual boroughs, the relevant housing supply area in London is London. It is for this reason, along with the chronic shortage of housing in the capital, that local authorities are required to meet and exceed the level of provision provided for in the London Plan, and to consider in preparing AAP's and other plans how this may be achieved. The requirement to exceed minimum targets is without an upper limit, which is understandable given the pressing and desperate need for housing in London. The latest available annual monitoring reports from the GLA show that the pan London delivery is falling significantly below even the minima target, giving strength to the case for a review of surplus employment land.</p>	Housing Employment land	<p>Noted. Haringey's adopted Strategic Policies Local Plan sets out how the Council will meet objectively assessed need for housing and the Borough's strategic housing requirement, consistent with the NPPF and in general conformity with the London Plan. The AAP will help give effect to the Strategic Policies. The Council will monitor outcomes of the FALP as the Local Plan documents are progressed, and seek to ensure plan proposals align with adopted changes in regional policy. As noted above, the Council will undertake an updated employment land review and prepare further relevant technical evidence</p>

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	<p>4.5 Furthermore, the emerging London Plan Further Alteration (issued for consultation January 2014) based on the most recent SHLAA and population estimates indicates a significant escalation in London's needs. For London as a whole the annual monitoring target rises from 32,210 to 42,389 and for Haringey the annual target rises from 820 to 1,502 (+83%). While it can be said that the weight to be given to the Draft Further Alterations should at this stage be limited the underlying of evidence of desperate shortage and need cannot be ignored.</p> <p>4.6 The Northumberland Park Area of Change is the subject of strategic policy ambitions for transformation both in terms of the quality and mix of housing and the nature and diversity of the employment offer' (Upper Lee Valley OAPF, 2013). Within the minimum target of 20,100 new homes to be delivered across the Upper Lee Valley Opportunity Area, the OAPF suggests that there is the potential for up to 4,500 new homes to be delivered within the Northumberland Park area. While the majority of this planned growth is likely to be delivered through the renewal of existing estates and the regeneration of Tottenham Hotspur stadium, further opportunities will require investigation to help reach these numbers with the potential for a significant contribution from the consolidation and release of employment land.</p> <p>4.7 Policy at all levels promotes the efficient use of land, including by directing development to brownfield sites and encouraging higher densities. The planning policy focus for housing delivery in London is on brownfield housing capacity with a key priority being 'mixed use redevelopment, especially of surplus commercial capacity'. As evidenced by Appendix A there is an identified surplus of industrial land within Haringey and the potential to accelerate the release of the brownfield housing capacity within the Central Leaside SIL having regard to the poor quality and arguable surplus nature of the employment land.</p>		to help inform considerations for industrial land management in the AAP area.
18	<p>Suitability for Alternative Uses</p> <p>5.1 The previous sections give evidence of the surplus capacity of industrial land and the adequate supply of available employment land in Haringey to meet demand. The current issues with the SIL and its physical and locational limitations in providing suitable alternative industrial accommodation that is desirable to the market are also identified. Having regard to these issues and the desperate need for housing in London, we believe there is a strong case for exploring alternative uses for the Central Leaside SIL and the subject site at 173 – 175 Willoughby Lane in particular.</p> <p>5.2 We note that the Council is in the process of producing a Site Allocations DPD and that the consultation document includes the Central Leaside SIL, although it states: 'A major land designation</p>	Employment land	Noted. The Council will undertake an updated employment land review and prepare further relevant technical evidence to help inform considerations for industrial land management in the AAP area, having

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	<p>in the North Tottenham Area is designated employment land. The future of these landholdings will be considered in an Employment Land Update which will be commissioned to inform the next iteration of this document, as well as the emerging Tottenham AAPs. This will look at the existing uses, and what sectoral growth is expected in the area, in the context of anticipated rising PTALs. We support such a review and request that our client is included in any consultations. However, we also consider that there is an opportunity to review the allocation through the AAP and support the suggestion in the Regulation 18 Document that this could facilitate strategic objectives for a more diverse housing and economic profile. For the reasons set out below we believe there is a strong case for a housing-led mixed use redevelopment of land within the Central Leaside SIL having to the location and context of the site in terms of sustainability, townscape and urban design.</p> <p>5.4 The site is well provided for by services being within a reasonable walking distance of the facilities within neighbouring town centres and railway stations. If it goes ahead, the proposed upgrade of the London Liverpool Street and Hertford East line and services through Northumberland Park will further improve the accessibility of the site and the opportunity for a mixed use redevelopment to include higher density residential uses.</p> <p>5.5 The site is also surrounded by a residential neighbourhood with which non-industrial uses would be more compatible, both in terms of amenity and the townscape relationship. Furthermore the site is located within an area of significant planned change, where future development in the Meridian Water area will dramatically change the context of eastern edge of the SIL to a more mixed and residential neighbourhood.</p> <p>5.6 Within the context of the wider Central Leaside SIL, the site at 173-75 Willoughby Lane is particularly well located to be considered for early release owing to its location on the edge of the SIL with direct access from Willoughby Lane and to Northumberland Park Station. In addition, it is well related to the existing residential neighbourhood to the north and is the site closest to the future regeneration at Meridian Water, with the potential to serve as a gateway development between the two areas.</p> <p>5.7 Our client has developed initial ideas on the potential of the site for redevelopment and would be more than happy to share and discuss these with the Council at the appropriate time to inform the AAP.</p>		<p>regard to meeting objectively assessed need and the Borough's strategic jobs target, along with delivering the spatial strategy. The Strategic Policies Local Plan sets out the employment land hierarchy for the Borough, which provides land and sites for a range of employment generating uses, with greater flexibility for uses offered on sites at the lower end of the hierarchy. The AAP will help give effect to these policies, and provide further details on implementation, where appropriate.</p>
18	<p>Summary and Conclusions</p> <p>6.1 Key conclusions and recommendations from this study are as follows: London Plan Policy 2.17</p>	Employment land	Noted. SIL is identified a regionally

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	<p>seeks to manage and protect SILs where appropriate, unless alternative uses are promoted through a strategic process of consolidation undertaken as part of the development plan process. In light of the decline in the general industrial sector, the rising stock of vacant industrial land in Haringey, and the pressing need for a diverse range of new homes and modern employment places in the Upper Lee Valley Opportunity Area, we believe there is an important opportunity to consider the strategic release of the Central Leaside SIL for alternative more appropriate uses through the Northumberland Park AAP. The shift away from industrial employment uses has been coupled with an increase in demand for distribution warehousing which requires specific locational factors, including large sites with direct access to a motorway, and the provision for the Lee Valley market is therefore to the north in Enfield near to the M25 junction. The site at Willoughby Lane clearly does not fit these criterion.</p> <p>As evidenced by the report at Appendix A, the Central Leaside SIL has been judged to be low quality when compared with other SILs in Haringey, Enfield and Waltham Forest and an adequate supply of better quality sites has been identified which can meet future employment needs (see Appendix A). There is therefore an opportunity to consider the consolidation and release of the land for more appropriate alternative uses.</p> <p>There is a clear policy target within the London Plan to achieve a significant amount of housing and job growth in the Upper Lee Valley Opportunity Area, with the Northumberland Park Area of Change being the subject of ambitions for transformation both in terms of the quality and mix of housing and the nature and diversity of the employment offer' (Upper Lee Valley OAPF, 2013). There is the potential for a significant contribution towards these strategic objectives from the consolidation and release of poor quality, surplus employment land.</p> <p>The Central Leaside SIL is a favourable location for housing-led mixed use redevelopment from a sustainability, townscape and urban design perspective. It is within a reasonable walking distance of the facilities within neighbouring town centres and railway stations. It is surrounded by a residential neighbourhood with which nonindustrial uses would be more compatible both in terms of amenity and the townscape relationship. Furthermore, the site is located within an area of significant planned change, with future development within the Meridian Water area.</p> <p>For the reasons set out above, we support the Council's suggestion on page 8 of the Regulation 18 document that there is an opportunity to review the employment land designations in the Northumberland Park AAP and consider the phased release in order to 'facilitate a more diverse housing and economic profile'.</p>		<p>significant employment land which should be protected, however recognising the London Plan provides scope for reconfiguration / consolidation through the plan process. The Council will undertake an updated employment land review to help inform considerations for industrial land management in the AAP area, having regard to meeting objectively assessed need and the Borough's strategic jobs target, along with delivering the spatial strategy.</p>

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	<p>Within the context of the wider Central Leaside SIL, the site at 173-75 Willoughby Lane is particularly well located to be considered for early release owing to its location on the edge of the SIL with direct access from Willoughby Lane and to Northumberland Park Station. In addition, it is well related to the existing residential neighbourhood to the north and is the site closest to the future regeneration at Meridian Water, with the potential to serve as a gateway development between the two areas.</p> <p>6.2 Our client is keen to work in partnership with the Council to explore the potential opportunities for the site through the AAP process and would request that they are informed of the next steps and updates.</p>		
19	<p>Thank you for the opportunity to comment on the Local Development Framework consultation for the Proposed Haringey Site Allocations Development Plan Development (SADPD) and specific AAP proposals for Tottenham. Overall the London Borough of Hackney welcomes the policy objectives of both the SADPD and Tottenham AAP's. Hackney broadly supports the objectives of both documents and is preparing its own Action Area Plan for Stamford Hill, which borders South Tottenham. Hackney is committed to working very closely supporting a cross-borough partnership approach to the Stamford Hill / South Tottenham areas and welcomes the opportunity to promote and enhance development in these areas across borough boundaries.</p> <p>The council is particularly interested in close working on key sites in the south of Haringey and specifically would like to be an active participant in any future Master planning exercise for strategic sites identified in the south of the borough. Two of the sites adjacent to the Borough boundary namely sites S3 Vale Road/ Tewksbury Road and and S4 Arena retail area mention the possibility of future further detailed Master planning. Hackney Council would welcome the opportunity to play an active role in this process.</p> <p>Similarly, with regard to the South Tottenham AAP Hackney supports the cross-borough partnership approach involving the adjoining boroughs of Hackney and Haringey Councils. A joint approach is essential if we are to successfully tackle the specific growth issues and challenges associated with meeting the needs of the community in this area.</p>	<p>General South Tottenham</p>	<p>Support for the Local Plan objectives noted. Haringey Council welcomes the opportunity to work with Hackney in addressing cross-boundary matters, in line with the Duty to Cooperate.</p>
19	<p>This is particularly acute in Stamford Hill/South Tottenham areas with regard to meeting the growing need for large family homes, schools and social infrastructure such as Synagogues.</p> <p>The draft AAP document for South Tottenham outlines some of the issues, opportunities, and challenges associated with its regeneration. Hackney is keen to work with Haringey in meeting these challenges going forward.</p>	<p>Stamford Hill /South Tottenham</p>	<p>Noted.</p>
20	<p>The Lee Valley Regional Park forms a significant part of the Borough's green infrastructure recognised as an important asset in Haringey's recently adopted Local Plan: Strategic Policies. Local Plan policy</p>	<p>Open space</p>	<p>Agreed. To help give effect to the</p>

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	<p>SP13 'Open Space and Biodiversity' states that: “The Council will enhance and improve the borough’s green infrastructure through:Working with the Lee Valley Regional Park Authority to protect and enhance access to the Park, its waterside open spaces and habitats, recreational and sporting facilities”.</p> <p>Justification text for Policy SP13 offers support for the Authority and other partners in “efforts to increase the range and access to open space for both residents and visitors”.</p> <p>Greater emphasis should be placed on the Regional Park and the adopted Area Proposals in the Site Allocations document under the site profile for Hale Wharf and in both proposed Area Action Plans. Substantial areas of Regional Park’s open space lie within the Tottenham Area and whilst there are some references to the Regional Park, which are welcomed, these need to be strengthened. Detailed comments follow below.</p> <p>The Authority considers that both the Site Allocations document and the draft AAP require a clear reference to CIL funding (or where relevant section 106) to provide improvements to green infrastructure and in particular for access projects. These will help link the Park to areas of deprivation within Haringey and improve opportunities for leisure and access to nature. This point was raised by officers in June 2013 in response to the Council’s Preliminary Draft Charging Schedule Consultation. It remains pertinent where a balance is required between a growing population and improved permeability to the Regional Park which allows access to its complex variety of open spaces and venues.</p>		<p>Strategic Policies Local Plan, the AAP will provide further details on the Lee Valley Regional Park, in particular, setting out the park’s importance as a local asset, as part of Haringey’s network of green infrastructure, and how access to the regional park can be improved for the benefit of residents and visitors.</p> <p>The use of Planning Obligations and CIL to support delivery of the spatial strategy for the Borough is set out in the Strategic Policies Local Plan (Policy SP 17), including consideration for funding open space / green infrastructure, and the Council does not consider it necessary to duplicate the policy in other Local Plan documents.</p>

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20	<p>The Policy designations listed under the Hale Wharf site profile should make reference to the Local Plan Policy SP13 Open Space and Biodiversity, and the Park Development Framework. These references help to establish that Hale Wharf, despite its largely ‘developed’ state, does form part of the Regional Park and with its waterside location and proximity to Tottenham Marshes and the Walthamstow Reservoirs, has potential to be enhanced as part of the borough’s green infrastructure. Reference is also needed to its location adjacent to internationally and nationally important biodiversity sites – Walthamstow Reservoirs SSSI.</p> <p>The Site Profile should reflect the requirements of the PDF Area Proposal 3.A.4 (2) as set out below. This recognises that Hale Wharf forms part of a Regeneration Area within Haringey and has value for generating local employment. It seeks to achieve a balance between bringing the site into a use that accords with the Park’s remit and enhances the waterside environment whilst contributing to the wider regeneration of the Tottenham area and meeting the Council’s need to maintain an employment generating use. Proposal 3.A.4 states:</p> <p>2) Hale Wharf</p> <p>Work with the London Borough of Haringey, the Canal and River Trust and other stakeholders to identify options for development on Hale Wharf that will bring this site into a Park compatible leisure use whilst also meeting its designation as a Regeneration Area within the London Borough of Haringey’s Core Strategy. Appropriate uses would include (but are not restricted to) one or more of the following:</p> <ul style="list-style-type: none"> New recreational or sporting facilities, based on the sites waterside location Accommodation serving visitors to the Park Waterside visitor facilities and facilities for clubs with a community emphasis, incorporating leisure uses for example café, cycle and canoe hire/club facilities. <p>The type, scale and design of development would need to be appropriate in terms of the sites location within the heart of the Park adjacent to internationally and nationally important biodiversity sites and its waterside environment.</p> <p>Any development of the site would be expected to support and complement existing leisure and nature conservation activity and facilities in the area in particular the Walthamstow Wetlands project. It should also enhance landscape quality and visual permeability, the ecological values of the environment and adjoining waterways and support waterside habitat creation. Design should allow views through the site from the towpath to the reservoirs and wider Park.</p> <p>Development on the site should encourage sustainable modes of transport, making full use of the</p>	Site Allocation DPD – Hale Wharf TH7	<p>The “policy designation boxes” are intended to signpost key plans and relevant land use designations. Development proposals will need to consider the Local Plan documents in their entirety and it is therefore not considered necessary to reference SP 13 here. The Council will make appropriate reference to SINC designations in future drafts.</p> <p>The Physical Development Framework area proposals are noted. The Council considers that the PDF is broadly reflected in the emerging site allocations; however it will give consideration to providing further</p>

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	<p>Tottenham Hale Station and bus interchange, with improved pedestrian and cycle links between this hub, Blackhorse Road station to the east and strategic pedestrian and cycle links within the valley. A new southern gateway into the Regional Park and Tottenham Marshes from Ferry Lane via Hale Wharf and a new pedestrian link across the waterways should form part of the regeneration of Hale Wharf.</p> <p>Development of the site which is not appropriate under the terms of the Park Act 1966 and the Park Authority's remit and does not accord with the proposals set out in the Park Development Framework will be resisted.</p> <p>It is proposed that the Council reconsider the site profile for Hale Wharf. A less intensive development compatible with the Park Act would achieve a wider spectrum of benefits and help reconnect this site into the wider green infrastructure network</p> <p>The Authority is concerned that the Design Principles included in the site profile will result in a high intensity development that takes no account of the sites sensitive waterside surroundings, (building heights of 5 to 8 storeys are recommended, together with communal gardens close to the banks of the River Lee). The site profile includes a range of other desirable uses a number of which the Authority would consider essential, for example, protection of waterside wildlife corridors, pedestrian walkways that connect with routes through the Regional Park, and an east-west walking and cycling route linking Tottenham High Road and the Regional Park. It is not clear however as to whether all these elements could be accommodated on the same site especially as it is in an area of high flood risk and potentially contains contaminated land.</p> <p>The Authority is concerned that the recommended building height is set at 5 to 8 storeys particularly given that Hale Wharf is a narrow site located within the centre of the Park. Given the Park consists predominantly of extensive sections of relatively flat river valley floor tall buildings would erode the openness of the Park landscape and the connectivity and sense of place created by long views through the landscape and along waterway corridors.</p> <p>Controls over storey height included in the adopted masterplan indicate heights stepping away from the Regional Park rising to 20 plus in the south west corner of Hale Village (furthest from the Park). The relationship to the Park is critical in that its permeability should be protected by both providing routes and views through adjacent development. The inclusion of heights up to 8 storeys on Hale Wharf doesn't respect its parkland setting. Storey heights should not exceed 5 storeys.</p>		<p>details in respect of opportunities for employment development, along with other potentially appropriate uses.</p> <p>Development densities and building heights are indicative at this time. The appropriate density / site capacity will be considered having regard to the nature of individual schemes, and any additional requirements set out in the Development Management document. The Council will undertake further technical evidence to establish a clear framework for building heights across the Borough.</p>

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20	<p>The Authority welcomes the inclusion of the Site Allocation to redevelop Tottenham Hale station as a gateway to Tottenham and the wider North London area. The Authority considers Tottenham Hale station, together with the bus station to be a major public transport node serving the Regional Park. This should be referenced under the Site Profile.</p> <p>The Authority supports the reference in the design principles to ‘a new pedestrian and cycle friendly east-west link’ envisaged in the north of the site which will bridge the railway and align with the east-west link through to Hale Village and on through to the Regional Park. The Authority has also recently been consulted on a planning application for redevelopment of Tottenham Hale Station which includes a station link through to Hale Village. The Authority has requested the provision of signage directing visitors to both the Lea Valley Walk and the Lee Valley Regional Park, via the new Hale Village Link in order to enhance access into the Park.</p>	Site TH2 Tottenham Hale Station Interchange	<p>The Council welcomes support for the proposals. It is not considered necessary that the site profile reflects that the Tottenham Hale station serves the Regional Park. However it is agreed that the Local Plan should reflect that Tottenham Hale is a destination offering access to the Lee Valley Regional Park, more broadly.</p>
20	<p>The Authority welcomes an Area Action Plan approach to the Tottenham Area. It is unfortunate that the Park area is divided between the two Area Action Plans especially as the division appears to have occurred at Stonebridge Lock and thus separated the Waterside Centre and Lock, identified as an enhanced visitor hub in the PDF Area Proposals from the main entrance into the Marshes.</p> <p>Tottenham Marshes and the associated waterway corridor are an important part of the borough’s green infrastructure which already suffers a degree of disconnection from adjoining communities due to severance from railway lines and major roads. This is raised in the general discussion of issues for the Tottenham AAPs and will need to be addressed in some detail in both AAPs to ensure east west movement into and then within the Park as a whole, from residential and business communities west of the railway and Watermead Way is enhanced and promoted.</p> <p>Both AAPs will need to include the PDF Area Proposals for Tottenham Marshes and the South Tottenham AAP will also need to include reference to Proposals for Hale Wharf (as discussed above), the Paddock and Markfield Park. Relevant sections of the PDF Area Proposals are included as Appendix A to this letter.</p> <p>A summary of the key proposals that should be incorporated and supported by the AAPs are as follows, some will apply to both AAPs</p> <p>The need to enhance Stonebridge Lock as a key visitor hub, based around the Waterside Centre, with increased recreational use of the waterways and the reinstatement of canoe/kayak hire facilities at</p>	Green infrastructure	<p>Support for the Area Action Plan approach is noted.</p> <p>The Local Plan will ensure that the network of green infrastructure is considered comprehensively across the Borough, irrespective of whether parts of it are dealt with separately under Area Action Plans and Site Allocations documents. The</p>

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	<p>Stonebridge Lock Further enhancement of pedestrian and cycle routes and the associated environment into Tottenham Marshes from the adjoining communities to the west and from Ferry Lane Partnership working with TfL to improve access from Tottenham Hale Station and bus interchange and Hale Village into the Park via an attractive, safe and well signed route Partnership working with the Canal and River Trust to ensure existing moorings along the Lee Navigation, especially between Stonebridge Lock and Ferry Lane are rationalized and associated structures removed. The promotion of active recreational use of the open spaces and events and local festival use of Clendish Marsh whilst also protecting the Marshes as an important urban wildlife habitat</p> <p>Safeguarding of the Paddock Community Nature Park as a local access to nature site; site management to complement the adjoining Walthamstow Reservoirs The protection of landscape quality and enhancement works undertaken in the southern part of the Marshes Improve pedestrian and cycle links between Markfield Park and adjoining areas of the Regional Park, explore opportunities for heritage trails linked to other heritage interests within and outside the Regional Park.</p>		<p>Borough-wide strategic approach to protecting and enhancing green infrastructure is set out in the adopted Strategic Policies Local Plan, which these consultation Plans will help give effect to.</p> <p>It is agreed that the Local Plan should seek to capitalise on opportunities to improve access to green spaces through improved pedestrian and cycle linkages between them.</p> <p>The Physical Development Framework area proposals are noted. The Council considers that the PDF is broadly reflected in the emerging site allocations; however it will give consideration to providing further details in respect of opportunities for appropriate uses on</p>

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			<p>sites.</p> <p>The Council will continue to engage with and consult stakeholders on proposals as the Local Plan is progressed, including the Park Authority, Transport for London and the Canal and River Trust.</p>
21	<p>Following our meeting last night I wanted to write to ensure that my opinions are reflected in the Area Action Plan. Several other freeholders from the Peacock Industrial Estate would also like to express opinions and will try to write to you either by tomorrow or by the 24th.</p> <p>I didn't realize the 7th was the deadline for the consultation and a lot of other freeholders didn't even realize there was a meeting last night. This is symptomatic of the problem we have as business owners on the proposed High Road West site.</p> <p>I have received one text and no emails informing me of consultation meetings despite having a meeting with Sarah Lovell and Abdul Qureshi at the Planning Department and giving them my details. We have had no visits from the planning department to my knowledge and we feel that those meetings we have attended have been oriented towards questions which will gather positive responses for the scheme and, until last night, offered us no forum to discuss our situation.</p> <p>These issues together with the behavior of some council members and planners which seem to present the scheme as a fait accompli give us the impression that we are an unfortunate obstacle in the way of a glamorous scheme that will provide so many new homes for the borough, so much planning gain for Haringey and so much money for the developer that they could not possibly let us impede it.</p> <p>This is further emphasized by the fact that, despite having spent a fortune on consultancy with Arup and generated huge volumes of glamorous literature and web graphics the council has yet to start researching possible sites for relocation.</p> <p>Most of the companies in the Peacock Industrial Estate are small family businesses which have</p>	<p>Consultation High Road West</p>	<p>The Council has carried out the Local Plan public consultation in line with its adopted Statement of Community Involvement and the Town and Country Planning (Local Planning Regulations) (England) Regulations 2012.</p> <p>The Council considers that the High Road West site allocation is integral to supporting delivery of the spatial</p>

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	<p>struggled over the last 20, 30 or, in the case of DW General Woodworks, over 60 years to establish themselves, pay off mortgages and grow in a part of London which has often been challenging. Together we provide almost 200 jobs, pay business rates and provide a service to the local community as well as clients further afield.</p> <p>In many cases we do this in a collaborative way – take for instance the 8 furniture, joinery and metalwork companies who often share skills, facilities and plant. I make furniture and regularly take jobs to DW to be machined, to Florite to be spray lacquered or to The Collectors Workshop to be leather covered. All done without motor transport.</p> <p>We are now faced with a future where we could be dispersed or, if compulsory purchased, could close down. Any research of industrial premises for sale in the area shows that there is almost nothing available, partly due to the recent demolition and relocation of the Wingate Estate, N17 Studios and the Northumberland Park Businesses.</p> <p>So there is a good chance that a substantial number of these thriving manufacturing jobs will be lost and replaced by a few more service jobs (where once we manufactured goods for the world we now sell each other coffee and manicures).</p> <p>The development plan includes provision for new start-up businesses on the site but the proportion of new businesses which survive the first year is small and Haringey may be losing 25 established ones in the Peacock alone plus many more in the shops and other areas under threat.</p> <p>Most of those business bought their own premises because they wanted to end up with an investment. For some of us it is our only pension so to have that forcibly removed without adequate recompense is hard to swallow, particularly since CPO is not being used to clear land for an airport or motorway. More flats will be built which will bring more people to a part of London which will then have less jobs.</p> <p>I understand that the 21st century model for urban redevelopment must often be financed by private interests and there is no way that small businesses like us can offer the same infrastructure improvement offered by Tottenham Hotspur or the developers who will build this project but this doesn't mean we should have no voice and that the hundreds of people, mostly Haringey residents, who are currently supported by the businesses on the estate should be brushed aside.</p>		<p>strategy for the Borough, particularly in supporting area regeneration to deliver uplift in housing of different types and tenures, new employment provision, access improvements and amenity spaces. The site allocation will set the principles for development, which the High Road West masterplan will help give effect to.</p> <p>The Local Plan sets a framework for managing the Borough's stock of industrial land, and through the plan process, the Council will designate land and set policies to meet objectively assessed need for employment land and floorspace and the strategic job target. This will include provision</p>

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			for a range of employment uses in the local area. The Council will seek to ensure the re-provision of any employment floorspace lost as a result of new development within the allocation.
21	We would welcome visits by councillors, planners and consultants to look at our options and reassure the businesses that we are part of Haringey's plans and hope that the Area Action Plan recognizes the value of the employment we provide.	Consultation	The Council invites the public to comment on the Local Plan proposals through its consultation exercises, which it undertakes in line with its adopted Statement of Community Involvement. There will be further consultation opportunities in the future as the plan is progressed.
22	Planning Policy Level 6 River Park House 225 High Road Wood Green N22 8HQ Our ref: JM/YK Date: 07 March 2014 Tottenham is a vibrant and diverse community which deserves future investment and opportunity. I welcome the commitment for future investment in the area and the future ambition for Tottenham. In	Housing Transport Open space	Haringey's Strategic Policies Local Plan (Policy SP2) sets out the Council's approach

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	<p>writing this however, there are risks and the planning authority must ensure that in its ambition to create mixed prosperous communities that a sufficient supply of affordable housing must be a main priority for the development. The current housing shortage is placing intense pressures on the market, with Valuation Office Agency data showing that private sector rents in Haringey increased from £1,050 to £1,200 in the year running to the end of September 2013. This is unaffordable for most households in the borough and demonstrates the need for more affordable housing to meet the housing needs of Haringey residents on low to middle incomes. While acknowledging that the Mayor's recently revised London Plan makes it difficult to ensure that the affordable housing that will be delivered is truly affordable, the council should – and I'm sure will – seek to negotiate that rent levels will be close to or at target rent, rather than at the maximum 80% of market rent allowed under the Affordable Rent model. Regeneration schemes have the potential to create many jobs, apprenticeships and training schemes for local people, both in the construction phase and in the longer term. It is vital that any scheme benefits those already living in the area and I trust that challenging targets will be set and delivered upon in this regard. There is also a general understandable concern expressed by residents that the necessary infrastructure in respect of enhanced transport links, school places, healthcare, leisure etc. must be, not only promised, but secured. It is vital that Tottenham is well connected to the rest of London and beyond. The plans must enable Tottenham to harness a regional option for Crossrail 2 in the future which will bring important connectivity and growth in our area. In the short to medium term, we must ensure that there is more investment in the West Anglia Railway, and improvements at Tottenham Hale, White Hart Lane and Northumberland Park stations. In addition these plans should allow for greatly enhanced cycling provision, segregated where possible, and the opportunity of Tottenham as a cycle hub should be seriously considered. Moreover, Tottenham lies adjacent to the wonderful green space of the Lee Valley Regional Park and these plans must ensure that access to this green space is vastly improved.</p> <p>Furthermore, I would urge you to continue to engage with local businesses who are rightly concerned over their future livelihood, and any impact caused as a result of changes to the area. Local traders will need on-going support throughout this process and the local authority must ensure that this is provided to them. These proposals must take the existing community with it, and therefore there must be strong on-going consultation and engagement with residents. Tottenham must continue to be a hub for local people and businesses, continuing the strong sense of community that already exists.</p>	Consultation	<p>to meeting objectively assessed housing need and the Borough's strategic housing target. SP 2 includes affordable housing requirements that new development will be expected to comply with, where appropriate and further details to assist with implementation of this approach are proposed to be set out in the Development Management policies. The AAP will help give effect to the strategic policies, and the Council will give consideration to bespoke housing policies in the AAP, where a variation on the Borough-wide policies is justified, in order to deliver mixed and balanced communities. The Local Plan seeks to ensure provision</p>

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			<p>that meets the needs of both existing and future residents of Tottenham.</p> <p>The Council agrees with the respondent's comments on strategic infrastructure, particularly transport infrastructure. The Council has prepared an Infrastructure Delivery Plan (IDP) which sets out the requirements needed to support the levels of planned growth. This will be updated over the plan period, reflecting future proposals for the Tottenham Area. The consultation documents reflect the need to capitalise on planned investment in transport infrastructure, a key to unlocking the</p>

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			<p>growth and regeneration potential of the area, improving accessibility to, from and within Tottenham.</p> <p>The Lee Valley Park is recognised as a key asset, part of the Borough's network of green infrastructure, in the Strategic Policies Local Plan.</p> <p>The Council considers that the key challenges and opportunities set out by the respondent are reflected in the Strategic Policies, and will seek to address these through the AAP, where appropriate.</p> <p>The Council invites the public to comment on the Local Plan proposals through its consultation exercises, which it undertakes in line with its adopted</p>

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			Statement of Community Involvement. There will be further consultation opportunities in the future as the plan is progressed.
23	<p>Thank you for advising us on the current status of this set of Area Action Plans (AAPs) however at this stage there isn't enough information for Natural England to comment in more detail upon certain aspects such as biodiversity and open space. It would of course be welcomed if these aspects of the AAPs were given serious weighting and that access to open space was more heavily promoted wherever possible in the various action plan areas.</p> <p>We do of course look forward to being consulted, in due course, at the next stage of the AAP development process.</p>	Open space and biodiversity	<p>The Council will continue to consult Natural England as the plan is progressed, and welcomes comments received in the future. The AAP will help give effect to Haringey's Strategic Policies Local Plan (including Policy SP 13), which sets out the strategic approach for protecting and enhancing biodiversity and open spaces across the Borough. The Council will give consideration to providing further additional details in the AAP, where appropriate.</p>

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24	<p>Network Rail has the following comments to make in regard of the consultation on the above documents.</p> <p>Site Allocations DPD</p> <p>Network Rail are pleased that Haringey recognises the importance of the proposed improvements to the Tottenham Hale Growth Area presented by the STAR scheme (pg10). Network Rail is keen to work with Haringey and the neighbouring borough of Enfield throughout the development of the final design for the scheme.</p> <p>Tottenham AAP</p> <p>Network Rail are please that Haringey recognise the importance of the improvements to the West Anglia Mainline and the opportunities this will bring to the local area as outlined in Section 2 under the subsection referring to Northumberland Park (pg 6).</p> <p>Given Haringey's recognition of the importance of the improvements to the West Anglia Mainline</p> <p>Network Rail would suggest it is appropriate that developer contributions, in the form of s.106 or CIL, are available to help fund these works.</p>	Transport infrastructure	<p>The Council welcomes support for the proposals, and will continue to consult with Network Rail in the preparation of the Plan. Capture and use S106 on transport infrastructure would have to meet the legal tests for planning obligations.</p> <p>Haringey's Regulation 123 List will set out the Council's priorities for local CIL spending, and it is not considered appropriate to specify this in the AAP.</p>
25	<p>The draft site allocation NT2 has been base on the NDP scheme promoted by THFC. This approach is flawed for 2 reasons.</p> <p>First, setting aside the issue of whether the permission that have been granted can be implemented, the fact remains that these permissions were granted on the basis of planning policies contained in the UDP which either have been withdrawn or will shortly be withdrawn. It makes no sense to perpetuate developments based on the former planning regime when new, more sustainable policies have been prepared and are in the course of preparation, which will secure far more sustainable planning outcomes than were previously achievable under expired planning policies.</p>	NT2 Tottenham Hotspur Stadium	<p>The Council cannot respectively apply planning policies where permission has been granted. The extant application must be taken into account.</p>
25	<p>Second, as we explored in detail in the CPO inquiry, there are a number of other schemes/alternatives which are significantly better than the NDP scheme, but the site allocations is not flexible enough to capture these enhanced benefits from different options.</p>	NT2 Tottenham Hotspur Stadium	<p>The site allocation reflects the extant planning</p>

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	<p>The proposed scheme and allocation would not significantly improve the economic, social or environmental wellbeing of the area. On the contrary, converting the NDP scheme to a site allocation would actually be a drag on the regenerative potential of the site and the wider area, not least because it depends on public sector funding that could more effectively be invested in more appropriate regeneration and environmental purposes in the area.</p> <p>Two realistic alternatives are, first, the retention and extension of the stadium in its present position, with ground capacity increased by redeveloping one or more of the stands (potentially up to 48,000 seats), with the cleared employment land to the north of Paxton Road developed for employment purposes (and the premises belonging to Archway left in situ). The second alternative is the relocation of the stadium to an alternative location and the comprehensive redevelopment of the whole o the NDP site south of the Northern Development for a mix of residential and commercial development.</p>		<p>permission, which must be taken into account.</p>
26	<p>Berkeley Homes wholeheartedly supports the regeneration of Tottenham and would certainly be interested in becoming a development partner to help deliver this exciting vision. With that in mind, our comments are designed to help shape the documents and ensure they will deliver their objectives.</p> <p>Tottenham Area Action Plan Purpose of the Area Action Plan</p> <p>Haringey is a diverse borough and it is agreed that an AAP is the best planning mechanism to deliver large scale regeneration in Tottenham. The AAP can fully appreciate the unique opportunities and challenges within the area and present a positive approach to aid in delivering the development opportunities to achieve change.</p> <p>Socio Economic Snapshot</p> <p>New development can directly help address unemployment rates in the area, particularly unemployment amongst young people, with opportunities for construction apprenticeships and training.</p> <p>Berkeley is committed to maximising local opportunities and has worked with REDS10 on recent schemes, including Goodmans Fields in the London Borough of Tower Hamlets and the aforementioned Woodberry Down in the London Borough of Hackney. REDS10 is an independent Social Enterprise that aims to unlock apprenticeship opportunities in construction by identifying ‘job ready’ local residents and directly employing them for 24 months. As part of this process all candidates are enrolled at a local college and gain valuable experience on site.</p> <p>Built Environment Snapshot</p> <p>Tottenham has good, existing public transport infrastructure and that will be significantly strengthened in the future. The improvements in infrastructure will make the area more attractive to homebuyers and employers.</p> <p>Many of Tottenham’s problems are a direct consequence of the demise of its manufacturing base.</p>	<p>Tottenham regeneration</p> <p>Employment land</p> <p>Design and character</p> <p>Building heights</p>	<p>The Council welcomes support for Tottenham regeneration. The AAP will set out a framework and principles for new development to support delivery of the spatial strategy for the Tottenham area and the Borough. It is recognised that plan implementation will require the Council to work closely with a range of different partners, including in the public and private sector, and developers are encouraged to positively engage with the Council to</p>

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	<p>Those jobs have not been replaced. Manufacturing in London has evolved and is now geared towards high-quality, bespoke products which are designed and made in London. There is a real opportunity to encourage the burgeoning creative manufacturing industries of East London into the area and help develop the existing growing businesses in Tottenham.</p> <p>The Scale of Change</p> <p>The AAP will be informed by emerging studies, notably the Haringey Urban Characterization Study. Whilst it is important the character of existing areas is recorded, and the strengths of those areas are enhanced, there is scope for major change in Tottenham. Modern development can create sustainable high-density living with substantial amenity space through the use of well-designed tall buildings, innovative architectural thinking and effective on-site management</p> <p>Issues and Challenges</p> <p>The creation mixed and balanced communities has been demonstrated to have numerous benefits for regeneration areas, not least in improving the perceptions of an area, creating safer communities and increasing access to employment opportunities. A similar approach is being adopted at Woodberry Down. It is important that there is flexibility on affordable housing requirements to ensure new housing can be delivered, and be of a tenure which will really encourage long-term change. New development in Tottenham offers the chance to address some of the public realm issues which have blighted the area's image for visitors and create better permeability and safer routes for existing and future residents. There is a real opportunity to create new green spaces and improve linkages to the Lee Valley.</p> <p>Tottenham Hale will have excellent transport links across London and the East of England. The opportunity for well-designed, high density sustainable development should not be missed.</p> <p>Site Allocations DPD</p> <p>It is noted that the development parameters for the High Road West area will be progressed as a Masterplan, and the Tottenham Hale Masterplan will be refreshed. These are also likely to be influenced by the Urban Characterisation Study.</p> <p>As a general comment, Berkeley consider the assumptions on height of 8 -10 storeys for the Tottenham Hale station area to be somewhat conservative, given there are buildings of 20 storeys envisioned on the adjacent sites at Hale Village and Ashley Road North. In such an accessible location, it is considered there would be real scope for a tall marker building here to define the area. Subsequent to the commencement of this consultation, the Mayor has published the Draft Further Alterations to the London Plan (FALP) for consultation. The London Plan revisions recognise the need to plan for substantial population growth and is seeking an uplift in housing numbers across London from 32,000 homes per year to 42,000 homes per year.</p>		<p>this effect.</p> <p>The AAP seeks to give effect to the Council's strategic approach to employment land management, and will set policies to ensure that employment sites are optimised in order to meet objectively assessed need and the Borough's strategic employment target. This includes provision of land and floorspace to accommodate a range of employment uses. The Council will undertake further technical evidence to ensure an up-to-date understanding of employment needs for the plan period.</p> <p>The consultation document clearly sets out the scope for significant development opportunities in</p>

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	<p>Haringey has been identified for significant growth, with the draft target increasing from 820 homes to 1,502 homes per year. Given the existing residential character and parklands of the West of the borough, it is felt the scope for growth is in the East of the borough, within the AAP areas. It is considered that sustainable residential development, in the form of higher densities and well designed taller buildings in accessible locations, needs to be positively promoted through emerging policy in order to meet these targets.</p>		<p>Tottenham. The Council considers that a balance must be struck in facilitating new development and ensuring the protection and enhancement of area character, particularly in line with Chapter 1.3 of the adopted Strategic Policies. The Council will give further consideration to the need for area-wide policies in the AAP to support this. Site allocations offer a further opportunity to set development guidelines and the Council welcomes public to comment on these as the plan is progressed.</p> <p>It is noted that the Mayor is preparing Further Alterations to the London Plan. The Council will keep this under review in order to ensure the AAP is in general conformity</p>

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			with adopted regional policies. It is recognised that appropriately located tall buildings can help to address housing need. To this effect, the Council will prepare further technical evidence to inform an approach to tall buildings / building heights across the Borough.
27	<p>Whilst Selby Trust recognises the need for additional affordable housing in London and therefore Haringey, we also want to ensure that the case is heard for the importance of preserving the Selby Centre as it is a well used, dynamic and innovative community hub. By supporting these particular community facilities in the future to become physically welcoming, modernised effective buildings, local neighbourhoods will avoid becoming further concentrated with disadvantage, unemployment and a low skills base, that are also atomised, soulless places that breed loneliness and ill health. In effect this could be a platform for prevention and early action in neighbourhoods - something we are seeking to raise long-term resources for to bring to Tottenham (see attached).</p> <p>If the Selby Centre site was to be the target of additional housing in the future, now is the time to begin discussions about the appropriate vehicle to manage that housing alongside community facilities that provide enterprise, learning and leisure space in an integrated way, that is equipped to support older people, intergenerational relationships and promote well-being forever or at least the next 125 years.</p> <p>The Selby Trust has been working in its current location on Selby Road for the last 21 years. We have managed to get this far, being used by 100+ diverse, resident led small grassroots groups and enterprises without any major capital investment after conversion from a disused school in mid-1980s. We have continued to survive in a dilapidated environment that sends a mixed message to communities – we are enterprising, we are here to help but are disadvantaged ourselves. Environment matters in Tottenham too.</p> <p>Yet it has been incredibly well-supported by communities, sustaining 90-100% occupancy for over 2</p>	Community facilities Selby Centre	The Selby Centre has been identified in the consultation document as a draft housing trajectory site. The Council will assess options for optimising the use of this site, having regard to the need to meet objectively assessed need for housing and the strategic housing requirement, along with delivery of the spatial strategy for the Borough. The community use on the site (Selby

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	<p>decades whilst offering affordable rates. We have employed locally, purchased locally and obtain investment from local businesses to revamp our Main Hall as well as benefited from corporate volunteering from a wide range of banks and businesses. We have crowd-funded for a "Global Garden", set up Wood Works Wonders to recycle wood for social good and established the Community Energy Lab to promote energy efficiency in hard-to-heat homes. These projects co-locate with those organisations reaching Somali, Kurdish, Turkish, African Caribbean, Congolese, Ugandan, Eritrean, Ethiopian, Indian, Latin American and Eastern European communities. As a registered charity, it generates 75% of its own income from lettings and hire amongst the poorest communities in Tottenham.</p> <p>We have built up a strong understanding of the needs of local residents in the neighbourhood, with the help of surveying by community organisers across the borough and providing services that make it a flagship.</p> <p>In the future, flagship status could arise from:</p> <ul style="list-style-type: none"> *Energy: Producing more energy at a community level than is used to offer to local educational and residential settings *A health campus that encourages healthy living, regular sports and fitness, and ‘experience experts’ in management of chronic long-term conditions across diverse communities *A social enterprise zone that delivers high quality, co-produced public services, generates jobs, reduces offending and widens skills from birth to 6th form, and meets employer needs across generations <p>An outline of one option in a 10 year retrofitting plan is attached to ensure the viability and sustainability of the centre for years to come, alongside a summary of our current work.</p> <p>Through our daily work we have come to understand the value of empowering local people as a goal in itself and as a way of reducing the cost of inequality. Recent examples reveal the transformation from unemployed into employable, offenders into ex-offenders taking responsibility and positive steps to transform the environment. There are hundreds of other good practice examples onsite.</p> <p>We would therefore welcome restarting discussions with the Council to investigate the possibility to develop the Selby Centre for the long-term benefit of the local community, which may include health, housing, school improvements, but must include an improvement in sizeable valued community facilities for it to be something we could support and participate in. Inevitably, any plan would be subject to robust and substantial consultation with the local community, promoting an understanding of the design process and fostering active citizenship.</p>		<p>Centre) is noted. In progressing the Local Plan the Council will give consideration to how to ensure appropriate provision of community infrastructure to support planned growth, with further policy/guidance on sites where there are existing community uses. The Council will continue to consult with the Selby Trust throughout the plan preparation process.</p>
28	<p>Key Issue – Water Supply and Sewerage/Wastewater Infrastructure</p> <p>A key sustainability objective for the preparation of the Local Plan/AAPs should be for new development to be co-ordinated with the infrastructure it demands and to take into account the</p>	Infrastructure	Noted.

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	<p>capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: “Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....” Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should works with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.” The new web based National Planning Guidance published in August 2013 includes a section on water an wastewater infrastructure and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs.</p>		
28	<p>Policy 5.14 of The London Plan, July 2011, relates to Water Quality and Wastewater Infrastructure and states: “LDF preparation E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.” Policy 5.15 relates to Water Use and Supplies. It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. It is unclear at this stage what the net increase in demand on Thames Water’s infrastructure will be as a result of the proposed AAP proposals. Details of, and the time to deliver, any required upgrades will be determined after receiving a clearer picture of the location, type and scale of development together with its phasing. Thames Water welcomes the opportunity to work closely with the Haringey Council as the Plan evolves to identify the net increase in demand on our infrastructure. Thames Water has also provided comments on the Site Allocations DPD and welcomes the opportunity to review the more detailed AAPs once they have been prepared for comment in early autumn 2014. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts of internal and external sewer flooding of property, pollution of water courses and / or issues of no or low water pressure. It is therefore essential that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate reports and appraisals to ascertain whether the proposed development will</p>	Infrastructure	<p>The Local Plan is supported by an Infrastructure Delivery Plan (IDP) that sets out the strategic infrastructure required to support planned growth, including for water supply and sewerage infrastructure. The IDP is set out in Appendix 4 of the adopted Strategic Policies Local Plan, and will be updated regularly over the plan period. The Council will continue to consult Thames Water as the Local Plan is progressed to</p>

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	<p>lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.</p> <p>Thames Water recommends that developers engage with them at the earliest opportunity to establish the following:</p> <p>The developments demand for water supply and network infrastructure both on and off site and can it be met;</p> <p>The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met; and</p> <p>The surface water drainage requirements and flood risk of the development both on and off site and can it be met</p> <p>When carrying out the necessary early consultations with Thames Water regarding the capacity of water and wastewater infrastructure, in respect of development proposals, adequate time should be allowed so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of days. For example, the modelling of water and wastewater infrastructure will be important to many consultation responses and the time requires for responses must not be underestimated. For example, the modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows. Therefore, consultation should be undertaken as early as possible with Thames Water regarding the capacity of water and wastewater infrastructure to serve development proposals. Adequate time must be allowed for a high level risk assessment to be undertaken. Should more comprehensive responses be required, it is likely that more detailed modelling work will need to be undertaken. The necessary funding for this work will need to be identified and secured through Developers and/or partnership working. It can take approximately 3 months to complete modelling work from the point funding has been secured.</p>		<p>ensure it is kept informed on proposals for the level and locations of planned growth, and welcomes information to include in the IDP.</p> <p>The Council will give further consideration to requirements for development proposals in respect of water supply and wastewater. This could be through the Borough-wide Development Management policies or elsewhere in the Local Plan.</p>
28	<p>To accord with the NPPF and the London Plan text along the lines of the following should be added to the AAPs:</p> <p>“Water Supply & Sewerage Infrastructure</p> <p>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree</p>	Infrastructure	Noted. The Council will give further consideration to requirements for development proposals in respect of water supply and wastewater. This could be through

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	<p>what improvements are required and how they will be funded prior to any occupation of the development.</p> <p>Further information for Developers on water/sewerage infrastructure can be found on Thames Water's website at: http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm Or contact can be made with Thames Water Developer Services by post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY; By telephone on: 0845 850 2777; Or by email: developer.services@thameswater.co.uk"</p> <p>It may be possible for public sewers or water mains to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989. The developer would be required to pay for any mains diversions.</p> <p>Thames Water must also be consulted regarding proposals involving building over or close to a public sewer. If building over or close to a public sewer is agreed by Thames Water it will need to be regulated by an Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers or water mains to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.</p>		<p>the Borough-wide Development Management policies or elsewhere in the Local Plan.</p>
28	<p>Deephams Sewage Works Upgrade</p> <p>The proposed Deephams Sewage Works Upgrade represents essential infrastructure development required to both significantly improve the quality of effluent discharged into the Salmon's Brook, Pymmes Brook and River Lee and to provide essential capacity for the management of increased amounts of sewage wastes arising as a result of population growth, including at Tottenham AAP area. Improvements are required to Deephams Sewage Works to ensure that Salmon's Brook which in turn flow into the Pymmes Brook and River Lee meet environmental quality standards to comply with the Urban Waste Water Treatment Directive, Freshwater Fish Directive and the Water Framework Directive. To meet these legislative obligations, the Environment Agency has determined that a new tighter effluent discharge consent is needed at Deephams Sewage Works.</p> <p>The National Policy Statement (NPS) for Waste Water (adopted March 2012) confirms that the Government's environmental regulators have approved a project at Deephams Sewage Works to improve the standard of treatment in order to meet European and National water quality targets. The NPS confirms the need for the improvements to Deephams Sewage Works and that these are essential to meet the environmental standards set out above, and to accommodate growth in the catchment. Thames Water request that the AAP makes reference to the Deephams Sewage Works, and recognising the need for the Upgrade to accommodate planned growth within the catchment. We</p>	Infrastructure	<p>Noted. Paragraph 4.2.4 of the adopted Strategic Policies Local Plan sets out information on sewerage infrastructure and signposts the Thames Water investment programme (including Deephams Sewage Works). The Site Allocations DPD and Tottenham AAP will help give effect to the Strategic Policies,</p>

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	<p>consider that it is important that such reference/support for the Upgrade project is included in the final version of the document as it is essential infrastructure for the Tottenham AAP development.</p>		<p>and the Council will give further consideration to signposting infrastructure projects in these Plans, where appropriate.</p>
28	<p>Water Efficiency Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water and this issue should be specifically covered in the Local Plan. All new dwellings should meet the water usage targets set out in code for sustainable homes code 3 rating as a minimum. Thames Water have a water efficiency website: www.thameswater.co.uk/waterwisely By exploring the interactive town, Waterwisely, you can discover how you can start saving water, help protect the environment, reduce your energy bill and even cut your water bill if you have a meter. You can calculate your water use, see how you compare against other Thames Water customers and the Government's target, and get lots of hints and tips on how to save water. Thames Water customers, can also order a range of free devices to help save water. The Policy/supporting text could make reference to this guidance. However, managing demand alone will not be sufficient meet increasing demand and Thames Water adopt the Government's twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in their latest draft Water Resource Management Plan.</p>	Infrastructure	<p>Noted. Policy SP 5 of the adopted Strategic Policies Local Plan sets out the Council's strategic approach on water management and flooding. This policy reflects the importance of water efficiency, and paragraph 4.2.3 of the supporting text provides that new development should meet the London Plan water consumption targets.</p>
29	<p>The Theatres Trust is The National Advisory Public Body for Theatres, and was established by The Theatres Trust Act 1976 to 'promote the better protection of theatres'. The Trust delivers statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2010 (DMPO) requires the Trust to be consulted on planning applications which include 'development involving any land on which there is a theatre.' We are also a consultee for Neighbourhood Development Orders and Community Right to Build Orders, and encourage local authorities, parish councils and local groups to consult the Trust on Local and Neighbourhood Development Plans that concern local theatres.</p>		<p>Noted.</p>

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	<p>Tottenham Green</p> <p>We support any schemes to enhance the cultural buildings and their environment listed on page 9, particularly the Bernie Grant Arts Centre, and any other cultural structures in the Borough such as Alexandra Palace and the Jackson's Lane Community Centre.</p>		
30	<p>Tottenham Business Group is composed of the local High Street Shops and businesses that are threatened with demolition through the High Road West Development scheme.</p> <p>The Master Planning work on the High Road West Development commissioned by the council from ARUP is to be incorporated into this present AAP</p> <p>However the consultation carried out on the Master Plan in April 2013 produced evidence was not sound. It did not engage the majority of the community. There was not sufficient information given to the community in the documentation to provide an informed response, particularly regarding the full planning intentions for the use of the "community hub".</p> <p>No option gave an alternative to the demolition of the local shops and businesses. There was and is a plan produced by the planning consultant that meets both the community demands and the council's key requirements, but it wasn't presented as an option.</p> <p>The community showed support and demonstrated their absolute wish to retain our businesses by signing a petition numbering 4200 local signatures.</p> <p>This petition has been represented to this consultation.</p> <p>This evidence that the community rejected these demolitions was passed over by the Haringey executive. The community's clear views did not change, inform or shape the development of the current plan.</p> <p>This consultation was flawed and is the subject of a formal complaint, evidence from it such as is contained in the Consultation Feedback report should not be considered a reliable or sound basis for subsequent decisions.</p> <p>Our involvement in Tottenham Futures Consultation was limited as no direct comment was allowed on the High Road West development. In addition the community were only allowed to discuss a Tottenham 20 years in the future. No comments on the present planning issues were allowed</p> <p>Our view and we are backed with considerable support in the community is that the High Road West plan has been foisted upon our community with evidence collected retrospectively to support it. There is no evidence to show</p> <p>the basis of Haringey's key planning decisions: demolition of the High Road, moving of the station, building of the walkway.</p> <p>In particular this business group has been discriminated against with concerted attempts to minimize the actual level of support in the community for the retention of the historic high street shops and established businesses. The High Road shops concerned date from 1850, and the industrial estate</p>	High Road West	<p>The Council has carried out the Local Plan public consultation in line with its adopted Statement of Community Involvement and the Town and Country Planning (Local Planning Regulations) (England) Regulations 2012.</p> <p>The Council considers that the proposed High Road West site allocation is integral to supporting delivery of the spatial strategy for the Borough, particularly in supporting area regeneration to deliver uplift in housing of different types and tenures, new employment provision, access improvements and amenity spaces.</p>

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	<p>contains many of the eclectic businesses celebrated in the recent visit by Prince Charles. The Victorian Society is objecting to the demolition of the High Road shops</p> <p>Despite the evidence Haringey has not responded to the strength of public opinion influence them and have retained the original plan.</p> <p>The aim of attracting new investments, new business, new residents which underpins these AAPs should not be accomplished by displacing the very residents and businesses the process was initiated for.</p> <p>The process of the Tottenham AAP survey was quite inaccessible to the ordinary public. The complex documentation should have been available in advance in order for the community to assess it properly.</p> <p>Arena Forum meetings were not advertised on the website until after January 18th and yet all were scheduled to take place in the first week of the consultation. Extra venues were arranged but again advertised at such short notice it was incredibly difficult for the general public to attend.</p> <p>In order to respond to this process copies of the blue and red regulation documents were needed. They were not generally available in adequate numbers.</p> <p>The website link revealed a very detailed page with no clear prompts linking to a response page.</p> <p>The surveys were incredibly difficult to find and to operate.</p> <p>The questions were designed to draw out the replies, which would retrospectively support and justify policies and planning already decided upon.</p> <p>The Community sees no need for the moving of White Hart Lane station. Its relocation necessitates a lot of unwanted demolition of the Historic Tottenham High Road. They prefer access to and from the station onto a well-lit road close to buses and taxis. The crowd on football days has always approached the stadium via White Hart Lane. We see no reason why this would now cause overwhelming difficulties. It would also be the major benefit to existing local business that could benefit from the increased footfall.</p> <p>The High Road West Development has been referred to by the Council as an attempt to form a Town Centre. However the current plan forces out small shops and businesses and drives out large numbers of the ethnic minority communities to make way for a new higher income population. What is created is an enclave of higher rents and higher prices inaccessible to the existing community. There needs to be compromise with the needs and wishes of the existing community so they may be visibly be seen to also benefit from the plans.</p> <p>Great emphasis has been put on the provision of a commercial cinema and leisure complex. This again is not aimed at a community audience. The infrastructure does not support the entering and exiting of large numbers of cars with the only access being back onto the high road.</p> <p>Discussion in the Community Liason Groups emphasized their requirement was for a multi functional</p>		<p>The site allocation will set the principles for development, which the High Road West masterplan will help give effect to.</p> <p>Consideration of alternatives will be explored throughout the plan production process, and informed by public consultation at the Regulation 18 stages. Further assessment of alternative policy approaches will also be included in future Sustainability Appraisal reports.</p> <p>The Local Plan sets a framework for managing the Borough's stock of industrial land, and through the plan process, the Council will designate land and set policies to meet objectively assessed need for employment land and floorspace and</p>

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	<p>community building doubling as a cinema and theatre with space that could be rented by local art, dance, or fitness groups.</p> <p>The planned “Community Hub” has at the moment been placed on the High Street. It was not revealed that the intention was to have retail areas on the ground floor of this building.</p> <p>A community building should be located in a more accessible area with easier and cheaper parking options. In its current placement it would be difficult to access for elderly or disabled, especially on match days.</p> <p>The current plan also sets out to demolish the industrial estate and re-designate the land. The loss of the industrial estate would mean the loss of 200 jobs. It would also mean the loss of manufacturing and industrial units that could provide valuable skilled training and apprenticeships for our local youth. Haringey has emphasized fostering start up businesses but is determined to eradicate low cost premises. The start up units shown on the HRW option plans would not only be too expensive but very limited as to usage,</p> <p>The jobs, the training and the varied established units of Peacock Estate and its surroundings could not be replaced elsewhere.</p> <p>Over 2000 jobs have already been lost with the demolition of other large estates in Northumberland Park. Peacock Estate should be protected</p> <p>The young community cannot be asked to rely on service industry jobs, which are all that will remain in Northumberland Park if the current plan goes through.</p> <p>The current plan simply creates an entertainment venue to enhance the new stadium and be co-developed by TFHC.</p> <p>The community wants heritage and positive character of the area to be preserved. It wants a “town Centre” focused on the community not match days. It wants to retain local shops and businesses. It wants low-level development with a good percentage of social and affordable housing.</p> <p>The community needs to inform and shape these plans. At the present time HARINGEY is not LISTENING.</p>		<p>the Borough’s strategic job target. This will include provision for a range of employment uses in the local area. The Council will seek to ensure the re-provision of any employment floorspace lost as a result of new development within the High Road West allocation.</p> <p>The Council will give further consideration to policies for positively managing the historic environment in the context of Tottenham regeneration, including the need for bespoke policies for the AAP to supplement Borough-wide policies elsewhere in the Local Plan.</p> <p>The Local Plan seeks to maximise the benefits of the proposed Hotspur</p>

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			Stadium redevelopment. The Council will give further consideration to policies which can help ensure the area within which it is set functions as a viable 7-day a week destination, and not only on match/event days.
31	<p>THFC welcomes the opportunity to comment on the Tottenham AAPs in the context of its ongoing commitment to work closely with Haringey Council and the community in delivering sustainable regeneration in Tottenham. Given the importance of the AAPs in shaping the wider regeneration of north London, THFC believes it should play a key part in helping to shape future development in this area, given their leading role in driving forward regeneration within the area to date. The comments provided in this letter reflect this approach.</p> <p>Whilst our representations relate predominately to the Northumberland Park AAP area, we have provided a response on the following sections of the document:</p> <ul style="list-style-type: none"> Key Issues Northumberland Park South Tottenham <p>THFC's representations are also informed by the following documents:</p> <ul style="list-style-type: none"> National Planning Policy Framework (March 2012) The London Plan (July 2011) The Upper Lea Valley Opportunity Area Planning Framework (July 2013) The Adopted Haringey Local Plan: Strategic Policies (March 2013) ("the Local Plan") A Plan for Tottenham by Haringey Council and the Tottenham Taskforce (September 2012) 	General	Noted.

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	<p>It Took Another Riot, Mayor of London’s Independent Panel on Tottenham (December 2012) The various planning permissions, listed building and conservation area consents forming our client’s Northumberland Development Project (“NDP”) The Tottenham Physical Development Framework (“PDF”) (March 2014).</p>		
31	<p>General Comments As with the Site Allocations DPD, the whole document would benefit from paragraph numbers and a contents page. The structure of the document is unclear and it would advantageous to have an initial paragraph/s which outline the different sections to the document; how the AAPs will be prepared; and whether they will form one document or be prepared as separate AAPs. The diagrams provided within both the introductory sections and Northumberland Park/South Tottenham sections are hard to read with some of the proposed boundaries and designations illegible. It is not possible to define, for example, what the actual boundary of the AAP areas are, as shown in orange and blue on Map 1. In addition, the “Key Issues and Challenges Maps” do not adequately or successfully outline the main issues facing the area and are inconsistent with the plans provided as part of the Site Allocations DPD Consultation Document at NT5. All plans would benefit from a different graphical approach/format and an accompanying key. The introductory section outlines that as a statutory planning document, an AAP has to go through a number of rigorous community consultation stages in order to build consensus around an area’s regeneration proposals. However, the document states within “Section 5. Next Steps” that the document will not go down the issues and options route of AAP development. Whilst the need to avoid unnecessary delay in producing these documents is welcome, this approach obviously misses out a key stage of engagement with both the community and local stakeholders, and therefore conflicts with the need to build consensus for the emerging proposals. Whilst THFC recognise that this document forms a starting point for discussion and consultation, it is considered that given the amount of work and evidence base that has already been undertaken for the area, this document is too high level, making it difficult to provide a meaningful response based on the information provided.</p>	General	<p>Comments on formatting and graphics are noted. The Council will aim to improve on this in future consultation documents.</p> <p>Noted. The Council agrees that the Section 5 statement on ‘next steps’ is unclear, and should explain that the AAP builds on work carried out through the PDF, SRF, Plan for Tottenham and the NDP. The evidence gathered through the consultation of these documents highlighted the need for a statutory planning framework. In response to the feedback received during the consultation of this document it is</p>

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			envisioned that another round of Regulation 18 consultation will be carried out, to consult on a more detailed set of policy options.
31	<p>Key Issues</p> <p>THFC supports the scale of change outlined within the Key Issues chapter and in particular the acknowledgment that Tottenham forms one of the most significant development opportunities in London over the next ten years.</p> <p>This section states that the AAP provides a statutory planning framework that has the potential to help deliver a number of key components (as referenced inside the pink box). THFC note that the delivery of the NDP Project and the new THFC Stadium, in particular, is omitted and given the importance of this project in the regeneration of Tottenham and North London, it should be included as a key item that the AAP can help deliver. Map 3 refers to “Tottenham’s possible character areas”, however these are the same diagrams used within the Tottenham PDF, which was finalised in March 2014 and therefore this document should be amended to reflect this, excluding the reference to “possible”.</p> <p>Whilst THFC broadly agree with the main issues and challenges outlined within the pink box on page 5 of the document, some text has been cut off from the end of the page, making it hard to fully understand the complete list of key issues and challenges that have been compiled for the area. The need for an improved housing and retail offer will be essential if the area is to develop successfully in the future and these should therefore be emphasised as key challenges that will need to be addressed going forward.</p>	Key issues chapter	<p>Support noted. The list of items the AAP has the potential to deliver (text box, page 4) is used for illustrative purposes and does not list every potential outcome. The Council recognises that the proposed Hotspur Stadium redevelopment can help anchor regeneration and facilitate positive outcomes for the area, and the Council will give consideration to better reflecting this in future AAP drafts.</p> <p>It is noted that the character areas reflect those set in</p>

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			<p>the Tottenham PDF and have been included for consultation purposes. The AAP provides an opportunity to set more nuanced character areas than those set in the PDF, having regard to the adopted spatial strategy for the Borough.</p> <p>Parts of text were omitted from the text box (page 5) due to formatting. The last bullet should have read “the need to improve the quality and amount of social infrastructure”.</p>
31	<p>Northumberland Park</p> <p>The title on page 6 appears to be referenced incorrectly and THFC question whether it should say ”Northumberland Park AAP” as opposed to “Northumberland Park MAP”?. In addition, there appears to be some text missing at the end of the first paragraph on page 6 - “High Road West has been identified as a specific...”</p> <p>Whilst “High Road West” clearly falls within the wider boundary of the Northumberland Park AAP as a sub area, the text also refers to a “Northumberland Park” sub area, which is not outlined on Map 1. It appears from Map 5 that the Northumberland Park area covers the entire AAP area, so reference to it being a sub-area is confusing. This either needs to be clarified within a new boundary inserted within Map 1, or the text within this section amended to address any inconsistencies.</p>	Northumberland Park	<p>Comments on formatting errors noted. Following this round of consultation, the Council will clarify and appropriately map character areas in future drafts of the Plan.</p>

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	<p>Within the supporting text, THFC support reference to the new THFC Stadium and the role it will play in the transformation of the High Road West area. THFC request that the wording within this section is reinforced so that it reflects the significant transformation already underway within the Tottenham area and acknowledges that the commencement of THFC’s Northumberland Development Project is a key driver in this.</p> <p>THFC supports the Council’s aspiration to provide residential uses within the area, but would like to see this sentiment strengthened further to acknowledge the transformational impact that new housing will have in creating mixed and balanced communities within Tottenham.</p> <p>In addition, reference to the proposed link between White Hart Lane Station and THFC’s new Stadium is supported, however its importance should be further accentuated to reflect the scale of ambition proposed and the importance of this connection will have in shaping future development proposals within the area. Additionally, the opportunity to improve connectivity to the north of the area, towards the new Sainsburys development should be highlighted as an important consideration.</p> <p>Consideration and reference should also be given to the school located to the east of THFC Stadium and how this will need to respond to the changes and potential opportunities occurring within the area over the next 5-10 years.</p> <p>The supporting text should make further reference to the Listed Buildings and Conservation Area that exists within the Northumberland Park AAP area and how the a need for a review and adaptation of these assets may be required so that they continue to respond effectively to the level of change and modification of the urban structure proposed within the area. THFC also consider that this section would benefit from further reference to the Site Allocations DPD, in particular the sites that are to be reassessed as part of the Employment Land Review, a study that needs to be undertaken immediately in order to inform the next draft of the AAPs for the area.</p> <p>In general, the supporting text could be more aspirational and will need to be updated in line with the finalised Tottenham PDF, which promotes a range of uses, alongside a strong focus on ‘place making’ at its heart.</p>		<p>The Council will give consideration to including additional information within the Plan, as suggested, including on: planned investment in transport infrastructure and opportunities for improved accessibility, community facilities and historic environment.</p>
31	<p>Northumberland Park AAP Map</p> <p>As outlined earlier, the Northumberland Park AAP “Key Issues and Challenges Map” is hard to read and doesn’t exhibit the main messages sufficiently. One of the key challenges within the area is the lack of permeability and need for improved accessibility to THFC Stadium and this is not communicated sufficiently within the map.</p> <p>There is a need to include High Road West within the text on “Employment Land” which is under review and the text for “Transport” should also recognise the benefits of improving the stations (and in turn the accessibility to THFC) which is a key issue identified within the finalised Tottenham PDF.</p>	Northumberland Park	<p>The issue of permeability is identified in the area-wide key issues and challenges text box (page 5), with the 3rd bullet discussing barriers to movement in all</p>

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			<p>directions. The Council will give consideration to addressing this matter in more detail, having particular regard to north Tottenham, in future drafts of the Plan.</p> <p>The Northumberland Park AAP map is for illustrative purposes and pitched at a high-level, and therefore details as suggested have not been included. Consideration will be given to more detailed descriptions of key issues and challenged, at a sub-area level, in future drafts of the Plan.</p>
31	<p>South Tottenham</p> <p>Finally, THFC consider that the improvements to Tottenham Hale Station (as outlined within TFL's recent planning application for the site) should be incorporated into the supporting text to this section, particularly as it will play a key part in the regeneration of the immediate and wider area.</p> <p>Whilst this letter sets out THFC's representations at this stage, the Club looks forward to progressing its ongoing dialogue with the Council and other regeneration partners around the regeneration of the Northumberland Park Area of Change.</p>	South Tottenham Infrastructure	The Council agrees that there is scope in the AAP to better set in context the key infrastructure, including transport infrastructure,

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			which will assist in facilitating area regeneration. This will be addressed in a future draft of the Plan.
32	<p>Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The Our Tottenham network brings together 40 key local community groups, projects and campaigns standing up for the interests of people in Tottenham, especially around planning and regeneration issues (http://ourtottenham.org.uk/?page_id=31). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham. This response, formulated by the Our Tottenham Planning Policy Working Group, is based on the principles embedded in the Community Charter for Tottenham agreed by the Our Tottenham network on 6 April 2013 (available here: http://ourtottenham.wordpress.com/community-charter/). This was followed up by a Community Planning for Tottenham conference in February 2014. See in the Appendices the Reports of our two conferences in April 2013 and February 2014.</p>		Noted.
32	<p>The stated aim of the Tottenham Area Action Plans (AAPs) is to facilitate and deliver the regeneration of Tottenham. The web page of the AAP consultation states that 'we are committed to transforming Tottenham into a successful place where people want to live, work and visit.' Most local residents and businesses are happy and proud to live, work and invite their friends to Tottenham. It is already 'a place for diverse communities that people are proud to belong to', to use the headline of the Sustainable Community Strategy 2007-2016 approved by the Council. Consequently, the aim of attracting new investments, new residents, new businesses and new development to Tottenham which underpins the AAPs should not be done at the expense of the existing community, i.e. by displacing local residents and local businesses; and it should actually improve the lives of existing residents (by creating jobs which locals can access and developments which generate true and significant benefits or facilities accessible to the community). Regeneration should not lead to gentrification in which local residents are forced or priced out of the area, and should not be done at the expense of the people of Tottenham. We do not want a form of regeneration which will over-develop Tottenham, which will push up house prices and private rents, reduce the amount of council housing in the area, force out small shops and businesses, encourage the exploitation of low-paid workers, and drive out large numbers of the poor and members of ethnic minorities to make way for a new higher-income population.</p>		<p>Comments noted. The AAP aims to build on the physical, social and economic strengths of Tottenham and enable regeneration which meets the needs of existing and future residents. The Plan will aim to ensure that the scale of development and change in the area is positively managed and guided by a planning</p>

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			framework, rather than on a piecemeal basis.
32	<p>Overall response to the Tottenham Area Action Plans Regulation 18 Consultation Document</p> <p>The Tottenham Area Action Plans Regulation 18 Consultation Document and the associated Site Allocation DPD do not ‘reflect the community’s aspirations for the area’. A consensus will only be built if the proposals put forward for the Tottenham area, and for the key sites earmarked within it, meet the unmet needs and demands of the existing residents and businesses of Tottenham. The ‘compelling case for comprehensive change’ (p. 11 of the AAP Reg. 18 Consultation Document) and the strategic priority given to new, large-scale development in Tottenham in the London Plan and in various statutory and non-statutory documents of Haringey Council (e.g. the Plan for Tottenham) cannot be realized at the expense of the people already living and working there. We therefore disagree with the basic premises of the ‘scale of change’ referred to on page 4 of the AAP Reg. 18 Consultation Document. The target of 10,000 new homes in Tottenham is totally overestimated. Several wards of Tottenham already have the highest densities in the Borough (see table and map below). Bruce Grove, Saint Ann’s Seven Sisters and Tottenham Green have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate). White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land – which means that the population density in the residential areas of those North Tottenham wards is high, too.</p> <p>Tottenham suffers from a chronic shortage of key facilities such as GPs, open space, schools etc... Tottenham cannot cater for 10,000 extra residents without grave problems for its social infrastructure and existing population. The sentence of the last bullet point on page 5 of the AAP Reg. 18 consultation document is incomplete, but seems to refer to the need for more and better social infrastructure - we strongly agree that there is an acute need to improve the quality and amount of existing social infrastructure. Consequently, how an additional 10,000 new homes would be accompanied by the necessary additional amenities and services would need to be convincingly demonstrated, which is not the case at present. How these amenities and services would be provided and funded – in particular through Section 106 agreements and the CIL – is not explored convincingly in the Tottenham Area Action Plans Regulation 18 Consultation Document and the associated Site Allocation DPD.</p>		<p>Noted. The Council agrees that this statement is unclear, and should explain that the AAP builds on work carried out through the PDF, SRF, Plan for Tottenham and the NDP. The evidence gathered through the consultation for these documents highlighted the need for a statutory planning framework. In response to the feedback received during the consultation of this document it is envisioned that another round of Reg 18 consultation will be carried out to consult on a more detailed set of policies options.</p> <p>The Council has identified sites across the borough</p>

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			<p>which can deliver future housing needs. The AAP will ensure that the scale of development is positively managed and guided by a planning framework. The Plan will ensure that infrastructure matches the development proposed, ensures local access to training and employment and enables housing choice for existing and new residents. The AAP will provide detail on the implementation, delivery and monitoring of the policies.</p>
32	<p>In a densely-populated borough with competing priorities for the use of existing land, and a scarcity of any further available land to use, it is clearly essential to challenge detailed policies which promote over-development, and fail to protect and extend open spaces and other community facilities. Such policies are not socially or environmentally sustainable. This has been officially recognised by the Council, as far back as its formal response (19.10.2005) to the Mayor of London over his draft North London Sub-Regional Development Framework - the most significant planning document affecting the borough at that time following the adoption of the London Plan: ‘... the Council is concerned that the document lacks visible plans and proposals for essential infrastructure, such as transport, which is necessary to enable London to operate as a world class city.’</p>		<p>Noted. The AAP will provide a planning framework to manage the scale and type of development in the area to ensure the housing, social and economic needs of existing and future</p>

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	<p>'It is considered that the document has missed the opportunity to promote greater sustainability by not addressing wider sustainable communities issues, such as homes for life, transport, social care services, access to community facilities for older people and equalities, including age discrimination. These are key quality of life issues for people living in London.'</p> <p>'The Council is concerned that the phrase 'intensification should be sought across the sub-region' (paragraph 105) does not address the character of areas. Some areas of Haringey are suburban in character with relatively lower densities and it should be recognised that these areas provide a role in providing family sized housing. It would be helpful if the SRDF provided some analysis of future housing density in North London and provided maps of public transport accessibility and urban character.'</p> <p>'The Council considers that the London Plan has prioritised housing provision without sufficient attention given to the need for necessary community, health and education infrastructure. For example, Haringey will experience particularly high growth in school numbers up to 2021, which will place considerable pressures on its existing schools. The Council is concerned that there may not be sufficient land to cater for a necessary increase in the number of health care services in the borough and such services will have to compete with other land uses, such as housing and employment uses.'</p> <p>'The Council disputes the assertion in the draft SRDF that the anticipated increase in demand for health care will largely be absorbed by existing services (paragraph 65). Where is the evidence to support this claim? Also, the conclusion that primary care provision is inadequate to meet future demands contradicts this claim. It would be helpful if the SRDF identified the relationship between the development of Opportunity Areas or Areas for Intensification and other areas of significant housing growth and the location of planned or improved primary care facilities and location of school development.'</p> <p>'The Council considers that significant additional public transport infrastructure and services are required to support housing growth and regeneration initiatives and to improve access to jobs for Haringey's residents. Although it is recognised in paragraph 121 that stronger orbital public transport capacity is required to serve key development areas, town centres and residential areas, there is an absence of schemes in the draft SRDF to improve orbital movement or to improve key transport interchanges.'</p> <p>These comments re-emphasise the Council's comments made as part of the formal consultation over the London Plan itself. The LBH Executive Committee meeting on 17th September 2002 accepted the proposed response to the London Plan drafted by the LBH Director of Environmental Services. The Report stated [Para 3.7 of the Report to the Executive] that '... it may be considered that it [the Draft London Plan] involves an unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough'. The Report also noted</p>		<p>residents are met. Planning applications will be assessed in line with all relevant planning policies in the Local Plan, including the Strategic Policies and the Development Management Policies.</p> <p>The Council's Infrastructure Delivery Plan (IDP) sets out the infrastructure that will be required over the Plan period to support the proposed residential and commercial growth across the borough. The IDP identifies the types of infrastructure required, where it should be located, the cost of it (where known), how it will be funded and who will be responsible for its delivery. The IDP is a live document and</p>

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	<p>[Para 6.28] that ‘the approach..... would impact upon Haringey residents’ quality of life’ ‘and fails to provide a sustainable solution to housing demand in London’. ‘The proposed housing target... would require more schools to be built, class sizes increased, pressure on community facilities and supporting services’. It notes ‘lack of land and funding for supporting services e.g. schools’, and ‘lack of engagement with local communities on bringing forward such a controversial proposal for high density housing development in advance of transport infrastructure.’</p> <p>We consequently demand that any new development encouraged by the AAPs should not lead to any net loss of social infrastructure, and should include additional social infrastructure to serve the existing and future residents in and near Tottenham, in particular:</p>		regularly updated.
32	<p>i. Adequate levels of GP and health services provision:</p> <p>In London the average is 1639 patients per GP, according to a Kings Fund report on ‘General Practice in London’². However, by going through the information for each practice provided for patients on https://www.myhealth.london.nhs.uk/, we can show that the average for Tottenham GPs is 2002 patients each, as outlined in the table below³. Thus Tottenham GPs have 22.2 per cent more patients on their list, on average, than London GPs in general.</p> <p>So in effect Tottenham is short of over one fifth of the GPs it needs even before we have an extra 10,000 or so homes as envisaged in the Tottenham regeneration plans. The existing situation may even be worse than that for at least three reasons:</p> <p>The number of GPs in this calculation assumes that they are all working full-time, except for one who says on the practice web site she is part-time and was counted as half. If other GPs are in fact working only part-time, the number of patients per full time equivalent GP would be higher.</p> <p>As a deprived area with therefore a relatively high incidence of various illnesses, and moreover many people for whom English is not their first language, Tottenham probably imposes on GPs a heavier workload per patient than the London or national average.</p> <p>Since Tottenham is characterised by a highly transient population with many migrants and students, the proportion of the resident population actually registered with a GP may be unusually low. If all who are entitled to be registered did register (regarded by the NHS as a desirable goal to keep people out of A and E departments) the number of patients per doctor might rise considerably.</p> <p>This raises the question of what specific plans are being made for extra health infrastructure in the Area Action Plans and Site Allocation documents. This is simply not clear. If an extra 10,000 homes bring in an extra 25,000 people (the exact number obviously depends on the size of dwellings and the vacancy rate), this population would need an extra 15 GPs to provide for their needs at the London average ratio of patients to doctors. A further 16 GPs are needed to reduce the patient/doctor ratio for the existing registered patients to the London average. This makes a total of 31 doctors needed for the N15/N17 areas. It is unrealistic to think these can be accommodated within the premises of the 25</p>		<p>The Council’s Infrastructure Delivery Plan (IDP) sets out the infrastructure that will be required over the Plan period to support the proposed residential and commercial growth across the borough. The IDP identifies the types of infrastructure required, where it should be located, the cost of it (where known), how it will be funded and who will be responsible for its delivery. The IDP is a live document and regularly updated.</p> <p>The Site Allocations for Tottenham will identify</p>

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	<p>existing practices listed in the attached spreadsheet, even if all the partners working there wanted to take on new colleagues. So a number of new doctors' surgeries will be needed and provision for them needs to be made within the land allocations for social infrastructure.</p> <p>This has important implications for the future of the St Ann's Hospital site. It is a large area of land currently devoted to health service use and capable of housing one or more GP practices, possibly also an urgent care centre, which would serve the N15 area as a whole. This would be the obvious and probably the most economical way to address the 'doctor deficit' in South Tottenham.</p> <p>However it is too far from the new housing developments planned around High Road West and the northern part of N17, for which additional health use land will be needed.</p>		<p>infrastructure required to support the proposed development.</p>
32	<p>ii. Adequate levels of quality, public open space (including major new spaces to address areas of deficiency), play areas and sports facilities:</p> <p>Based on the London Plan's public open space hierarchy, around 50% of Haringey is deficient in public open green space. In addition, using the Mayor's Guide to Preparing Open Space Strategies - best practice guidance of the London Plan, there are also huge areas of deficiency in allotment provision, children's play areas, sports pitches and nature conservation areas. These officially recognised criteria for assessing deficiency are minimums. The London Borough of Haringey Open Space Strategy - Action Plan (November 2005), Objective 1.2, reads: 'To adopt the GLA Guidelines for provision of the different types of open space as the standard to which Haringey will work towards.'</p> <p>'Priority: High' 'Timescale: Immediate'.⁴ That Action Plan still applies. To achieve minimum standards requires a massive expansion of provision. So the AAPs and Site Allocation DPD need to make very significant provisions to deliver not only the missing open spaces but also any additional open space needed to cater for any future growth in the resident population of Tottenham.</p>		<p>The Council is due to update the Borough's Open Space Study to support the emerging Local Plan policies. The amended policies will take account of the updated evidence.</p>
32	<p>In terms of sports facilities, The Haringey Open Space and Sports Assessment (2003) provides excellent information on the need to address deficiencies of a whole range of much needed facilities. Since then the population of Tottenham has increased greatly, and is projected to increase even further. The Council has produced a number of useful sports-related plans including: LB Haringey Sport and Physical Activity Action Plan 2005; LB Haringey Tennis Development Plan - 2010-2013; LB Haringey Football Development Plan - 2009-2012; LB Haringey Football Development Plan - 2009-2012. As an example, the Football Development Plan (Section 4 – Key Issues and Recommendations) contains detailed and useful recommendations about facilities, education, club development, health, Voluntary Sector development, girls and women's development, disability development, celebrating cultural diversity, coach education, and disaffected young people. Key recommendations regarding facilities include:</p> <p>'develop additional pitches and ancillary facilities in the east of Haringey where quality facilities and provision are most needed'</p>		<p>The Council's Infrastructure Delivery Plan (IDP) sets out the infrastructure that will be required over the Plan period to support the proposed residential and commercial growth across the borough. The IDP identifies the types of</p>

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	<p>'develop Service Level Agreements with a number of schools to extend community access to school facilities and to implement dual use'</p> <p>'develop the use of s. 106 agreements to create or improve local sports and leisure facilities. The population in Haringey is set to rise.... Haringey Council is responsible for providing the growing community with sport and recreation facilities that are accessible and inclusive to meet the demand of an increasing population'.</p> <p>Here are some extracts from the Summary of the Football Development Plan regarding Facility development:</p> <p>Accessibility: The Haringey Open Space and Sports Assessment identified a 400m walk as the appropriate catchment for football pitches. At present, around half of the population of the borough is outside such a catchment.</p> <p>Localised facilities: To seek to provide at least one multi-use games area in each of the 19 wards in the borough, to support local efforts to expand the small-sided game. Reviewing the size and quality of the hard play areas at all 62 primary school sites in the borough and making improvements as appropriate, to facilitate skills training for the 5 - 11 year old age group.</p> <p>Overall sports participation rates: The overall rates of sports participation in Haringey are below the regional and national averages, according to the 2008 Active People survey. Participation by under-represented groups: The Active People survey found participation amongst underrepresented groups such as women, BME groups and disabled people is disproportionately low in Haringey.</p> <p>Football conversion rates: FA data shows the proportion of footballers as a percentage of the overall population is significantly lower in Haringey than for London or England as a whole. The mini-soccer figures are lowest of all, with conversion rates only 20% of the national average.</p> <p>Small-sided football: Small-sided football is poorly developed at junior level, with no teams at all in the borough. Eight of the 19 wards in Haringey do not have a kickabout area at present.</p> <p>Pitch provision: There are currently enough football pitches to meet existing demand in Haringey, but the number of pitches per capita is well below regional and national averages. This suggests current provision is only adequate because local demand levels are suppressed, possibly as a result of the lack of pitch supply. Quality of pitches and ancillary facilities: 17% of all football pitches are in poor condition, 22% do not have access to changing facilities and 60% do not have any on-site social facilities.</p>		<p>infrastructure required, where it should be located, the cost of it (where known), how it will be funded and who will be responsible for its delivery. The IDP is a live document and regularly updated.</p> <p>The Site Allocations for Tottenham will identify infrastructure required to support the proposed development.</p>
32	<p>iii. Adequate levels of school provision (and other educational facilities):</p> <p>According to a report compiled by Haringey Council in 20135 there is already a shortage of school places in various part of the Borough, in particular Tottenham. This report provides an extensive and detailed picture of the existing situation. Surplus capacity at school reception level is already incredibly tight. The Published Admissions Number are projected by the Council to be in deficit</p>		<p>The Council's Infrastructure Delivery Plan (IDP) sets out the infrastructure that will be required</p>

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	<p>against the GLA's projections by 143 needed reception places by 2023 for Tottenham Green, Tottenham Hale, Northumberland Park, White Hart Lane and Bruce Grove wards (p. 41). Secondary school places will be in deficit by 10% by 2021/22. Appendix 12 of the report analyses the implications of the proposed new housing developments in identified growth areas (most of which are located in Tottenham) for school place planning, and states that to support the inevitable demand that will arise from the provision of more than 6,000 units across the area, 'planning for further capacity within local primary and secondary schools as well as any special school provision will be an important component in ensuring that additional school place provision is joined up and sustainable' (p. 67). The report goes on to recognize the huge challenge posed by the need for further school provision, for example in Northumberland Park: 'Schools in the local area are at or close to capacity at primary reception level and even before the grant of planning permission for additional units at Spurs and at Canon Rubber we were aware of the need to increase local capacity. The provision of a two form entry primary school by EACT Free School, Hartsbrook Primary, which opened in September 2012, went some way to relieving local pressure for places, but, with the roll out of the development outlined above, we are aware that we will need additional provision...There are physical constraints at almost all of the existing local school in the area meaning expansion of existing schools will be challenging at best' (pp. 69-70).</p>		<p>over the Plan period to support the proposed residential and commercial growth across the borough. The IDP identifies the types of infrastructure required, where it should be located, the cost of it (where known), how it will be funded and who will be responsible for its delivery. The IDP is a live document and regularly updated.</p> <p>The Site Allocations for Tottenham will identify infrastructure required to support the proposed development.</p> <p>The AAP will provide detail on the implementation, delivery and monitoring of the policies.</p>
32	<p>Q2 To what extent do you agree with our description of Northumberland Park presented in this document? We strongly disagree with the description given of Northumberland Park and its potential on pp. 5-8 of the document.</p>	Northumberland Park	Noted.

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32	<p>Q3 If you disagree or strongly disagree please use the place below to tell us why:</p> <p>There are several statements in the document about the fact that concentrations of social housing are viewed as a negative feature which should be addressed through ‘mixed tenure’ and ‘mixed communities’ policies. We would argue that the ‘dominance of single tenure housing’ in North Tottenham (p. 5) is not in itself detrimental or the root cause of the ‘problems’ of the area. The ‘legacy of poor land use, typified by many 1960s housing estates’ (p. 7) is not a fair representation of the views of many of their residents. The statement on the Northumberland Park AAP map, p. 8, at the bottom left corner, does not make sense: ‘the mono tenure nature of housing has resulted in a lack of housing in this area’. Given the current housing crisis in London, there is an acute need for more social and truly affordable housing in Haringey.</p> <p>We question the claim that ‘housing regeneration through estate renewal and new build has the potential to create new residential neighbourhoods and improve the quality, mix, tenure of housing in the area’ (p. 6) if this is done via demolitions, a net loss of existing social housing units, and the creation of highly divided new developments with gated/separated market-rate housing in areas of existing social housing. Such development would also increase densities unacceptably, reduce the green and amenity space serving the occupants, and cause unnecessary social disruption to the estate’s community during the works. We strongly disagree with the notion that a significant change in the housing mix of the Northumberland Park area through ‘major estate renewal and the introduction of more private and shared accommodation’ (p. 6) would improve the issues and problems of the area. The objective of ‘mixed and balanced communities’ should not be done through demolition or a reduction in the net stock of social housing, insufficient community participation, overall net loss in the number of social housing units after regeneration, decanting of the original population and gentrification as unfortunately has been the case in other parts of London (Woodberry Downs in Hackney, Aylesbury in Southwark...).</p> <p>There has been a lot of research done, over the past fifteen years, about the effectiveness of such policies in dealing with socio-economic deprivation, the social problems of an area and generally the regeneration of a neighbourhood. Such policies are based on the notion of the ‘neighbourhood effect’ (or area effect), which hypothesizes that a high concentration of poor, or ethnic minority, people in specific areas reinforces and perpetuates poverty and exclusion. The key assumption is that mixing different types of housing tenure would lead to greater social mix and to positive effects for (poor) urban residents and for deprived neighbourhoods at large. This is achieved by getting higher income groups to live there (and rarely by bringing bring lower income residents to rich neighbourhoods). The conclusion of the majority of the studies carried out in the UK and in countries where similar policies have been carried out is that there is rather limited evidence that interventions in the housing mix alone can lead to greater social mix and to positive effects for deprived urban neighbourhoods and</p>		<p>The 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 AAP will need to be in general conformity with the London Plan. It should be noted that discussions around the balance of tenure at any given site will be negotiated and considered on a case by case basis.</p> <p>Some housing estates are currently configured in such a way that means they experience issues such as poor connectivity and</p>

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	<p>their residents, in particular tenure mix interventions in social housing estates.⁶ Often old and new residents live parallel lives side by side with little contact. Social worlds, places of consumption and socialisation are markedly different (different supermarkets and pubs, for example), and newcomers often send their children to private schools outside the area. Additionally, mixed tenure neighbourhoods do not necessarily lead to an improvement in the quality of local services and amenities if there is no parallel public investment and if the incoming middle-class households consume such services outside the neighbourhood or recur to the private sector.</p> <p>There is no evidence that ‘the new resources that may come with higher income residents (e.g. shops) either materialise or are beneficial to people on low incomes’⁷, for example through job opportunities. Whilst it is true that residents in areas of concentration of social housing, such as Northumberland Park, suffer considerably worse outcomes than the national average for selected indicators of deprivation (e.g. income, general and mental health, educational attainment, benefit claims), the causal explanation for this does not reside with the fact that they live in a mono-tenurial area. Sociological research has clearly shown that individual and family characteristics are more important than the neighbourhood in explaining individual life trajectories. Research has even shown that in some cases mixing policies can have negative impacts on low-income or ethnic minority groups, because, through the influx of new residents and new services, such interventions may break social networks and endanger businesses catering for a low-income population or for specific ethnic minority groups, leading to more class or ethnic conflicts. Many sociological studies have since long shown that a degree of concentration may benefit particular social or ethnic groups, which means that an imposed deconcentration may break crucial community ties. The presence of family networks, small businesses, support organisations and informal networks can support the process of survival and of socio-economic integration or social mobility. Social mix policies were provocatively labelled ‘faith-based displacement activity’ by the respected LSE economist Paul Cheshire (2009), who argued that they treat the symptoms of urban deprivation and inequality rather than tackling its causes.⁸</p> <p>Altogether, in the UK, there is thus ‘substantial evidence that areas with more mixed social composition tend to be more popular, more satisfying to live in, and have better services than poorer areas’, but ‘to date the evidence is limited that neighbourhood has a large effect on individual outcomes, over and above individual and household factors. Nor is there robust evidence that neighbourhood mix per se or changes to mix (over and above other neighbourhood characteristics) is influential’⁹. The authors of the evidence review commissioned by the DCLG in 2010 on the evaluation of past mixed communities policy conclude that it is not evident that mixing communities are a more effective strategy for the regeneration of disadvantaged neighbourhoods than traditional neighbourhood renewal approaches – i.e. those which target public resources to particular areas to support integrated strategies of social, economic, and physical regeneration in partnership with local</p>		<p>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.</p> <p>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</p>

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	<p>residents: ‘if there had to be a crude choice between traditional urban and neighbourhood renewal and mixed communities policies to address the top quarter most deprived local authorities (as Neighbourhood Renewal Fund did) or even the most deprived 10% or 5% of wards, the evidence suggests the former offer more limited but better-evidenced benefits at lower costs, and are also more achievable during a recession. If there is a choice between doing nothing in deprived areas and doing something, the evidence suggests doing something. The evidence suggests that:</p> <p>(a) There should be continued support for ‘traditional’ urban and neighbourhood renewal, which might include a modest mixing element.</p> <p>(b) On the precautionary principle, and on the grounds that the costs of preventing non-mix are lower than those of altering it, mix should be encouraged in new developments, and through any schemes to support developers and registered social landlords during the housing market downturn.</p> <p>(c) Mix should be considered in existing areas through methods such as pepper potted-tenure change, tenure blurring, sensitive allocations policy and targeted fiscal stimulus’.¹⁰</p> <p>For the Northumberland Park area and for the rest of Tottenham, this means that:</p> <p>No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes.</p> <p>Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.</p> <p>There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. The approved development of the Tottenham Hotspur’s FC has been done at the expense of the surrounding population’s needs and the retreat of the Council with regard to S106 contributions (in particular affordable/social housing) from the developer in Feb. 2012 is a grave mistake that should be renegotiated and not be repeated in any future development in Tottenham.</p>		<p>Council will work with existing residents to identify an approach for estate renewal which best meets the needs of current and future residents.</p> <p>The Council aims to set out a new Development Management 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.</p>
32	<p>Q4 In order to make Northumberland Park a more successful place what transport issues or opportunities do you think need to be addressed?</p> <p>The future Spurs development will add a lot of pressure on existing transport infrastructure. There is a danger of severe problems with the doubling of visitors on match days including parking problems. More buses and trains will be essential if the capacity is available. Proposals to extend the Victoria line to Northumberland Park have been made on previous occasions.</p>		<p>Noted. The Plan will be amended to set out more detailed policy options to address transport issues.</p>
32	<p>Q5 In order to create successful places in Northumberland Park what housing issues or opportunities do you think should be addressed?</p>		<p>When considering the options for a</p>

ID	Summary of Comments	Topic / Change	Council Response
	<p>Regarding the existing social housing stock in the area, see the comments above under Q2: No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes. Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants. There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. The approved development of the Tottenham Hotspur's FC has been done at the expense of the surrounding population's needs and the retreat of the Council with regard to S106 contributions (in particular affordable/social housing) from the developer in Feb. 2012 is a grave mistake that should be renegotiated and not be repeated in any future development in Tottenham.</p> <p>Regarding the new homes to be built in Tottenham, the Tottenham Area Action Plans Regulation 18 Consultation Document seems to indicate that they should be overwhelmingly for private market rent, near private market rent, private sale or shared ownership. It is not acceptable to meet affordable accommodation targets with shared ownership or intermediate rent housing, both of which are out of the price range of low income families. We demand that the new housing to be built in Tottenham should be high quality and genuinely affordable. An affordable home is one that is affordable to any tenant earning the London Living Wage. 'Affordable' is not 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. 70% of such new build affordable housing should be social housing. There should a mix of unit sizes and types to suit local needs, based on evidence – e.g. more provision for large family dwellings, no over-provision of small flats. A quality home means all of the following: secure; physically comfortable (with adequate indoor space to at least 'London Housing Design Guide 2010' standards i.e. Parker Morris standards plus 10% more space - and to outside garden space); in compliance with, and not exceeding, the density matrix as set out in the London Plan; built to 100% lifetimes homes standards. Design should promote a permeable and convivial street pattern, protect and enhance the conservation and positive character of the local area. There should be easy access to schools, work, healthcare, cultural facilities, public transport, fresh affordable food, and green space. It should allow people to have control over their indoor and outdoor space, and to develop communities and support each other. Residents and communities should be empowered to make decisions and have control over their housing. As stated in the Haringey Local Plan, Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough, and 3-4 storey development in its town centres. The pattern of local housing heights in the various neighbourhoods should be respected and all new</p>		<p>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.</p> <p>The Council aims to set out a new Development Management 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. In</p>

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	<p>housing sites should conform to such patterns. In some very exceptional circumstances where the overwhelming pattern of development in an area is greater, heights may be appropriate up to a maximum of 6 storeys.</p>		<p>addition, the DM document will set out borough wide design standards against which planning applications will be assessed.</p> <p>An emerging Urban Characterisation Study will provide evidence to inform appropriate heights and design across the borough.</p>
32	<p>Q6 What would make town centres in Northumberland Park more successful? The sentence ‘High Road West has been identified as a specific...’ (p. 6) is incomplete. The statement about ‘innovative ways of improving the existing retail uses’ needs to be clarified: what would this entail exactly? This should not mean the displacement of existing shops serving local needs to cater for high income consumers. The protection of independent shops and small scale retail should be explicitly stated as a goal in the AAPs, and improvements sought for via grants to the occupants. In that respect the ‘retention of existing local services and professions’ in the area mentioned on page 7 is key.</p>		<p>Noted. The amended Plan will set out further detail on the areas Town Centre policies.</p>
32	<p>Q7 How do you think sports and leisure needs in Northumberland Park could be best met? See generic comments in Section 2 above about the need for open space and sports facilities in Tottenham. In Tottenham specifically there is a need for:</p> <ul style="list-style-type: none"> - much more low cost sports facilities, - a cricket pitch, - support for the Tottenham Community Sports Centre and Frederick Knight Sports Ground both based in Northumberland Park and managed by local people, - support for existing community sports clubs and societies <p>Development of community sports in the Lea Valley, including supporting current user groups,</p>		<p>The Council’s Infrastructure Delivery Plan (IDP) sets out the infrastructure that will be required over the Plan period to support the proposed residential and commercial growth</p>

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	<ul style="list-style-type: none"> - the Spurs Foundation to commit to putting money and resources into the area, and working in partnership with local clubs and providers, local schools to commit to working in partnership with local clubs and providers, and to open up their facilities for public use, - ensuring that the Northumberland Park School swimming pool is available for public use, - the Bull Lane Playing Fields Community Plan to be backed and implemented, - upgrading all playing fields and their ancillary facilities for public use, - supporting the Selby Trust and other community centres in managing and developing their sports and leisure potential. 		<p>across the borough. The IDP identifies the types of infrastructure required, where it should be located, the cost of it (where known), how it will be funded and who will be responsible for its delivery. The IDP is a live document and regularly updated.</p> <p>Site allocations for Tottenham will provide guidance on where and what type of facilities will be required to support development.</p>
32	<p>Q8 What design and heritage opportunities and challenges do you think there are in Northumberland Park?</p> <p>Opportunities to create and extend Conservation Areas should be pursued. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list. The heritage and positive characteristics of the area should be preserved.</p>		<p>Comments noted. The amended AAP will provide further detail about the significance of Tottenham's design and heritage and will aim to protect and enhance it.</p>
32	<p>Q9 What would make movement within and around Northumberland Park easier?</p> <p>The exact implications of 'investment in the increased legibility of nature desire lines' (bottom right of the Northumberland Park AAP map, p. 8) need to be clarified. The improvements of the East-West</p>		<p>Noted. Further detail will be provided in the</p>

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	connections in the area should not entail the demolition of existing occupied residential or commercial buildings.		amended AAP and further comments will be sought.
32	<p>Q10 What do you think could be done to increase job opportunities and the skills of local people in Northumberland Park?</p> <p>Reference is made in the introduction of the AAP Reg. 18 Consultation Document to the objective of creating over 5,000 new jobs: where, of what kind, and for whom would need to be specified in more depth, so as to ensure that most of these benefit the existing residents of the area. We agree that employment and education could be important elements of the regeneration of Northumberland Park if new employment and education opportunities serve the need and skills of the existing residents. All jobs created during and following development should be quality jobs, above the London Living Wage, with local trade union branch involvement, and earmarked for local people as far as possible, and to include local apprenticeships.</p>		Noted. The amended AAP will provide further detail on employment protection and increasing opportunities and further comments will be sought.
32	<p>Q11 In light of the regeneration agenda in Tottenham, do you think there is the opportunity to redesignate employment land for other uses in Northumberland Park?</p> <p>The forthcoming review of Employment Land which is referred to on p. 7 of the document is a matter of concern. The acronym PTAL used on p. 7 should be spelled out in full in the document as it is not understandable for a lay audience (Public Transport Accessibility Level). The improvements in accessibility in North Tottenham should not lead to a mass conversion of employment land into housing land for the purpose of capturing increasing land values for private developers, as there is a need to (i) maintain all existing sources of employment in the Borough and (ii) maintain industrial uses in London to keep a diverse economy. Any release of employment land should be exceptional (e.g. site vacant, or derelict), minor and justified; and there should not be any loss of jobs or displacement of businesses without relocation options in the immediate vicinity. There should be no net loss of employment land and facilities unless the existing site can be demonstrated to have been unviable for a clear 3 year period. Anyone displaced by the development (whether residential or commercial tenant) must be rehoused by the developer in an equivalent or improved arrangement in the final site or nearby.</p>		<p>Noted. The Employment Land review will provide updated information on the use, occupancy and future viability of employment sites and will provide evidence to inform the proposed policies in the AAP.</p> <p>All acronyms and technical terms will be clearly explained and a glossary will be included in the amended AAP.</p>
32	<p>Q12 How could Northumberland Park's open spaces and biodiversity be improved?</p> <p>See generic comments under Section 2 above about open space facilities. All possible steps should be taken to protect and enhance green and open space and disallow development on it, to address</p>		Comments noted. Green and open spaces are

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	<p>green space deficiencies, protect gardens from being concreted over, and develop greenery throughout the streetscape and on major roofs.</p> <p>Increase in biodiversity often takes place on previously industrial land which is shown in many of London's nature reserves. These sites are important sources of biodiversity.</p>		<p>protected by national, regional and local policies. The AAP will aim to further enhance existing spaces and encourage further open spaces to meet the scale of future development. Site allocations for Tottenham will set out where new open spaces may be appropriate.</p>
32	<p>Q13 What environmental and sustainability Issues do you think need addressing in Northumberland Park?</p> <p>All new facilities (residential, commercial, social) to be environmentally sustainable, i.e. conform to highest carbon-neutral criteria.</p>		<p>Comments noted and agreed.</p>
32	<p>Q14 How could community facilities be improved in Northumberland Park?</p> <p>See generic comments in Section 2 above about social infrastructure, in particular GPs and schools. There should be a strict policy of protection of existing community centres - many of which under threat, of pubs, post offices, and corner shops from change of use. An expansion of youth services and facilities and nurseries is absolutely vital across Tottenham.</p>		<p>The Council's Infrastructure Delivery Plan (IDP) sets out the infrastructure that will be required over the Plan period to support the proposed residential and commercial growth across the borough. The IDP identifies the types of infrastructure required, where it should be located, the cost of it (where</p>

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			<p>known), how it will be funded and who will be responsible for its delivery. The IDP is a live document and regularly updated.</p> <p>The site allocations for Tottenham will provide guidance on where and what type of community facilities will be expected to support development.</p>
32	<p>Q15 To what extent do you agree with our description of South Tottenham presented in the AAP? The section of the document on South Tottenham (p. 9-10) is shorter than the one regarding Northumberland Park and includes only very generic statements. However we disagree with a number of points made (see comments below). The map (Map 3) showing 'possible Character Areas' on page 5 is a very simplistic vision which does not represent the actual and desirable intricate mix of uses that should remain across Tottenham.</p>	South Tottenham	Noted. Further detail will be provided and all areas will be treated equally.
32	<p>Q16 If you disagree or strongly disagree please use the place below to tell us why: See generic comments in Section 2 above and in the boxes below.</p>		Noted.
32	<p>Q18 In order to create successful places in South Tottenham what housing issues or opportunities do you think should be addressed? Regarding the existing social housing stock in the area: No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes. Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of</p>		When considering the options for a site, the need to meet housing need may mean that redevelopment, rather than refurbishment is necessary. In order

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	<p>the current occupants.</p> <p>There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area. The approved development of the Tottenham Hotspur's FC has been done at the expense of the surrounding population's needs and the retreat of the Council with regard to S106 contributions (in particular affordable/social housing) from the developer in Feb. 2012 is a grave mistake that should be renegotiated and not be repeated in any future development in Tottenham.</p> <p>Regarding the new homes to be built in Tottenham, the Tottenham Area Action Plans Regulation 18 Consultation Document seems to indicate that they should be overwhelmingly for private market rent, near private market rent, private sale or shared ownership. It is not acceptable to meet affordable accommodation targets with shared ownership or intermediate rent housing, both of which are out of the price range of low income families. We demand that the new housing to be built in Tottenham should be high quality and genuinely affordable. An affordable home is one that is affordable to any tenant earning the London Living Wage. 'Affordable' is not 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. 70% of such new build affordable housing should be social housing. There should a mix of unit sizes and types to suit local needs, based on evidence – e.g. more provision for large family dwellings, no over-provision of small flats. A quality home means all of the following: secure; physically comfortable (with adequate indoor space to at least 'London Housing Design Guide 2010' standards i.e. Parker Morris standards plus 10% more space - and to outside garden space); in compliance with, and not exceeding, the density matrix as set out in the London Plan; built to 100% lifetimes homes standards. Design should promote a permeable and convivial street pattern, protect and enhance the conservation and positive character of the local area. There should be easy access to schools, work, healthcare, cultural facilities, public transport, fresh affordable food, and green space. It should allow people to have control over their indoor and outdoor space, and to develop communities and support each other. Residents and communities should be empowered to make decisions and have control over their housing.</p> <p>As stated in the Haringey Local Plan, Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough, and 3-4 storey development in its town centres. The pattern of local housing heights in the various neighbourhoods should be respected and all new housing sites should conform to such patterns. In some very exceptional circumstances where the overwhelming pattern of development in an area is greater, heights may be appropriate up to a maximum of 6 storeys.</p>		<p>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.</p> <p>The Council aims to set out a new Development Management 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. In addition, the DM document will set out borough wide design standards against which planning applications will be</p>

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			<p>assessed.</p> <p>An emerging Urban Characterisation Study will provide evidence to inform appropriate heights and design across the borough.</p>
32	<p>Q19 What would make town centres in South Tottenham more successful?</p> <p>We disagree with the expression ‘underperformance of the High Road’ referred to on p. 5, which does not account for the successful small retailers which serve the needs of the low-income residents of the area and should be preserved. We strongly disagree with the statement (p. 9) that retail at Bruce Grove should be ‘enhanced through a number of planning related interventions that respond to the development of larger footplate store retailers at Tottenham Hall and potentially Northumberland park’ if this means the displacement or closure of small independent retailers which have served the local community. A ‘reinvigorated and enhanced high street at Bruce Grove’ (p. 4) should not mean the displacement of existing businesses and retailers</p> <p>‘A new gateway to Seven Sisters’: what does ‘gateway’ mean?</p>		<p>Comments noted. These concerns will be taken into consideration when amending the proposed policies and site allocations. Further detail and guidance will be provided for clarity.</p>
32	<p>Q20 How do you think sports and leisure needs in South Tottenham could be best met?</p> <p>See generic comments in Section 2 above about the need for open space and sports facilities in Tottenham.</p> <p>In Tottenham specifically there is a need for:</p> <ul style="list-style-type: none"> - much more low cost sports facilities, - a cricket pitch, - support for the Tottenham Community Sports Centre and Frederick Knight Sports Ground both based in Northumberland Park and managed by local people, - support for existing community sports clubs and societies <p>Development of community sports in the Lea Valley, including supporting current user groups,</p> <ul style="list-style-type: none"> - the Spurs Foundation to commit to putting money and resources into the area, and working in partnership with local clubs and providers, - local schools to commit to working in partnership with local clubs and providers, and to open up their facilities for public use, - ensuring that the Northumberland Park School swimming pool is available for public use, 		<p>The Council’s Infrastructure Delivery Plan (IDP) sets out the infrastructure that will be required over the Plan period to support the proposed residential and commercial growth across the borough. The IDP identifies the types of infrastructure required, where it</p>

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	<ul style="list-style-type: none"> - the Bull Lane Playing Fields Community Plan to be backed and implemented, - upgrading all playing fields and their ancillary facilities for public use, - supporting the Selby Trust and other community centres in managing and developing their sports and leisure potential. 		<p>should be located, the cost of it (where known), how it will be funded and who will be responsible for its delivery. The IDP is a live document and regularly updated.</p> <p>Site allocations for Tottenham will provide guidance on where and what type of facilities will be required to support development.</p>
32	<p>Q21 What design and heritage opportunities and challenges do you think there are in South Tottenham? Opportunities to create and extend Conservation Areas should be pursued. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list. The heritage and positive characteristics of the area should be preserved.</p>		<p>Comments noted. The amended AAP will provide further detail about the significance of Tottenham's design and heritage and will aim to protect and enhance it.</p>
32	<p>Q23 What do you think could be done to increase job opportunities and the skills of local people in South Tottenham? Reference is made in the introduction of the AAP Reg. 18 Consultation Document to the objective of creating over 5,000 new jobs: where, of what kind, and for whom would need to be specified in more depth, so as to ensure that most of these benefit the existing residents of the area. We agree that employment and education could be important elements of the regeneration of Northumberland Park if new employment and education opportunities serve the need and skills of the existing residents. All jobs created during and following development should be quality jobs, above the London Living Wage,</p>		<p>Noted. Further detail will be provided in the amended AAP and further comments will be sought.</p>

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	with local trade union branch involvement, and earmarked for local people as far as possible, and to include local apprenticeships.		
32	<p>Q24 In light of the regeneration agenda in Tottenham, do you think there is the opportunity to redesignate employment land for other uses in South Tottenham?</p> <p>The forthcoming review of Employment Land which is referred to on p. 7 of the document is a matter of concern. The acronym PTAL used on p. 7 should be spelled out in full in the document as it is not understandable for a lay audience (Public Transport Accessibility Level). The improvements in accessibility in North Tottenham should not lead to a mass conversion of employment land into housing land for the purpose of capturing increasing land values for private developers, as there is a need to (i) maintain all existing sources of employment in the Borough and (ii) maintain industrial uses in London to keep a diverse economy. Any release of employment land should be exceptional (e.g. site vacant or derelict), minor and justified; and there should not be any loss of jobs or displacement of businesses without relocation options in the immediate vicinity. There should be no net loss of employment land and facilities unless the existing site can be demonstrated to have been unviable for a clear 3 year period. Anyone displaced by the development (whether residential or commercial tenant) must be rehoused by the developer in an equivalent or improved arrangement in the final site or nearby.</p> <p>What does ‘address the emerging creative hub in the area’ (p. 9) mean? Opportunities need to be given to existing young talents who reside in Tottenham, not just to ‘creatives’ from outside the area.</p>		Noted. The Employment Land review will provide updated information on the use, occupancy and future viability of employment sites and will provide evidence to inform the proposed policies in the AAP.
32	<p>Q25 How could South Tottenham's open spaces and biodiversity be improved?</p> <p>See generic comments under Section 2 above about open space facilities.</p> <p>All possible steps should be taken to protect and enhance green and open space and disallow development on it, to address green space deficiencies, protect gardens from being concreted over, and develop greenery throughout the streetscape and on major roofs. Increase in biodiversity often takes place on previously industrial land which is shown in many of London’s nature reserves. These sites are important sources of biodiversity.</p>		Comments noted. Green and open spaces are protected by national, regional and local policies. The AAP will aim to further enhance existing spaces and encourage further open spaces to meet the scale of future development. Site allocations for Tottenham will set out where new open spaces may

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			be appropriate.
32	<p>Q26 What environmental and sustainability Issues do you think need addressing in South Tottenham? All new facilities (residential, commercial, social) to be environmentally sustainable, i.e. conform to highest carbon-neutral criteria.</p>		Comments noted and agreed.
32	<p>Q27 How could community facilities be improved in South Tottenham? See generic comments in Section 2 above about social infrastructure, in particular GPs and schools. We support the proposed improvements to the civic facilities at Tottenham Green. We support the statement on the South Tottenham Map (p. 10) that the proposed regeneration of housing estates should result in 'better quality community provision'. There should be a strict policy of protection of existing community centres - many of which under threat, of pubs, post offices, and corner shops from change of use. An expansion of youth services and facilities and nurseries is absolutely vital across Tottenham.</p>		<p>The Council's Infrastructure Delivery Plan (IDP) sets out the infrastructure that will be required over the Plan period to support the proposed residential and commercial growth across the borough. The IDP identifies the types of infrastructure required, where it should be located, the cost of it (where known), how it will be funded and who will be responsible for its delivery. The IDP is a live document and regularly updated.</p> <p>The site allocations for Tottenham will provide guidance on where and what type of community facilities will be</p>

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			expected to support development.
33	<p>The Victorian Society has been made aware of developing local plans for the area of Tottenham High Road including numbers 731 to 759. We would like to register our concern at the proposal to demolish this good Victorian terrace in the North Tottenham Conservation Area.</p> <p>731 to 759 Tottenham High Road are an example of the sort of simple, attractive historic buildings which give real character to London streetscapes. Retention of sets of buildings like these, which make a real contribution to the area's identity and have aesthetic value, should be a high priority. The High Street 2012 project in Whitechapel is an example of how conservation areas such as this can be rejuvenated by rediscovering the potential of simple, attractive Victorian building stock through a programme of cosmetic renovation. Despite requiring some restoration, the High Road terraces are in use and appear to be in good condition. They are a coherent and attractive row of buildings, which retain good, consistent features along the complete row, such as corncicing, window keystones, and decorative corbels to the dividing shop fronts, as is noted in the Conservation Area Appraisal (pp.21-22). The loss of the terrace would be harmful to the area.</p> <p>Section 126 of the NPPF makes it clear that in developing Local Plans, local planning authorities should take into account the following:</p> <ul style="list-style-type: none"> the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;(…) opportunities to draw on the contribution made by the historic environment to the character of a place. <p>Numbers 731 to 759 Tottenham High Road make a positive contribution to the conservation area. Of the options being considered for development of the area which went to local consultation in 2013, we understand that no option has been under consideration which would retain the buildings. We understand that an option was initially proposed in early 2013 which would retain the terrace, but that due to concerns about storage of books whilst the library was rebuilt, this was discarded. To eliminate an option to retain a good-quality Victorian terrace in a conservation area, because of short term, logistical concerns, seems extremely short-sighted and not in the longer-term interests of the community. Given the obligations laid out in the NPPF, and the importance to local areas of buildings</p>		<p>These comments refer to a specific planning application which is beyond the remit of this consultation.</p> <p>The AAP will aim to protect and enhance the heritage of Tottenham as part of the positive regeneration of the area.</p>

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	of this sort, options to retain these terraces should be further investigated.		
34	<p>Wards Corner Community Coalition endorses the response to the Tottenham AAPs consultation by Our Tottenham Planning Working Group. We provide additional specific detail on Seven Sisters, Wards Corner and the Wards Corner Community Plan in this document, drawing on our experience in planning, our deep knowledge of the site and our local expertise since 2007. We have annexed the Community Plan to this response, also available at https://wardscornercommunityplan.wordpress.com/.</p> <p>A) Specific comments on the Tottenham AAPs document</p> <p>Key Issues</p> <p>Page 4: It is argued that there needs to be a new gateway to Tottenham at Seven Sisters Page 5: It is said that Seven Sisters suffers from a weak sense of place</p> <p>Response:</p> <p>The existing Wards Corner indoor market is a major destination for London’s large Latin American population (estimated one million) and other visitors from all over London who want to speak their languages, meet friends, let their children play with other families and enjoy live music. It is indeed a place where people linger and spend money. If properly restored and managed, it has even more potential and could attract many more visitors to Tottenham. The Community Plan sets out how Wards Corner could become a genuine destination and attraction for the people of Tottenham and London as a whole. However, present plans to re-locate the market occupants risk disrupting individual businesses as well as the ‘Gestalt’ of the market as a whole and surrounding businesses, in particular through the two-year hiatus caused by the current development plans and the tripling of rents which is expected to result. We suggest the AAP is amended to recognise this, specifically for a restored Wards Corner building and a commitment to retain and support the unique character and retail offer currently on the site as the centre point for a new gateway to Tottenham.</p> <p>4. South Tottenham AAP</p> <p>In the South Tottenham map (p.10), Seven Sisters is included with Tottenham Green as one of the highlighted areas</p> <p>Response:</p> <p>There is no detailed text on Seven Sisters within the detail on p.9 for this area, which focuses only on Tottenham Green. There is no reference to Wards Corner, despite this being a key local asset and proposed as a major development site with Apex House currently. Much more detail needs to be included on Seven Sisters. The Community Plan sets out WCC’s research and analysis of Seven Sisters, and we propose that the AAPs acknowledge and draw on this.</p>		<p>Comments noted.</p> <p>The bullet point on page 5 which says to ‘the lack of a strong sense of place in ... Seven Sisters.’ refers to the built environment, including the poor public realm. The Plan identifies an opportunity to create a more distinctive area through the enhancement of existing assets and new improvements which complement existing local activities. The Plan will be amended to take into account the cultural and economic importance of the Wards Corner market.</p> <p>Comments noted.</p> <p>Further detail on Seven Sisters and Wards Corner will be provided in the amended Plan.</p>

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34	<p>Your comments</p> <p>Response:</p> <p>We strongly agree there should be a statutory consultation on the Tottenham AAPs, due to their importance in shaping future development. Wards Corner Community Coalition would like to meet with the Council to explore the potential to work together to improve the text on Seven Sisters in the AAP. We would like to be able to run through in detail how our work on the Community Plan could feed into the AAPs. We would like to suggest resources to support public participation in planning that are directed towards empowering people to engage in the consultations on these important statutory planning documents. Much more support, much longer timeframes and more opportunities to engage have been available for Tottenham Futures consultation than for the Tottenham AAPs (and site allocations document). Back page text should be provided on the last page in Spanish, in light of the presence of Latin American traders at Wards Corner, to enable participation.</p> <p>B) Views on the future of Tottenham</p> <p>WCC and the West Green Road and Seven Sisters Development Trust have spent some three years developing a community plan for Wards Corner, based around the retention and restoration of the market building and the nurturing, amplification and extension of its present strengths and community. The Plan includes proposals for further community and exhibition spaces, and on-site services and facilities to support micro- and social enterprise, drawing and building on the existing strengths of the indoor market and immediate surrounding business community. It proposes that the regeneration and management of Wards Corner should proceed through the West Green Road and Seven Sisters Development Trust, enabling community-led regeneration to occur. There is much in the Community Plan which is in line with existing Haringey Council planning policy, and its aims to support entrepreneurship, small business development and cultural space seem particularly relevant to existing priorities.</p> <p>Our overall comment on the future of Tottenham is that it has a wide range of existing community assets that should be retained and supported to grow organically in any regeneration plans, proceeding in collaboration with the community. The Community Plan for Wards Corner and the recent Our Tottenham commitment to support the development of community planning in Tottenham should give the council confidence to work with the community. This should provide an impetus for a shift from the existing top-down model of regeneration, to a community-led approach, which is likely to be far more effective in achieving the Council's aims to address problems of deprivation and opportunity in Tottenham. Regeneration in Tottenham should not be solely in the hands of the Major Businesses and Landowners Group. We look forward to much greater dialogue with Haringey Council on the future of Tottenham.</p>		<p>Comments noted.</p> <p>The Council welcomes continued dialogue with, and input into the development of the Plan from the community. We will carry out public consultation at each stage of development of the Plan and will aim to incorporate comments where appropriate. The draft policies and site allocations will take into account all relevant documents to inform the AAP.</p>
34	C) Background on Wards Corner Community Coalition		Comments noted.

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	<p>The Wards Corner Community Coalition (WCC) is a broad based coalition of groups and individuals who came together to challenge plans to demolish a city block in Seven Sisters, Tottenham, known locally as Wards Corner. WCC has campaigned since 2007 to save the market, local businesses and homes, meeting spaces and cherished buildings. WCC is made up of and supported by residents and a wide range of local groups including residents associations, trader organisations, Tottenham Civic Society, Tottenham Conservation Area Advisory Committee, Pedro Achata Trust, Pueblito Paisa, the Seven Sisters Multicultural Market Traders, the Tottenham Traders Association, Tottenham & Wood Green Friends of the Earth, Sustainable Haringey, Haringey Living Streets, Seven Sisters Permaculture, The Civic Trust, The Victorian Society, English Heritage, the New Economics Foundation, the Ethical Property Foundation, Bioregional, Planning Aid for London, Parity Projects, representatives of political parties and other groups. The WCC has two principal objectives:</p> <p>1) Stop Grainger PLC and Haringey Council's plan to demolish Wards Corner and displace all the residents and businesses, building in their place unaffordable flats and retail space aimed at national chains.</p> <p>2) Design and implement a community led development of the site That allows all current occupants to stay and provides space for new retail, community facilities and small start-up businesses. The former Wards department store has been home to a thriving indoor market since 1985, providing a space for diverse ethnic groups, including Afro-Caribbean and Latin American, to launch and grow their small businesses. It currently supports around 60 businesses, providing around 150 jobs. The particular role of the indoor market in supporting entrepreneurship amongst diverse groups is of particular value in light of the barriers and inequalities faced by migrant and ethnic minority groups in economic participation, and in light of the deprivation in the surrounding areas. The indoor market is also a social place that offers opportunities for inter-generational and inter-cultural exchange and support. There are additionally many local shops outside of this building within the wider Wards Corner site, which are also highly valued for the specific services and goods they supply and their social function in supporting Tottenham's diverse communities (e.g. Cosmos newsagent; Tottenham Wines; The Eye Practice). WCC meets every Monday evening in Pueblito Paisa café, Seven Sisters Market, and regularly organises events and workshops. WCC has developed a Community Plan, which has just been validated by Haringey Council followed by a long delay, and is affiliated with the Our Tottenham Community Planning Network. WCC was selected by academics from the Open University as a case study for their 'Creative Citizens' project with the Royal College of Art, funded by the Arts and Humanities Research Council under the 'Connected Communities and Digital Economies' programme. This collaboration has resulted in the launch of an on-line consultation platform for the Community Plan, using 3D images of the plans to invite comment (see https://cc.stickyworld.com). The WCC believes that regeneration should be community-led, that the people affected should be involved at</p>		<p>The AAP aims to set out planning policies which enables growth and development to meet the needs of existing and future communities of the area. The Council will consult with the public at each stage of development of this Plan and welcomes input from local organisations and individuals.</p>

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	<p>every stage of development and that any regeneration project should focus on meeting the needs of local people, not on displacing them. Haringey Council's approach to regeneration at Wards Corner has led to exclusion of many local people at every opportunity and explicitly to change the social makeup of the area. As such their development includes no social housing, will provide little to no space for small independent businesses and will not serve to meet the needs of many of the current residents at Seven Sisters. Despite the thriving multi-cultural market, surrounding shops and huge potential of the site it has been blighted for many years by the Council' and Transport for London's plans for impending demolition and refusal to allow use of the building above the ground floor. Shopkeepers and landlords have not spent money on their buildings and the whole site appears at first site to be a mess. It is not therefore surprising that people who have not seen inside the Wards Stores building nor understood the Community Plan draw the quick conclusion that everything should be demolished and replaced by something new, regardless of its lack of quality and distinctiveness. The Council's low aspirations for our neighbourhood, shown by years of ignoring the community's views and proceeding with this dated and dispiriting proposal are a disaster. There is the real alternative of an exciting and genuinely community led scheme which, more than ever before, has engaged the talent, enthusiasm, commitment and energy of hundreds of multi-cultural Tottenham residents and traders. The core work of the WCC is campaigning for a fairer, more just, more accessible, and more inclusive approach to planning and development, at local, borough and London-wide levels. This work goes hand-in-hand with our principal focus which is to halt the plans for demolition at Wards Corner and to implement a community-led redevelopment of the site.</p>		