

# London Borough of Haringey

Haringey Local Plan Preferred Option  
consultation of 4 Local Plan Documents held  
Feb-Mar 2015:

Site Allocations DPD

Regulation 22(1)(c) Consultation Statement

October 2015

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## 1. Introduction

### The Consultation

- 1.1 Consultation on the Preferred Option of four Haringey Local Plan documents took place between 5 February and 27 March 2015. These were:
- Amendments to the Local Plan: Strategic Policies (Adopted 2013);
  - Development Management Policies;
  - Site Allocations; and
  - Tottenham Area Action Plan.
- 1.2 The consultation was undertaken in accordance **with the Council's Statement of Community Involvement** and in line with 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 local plan document, a summary of the main issues raised to consultation, and to detail how the Council took account of the comments received in preparing the subsequent version of the plan - the Preferred Option version.

### This Document

- 1.3 The details of the consultation undertaken are included in the next section, which includes reference to the consultation documentation, who was contacted seeking consultation responses and a summary of representations.

### Process & next steps

- 1.4 This consultation report, submitted to Cabinet in October 2015, builds upon the recommendations of Regulatory Committee on a summary version of this document in September 2015.
- 1.5 Following decisions on amendments to the documents, the next stage will be to conduct a Proposed Submission consultation, seeking comments on soundness and legality, prior to submission to the Secretary of State for Examination in Public of the planning documents by an independent Planning Inspector. The exact dates for the submission, and length of time taken to examine the documents, will depend on the number of issues arising from the proposed submission consultation. It is planned that the Proposed Submission consultation will take place from December 2015 to January 2016, with Submission and Examination taking place in 2016. Following the Examination, the Inspector will issue an Examination Report on the soundness of the plan. It is expected that should they decide the Plan is sound, the Council will adopt the plan in mid-late 2016.

## 2. Summary of consultation undertaken on the Site Allocations DPD Preferred Option consultation document

### **Summary of consultation undertaken on the Site Allocations Regulation 18 consultation document**

- 2.1 Following Cabinet approval in January 2015, the alterations to the Strategic Policies and the 'preferred option' drafts of three local plan documents, were published for public consultation from 9 February to 27 March 2015.
- 2.2 Public consultation on the four Local Plan documents was carried out in accordance with the Council's adopted Statement of Community Involvement (2011) and statutory requirements. This included:
- Notification by letter/e-mail on 9 February to over 1,200 individuals and organisations already registered on the planning consultation database;
  - A reminder e-mail sent to those on the database on 14 March;
  - Notification letters to all landowners and occupiers within the boundary of sites proposed for allocation;
  - Public notice placed in the local newspaper on 12 February;
  - Reference and loan copies of each document and the accompanying sustainability appraisals were made available in each of the borough libraries, at the Civic Centre & Planning Reception at River Park House, and on the Council's website.
- 2.3 In addition to the above, and in an effort to engage the wider public in the consideration of the draft local plan documents, articles were placed in the February editions of the Haringey People Magazine (which is delivered to all households in the borough) and the Tottenham News. The following drop in sessions and public meetings were also held:
- Turner Avenue Steering Group (22 January)
  - Park Grove and Dunsford Road Steering Group (29 January)
  - **St Ann's & Haringey Area Forum Meeting (3 February)**
  - Northumberland Park Area Forum (5 February)
  - Tunnel Gardens / Blake Estate Residents Meeting (5 February)
  - Highgate & Muswell Hill Area Forum (5 February)
  - Tamar Residents Meeting (12 February)
  - Reynardson Residents Meeting (12 February)
  - River Park House drop in session (16 February)
  - Tangmere Steering Group (18 February)
  - Broad Water Farm RA (18 February)

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- Turner Avenue Drop in Session (21 February)
- High Road West / Love Lane RA (25 February)
- Wood Green Library drop in session (25 February)
- River Park House Member drop in session (4 March)
- Hillcrest RA (9 March)
- West Green & Bruce Grove Area Forum (9 March)
- Musewell Hill Library Drop in Session (10 March)
- Stellar House, Altair Close, The Lindales and Bennetts Close Residents and Community Association (10 March)
- 163 Park Lane Drop in Session (11 March)
- Northumberland Park and Park Lane Residents and Community Association (12 March)
- All Ward Member drop in session (18 March)
- Headcorn & Tenterden Residents Association (24 March)
- Summersby Road RA (26 March)

- 2.4 Additionally all addresses within identified Site Allocations (in both the site Allocations and Tottenham AAP sites) were contacted (see Appendix 1d for a copy of the letter that was sent, and 1e for the list of addresses contacted).
- 2.5 In addition, following requests from local residents in close proximity to sites at Keston Centre and Lynton Rd, additional letters were sent out to adjoining properties. The list of addresses is included at Appendix 1f.
- 2.6 The aim of the consultation was to invite public and stakeholder views and comments on the proposed policies and sites being put forward for consideration. It enabled consultees to offer up further information, to enable the preparation of the next iterations of the documents – the pre-submission versions.
- 2.7 Notwithstanding the above, criticism was received on the extent and adequacy of **the consultation process. Whilst meeting the obligations within the Council's** adopted Statement of Community Involvement (2011), officers have subsequently met with some of the concerned parties representing some of the residents' groups to see how consultation on the documents could be improved. Where feasible, these new techniques and standards have been incorporated in the update to the **Council's Statement of Community Involvement**. Officers will also be seeking to ensure that the lessons learnt and feedback received on the earlier consultation process can be incorporated into the next round of consultation on these documents planned for later in the year.

### 3. Who responded and number of representations received

- 3.1 The site allocations document was the most responded to of the four documents which went out for consultation. Approximately 80 per cent of all respondents made at least one comment on the site allocations document. In total 606 individuals, businesses, community groups and government departments responded to the consultation. Between them they raised 4,385 individual points.
- 3.2 The most responses were received to the site allocation for Broadwater Farm. 293 representations were received accounting for 1,421 comments. This represents approximately a third of all the comments to the document. Many of the individual respondents to the Broadwater Farm site allocation submitted a form letter.
- 3.3 The Keston Centre received the second highest number of comments with 1,076. These were submitted by 80 different respondents. Many of the Keston Centre responses also came in a standard form letter.
- 3.4 Other significant allocations included those outlined in the amended strategic policy SP2 as potential estate renewal sites: Summersby Road (82 representations and 345 comments); Hillcrest (28 representations and 241 comments); and Tunnel Gardens (14 representations and 52 comments).
- 3.5 Additionally Lynton Road (24 representations and 148 comments); Overbury and Eade Roads (20 representations and 76 comments) and Pinkham Way (12 representations and 120 comments) received a significant number.

## 4. Summary of Issues Raised During the Consultation

### General responses

14 respondents: 42 comments

- 4.1 Respondents made general comments regarding the consultation process, tall buildings and the inclusion of MOL in three of the site allocations. One respondent stated that concerns raised in previous consultations had been confirmed rather than addressed.
- 4.2 The sites that included MOL, Broadwater Farm and Finsbury Park Bowling Alley, have been amended to remove MOL while Hornsey Water Treatment Works was removed entirely. There were also suggestions heights generally are too tall and will put pressure on the existing facilities.
- 4.3 Historic England also suggested the plan was an opportunity to address at risk heritage assets. The Council will continue to work with Historic England on the protection of heritage assets.
- 4.4 Minor changes were also made to reflect concerns with wording errors and to amend the quality of maps which was highlighted as an issue.

### New sites

7 respondents, 7 comments

- 4.5 A number of new sites were put forward for allocation. However, these were generally considered inappropriate as they were not of large enough size or were considered likely to come forward without an allocation.

### Sustainability appraisal

3 respondents: 8 comments

- 4.6 One respondent had a number of concerns relating to the perception that the sustainability appraisal allows open space to be built on. This is not the case and the Council believes open space is adequately protected by Local Plan policies.
- 4.7 It is also suggested the Council has not addressed reasonable alternatives. These were however considered as part of the sustainability appraisal process and as the site allocations give effect to an agreed spatial strategy (Local Plan: Strategic Policies), alternatives are limited in terms of deliverability.

### General issues for multiple site allocations

- 4.8 Infrastructure providers made comments relating to the need for new design guidelines or site requirements to be added for specific sites. These included:
  - the need for a piling statement before works can take place;
  - flood risk assessments to be undertaken;

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- ‘build over or near to’ agreements relating to the presence of sewers; and
- the need to consult with Thames Water on wastewater and water supply capacity.

4.9 The site allocations were amended to reflect these new requirements. Thames Water also expressed concern regarding the cumulative impact of new development on their networks. This is an issue that will be addressed through the update to the infrastructure delivery plan.

### ***SA1 (Indicative Crossrail 2 Areas)***

6 respondents: 11 comments

4.10 There is concern among some respondents that identifying zones around future stations is a form of planning blight; however the Council remains committed to support the introduction of Crossrail as important infrastructure to meet the needs of the growing population. To this end the site has been revised to ensure a 1000 metre radius around potential Crossrail 2 stations to properly safeguard the sites and reflect the appropriate area required based on experiences of impacts from Crossrail1.

### ***SA2 (Designated Employment Areas)***

9 respondents: 16 comments

4.11 Respondents to SA2 were concerned about the loss of industrial designations and that the release of land is seen as appropriate for the residential needs of the gypsy and traveller community. While Council agrees that industrial land is less accessible areas is appropriate it is considered that in more accessible locations higher density mixed uses can better meet the housing and employment demand. Additionally, it is recognised that these sites have the highest value uplift, and therefore potential to accommodate new pitches. Any sites would need to consider the appropriateness of pitches from a design perspective using SP3 of the Local Plan.

4.12 There was also confusion about the status of White Hart Lane - this has been amended to LSIS - and concern about Omega Works designation as a regeneration area, which Council considers the only suitable designation for the mix of uses proposed for the site.

### ***SA3 (Changes to Town Centre boundaries)***

3 respondents: 3 comments

4.13 There were no major issues with SA3.



### **SA4 (*Safeguarded Waste Sites*)**

3 respondents: 3 comments

- 4.14 An objection was received to SA4 (Licensed Waste Capacity) from the landowner to the requirement to maintain licensed waste capacity on one of the sites. The Council does not consider it appropriate to release existing licensed waste capacity before it is reprovided.

### **Extant planning permissions**

- 4.15 The comments on these sites (SA5 – SA9) were minor due to the fact the sites all have extant planning permissions.
- **SA5 (*Clarendon Square*):** 4 respondents: 15 comments
  - **SA6 (*Hornsey Depot*):** 2 respondents: 3 comments
  - **SA7 (*St Luke's Hospital Site*):** 2 respondents: 3 comments
  - **SA8 (*Hornsey Town Hall*):** 2 respondents: 3 comments
  - **SA9 (*Highgate Magistrates Court*):** 3 respondents: 4 comments

### **Wood Green**

5 respondents: 9 comments

- 4.16 A number of respondents made comments generally on issues associated with the sites in Wood Green. One respondent was concerned with tall buildings noting that generally 10-12 storeys would be more appropriate in Wood Green. Another noted that it considered the location of tall buildings appropriate. One respondent also questioned whether the scale of regeneration was appropriate across Tottenham noting that if only half completed it will be worse than the disease it is trying to cure.
- 4.17 One resident was particularly concerned about the prevalence of betting shops and the detrimental effects they are contributing to discouraging better quality businesses from locating in Wood Green. The respondent was advised there is a new DM policy which will help address the prevalence of betting shops in town centres. Another respondent recognised the potential of Wood Green and the need to invest in the area. The aim of the site allocations and forthcoming area action plan is to bring investment into the area.

### **SA10 (*London Borough of Haringey Civic Centre*)**

4 respondents: 6 comments

- 4.18 The main issue for SA10 relates to the existing traveller pitch. The existing pitch would need to be reprovided before any development occurs. The site allocation was amended to reflect a comment from Transport for London regarding the requirement to retain a bus stop adjacent to the site.

**SA11 (*Green Ridings House*)**

3 respondents: 5 comments

- 4.19 Concerns for SA11 included that the heights proposed would be detrimental to the amenity of residents on Ringslade Road. They suggested a recommendation of mews type development however this is not considered appropriate on a retained road within a town centre and that the reduced heights along Watson's Road are already to the benefit of Ringslade Road properties.

**SA12 (*Wood Green Bus Garage*)**

4 respondents: 8 comments

- 4.20 SA12 has been amended to reflect that the access to the bus garage may not be feasible from just Station Road and that the High Road should also be included. This will ensure flexibility within any future design. Additionally it is noted that access from the high road should be successfully integrated into the secondary frontage.

**SA13 (*Station Road offices*)**

6 respondents: 12 comments

- 4.21 SA13 has been amended to strengthen text about the requirement that temporary reprovision of the bus garage should be secured before any redevelopment and also to reflect that any development should be aware of the provision of the bus garage on the adjacent site. There is both support for and opposition to tall buildings on this site. One respondent has noted that the justification for tall buildings as a place marker of the station is unnecessary as 10,000s of people find the station every day. Council is undertaking further analysis to validate its position on tall buildings including their role in place making and housing / employment delivery.

**SA14 (*Mecca Bingo*)**

2 respondents: 4 comments

- 4.22 SA14 has only been amended to reflect infrastructure requirements as set out above. Environment Agency suggested an eight metre buffer for development adjacent to Moselle Brook culverts however this is not consistent with meeting housing targets. Where deculverting is viable an eight metre buffer could be acceptable.

**SA15 (*Morrison's Wood Green*)**

3 respondents: 8 comments

- 4.23 SA15 has been amended to reflect support for bringing Gaumont Theatre back into use and providing for soundproofing on adjacent sites.

**SA16 (*Wood Green Library*)**

6 respondents: 17 comments

4.24 Respondents to SA16 were concerned with the loss of the library building. However, as it is not considered a building of architectural merit it is not considered necessary to retain the building itself, only the use. A respondent was also concerned the idea of a sky cafe is a folly however it is considered appropriate to retain this reference to maximise opportunities in Wood Green including the value from tall buildings. This allocation was also amended to reflect the need to be aware of the theatre on the neighbouring site and soundproofing.

**SA17 (*The Mall*)**

4 respondents: 6 comments

4.25 SA17 has been amended to reflect a suggestion for the addition of a development guideline to support upgrading the public realm on the Mayes Road side of the Mall. A requirement has also been included regarding optimizing the developable part of the site to optimise the local cycling and pedestrian network.

**SA18 (*Bury Road Car Park*)**

2 respondents: 7 comments

4.26 There are no major issues associated with SA18.

**SA19 (*16-54 Wood Green High Road*)**

2 respondents: 7 comments

4.27 There are no major issues associated with SA19.

**SA20 (*Westbury and Whymark Avenues*).**

6 respondents: 17 comments

4.28 There have been no major amendments to SA20. There is concern regarding the proposed location of a tall building on this site. . Reference to specific heights in the allocation has been deleted and the site will be assessed against the development management policies.

**SA21 Turnpike Lane Triangle**

2 respondents: 6 comments

4.29 Transport for London has suggested a car free development for SA21. It is noted that there may be a need for wheelchair access for both residential and town centre uses on site.

### ***SA22 (North of Hornsey Rail Depot)***

5 respondents: 11 comments

- 4.30 No major amendments to SA22. One respondent commented on the fact that the site is in two ownerships and there is no realistic prospect of the site coming forward at the same time for development. It is considered necessary for any proposed development to meet the strategic objectives of the site before planning permission is granted. It is also suggested that a yield of 70 residential units is too low and that at least 100 would be possible. Densities allocated for these sites are in line with London Plan compliant methodology.

### ***SA23 (Wood Green Cultural Quarter North)***

4 respondents: 27 comments

- 4.31 SA23 has been amended to remove reference to the 33 per cent floor employment space target and replace this with a requirement for the maximum feasible floor space instead. There is opposition to active frontages, public realm improvements, capped commercial rents, decentralised energy networks and the pedestrian-cycle link. These are all considered appropriate for this site and comments did not result in amendments to the allocation. There are concerns with the height limits in the allocation; both that they are too tall and too restrictive. Reference to specific heights in the allocation has been deleted and each site will be assessed against the tall and taller buildings policy in the development management policies.
- 4.32 A guideline has also been added that development on the site should make a positive contribution to the neighbouring conservation area. A respondent is also concerned about the requirement to follow a council approved masterplan considering it has not yet been developed. This is currently underway as part of the Wood Green area action plan for which council approval will be sought in spring 2016.

### ***SA24 (Wood Green Cultural Quarter south)***

3 respondents: 12 comments

- 4.33 This allocation has been amended to reflect infrastructure requirements and to replace the employment floorspace target with a requirement to provide the maximum viable employment floorspace. There is disagreement with the location of the tall building proposed on site and it is considered by a respondent that a landmark building should be integral to the wider development rather than tucked away by the railway. The location of this building is proposed to mark the entrance to Alexandra Palace from Wood Green and the location is considered appropriate. A respondent also objected to the 8 storey limit for development considering the site is within a metropolitan centre and has good transport links. Reference to height limits have been removed from the allocation and any development will be assessed against the development management policy on tall and taller buildings.

**SA25 (*Wood Green Cultural Quarter east*)**

3 respondents: 14 comments

- 4.34 The boundary of SA25 has been amended to reflect that a small part of one of the sites has been included in SA23 rather than SA25. It was also amended to remove the 33 percent employment target and the specific height requirement of eight storeys. The landowner supports many of the requirements for the site including the adoption of a master plan and the possibility of connecting into a decentralised energy network. There is concern, however, about the need to retain the existing buildings on site. However, council considers that the Chocolate Factory building 2 creates a positive active frontage well suited to being part of the future of the site while providing a link with the past.

**SA26 (*Clarendon Square Gateway*)**

4 respondents: 27 comments

- 4.35 This allocation has been amended to remove reference to the height requirements. Development will be assessed against a new policy on tall and taller buildings in the development management policies therefore height limits in individual allocations are not considered necessary. The allocation has also been amended to make it clear that a pedestrian cycle link through the site is proposed, rather than a road. A respondent has suggested that A1/A3/A4 uses should also be considered for this site, however as the site does not have a town centre frontage these are considered inappropriate. There is support for the inclusion of a requirement for student accommodation however Wood Green town centre is the preferred location for this use.

**SA27 (*Clarendon Road South*)**

3 respondents: 11 comments

- 4.36 SA27 has been amended to reflect the change in employment land space requirements and to remove references to building heights in accordance with reasons set out above. The allocation has also been amended to reflect that residential is appropriate on site in order to subsidise employment floorspace.

**SA28 (*NW of Clarendon Square*)**

2 respondents: 6 comments

- 4.37 There is concern that the height limits for SA28 are too high and should be amended to reflect heights for the other Clarendon allocations. References to specific heights have been removed as all new development will be assessed against a new development management policy on tall and taller buildings.

**SA29 (*Land Adjacent to Coronation Sidings*)**

5 respondents: 9 comments

- 4.38 Respondents expressed concern with the proposed tall building location within SA29 at the entrance to Penstock Tunnel. There is concern a building of such a significant height would have a detrimental effect on Alexandra Park. The specific height of the building has been removed as development will be assessed against the tall buildings policy in the development management policies. A requirement was added that the building should be slim in appearance to help minimise the impact on the park.

**SA30 (*Hawes and Curtis, Green Lanes*)**

3 respondents: 7 comments

- 4.39 SA30 had no major amendments.

**SA31 (*Wightman Rd*)**

2 respondents: 3 comments

- 4.40 There are no major issues associated with SA31.

**SA32 (*St Ann's Hospital Site*)**

7 respondents: 18 comments

- 4.41 There have been no major amendments made to SA32. **One residents' association** expressed concern with the proposed access to Warwick Gardens. It is considered that the use of Secured By Design principles which are included in the development management design policies will ensure this is mitigated. There is also support for public open space within the site rather than individual private gardens.

**SA33 (*Arena Retail Park*)**

7 respondents: 29 comments

- 4.42 There were no major amendments made to SA33. The respondents brought up concerns relating to the impact of increased traffic on congestion and air quality. It is hoped that changes to the site will mean a reduction in car use which in turn will decrease congestion and air pollution.

**Harringay Warehouse District sites**

- 4.43 The Harringay Warehouse site allocations (SA34 – SA39) are listed below with the number of respondents and number of comments. However for the discussion on the main issues for these sites please refer to the main issues discussion under DM51. This can be found in Appendix D DMDPD Consultation Report Part 7.

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- SA34 (Arena Design Centre) 12 respondents: 45 comments
- SA35 (Crusader Industrial Estate) 6 respondents: 17 comments
- SA36 (Omega Works) 10 respondents: 35 comments
- SA37 (Vale / Eade roads) 6 respondents: 14 comments
- SA38 (Overbury & Eade roads) 20 respondents: 76 comments
- SA39 (L/b Seven Sisters Rd & Tewkesbury Rd) 3 respondents: 9 comments

### **SA40 (*Finsbury Park Bowling Alley*)**

8 respondents: 18 comments

- 4.44 Amendments were made to SA40 to clarify the requirements regarding the provision of a new link in to Finsbury Park and the need to retain existing leisure use in any new development. A number of respondents also expressed concern about the possibility of a 15 storey building on the site and the likelihood that it would overshadow the park. Specific reference to building height has been removed and any proposed development will be assessed against the development management policies. A respondent also questioned the inclusion of metropolitan open land in the allocation. The site boundary has been redrawn to reduce the amount of MOL in the allocation.

### **SA41 (*18-20 Stroud Green Road*)**

1 respondent: 2 comments

- 4.45 There were no major issues associated with SA41.

### **Highgate general: 1 respondent, 1 comment**

- 4.46 One respondent expressed support for the identification of the neighbourhood plan in the site allocations document.

### **SA42 (*460-470 Archway Road*)**

7 respondents: 18 comments

- 4.47 Opposition to specific height limits of up to six storeys on SA42 has meant the specific reference has been deleted from the allocation. All development proposals will be assessed against the tall buildings policy in the development management policies. It is also suggested that the proposals will have an adverse impact on the conservation area including on views. The site allocation together with the development management policies will ensure the impact of any development on the conservation area is minimised.

### **SA43 (*Highgate Station and Gonnermann*)**

9 respondents: 27 comments

- 4.48 SA43 has been substantially amended as it has been split into two separate site allocations. The first covers the old Highgate train station and the second, the **Gonnermann's site to the east of Shepherd's Hill**.
- 4.49 The main concern for respondents to this allocation was the opening up of the tunnels to link with Parkland Walk. Respondents were concerned that this would have a detrimental effect on biodiversity. The new site allocations reflect the opportunity to safeguard biodiversity values on the former station site while enhancing access and the need for carefully managed redevelopment for the Gonnermann site.
- 4.50 The new Gonnermann site allocation has no height limits as height will be assessed against the development management policies.

### **SA44 (*Highgate School*)**

4 respondents: 4 comments

- 4.51 No major amendments have been made to SA44. A respondent was unclear on **what is intended for parts of the site including the sports field**. The Council's Core Strategy will ensure any future development results in no net loss of open space unless an assessment indicates it is surplus to requirements.

### **SA45 (*Highgate Bowl*)**

14 respondents: 82 comments

- 4.52 The site boundary of SA45 has been redrawn to reflect the most recent Appeal decision on the garden centre and the exclusion of buildings and land to the rear of Dyne House. There was concern for the loss of Harington Scheme. The allocation has been amended to provide recognition of this facility and its long term community value is translated into a requirement for safeguarding of these facilities within any future proposals for development on this land.
- 4.53 There were also concerns that the access through the bowl would impact on the amenity of residents, and specific objection to access from Chomeley Park. The Council is seeking to increase access to and through the new metropolitan open land. These accesses will be assessed against the development management policies which seek to address issues of amenity and local character.
- 4.54 The owner of the nurseries site also believes the bowl should not be designated SLOL. However, as the bowl is an important contributor to the character of the conservation area, the SLOL designation is considered appropriate.



### **SA46 (*Summersby Road*)**

82 respondents: 345 comments

- 4.55 The boundary of SA46 has been substantially altered to exclude the Summersby Road estate and the car parks on South Close. Respondents had concerns about the inclusion of the estate because the buildings were considered to be in good condition, Decent Homes work is commencing on the site, and because it had not been included in an earlier version of the plan. It has therefore been removed. The car parks on South Close are part of a different estate and so have also been excluded.

### **SA47 (*Hillcrest*)**

28 respondents: 241 comments

- 4.56 Respondents to SA47 had many concerns regarding the inclusion of Hillcrest in the site allocations document. They made specific mention to the play space that would be lost in the area. Any development would be required to make appropriate **provision for amenity and children's play** space. Respondents were concerned about proposed heights and the effect this would have on density and overcrowding of the site. Specific height limits have been removed and heights will be assessed against development management policies which will require that consideration is given to residential amenity, and that density has regard to the local character. Views and parking loss were also issues and these will also be addressed through development management policies. A transport and parking assessment would also be required as part of a detailed development proposal.
- 4.57 Respondents also suggested the allocation is contrary to the emerging neighbourhood plan which intends to protect open spaces at Hillcrest. The neighbourhood plan is not yet adopted. When it is, it will form part of the development plan but as a lower level document it must be in general conformity with the strategic policies of the Local Plan.
- 4.58 There was also confusion regarding the PRP report and its relationship to the Local Plan with many respondents referencing development proposed on specific sites within Hillcrest. The site allocation sets out principles to guide future development of the site but does not propose specific development. It allows for a range of options to be considered. The PRP report was prepared for the housing team within Council to consider development options and site capacity.

### **SA48 (*Hornsey Water Treatment Works*)**

13 respondents: 32 comments

- 4.59 SA48 has been removed from the site allocations document due to the specific challenges associated with the site such as the impact on MOL, the setting of Alexandra Palace and the heritage value of the filter beds, and the absence of a detailed proposal indicating how these could be addressed.

### **SA49 (*Cross Lane*)**

2 respondents: 4 comments

4.60 There were no major issues with SA49.

### **SA50 (*Chettle Court*)**

3 respondents: 6 comments

4.61 Following further discussions with the housing investment team SA50 was removed from the allocations document due to the unlikelihood of its coming forward for development during the plan period.

### **SA51 (*Lynton Road*)**

24 respondents: 148 comments

4.62 Minor amendments to SA51 include the addition of a new development guideline requiring the retention, where possible, of mature trees on site and the need to replace jobs in the allocation. Specific height limits and the reference to extending the district centre have been removed in line with responses to the consultation. Respondents also expressed concern regarding the impact of new development on parking. This will be picked up through the transport and parking assessment which would be required at the time of development.

### **SA52 (*Pinkham Way*)**

12 respondents: 120 comments

4.63 One respondent, a local advocacy group, feels the site is not suitable for employment use. The existing designations, both as employment land and SINC, are considered appropriate on the basis that there is a continuing need for employment spaces in the borough. Any development would be required to consider the SINC designation as well. The evidence the group submitted on the biodiversity present on the site is not sufficient to demonstrate that employment **couldn't coexist on the site**. Flood risk and culverted watercourse were also reasons suggested as to why the site is unsuitable for development. Any proposed development would require a flood risk assessment to demonstrate no adverse impact in flood risk while the impact upon the watercourse is already covered by the policy.

4.64 There is specific opposition to the use of the site for waste, which is noted by the Council. The allocation does not specify that this is the use that will be on site.

4.65 Respondents were also concerned about views from Friern Barnet Bridge Park to Alexandra Paces being disrupted. Any development would require an impact assessment on long distance views to be undertaken.

### **SA53 (*Cranwood and St James' School*)**

15 respondents: 52 comments

- 4.66 There have been no major amendments to SA53. Respondents' concerns included the impact of development on infrastructure, and in particular on school places. This will be addressed through the update to the infrastructure delivery plan. Respondents were also concerned about the potential demolition of houses on the site. The houses have been included to ensure a comprehensive approach to development to make best use of the land.
- 4.67 Urban realm concerns included the possibility of housing being demolished to form this new urban realm. Enhanced entrances to Parkland Walk and the school are not considered necessary by residents. However these site requirements help to contribute to the site having a mix of uses helping address open space, accessibility and housing objectives.

### **SA54 (Tunnel Gardens)**

14 respondents: 52 comments

- 4.68 Respondents to SA54 are concerned about plans to redevelop their homes and have expressed an interest in seeing evidence which suggests refurbishment is not an option. The site allocation has been based on a preliminary assessment that found the houses are constructed from a defective material which makes restoration uneconomical. More detailed work is being undertaken to compare the costs of redevelopment and refurbishment. At this stage the site allocation allows for either option to be pursued in the future.
- 4.69 Height limits have been removed in line with other allocations. Drainage was also an issue and this will be addressed through a flood risk assessment at the time of detailed design.

### **SA55 (Alexandra Palace)**

5 respondents: 8 comments

- 4.70 Respondents to SA55 expressed concern that the allocation meant that comprehensive redevelopment of Alexandra Palace and the park could be undertaken, which is not the case. The allocation was amended to highlight that Alexandra Palace is the centrepiece of the conservation area rather than just part of it.

### **SA56 (Coppetts Wood Hospital)**

3 respondents: 20 comments

- 4.71 Respondents to SA56 have expressed concern at the ambiguous wording of the site allocation in particular the requirement for facilities to be deemed surplus to requirement before any development can take place. The site allocation has been

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amended to make it clear that this requirement refers to each individual use. Respondents also expressed concern over the loss of parking. This is a detailed design issue and not strategic enough to prevent inclusion in the document. A parking and transport assessment will be required as part of any development plans.

### ***SA57 (Park View & Durnsford Road)***

6 respondents: 22 comments

- 4.72 The site boundary of SA57 has been amended in line with responses to include the car park and empty site to the south of the existing allocation. Respondents also suggested the inclusion of Park Court however it is not made from the same materials which have informed the decision to allocate the other houses.
- 4.73 Respondents also requested to see the evidence suggesting refurbishment is not an option. The site allocation has been based on a preliminary assessment that found the houses are constructed from a defective material which makes restoration uneconomical. More detailed work is being undertaken to compare the costs of redevelopment and refurbishment. At this stage the site allocation allows for either option to be pursued in the future. Height limits have been removed in line with other allocations.
- 4.74 There was also support for the improvement of the open spaces on site and a suggestion that they could be combined with Springfield Park. Reference has been made in the allocation to the potential for open space improvements with Springfield Park.

### ***SA58 (Myddleton Road Local Centre)***

4 respondents: 8 comments

- 4.75 Respondents to SA58 were unhappy about the support for back land development in this allocation. A new policy has been included in the development management policies on back land development. There is also concern about the reference to echelon parking as it is considered the street is too narrow and shared space could be a better option. This is a detailed design issue and the policy has been revised to remove reference to specific types of parking so all options can be considered in any proposals for redevelopment.

### ***SA59 (Red House)***

5 respondents: 16 comments

- 4.76 SA59 was amended to reflect concerns regarding the proposed height of buildings close to smaller properties. The text was amended to bring it in line with other allocations where the allocation provides that heights will be reduced to respect the amenity of adjacent properties. Additionally specific height requirements were

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removed from the allocation. Two respondents also supported the policy to improve the adjacent open space in any proposed development.

### **SA60 (Haringey Professional Development Centre)**

3 respondents: 4 comments

4.77 There were no major issues with SA60.

### **SA61 (Keston Centre)**

80 respondents: 1076 comments

4.78 Respondents had five main concerns regarding SA61. These were: the building height; the opportunity to retain the Victorian school building; the potential land swap of MOL and its impact on the park; the replacement of the nursery on site and traffic issues.

4.79 The allocation was amended to remove the specific building heights as any development will be assessed against development management policies which address issues of local character and impact on neighbouring sites. While the Victorian school building has some architectural merit, it is not considered appropriate to retain it as the site could be used more optimally by making use of the space for residential use.

4.80 The use of MOL for a land swap is considered appropriate to improve access and as per strategic policies there would be no net loss of open space. The development management policies will address the issues of the impact on the park and traffic while the reprovision of the nursery will be addressed by the infrastructure delivery plan update.

### **SA62 (Barber Wilson)**

6 respondents: 10 comments

4.81 The main issue associated with SA62 included the displacement of a viable business which has been operating on the site for many years. The allocation was amended to clarify that any proposal does not result in a loss of employment uses with the presumption in favour of retention /conversion of historic industrial buildings on site.

### **SA63 (Broadwater Farm)**

293 respondents: 1421 comments

4.82 Respondents were generally concerned that the text of the allocation did not match what they were being told might happen, which included building on the park and potential demolition of buildings on Broadwater Farm. The allocation reflects comments by residents about the need for improvements to the site, therefore it allows for improvements to the estate. However a delivery model for this has not

been consulted on. The policy highlights the need for further work and engagement to determine the appropriate way forward.

- 4.83 As a result of numerous respondents to SA63 the allocation was amended to remove the part of Lordship Recreation Ground which was in the allocation. Multiple objections were received to building on the park including: the loss of the football pitch which is an essential facility for young people in Tottenham; the park being vital for health and well being; the park being award winning and protected by a covenant; that there would be less space for events and that the park is linked with the history of the area. Respondents were also concerned that the loss of the park would be detrimental to the people of Tottenham as it is already a very built-up area with a deficiency of open space and that the loss of park space would set a dangerous precedent. There were concerns that development would mean more people with less green space. There were also concerns about implementation including the increased risk of flooding, poor drainage, the reduction of water quality in the Moselle and the potential impact on biodiversity. Therefore the allocation has been amended to remove the park.
- 4.84 Respondents were also concerned about the idea of estate renewal for Broadwater Farm, suggesting that it would destroy the vibrant, cohesive and inclusive communities they have worked hard to create. They also suggested that the **community hasn't been consulted properly** on proposals for the area and that the council should work with the community to improve the area and facilities. Any proposal for improvements to the area would involve masterplanning which would be undertaken in full consultation with the community and would intend to ensure there were opportunities to enhance the community cohesion and vibrancy already present within the estate.
- 4.85 They have suggested there are no structural problems and therefore no reason to suggest demolishing houses. Respondents suggested that it would be better to continue with Decent Homes programme rather than demolition as the estate is only 30 years old and generally in good condition. There was also the suggestion that the **council shouldn't use the problems with Tangmere block to justify renewal** of the entire estate. There was support for demolition of Tangmere block as repairs are **ongoing and don't seem to make a difference**.
- 4.86 Other concerns with the estate renewal included the potential loss of affordable housing and the suggestions that new affordable housing would not be affordable to many in the community. There should be no net loss of social housing. They were **concerned that poorer people would be displaced because they wouldn't be able to afford to live in the new buildings**. It was also suggested that housing associations generally meant an increase in rents and a reduction in tenancy rights. They argued that the Council is displacing poorer people from the borough with wealthier ones from outside the borough. There is concern about where the people of Broadwater Farm will go. They are concerned that development will follow the example set by Woodberry Down where it is suggested existing residents are given substandard care and attention compared to newcomers. Affordable housing would be reprovided in any development on the estate to ensure no net loss of affordable housing by habitable room. In the event of any development, tenure split would be

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determined by housing need, viability and development management policies informed by the adopted housing strategy.

- 4.87 Respondents were also concerned about the inclusion of freeholds on Lordship Lane and the culs-de-sac surrounding the estate including Moira Close. Moira Close residents provide support networks for each other and there is concern that separation of residents could lead to mental illness. Any master planning for this area would seek to address this. The allocation includes these properties as all properties that may have a role to play in the delivery of the objectives of the site allocation were identified. They also suggested that private owners should be offered a sufficient amount of money to find a similar house nearby and that private **tenants may end up homeless if they don't fit one of councils priority need** categories. While these are not strictly planning issues they will be addressed **through Council's rehousing strategy**.
- 4.88 There are also other concerns with potential development on site including traffic congestion, pollution associated with development, pressure on local facilities and the potential loss of community facilities. These issues would be addressed through the development management policies and the update to the infrastructure delivery plan.
- 4.89 There were suggestions that redevelopment could include phasing of development using empty properties to decant people into while blocks were redeveloped one by one. These particular issues are beyond the scope of the site allocation but have been noted.
- 4.90 Tall buildings were also a concern, with respondents suggesting they were not in line with SP11 of the Local Plan: Strategic Policies. One respondent also suggests that as two dwellings are usually built and sold for every social unit any new development would be the size of the barbican to re-house council tenants. However, there was some support for tall buildings with one person suggesting a increasing the heights in some areas could accommodate more units. In line with other allocations, specific heights have been removed from the document as any proposed development will be assessed against development management policies.
- 4.91 Respondents also expressed concern that development seems to be unbalanced in favour of the west of the borough. They suggested there are numerous brownfield sites which could be used for development instead. The site allocations follow the spatial strategy outlined in the Local Plan: Strategic Policies. The Council has explored sites across the borough for development and where appropriate these have been included in the site allocation for development.

### SA64 (The Selby Centre)

5 respondents: 27 comments

- 4.92 There was strong support from The Selby Trust for retention of the site and the role it can play in meeting the need for community use produced by nearby development. The policy seeks to secure re-provision of the community use before any development can occur.

### SA65 (The Roundway)

7 respondents: 12 comments

- 4.93 SA65 has been amended to reflect the changes to the height requirements of the site allocations. This was particularly a concern for The Roundway as a previous **inspector's report stated that a building of four storeys would undermine the** dominance of Bruce Castle. An increase in density will be required to ensure redevelopment is viable however the height will be assessed against the development management policies which take into account impact on local character including heritage buildings.

### SA66 (Leabank and Lemsford Close)

4 respondents: 11 comments

- 4.94 There were no major amendments made to SA66.