

Haringey Local Plan: No Plan Specified Regulation 22(1)(c)(v) Statement of Consultation (Pre Submission)

1. Introduction

- 1.1 Pre-Submission consultation on the Local Plan took place between 8th January and 4th March 2016. Consultation was undertaken in accordance with the Council's Statement of Community Involvement (2011) and in line with regulations of the Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations require the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken on the Local Plan at the Pre-Submission stage, a summary of the main issues raised in response to that consultation, and to detail the Council's response to comments made.

2. Summary of consultation undertaken on the Local Plan

- 2.1 On 23rd November 2015, Haringey's Full Council endorsed 4 DPDs and resolved to publish the documents for consultation for a period of eight weeks and, following consultation, submission to the Secretary of State for independent examination in public (see [here](#))
- 2.3 Formal notification of the Pre-Submission publication of the Local Plan was given on 8th January 2016, and representations were invited for an eight week period ending 4th March 2016. Representations were also invited on the Sustainability Appraisal of the Local Plan Documents during this period.
- 2.4 A formal notice setting out the proposals matters and representations procedure was placed in the 'Haringey Independent' newspaper on both January 8th 2016 and January 15th 2016 (see **Appendix A**). In addition, on 8th January, a total of 1,582 notifications (see **Appendix B**) were sent by post or email to all contacts on the LDF database (see **Appendix C**), including all appropriate general consultation bodies. Additionally 8,484 properties within Site Allocation boundaries were notified. Addresses outside Site Allocation boundaries were not notified directly, but site notices were placed

outside sites. Enclosed with the letter was the Statement of the Representations Procedure (see **Appendix D**). Those emailed were also provided with the web link to the documents on the Council’s Local Plan web pages. All specific consultation bodies (see **Appendix E**) were also notified on 8th January 2016. Unless otherwise requested by the consultation body, enclosed with the notification was a hard copy of the Pre- Submission Local Plan Documents, the Statement of the Representations Procedure, and the Sustainability Appraisal Report. In accordance with Regulation 21 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a separate letter was also sent to the Mayor of London requesting his opinion on the conformity of the DPD with the London Plan 2015 (see **Appendix F**).

2.5 Hard copies of the Pre-Submission Local Plan Documents, the Sustainability Appraisal Report, the Statement of the Representations Procedure and the response form (see **Appendix G**) were made available at the Haringey Civic Centre, the Planning Reception at River Park House, and at all public libraries across the Borough. Additional copies of the Pre-Submission Local Plan Documents were also made available at the libraries for short term loan. The documents were also made available to view and download from the LDF web pages of the Council’s website. The response form was made available on the Council’s website for downloading or could be completed and submitted online. Council’s Facebook and Twitter were also used to advertise the consultation and the dates of the drop-in events held during the consultation period:

Library	Drop In Date and Time
St Anns’s	Monday 18 th January 4 – 7pm
Highgate	Tuesday 19 th January 2 – 5pm
Wood Green	Thursday 21 st January 11am – 2pm
Alexandra Park	Tuesday 26 th January 1- 4pm
Coombes Croft	Wednesday 27 th January 3 – 6pm
Muswell Hill	Thursday 28 th January 4 – 7pm
Stroud Green	Thursday 4 th February 3 – 6pm

Hornsey	Tuesday 2 nd February 3 – 6pm
Wood Green	Thursday 25 th February 4 – 7pm
Tottenham Town Hall	Tues 9th Feb - 6. 30-8. 30pm
639 High Road Tottenham	Monday 15th Feb - 6. 30-8. 30pm
Ferry Lane Primary school	Tues 16th Feb - 6. 30-8. 30pm
Northumberland Park Residents Association	Wed 2 nd March
Dowsett Estates RA	26 th January

2.6 A week prior to the close of consultation a reminder e-mail was sent out to those on the LDF consultation database to remind online consultees of the closing date for making their comments.

3. Duty to Cooperate

3.1 Section 110 of the Localism Act inserts section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A imposes a duty on a local planning authority to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed.

3.2 The other persons prescribed are those identified in regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The bodies prescribed under section 33A(1)(c) are:

(a) the Environment Agency;

- (b) the Historic Buildings and Monuments Commission for England (known as Historic England);
- (c) Natural England;
- (d) the Mayor of London;
- (e) the Civil Aviation Authority;
- (f) the Homes and Communities Agency;
- (g) each CCG;
- (h) the Office of Rail Regulation;
- (i) Transport for London;
- (j) each Integrated Transport Authority;
- (k) each highway authority and
- (l) the Marine Management Organisation.

3.3 The duty imposed to co-operate requires each person, including a local planning authority, to:

- (a) engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and
- (b) have regard to activities of the persons or bodies (above) so far as they are relevant to activities within subsection (3).

3.4 The relevant activities listed under subsection (3) comprises the preparation of development plan documents/local development documents, and activities which prepare the way for and which support the preparation of development plan documents, so far as relating to a strategic matter.

3.5 The Council has and continues to engage constructively with other local planning authorities and other public bodies on the preparation of the Local Plan, following the approach set out in the NPPF. The mechanisms for and evidence of cooperation and engagement is set out below.

Duty to Cooperate – Engagement Undertaken

Cross Boundary Consultee	How we Cooperated	Outcomes
<p>Neighbouring authorities (see map 1)</p>	<p>Letters sent inviting representations on the DPD at both stages of preparation and responses received. (See Consultation Statements)</p> <p>Planning Officer meetings with:</p> <ul style="list-style-type: none"> • Camden: 19 September 2014, 15 June 2015, 13 May 2014, 26 February 2016 • Barnet: 22 September 2014 • Islington: 19 September 2014 • Waltham Forest: 25 September 2014 • Hackney: 8 October 2014, 6 April 2016 <p>ALBPO Meetings</p> <ul style="list-style-type: none"> • 24 November 2015 • 22 October 2015 • 31 March 2015 • 28 November 2013 • 6 February 2013 	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements</p> <p>Cross boundary issues identified included:</p> <p>Enfield/Barnet: Pinkham Way (partly in Barnet ownership) and potential Opportunity Area at New Southgate, with outcome seeking to keep future options open for wider comprehensive development – TfL also engaged in such discussions. More recently, preparation of joint statement on the importance of this spur of the Crossrail 2 project remaining in the initial funding bid to Treasury.</p> <p>Hackney – South Tottenham Residential Extensions SPD and the potential to prepare a joint SPD at point of next review. Agreement to work on the issue/ concept of warehouse living and access to and through the Harringay Warehouse District.</p> <p>Enfield – relationship between Meridian Water's development and North Tottenham – agreement over sharing of infrastructure requirements and joint provision cross boundary to avoid duplication.</p>

		<p>Camden – joint response to the Highgate Neighbourhood Plan ensuring consistency of view from the two LPAs</p> <p>Waltham Forest, Enfield & Hackney: Work on the jointly produced (with GLA) Upper Lee Valley Opportunity Area Framework (OAPF) and OAPF District Infrastructure Funding Strategy</p> <p>Updates given by respective Borough’s on Local Plan progress at All London Borough Planning Officer Group and any cross boundary issues raised. Meetings last held in March - April and are scheduled for every quarter.</p> <p>Hackney & Islington: Joint progression of the Finsbury Park Town Centre SPD.</p>
Environment Agency	<p>Letters inviting representations on the Local Plan documents and Sustainability Appraisal and responses received. (See Consultation Statements for each DPD)</p> <p>Meetings at Council offices:</p> <ul style="list-style-type: none"> • 1 April 2014, 7 July 2014 	<p>Details of representations received and the Council’s actions as a result are detailed in the Consultation Statements.</p> <p>Key area of discussion was regarding sequential testing of proposed development sites in Tottenham.</p> <p>EA provide flood mapping for the Borough.</p> <p>Comments received and taken on board on the Sustainability Appraisal scoping and, in later iterations of the appraisal.</p>
Historic England	<p>Letters inviting representations on Local Plan documents and Sustainability Appraisal and responses received. (See Consultation Statements for each DPD)</p> <p>Written communications between the Council and Historic England</p> <p>Early engagement in seeking view of Historic England on the heritage policies sent before formal consultation.</p> <p>Meetings at Council offices</p>	<p>Details of representations received and the Council’s actions as a result are detailed in the Consultation Statements.</p> <p>Advice on Heritage and Conservation policies given</p> <p>Heritage policies amended in light of specialist advice.</p> <p>Funding from HE to assist in preparing up to date CAAMs for the six Conservation Areas in Tottenham with focus on ensuring heritage conservation and the regeneration</p>

		<p>proposals are better integrated.</p> <p>Further HE funding for completion of the Noel Park CAAM, which is part in and adjoins the Wood Green AAP area.</p> <p>Comments received and taken on board on the Sustainability Appraisal scoping and, in later iterations of the appraisal.</p>
Natural England	<p>Letters inviting representations on all Development Plan Documents and responses received.</p> <p>Engagement on SA</p>	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</p> <p>Comments received and taken on board on the SA scoping and, in later iterations, the assessment of effects on natural habitats. Assistance with Habitats Regulations Assessment ensuring compliance with relevant EU Directives.</p>
Greater London Authority	<p>Letters inviting representations on all Development Plan Documents and responses received.</p> <p>(See Consultation Statements for each DPD)</p> <p>Meetings with Haringey assigned Officer from the GLA to discuss strategic fit of emerging policies</p> <p>GLA Housing Study meetings and work</p> <p>Liaison with specialist officers for policy development regarding affordable housing and sustainability in light of changes to Lifetime Homes etc and London Plan alterations</p> <p>GLA represented on governance boards for the Tottenham housing zone's and the Wood Green AAP.</p> <p>Current engagement on Crossrail 2 spur serving Wood Green.</p> <p>Submitted responses to the Further Alterations to the London Plan consultation.</p>	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</p> <p>Officer advice on policy development to ensure there are no conflicts with the strategic London Plan – especially release of industrial land, affordable housing provision and meeting strategic housing requirements.</p> <p>Participation in the London wide SHLAA and SHMA evidence base studies – most recently the call for sites.</p> <p>Agreement to methodology for surveys on Town Centre Health Checks to take place mid-2016.</p> <p>Discussions held, advice, and funding agreed for tall buildings policy work, including the acquisition of 3D model and zmapping. GLA input into brief and commitment to further involvement on subsequent Tall Buildings and Views SPD.</p> <p>Housing Zone confirmed for Tottenham and ongoing work regarding implementation of development schemes in accordance with agreed DCS and High Road West masterplans – including GLA assistance on procurement</p>

		process for delivery vehicle.
Civil Aviation Authority	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)	Details of representations received are provided in the Consultation Statement. No major issues raised. Further engagement likely to be required on the Tall Buildings and Views SPD, which sets upper parameters for tall buildings within growth areas.
Haringey Clinical Commissioning Group (CCG)	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Infrastructure Delivery meetings and correspondence.	Details of representations received and the Council's actions as a result are detailed above. Consulted on evidence base documents, and provided information to inform future service delivery, including 'deep dive' for North Tottenham, Tottenham Hale, Green Lanes and Wood Green areas, resulting in floorspace figures for new provision for CCG to take forward to capital bid stage. Continued engagement on healthcare requirements/priorities being reflected in local plan policies, including those that address obesity and mental health.
Homes and Communities Agency	Letters inviting representations on all Development Plan Documents	Details of representations received are provided in the Consultation Statement. No major issues raised
Highways Agency/ Highways England	Letters inviting representations on all Development Plan Documents and responses received.	Details of representations received are provided in the Consultation Statement. No major issues raised
Transport for London	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Quarterly 1:1 meetings to discuss all transport related matters. Liaison with TfL regarding transport study modelling and findings Infrastructure Delivery. Meetings and correspondence on specific transport projects. Meetings on Crossrail 2 proposals Engagement on DCF for the Upper Lee Valley OAPF.	Details of representations received and the Council's actions as a result are detailed in the Consultation Statement. Agreed the methodology for transport modelling of broad growth assumptions, and the results of the findings of the study, using TfL data. Consulted on evidence base documents, and provided information to inform future infrastructure provision in particular around Tottenham, including the Station overdevelopment, Bus station Improvements, STAR, cycle superhighway, White Hart Lane station improvements, and

		<p>Crossrail2. Further engagement on Crossrail 2 following Council’s proposal for a single station serving Wood Green, extension to New Southgate, and subsequently, Growth Commissions recommendation that spur be delayed. Confirmation of population projections and sites informing infrastructure provision across the Lee Valley OAPF area, in recognition of refresh.</p>
Office of Rail Regulation	<p>Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)</p>	<p>Details of representations received are provided in the Consultation Statement. No major issues raised.</p>

4. Who Responded and the Number of Representations Received

- 4.1 There were 49 representations received to the Pre-Submission consultation with no Policies specified. **Appendix H** provides a full list of the respondents. The comments are provided by Respondent order at **Appendix I** and by Alternation order (grouped by relevant chapters in the Strategic Policies DPD) at **Appendix J**.
- 4.2 6 representations to the Schedule of Alterations to the Strategic Policies were received after the deadline for the close of the publication period. These respondents are listed at **Appendix K** and were subsequently notified of the fact that their representation was not duly made, and that it would be for the appointed Planning Inspector to determine whether the matters raised therein would be considered. In the event that the appointed Planning Inspector wished to take these late representations into account in their examination of the Schedule of Alterations to the Strategic Policies, the individual late comments are provided at **Appendix L** along with Council’s response to each. These are provided in Respondent order only.

5. Summary of the main issues/comments raised to the Pre-Submission consultation – No Specific Plan Identified

5.1 Regulation 22(1)(c)(v) requires a summary of the main issues raised in representations made to the pre-submission Schedule of Alterations to the Strategic Policies and the Proposals Map. Pursuant to this requirement, the following paragraphs set out the main issues raised in respect of the proposed alterations, grouped by the relevant chapter within the Strategic Policies DPD, and to the Proposals Map.

General

A number of representations were received which argued that the Council was, through the Local Plan, effectively favouring private industry / developers, rather than seeking to address the needs of local residents. Some pointed to the Council's emerging development vehicle as evidence that the Council is already aligning with private developers. In response it was reiterated that the role of the Local Plan was to manage development and growth by ensure developable site were identified with sufficient capacity to meet Haringey's objectively assessed needs for housing, employment, retail, community facilities and other land uses.

Some respondents considered that the Council had undertaken no consideration of alternatives in preparing the plan. Further to this, a respondent suggested that the plan was single dimension, in that it solely depended on private property development to ensure delivery. The Council directed respondents to the Sustainability Appraisal for each of the DPDs, which sets out and assesses reasonable alternatives. The Plan is heavily reliant on the private development sector for its delivery, including affordable housing, infrastructure and other public benefits, including new jobs.

There were some respondents who considered that the Council had failed in meeting the Duty to Co-operate in preparing the Local Plan by not consulting directly with certain amenity or interest groups, none of which were bodies specifically prescribed by the regulations.

One respondent advocated that the Council should review the pre-submission plan to take account of Housing and Planning Bill. It was noted that the implications of the now Act, may require the bringing forward of further alterations following adoption of the current proposed Local Plan.

Equalities

There were some representations on equalities, with those commenting arguing that the plan would have adverse equalities impacts. Some respondents suggested more specifically that the plan will discriminate against black households, particularly in respect of availability and provision of affordable

housing. The latter relates clearly to the EqIA undertaken for Council's draft Housing Strategy rather than the EqIA for the Local Plan, which identified mostly positive impacts on protected groups.

Housing

There were a significant amount of representations on the Local Plan housing proposals. These included objections to the demolition of Council estates / social housing, and arguments that the plan is not doing enough to ensure provision of affordable housing for local people (particularly Tottenham residents), whom they feared would be priced out of the area. Many respondents considered that the Council should focus on the protection and refurbishment of existing estates, rather than demolishing homes. Such responses largely ignored the fact that estate renewal is only proposed for a small estates and that refurbishment is taking place, through the Decent Homes Programme, across the vast majority of Council's housing stock.

Some respondents considered that too much emphasis was being put on private sector housing development at the expense of housing that might be more affordable to existing Haringey residents. Council's response centred on the need for private housing, and that this also helped pay for more affordable forms of housing as well as supporting infrastructure provision and local jobs.

There were representations arguing that the plan does not respond to the local evidence base (including the Housing Needs Assessment 2007 & SHMA 2014) but these failed to recognise the fact that the need for affordable housing outstripped supply and that, to be deliverable, the policies of the Local Plan could not render development unviable, which meant that a low borough-wide target for affordable housing was necessary.

One respondent considered that the Local Plan does not adequately address student housing needs.

Design

There were a number of representations on design. This included concerns raised and/or objections to the development of tall buildings, including at specific locations, such as Hale Wharf. It was suggested that the plan had not made any consideration of alternatives to tall buildings. Some respondents also requested that specific building separation distances and prescribed building heights be reintroduced, as provided in previous Regulation 18 draft documents. The Council acknowledged that the intensification of brownfield sites was necessary to respond to Haringey's and London's housing needs and that the plan identified suitable locations for tall buildings and included policies aimed at further ensuring these were of high architectural quality and added to the interest and attractiveness of the area.

One respondent considered the plan unsound owing to the use of the Urban Characterisation Study. While not formally adopted by the Council, the UCS does from an important evidence base underpinning the Local Plan.

Finally, there were suggestions for views to be included in the Council's view management framework. It was noted that these could be assessed as part of any future review of the Plan or in the development of a Supplementary Planning Document that addressed local views.

Town centres

There was an objection to proposal to designate a new town centre at Tottenham Hale. The Council set out that this was important in meet the local needs of the new residents into the area and for the regeneration of the wider area. It was noted that the existing Retail Park could however, remain on site for much of the plan period because of the safeguarding order for Crossrail 2 utilising parts of this site.

Infrastructure

A number of respondents expressed concern that the plan does not make sufficient provision for infrastructure and community facilities needed to support the considerable growth planned, including schools, health care, and other provision. Council's response pointed to the Infrastructure Delivery Plan, which assesses and sets out the physical and social infrastructure needed to match growth within the Borough.

There was an objection to the proposed Green Grid, with the responding indicating there was a lack of detail on where Green Link were planned, and objecting to any link through Down Lane Park.

Consultation

A number of representations were received on the plan soundness/legal compliance in respect of consultation process. Respondents considered that the public was not adequately consulted for reasons including: the online tool was difficult to use; the consultation and drop in sessions were not adequately publicised, the consultation documents were too difficult to understand; there were not enough printed copies made available; and letters were only sent out in English. The Council confirmed that the consultation was undertaken in accordance with the adopted Haringey Statement of Community Involvement and planning regulations. In most instance, the Council also utilised additional consultation methods to advertise the consultation including the use of social media as well as site notices.

Appendix A – Notice placed in the local newspaper on both the 8th and 15th January 2016

thetottenhamindependent.co.uk

January 15, 2016 25



TO ADVERTISE: 01923 216232
Email: classifiedads@london.newsquest.co.uk

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HARINGEY LOCAL PLAN PUBLIC NOTICE
Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England) Regulations 2012
Publication of a Local Plan (Regulation 19) Haringey's Local Plan documents:
Alterations to Strategic Policies; Development Management DPD
(Pre-submission); Site Allocations DPD (Pre-submission); and
Tottenham Area Action Plan (Pre-submission)

Haringey Council has prepared the proposed submission versions of the above Development Plan Documents (DPDs), which form Haringey's Local Plan to guide planning and development in the borough up to 2026 and beyond. The Strategic Policies (adopted 2013) is subject to a partial review to take account of new growth requirements for the borough as set out in the London Plan as well as the findings of updated evidence base studies. The Development Management DPD contains the general planning policies for the borough that will be used to assess and determine planning applications for new development. The Site Allocations DPD identifies sufficient development sites, outside of the Tottenham AAP area, to meet the identified needs for housing, jobs, and the delivery of required infrastructure. The Tottenham Area Action Plan sets out relevant policies, proposals and site allocations for future development within the Tottenham area. The DPDs are accompanied by a Sustainability Appraisal, Habitats Assessment and an Equalities Impact Assessment.

Inspection of documents
The Council is inviting representations on the above DPDs and the accompanying documents. They are available for inspection from **Friday 8th January to Friday 4th March 2016**:

- at all Haringey libraries (during normal opening hours);
- at the Civic Centre, Wood Green N22 8LE;
- at the Planning Service, 6th Floor, River Park House, 225 High Road Wood Green, N22 8HQ; and
- on line at www.haringey.gov.uk/localplan.

Representation procedure
The DPDs are being published in order for representations to be made prior to the documents being submitted to the Secretary of State for examination in public. Representations received during this pre-submission consultation will be considered alongside the submitted DPDs by an independent Planning Inspector. The purpose of the examination is to consider whether the DPDs comply with legal requirements and are 'sound' against the test of soundness prescribed by the Government in the National Planning Policy Framework (2012). To be 'sound' the DPDs must be positively prepared, justified, effective and consistent with national planning policy and in general conformity with the London Plan (2015). Representations may be accompanied by a request to be notified at a specific address about the submission of the DPDs to the Secretary of State for examination in public. All comments must be made on a 'representation' form which is available at the above venues and on the Council's website. Representations must be received by 5pm on **Friday 4th March 2016**. Representations may be made by any of the following means:

- the online response form at www.haringey.gov.uk/localplan
- by email at: ldf@haringey.gov.uk or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Further Information
For enquiries, email ldf@haringey.gov.uk or contact the Planning Policy Team on 020 8489 1475 or at the above address.
Dated 8th January 2016

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- the online response form at www.haringey.gov.uk/localplan
- by email at: ldf@haringey.gov.uk or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Further Information
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Dated 8th January 2016

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Planning) (England) Regulations 2012

Publication of a Local Plan (Regulation 19) Haringey's Local Plan documents: Alterations to Strategic Policies; Development Management Policies (Pre-submission); Site Allocations (Pre-submission); and Tottenham Area Action Plan (Pre-submission)

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Representations may be accompanied by a request to be notified at a specific address about the submission of the DPDs to the Secretary of State for examination in public.

All comments must be made on a 'representation' form which is available at the above venues and on the Council's website. Representations must be received by **5pm on Friday 4th March 2016**. Representations may be made by any of the following means:

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- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Further information

For enquiries, email ldf@haringey.gov.uk or contact the Planning Policy Team on 020 8489 1479 or at the above address.

Dated 6th January 2016

Appendix B – Notification Letter sent to all Consultees on the Council’s LDF Consultation Database

Date: 6th January 2016
Contact: Planning Policy Team
Direct dial: 020 8489 1479
Email: ldf@haringey.gov.uk

Dear Sir/Madam,

Haringey Local Plan Pre-Submission Public Consultation

8th January 2015- 4th March 2016

Haringey Council is now consulting on the final drafts of four Development Plan Documents (DPD), which make up Haringey’s Local Plan. These include:

- Alterations to the Strategic Policies;
- Development Management Policies;

- Site Allocations; and
- Tottenham Area Action Plan

These documents have been prepared in response to the previous consultation in February/March 2015; and earlier consultations on the Development Management Policies in 2013; and the Site Allocations and Tottenham Area Action Plan in 2014. We are now seeking your views on the final drafts of the above plans.

The Strategic Policies (adopted 2013) set out the Council's spatial strategy for how Haringey will develop and grow over the period to 2026. The partial review of the policies take account of new growth requirements for the borough as set out in the London Plan as well as the findings of updated evidence base studies.

The Development Management Policies contains the general planning policies for the borough that will be used to assess and determine planning applications for new development. Once adopted, the policies will replace those contained in the Haringey Unitary Development Plan (2006).

The Site Allocations identifies sufficient development sites, outside of the Tottenham AAP area, to meet the identified growth needs/targets set out in the Strategic Policies DPD, including those for housing, jobs, and the delivery of required infrastructure. It also establishes specific site requirements against which planning applications will be considered.

The Tottenham Area Action Plan sets out policies, proposals and site allocations for future development within the Tottenham area, based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

A Local Plan Policies Map has also been produced to graphically represent the planning designations and policies contained in the four DPDs.

Following this consultation, the documents along with the consultation responses will be submitted to the Secretary of State for independent examination.

Please find enclosed a Statement of Representations Procedure, which provides details of how you can provide your comments on the documents, all of which are available to view at www.haringey.gov.uk/local-plan ; and in hard copies at all public libraries, Planning Service offices, 6th Floor, River Park House, 225 High Road Wood Green, N22 8HQ, and the Civic Centre, Wood Green N22 8LE.

Please provide us with your comments via:

- The online response form at <http://haringey.gov.uk/localplan>
- by email at: ldf@haringey.gov.uk; or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Comments must be received by 5pm on Friday 4th March 2016.

Comments may be made in support of the policy documents, as well as in objection. However, at this stage of the Local Plan's production it is required that your comments focus on the legal compliance and soundness of the documents. Details of what constitutes legal compliance and soundness can be found in the Statement of Representation Procedures attached. In addition, the Sustainability Appraisal and supporting evidence base are available to view and download from the Council's website: www.haringey.gov.uk/localplan.

Next Stages

Following the end of the consultation period, copies of all responses received will be sent to the Planning Inspectorate for consideration alongside the documents, together with a summary of the key issues, including the Council's responses to the points raised.

The Council anticipates that the Examination in Public will take place in summer 2016. We will regularly update our website www.haringey.gov.uk/localplan with information about this. If you would like to find out more about the Local Plan you can call the Planning Policy team on 020 8489 1479 or email us at ldf@haringey.gov.uk.

Yours faithfully,

Stephen Kelly

Stephen Kelly, Assistant Director, Planning

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

Individual First Name	Individual Family Name	Councillor/MP Name
Lynne	Zilkha	Cllr Adamou Gina
Jasper	Woodcock	Cllr Adje Charles
Heather	Wood	Cllr Ahmet Peray
Kitty	Wong	Cllr Akwasi-Ayisi Eugene
John	Wise	Cllr Amin Kaushika
Teresa	Wing	Cllr Arthur Jason
Carolyn	Whitehead	Cllr Basu Dhiren
Edward	Webb	Cllr Beacham David
Julia	Warburton	Cllr Berryman Patrick
Jonathan	Vellapah	Cllr Bevan John
Nick	Trivias	Cllr Blake Barbara

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

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

Nicholas	Rusz
Joyce	Rosser
Jeff	Rollings
Chris	Roberts
Lorna	Reith
Barry	Rawlings
Kimberley	Pyper
Annabruna	Poli
Karl-Dirk	Plutz
Richard	Perry
Andrew	Papadopoulos
Pavel	Pachovský
Christopher	Owen
Stephen	Overell
Gerrit	Ormel
Christian	Ogilvie-

Cllr Gallagher Tim
Cllr Goldberg Joe
Cllr Griffith Eddie
Cllr Gunes Makbule
Cllr Hare Bob
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

	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	McNam

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

	ara
Peter	McNamara
Richard	Max
Kim	Mason
Colin	Marr
Jason	MacKay
Stephen	Lubell
John	Long
Alison	Lister
Barry and Louise	Lewis
Rebecca	Lellis Ferreira
Ethan	Lazell
Charlie	Kronick
Heather	Kinnersley
Angie	Kikkides
Gabrielle	Kagan

Cllr Waters Ann
Cllr Weston Elin
David Lammy MP
Lynne Featherstone MP

Company/Organisation
A Anva Ltd
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

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

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

Joe	Friedman
Hannah	French
Elaine	Graham
Sean	Fewlass
Carla	Ferrarello
Pasco	Fearon
Cindy	Evans
Sue	Ettinger
Chris	Elser
Kieron	Edwards
Johnny	Dixon
Angharad	Davies
Felipe	Da Rocha
Ruth	Cowan
Stephen	Cook

Alexander Elliot Ltd
Alexandra Mansions Tenants Association
Alexandra Palace Action Group
Alexandra Palace Residents Association
Alexandra Park/Grove Lodge Meadow Allotments
Alexandra Primary School
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

Kenneth	Connolly
Anastasia	Christofis
David	Burrowes MP
Paul	Bumstead
Paul	Brown
Stephen	Brice
Jill	Bowden
Tim	Blake
Anna	Blackburn
Matthias	Bauss
Frances	Basham
Miles	Attenborough
James	Athanasiou

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

Ruth	Antonia des
Paulette	Amadi
Linda	Alliston
Andreas	Adamides
Leila	Sifri
Eliza	Kaczynska-Nay
Cynthia	Jenkins
Robert	Franks
Selina & Dan	Egerton
Tinu	Cornish
Lucia	Brusati
Tim	Brierley
Arthur	Leigh
Beatrice	Hyams

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
Bahai Community
Bangladesh Muslim Organisation
Bangladeshi Cultural Society

Valerie Rose	Berry
Bill	Temple - Pediani
Laura	Forrest- Hay
Sarah	Lane
Elizabeth	Gray
Nicola	Vennin g
Panos	Nicolaid es
Poppy	Rose
Christopher	Chadwi ck
Barry	James
Bob	Maltz
Flavio	Poli
Reuben	Payne
Hannah	Redler Hawes

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

John	Murray
Christine	King
Jon	Brooks
Chris	Warbur ton
David	Lichten stein
Nick	Oparva r
Ruth	Ortiz
Ursula	Riniker
David	Baker
Michele	Eastmo nd
Chris	Mayled
Jeremy	Munda y
Nicholas	Embling
Andrew	Tiffney

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
Broadwater Farm Community Centre

Elizabeth	Barnett
Angela	Rossi Carter
Tony	Baker
Gordon	Forbes
Huub	Nieuws tadt
Bill	Nottag e
Frederick	Limbay a
Feolezico	Calboli
Sue	Penny
J N	Douglas
David	Rennie
Steve	Roe
Katy	Andrew s
Sophie	Cattell

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

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
Haringey Fire Service
London Ambulance Service

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
Central & Cecil
Centre for Accessible Environments

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

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

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
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

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
Community Church of God
Community Gay & Lesbian Association
Community Response Unit
Community Safety Unit
Confederation of British Industry
Co-op Homes
Coppetts Residents Association

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

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

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
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

Cypriot Women's League
Cyprus Turkey Democratic Association
D R M Associates
DASH
David Langan Architects
Dental Health Centre
Dental Practice
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

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

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

Fortismere Residents Association
Garden Residents Association
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

Organisation
Ferry Lane Estate Residents Association
Finsbury Park Track & Gym
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

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
Resident Association

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
Friends of Wood Green Common

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.

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

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 Assocation/Noel Park Conservation Area Advisory Committee/Friends of Noel Park
Parkside & Malvern Residents Association
Parkside Malvern Residents Association
Rookfield Estate Residents Association
Sandlings Residents Association

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
Haringey Autism
Haringey Breastfeeding Centre
Haringey Community Volunteer
Haringey Deaf Group

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 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

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
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

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
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

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

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

Black & Ethnic Minority Carers Support Service
BME Community Services - Selby Centre
BPTW
British Waterways
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)

Hornsey YMCA
Housing 21
HPN Ltd
HTBG Residents Association
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

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

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.

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

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
HAVCO
Her Majesty's Court Service
HFRA (Haringey Federation of Residents Association)
Home Builders Federation - London

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
London Islamic Cultural Society
London Islamic Cultural Society
London Port Health Authority
London Walking Forum

Home Office
Home-Start Haringey
Hornsey CAAC
Hornsey Historical Society
Hornsey Vale Community Association
Hornsey Vale Community Association
Jala - Johnanthan 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 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

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
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

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
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

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

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

Planning Perspectives
Pollard Thomas & Edwards Architects
PTEA
Rapleys
Rapleys
Redrow Homes (Eastern) Ltd
Restoration Community Project
Rookfield Estate Residents Association
RPS Planning
Sandlings Residents Association
Savills
Savills
Savills
Savills
Savills Planning
Savills

New River Action Group
New River Sports Centre
New Space
New Stroud Green Health Centre
Newton Architecture
NHS London
Nightingale Primary School
Noel Park Infant & Junior School
Noel Park North Area Residents Association
Noel Park Over 55's Club
North Grove Residents Association
North Harringay Infant & Junior School
North London West Indian Association
Northumberland Park Community School
Northumberland Park Tenants & Community Association
Northumberland Park Women's & Childrens Centre

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

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

The Ramblers
The Theatres Trust
<u>Sustrans</u>
Tiverton Primary School
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

Park Vue Dental Practice
Parsons Brinckerhoff Ltd
Partridge Way Residents Association
Pathmeads
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

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

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

Planner
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

Robert Burns Residents Association
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

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
Methodist Homes
Network Housing
Network Housing

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
Sophia House Residents Association
South Harringay Infant School
South Harringay Junior School

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

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

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
Origin Housing
Origin Housing
Origin Housing Group
Pocket
Pocket
Pocket Living
Sahil HA
Sahil Housing

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
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

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

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

Exposure Organisation
Open Door
Open Door
Open Door
Space Design Consultants Ltd
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

Symon Smith & Partners
T.B.F.H.A
Tasou Associates
Temple of Refuge
Templeton Associates
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

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

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
Myddleton Road Surgery
The Surgery

Muswell Hill Centre
Coleridge Primary School
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

The Surgery
The Surgery
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

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
London Borough of Enfield
Collins & Coward
Hornsey Historical Society member

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
Turkish Cypriot Counselling Group
Turkish Cypriot Elderly Group
Turkish Cypriot Forum

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
Level 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

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

Arriva
Metroline
First Capital Connect
First Capital Connect
TfL
TfL
TfL
TfL
TfL London Rail
LOROL
Metroline
Abellio
Go Ahead
Greater Anglia
Haselmere Residents Association
Haselmere Residents Association
London Travel Watch - Chair of Consumer Affairs
London Travel Watch

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
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

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

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

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

Xeva Design Concepts
Yabsley Stevens Architects
Young Lesbian Group
Youth One Stop Shop
Youth Theatre Project
Zatkhon Construction Co. Ltd.
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 – Statement of Representation Procedure

Statement of Representations Procedure for the Haringey Local Plan:

Alterations to the Local Plan Strategic Policies Proposed Submission (Regulation 19)

Development Management DPD Proposed Submission (Regulation 19)

Site Allocations DPD Proposed Submission (Regulation 19)

Tottenham AAP Proposed Submission (Regulation 19)

As part of the local Plan, Haringey Council plans to submit four Local Development Documents (Alterations to the Local Plan: Strategic Policies DPD, the Development Management DPD, the Site Allocations DPD, and the Tottenham Area Action Plan) to the Secretary of State for Communities and Local Government. The submission documents are being published for representations.

Title of Documents

Alterations to the Local Plan Strategic Policies: Pre-Submission Consultation

Development Management DPD: Pre-Submission Consultation

Site Allocations DPD: Pre-Submission Consultation

Tottenham AAP: Pre-Submission Consultation

Subject Matter

The Strategic Policies were adopted in 2013 and sets out the Council's spatial strategy for how Haringey will develop and grow over the period to 2026. A partial review is proposed to take account of new growth requirements for the Borough as set out in the London Plan (2015) as well as the findings of updated evidence base studies. A schedule of proposed changes is subject to public consultation and comment.

The Development Management Policies DPD sets out the policies that will be used to assess and determine planning applications for development across the borough. Once adopted, the policies will supersede those contained in the Haringey Unitary Development Plan (2006).

The Site Allocations DPD allocates 'proposal sites' for development where opportunities have been identified, and identifies new or revised designations to which planning policies will apply (including shopping frontages and reclassification of industrial designated land), outside of the Tottenham AAP area. Once adopted, the proposal sites and designations will appear on the Haringey policies map, replacing that which accompanies the Haringey Unitary Development Plan (2006).

The Tottenham Area Action Plan proposes a comprehensive set of policies, proposals and site allocations for future development within the Tottenham area based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

Area Covered

The draft Tottenham Area Action Plan area comprises the wards of Northumberland Park, Tottenham Hale and Tottenham Green, and parts of the Bruce Grove, St. Ann's and Seven Sisters.

The Strategic Policies (Partial Review) and Development Management Policies apply to the entire Borough, while the draft Site Allocations DPD applies to that part of the Borough outside of the draft Tottenham AAP boundary.

Period within which representations must be made

Representations must be made between **8th January and received no later than 5pm Friday 4th March 2016.**

Where have the documents been made available, and the places and times at which they can be inspected:

The four DPDs and supporting documentation are available for inspection at the following locations:

- Council's website www.haringey.gov.uk/localplan
- Haringey Civic Centre, Wood Green High Rd, N22 8LE
- Level 6 River Park House, Wood Green, N22 8HQ
- At all of Haringey's libraries (see details below)

Address	Opening Times	Address	Opening Times
Alexandra Park Library Alexandra Park Road, N22 7UJ	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm	Coombes Croft Library Tottenham High Road, N17 8AG	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
Highgate Library Shepherds Hill, Highgate, N6 5QT	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed	Hornsey Library Haringey Park, Hornsey N8 9JA	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm
Marcus Garvey Library 1 Philip Lane, Tottenham Green N15 4JA	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm	Muswell Hill Library Queens Avenue, Muswell Hill N10 3PE	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
St Ann’s Library Cissbury Road, Tottenham N15 5PU	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed	Stroud Green and Harringay Library Quernmore Road N4 4QR	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
Wood Green Library High Road, Wood Green N22 6XD	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm		

Making a representation

The Council welcomes comments on the four DPDs. At this stage of the plan-making process, it is important that representations are made in the format included on the representations response form. These are available alongside consultation documents both online and in hard copy form.

Representations can be made via:

- the online response form at <http://haringey.gov.uk/localplan>
- by email at ldf@haringey.gov.uk
- by post to Local Plan Consultation, Level 6, River Park house, Wood Green, N22 8HQ

Please note that all responses received will be made publically available.

Comments must be received by 5pm on Friday 4th March.

For any further enquiries, please email ldf@haringey.gov.uk or contact the Local Plan Team on 020 8489 1479

Appendix E – List of Specific Consultation Bodies

Greater London Authority

English Heritage

The Coal Authority

Environment Agency

The Historic Buildings & Monuments Commission for England

Natural England

London Midland

Harrow Primary Care Trust

Defence Infrastructure Organisation

British Gas PLC Group

EDF Energy

Thames Water Utilities Ltd

Thames Water Property

Veolia Water Central

Homes and Communities Agency - London

Planning Inspectorate

Communities and Local Government

Entec on behalf of National Grid

Appendix F – Letter to the Mayor of London

Mayor of London

City Hall

The Queen's Walk

London

SE1 2AA

Date: **11th January 2016**

Contact : Planning Policy Team

Direct dial: 020 8489 1479

Email: ldf@haringey.gov.uk

Dear Mayor,

Haringey Local Plan Regulation 19 Pre-Submission Public Consultation

8th January 2016 - 4th March 2016

As you are aware, Haringey Council has recently published four Local Plan documents for pre-submission consultation in accordance with Regulation 19(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The four Development Plan Documents are the:

- Alterations to the Strategic Policies 2011 - 2026;
- Development Management DPD;
- Site Allocations DPD; and
- Tottenham Area Action Plan.

Copies of these are enclosed.

Pre-submission consultation on the DPDs will run for eight weeks from **Friday, 8th January** to **Friday, 4th March 2016**.

I write to you pursuant to section 24(4)(a) of the Planning and Compulsory Purchase Act (2004) and Regulation 21(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 to seek your opinion as to the conformity of the pre-submission Development Plan Documents with the London Plan.

In accordance with the statutory requirements, I would be grateful to receive your opinion no later than Friday 4th March 2016.

Yours sincerely,

Matthew Patterson

Matthew Patterson, Head of Strategic Planning

cc. Graham Clements, Greater London Authority

Appendix G – Response Form

Haringey Local Plan Pre-submission

Response Form

Pre-Submission Consultation

The council is publishing four Development Plan Documents for consultation. These are the:

- Alterations to the Strategic Policies (DPD) (adopted 2013)
- Draft Tottenham Area Action Plan: Preferred Option
- Draft Development Management Policies (DPD): Preferred Option
- Draft Site Allocations (DPD): Preferred Option

They will be submitted to the Secretary of State for Examination in Public later this year. This is your final chance to make comments on the documents.

How to Make Comments

This form is designed for postal comments, if you wish to respond by email, please use the word compatible version of this form which is available for downloading from the Council's website www.haringey.gov.uk/localplan.

Please note that you need to use a separate Part B form for each comment that you make. Your comments will be considered by a Planning Inspector, therefore they should only relate to the “tests of soundness” (see DPDs appendices and the guidance note on our website for more information on the “tests of soundness”).

Complete the form overleaf and return to:

Local Plan team
Level 6, River Park House,
Wood Green

Or by email to:
ldf@haringey.gov.uk

Or on-line:
www.haringey.gov.uk/localplan


London
N22 8HQ

To ensure your comments are considered, please ensure we receive them by **5pm on Friday 4th March 2016**.

Next Steps

In the summer of 2016 the Planning Inspector will hold an “Examination in Public” to consider the DPDs and comments made to them. The timetable for the Examination in Public will be advertised when it has been confirmed.

For further information please visit www.haringey.gov.uk/localplan or email ldf@haringey.gov.uk

Ref: (for official use only)	Local Plan Publication Stage Response Form	
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Name of the DPD to which this representation relates:

Please return to London Borough of Haringey by 5pm on Friday 4th March 2016

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

Part A

1. Personal Details ¹	2. Agent's Details
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Address Line 2	
Address Line 3	
Post Code	
Telephone Number	
Email address	

¹ If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

Part B – Please use a separate sheet for each response

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

4.(3) Complies with the Duty to co-operate Yes No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet/ expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

9. Signature

Date:

Appendix H – Respondents to the Pre-Submission Local Plan (no plan specified)

ID	Respondent	Wishes to Attend Hearings	ID	Respondent	Wishes to Attend Hearings
1	Maria and Roger Nyemecz	yes	26	David Stoker	Yes
2	Bibsi Haywill	Yes	27	Pavlos Mastiki	No
3	Fiona English and Mark Ellerby	Not stated	28	Seema Chandwani	No
4	Zena Brabazon	yes	29	Milena Buyum	No
5	Gary Phoenix	Not stated	30	Broadwater Farm Residents' Association	Yes
6	Our Tottenham	Yes	31	Sainsbury's Supermarkets Ltd	Yes
7	Bob Lindsay-Smith	Yes	32	Michael Hodges	Yes
8	Noah Tucker	Not stated	33	Ann McTaggart	Not stated
9	Canal and River Trust	Not stated	34	Walter Lee	Yes
10	Melissa Friedberg	Not stated	35	Suat Asan	Yes
11	James Carey	No	36	Habieziun Hagos	No
12	Keith Flett	No	37	Haringey Defend Council Housing	Yes
13	Ruth Gordon	No	38	House Builders Federation	Yes
14	Marcin Korowiecki	Not stated	39	Deloitte on behalf of National Grid	Not stated
15	Lilian Kaluma	Not stated	40	Lynne Zilkha	Not stated
16	Jon Hughes	Not stated	41	Stroud Green CAAC	Not stated
17	Marco Consolaro	Yes	42	Highgate Society	Not stated
18	Lena Elliott	Not stated	43	Iceni Projects on behalf of Berkeley Homes (North East London Limited)	Yes
19	Nicholas Fenton	Not stated	44	Mrs Deman Abdulla	Yes
20	Luci Davin	Not stated	45	Ms Ozgul Aslan	No
21	Luan Hoxha	No	46	Mario Petrou	Not stated
22	Patrick Watson		47	Constantine J. Smith	No
23	Shirlie Ritchie	No	48	Chris Roche	No
24	Martin Ball	Yes	49	Martin Hyacinth	Not stated
25	Kelly Arnstein	Yes			

Appendix I: Responses to the Pre-Submission Consultation: No Plan Specified

Respondent 1: Maria and Roger Nyemecz

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	NPS1	N/A	No response given	No	Distance from Teresa Walk especially number 7. This project has used every loophole in the planning application and you as our representatives in this matter have failed with the duty of care for your residents for the sake of financial gain. The area is already densely populated and you have made no requirements of the developer for adequate parking. You have been from the outset hand in glove with the developer, agreeing to all their plans and disregarding our objections. When this project is finished you can come and sit in one of the apartments and almost touch number 7. I know these comments are futile based on your previous history and I wonder to what end they benefit you who do not have to live here.	Re-introduction of height and distance requirements.	Heights and separation distances will be determined as part of detailed planning applications.

Respondent 2: Bibsi Haywill

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	NPS2	all	No	Yes	I do not think the plans are sound, regarding the equality impact assessment.	You need to base your housing policy on the needs of the people in your	The Council does not agree that the local plan's housing plan will disadvantage BME
2	NPS3	all	No	Yes			

				<p>Considering black people make up nearly half of the population in some areas of the borough, it is outrageous that you are going ahead with a housing plan that you openly admit will disadvantage black people. Your response to this equality impact assessment is also ridiculously impractical. You suggest people take legal action or are paid for any inconveniences, but I ask you this: what use will it be for someone to take legal action for their lost home, AFTER it has been demolished (re plans to demolish council estates)? Obviously, in order for the problem to be redeemed, the council estates simply shouldn't be demolished in the first place. You may argue that some are being demolished to simply modernise them and make them better; in which case you need to guarantee that all the people currently living in the sites to be demolished, will not only get their home back in the same location, but will do so at no extra costs (e.g heightened rent).</p>	<p>constituancy, i.e if half the people are black, you need to ensure that half your housing policy is dedicated to ensuring black people have homes which are affordable TO THEM (i.e relative to their income) and in good condition. And these homes need to be stable, i.e long term contracts. Obviously the proper response to the equality impact assesment re the local plan, would be to modify the local plan so it DOES meet the needs of your constituents, i.e change the housing policy so it does advantage black people. You may argue that some council estates are being demolished only in order to modernise or improve them; in which case, you need to guarantee for every person living in these estates now that.</p> <ol style="list-style-type: none"> 1. they will be rehomed in the local area 2. they will pay no extra cost (e.g heightened rent) for their home 3. they will have the same number of 	<p>residents. The respondent refers to the EQiA that was carried out in relation to the Housing Strategy. The EQiA that was published with the draft Housing Strategy identified a cause of concern in the take up of one particular type of housing, which is Shared Ownership. Shared ownership (part-rent part-buy homes) consisted of around 135 units a year during the last two years, whilst social housing lets over the last two years were around 600 a year. The findings related to the shared ownership take up, are not directly related to the issue of estate renewal. The Council is taking action to mitigate the imbalance of households who buy into shared ownership schemes, by undertaking further research and monitoring, and by ensuring that its marketing and sales are targeted at local households.</p> <p>The housing policy governing estate renewal, which has</p>
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					<p>I do not believe the whole local plans response to the equality impact assessment to be sound. The impact assessment openly admits that the local plan's housing plan will disadvantage black people. That a plan could disadvantage a people which makes up nearly half of the population of some constituents in Haringey, is ridiculous. You are the council. You are meant to represent the needs of your people, and so making a plan which will actually disadvantage a large number of these people is wholly out of order. Your response to the impact assessment is also wholly inadequate. You mention people can take legal action, or be paid if there are any inconveniences; but I ask you this: what is the use of someone taking legal action AFTER their home has been demolished? Can you magic up a new home immediately? No.</p>	<p>rooms etc in their new home 4. they will have a stable, long term contract if that is what they wish for. You should always base your local plan on the needs of the constituents, i.e if half your constituents are black, half your housing policy should focus on ensuring black people have housing that is affordable TO THEM (i.e relative to their income) in good condition, and stable. same goes with all elements of your plan.</p>	<p>been the subject of extensive consultation between November 2015 and February 2016, and which is due to report back to Cabinet in July 2016. There will be a separate Equalities Impact Assessment published when that report is presented to Cabinet. The Local Plan has been subject to it's own EQiA as part of the Sustainability Appraisal.</p>
2	NPS4	Not stated	No response given	No response given	You need to warn people before they begin writing a response to the consultation that:	Not stated	The consultations undertaken in the preparation of the Plan have been held in

					1. their writing is not automatically saved 2. has a particular time limit before it 'times out' and loses all the person has written.		accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement .
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Respondent 3: Fiona English and Mark Ellerby

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	NPS5	Consultation process			<p>We are writing as a residents of Tottenham to formally object to the Haringey Local Plan.</p> <p>There has been a significant lack of consultation in this final step of the process. In asking if this plan is justified, one of the required criteria is 'evidence of participation of the local community and others having a stake in the area'. There is little evidence of community participation being encouraged or promoted by the Local Authority in this final round of consultation apart from the absolute bare minimum. The main means of consultation were:</p> <ul style="list-style-type: none"> • Documents posted on the Council website • Two hour sessions for people to attend at local libraries. <p>This is a formal process involving technical and complex documents which are likely to be challenging for the layperson, that is, if they actually know that they exist and where to find them. There were no public meetings called by Haringey to explain these plans even though the consultation ran for several weeks. The Council's</p>		The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement .

				<p>borough wide magazine Haringey People – which goes to households directly – did not include one word or reference to this consultation - http://www.haringey.gov.uk/.../haring.../haringey-people-archive . This would have been the most effective method for directly communicating with residents.</p> <p>Consultation sessions in the public libraries were poorly promoted and publicised, running at times most people could not make, even if they were aware of the sessions. Given these circumstances, it would not be surprising if there was not a large response to this consultation and local people should not be blamed for lack of interest or engagement when it is likely that they were not even aware of the plans under consideration.</p> <p>Haringey Council has been criticised in the Supreme Court regarding consultation. Their judgement set out conditions for fair consultation whereby, amongst the four criteria proposed, it states that ‘the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.’ We are not convinced that this condition has been met in relation to consultation on the Local Plan.</p>	
3	NPS6	Relationship to private developers		<p>It appears that the single dimension of the Local Plan is that it depends on private property development – there appears to be no alternative approach on offer. This is high risk and runs counter to the ' soundness' criterion of flexibility and deliverability. There are many alternatives to private sector development, including working with community land trusts, building higher on existing buildings or refurbishment. None of these are mentioned as alternative options for consideration. Instead this plan is predicated on demolition of estates,</p>	<p>The council has a requirement to meet the borough’s objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it’s own</p>

					<p>including Broadwater Farm and Northumberland Park, where many people will be at risk of losing their homes and their security.</p> <p>The local authority is also planning to enter into a joint venture with a private development company in which the Council will hand over two large council estates and many other properties. It is evident from recent news that the economy is fragile and any downturn could have a serious impact on the viability of these plans which appear predicated solely on a strong and rising property market. We consider it irresponsible for the local authority to invest all its efforts in one single approach which could have a devastating impact on tenants living on estates, and families waiting for housing.</p>		<p>development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p>
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Respondent 4: Zena Brabazon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	NP S7	General	no	No response given	Having read the documents and discussed the plan at our residents' association meeting, I am setting out in summary reasons		The Plan will deliver nearly 20,000 new homes across the

				<p>why I do not think the plan meets elements of the ‘soundness’ test. A more detailed document which challenges the soundness of the Local Plan, is being submitted by Our Tottenham, of which Dowsett Estate Residents’ Association is an active member group. In my capacity as Chair of our association I have contributed to the full Our Tottenham submission.</p> <p><i>Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?</i></p> <p>No. It does not meet the community’s requirements. It is vague on how to meet many London Plan, national and local targets and policies – e.g. for necessary social infrastructure as detailed in the Our Tottenham submission. It also fails to demonstrate how the local heritage, and the character of Tottenham in particular will be protected. This Plan is singularly focused on enforcing a ‘top-down’ social and physical re-engineering of large parts of Tottenham to the detriment of current communities.</p> <p>Most crucially the plan does not respect the overwhelming view of Tottenham’s residents (as made clear in the Soundings run consultation) that their priorities were provision of Council and social housing at a genuinely affordable rent, and for enforcement against private sector rogue landlords. In addition, Housing Policy 3.2</p>		<p>borough, with 40% of those being affordable housing. It is considered that it is positively prepared in this regard.</p> <p>The Local Plan contains policies that ensure delivery of new schools and health services through site allocations. It is considered that it is positively prepared in this regard.</p> <p>The Plan introduces policies protecting, and facilitating improvements to local community facilities. It is positively prepared in this regard.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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					<p>states ‘the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of’. This aspiration, and the priorities clearly expressed by local people will not be achieved by this plan. It does the reverse by promoting private sector developments which will be not be affordable or accessible to the thousands of families on the housing waiting list.</p> <p>Alongside the Housing Policy, The Council’s Sustainable Community Strategy (2010-2016) states ‘We will continue to increase the availability of affordable housing through the optimum use of existing dwellings and by building more affordable homes’ for people in housing need. In Haringey this means social rented housing. But no alternative option which demonstrates how this might be achieved is included in the plan even within the current housing and planning environment, so how can it be’ the most appropriate strategy when considered against the alternatives’ if no alternative has been proposed or evidenced?</p> <p>The Our Tottenham Submission discusses further housing aspects of the plan great detail and I refer to that document to complement this submission.</p>		
4	NP	Consultation	no	No	In asking if this plan is justified, one of the	The Council’s	The consultations

	S8			response given	<p>required criteria is ‘evidence of participation of the local community and others having a stake in the area’. There is little evidence of broad based community participation encouraged or promoted by the LA in this final round of consultation. The Council posted the consultation on its website and offered two hour sessions for people to attend at local libraries, at hours most people could not make, even if they were aware of the sessions. These were not very well publicized, and were very poorly attended and run at times inconvenient for many working people. The lack of participation at these sessions is not the fault of local people. There were no public meetings to explain these plans even though the consultation runs for several weeks.</p>	<p>borough wide magazine – which goes to households directly – did not include one word or reference to this consultation - http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-people-archive. This would have been the most effective method for directly communicating with residents. The documents are very hard to read on line, and the on line forms are extremely difficult to complete. The number of printed sets of documents is limited yet this is the most effective way to read this complex material.</p>	<p>undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council’s Statement of Community Involvement.</p>
4	NP S9	General	no	No response given	<i>Is it based on robust and credible evidence?</i>		The council has a requirement to meet the borough’s

					<p>No. There is no evidence that the development of ‘mixed’ communities by densification of existing housing estates and change of use from industrial to residential on council-owned industrial estates will be beneficial to the local community, either in terms of housing or employment.</p> <p>Please see the Our Tottenham submission for a detailed response regarding the assumptions in the plan which emanate from the Housing Market Assessment which are, it is argued, far too low. It describes how prices have increased, and agrees with the conclusion of the SHMA that most of the new housing will be ‘unaffordable’ for existing Haringey residents.</p>		<p>objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it’s own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough’s needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough’s residents.</p>
4	NP S10	General	no	No response given	<p><i>Is it the most appropriate strategy when considered against the alternatives?</i></p> <p>No. The Local Plan does not really give alternatives to private property development,</p>		<p>The council has a requirement to meet the borough’s objectively identified housing and</p>

					<p>high density/high rise flats and estate demolitions. Eleven alternative ideas have been set out in the Our Tottenham submission. If the intention is to have a genuinely mixed community which met the needs of local people on waiting lists and/or living in poor private sector or temporary accommodation, the Local Plan would include these other options and ideas.</p>		<p>employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p>
4	NP S11	General	no	No response given	<p><i>Is the document effective?</i></p> <p>Not for local people who need decent, affordable homes. It is likely to result in many residents being 'priced out' or 'demolished out' of the area and possibly out of London altogether. In the meantime, rising rents</p>		<p>The Local Plan includes proposals for new housing that meet overall housing need in the borough. Additionally there is a target for 40% of this</p>

				<p>brought about by the introduction of higher-value housing and the attendant uplift to the property market for older homes will mean a higher housing benefit bill, increasing arrears and increasing homelessness.</p> <p>There is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need. The assessment of the need for school places does not appear to reflect the implications of building high rise, largely one or two bedroom flats. What provision will there be for community facilities? Whilst the Council's recent school planning places document suggests an increased child population because of the regeneration, Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. The outcome of this policy is likely to be a shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use. But in any event my reading of the plans, especially for Tottenham Hale, is that the bulk will be one and two bedroom flats. The policies and plans simply do not match.</p> <p>There is a very serious lack of health</p>		<p>to be affordable housing. This plan seeks to provide additional new, high quality, affordable housing.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p>
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					<p>provision, particularly Tottenham Hale. With a further 5000 homes proposed there should be detail about how services will be provided. There are fine aspirations about traffic and the infrastructure (para 3.1.19 of the Alterations to Strategic Policies, Pre-submission version January 2016) but much of this does not relate to real experience. This section states that ‘the £37m Tottenham Hale transport scheme has sought to reduce the impact of traffic on the local area, and increase capacity to cope with future demand. This will enable the regeneration of the area as set out in the Area Action Plan...’ The Tottenham Hale gyratory works are complete, yet the traffic is frequently as gridlocked as ever, and access routes, such as Ferry Lane are extremely congested. How will an additional 5000 homes, (possibly an additional 10,000 people) be accommodated?</p>		
4	NP S12	General	no	No response given	<p><i>Is it deliverable?</i></p> <p>No. Some of the sites which will have very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will surely increase the flood risk with more land built over and unable to absorb rainwater into gardens and landscaped areas.</p> <p>The Council has expressed a preference for a very small number of development partners, which renders the plan vulnerable to being ‘beaten down’ in negotiations on the</p>		<p>The pattern of development that has been set out in the Local Plan has been subject to the statutorily required sequential test, and all sites have been included in a borough-wide SFRA. Additionally, upon development, all sites will be required to not increase the risk of</p>

				<p>proportion of 'affordable' units and on infrastructure contributions, as with the Spurs development.</p> <p>This is a one-dimensional plan. It relies on private developers and a buoyant housing market to achieve its objectives. Yet there are already concerns that the economy is weakening. There is no guarantee that a further recession might not happen, especially given the situation with the EU. Surely the LA has a responsibility to develop alternative strategies for Tottenham. If the economy goes into downturn, what commitment would these developers have to Tottenham and its communities?</p> <p>Part of developing alternative approaches would be to examine eventualities which might occur –in other words, to carry out a risk assessment. Relying on this plan, should there be an economic collapse, would leave Tottenham blighted, with many communities caught within red lined zones.</p> <p>Haringey's proposal for a joint venture company comprising 50/50 ownership with a private development partner compounds the huge risk of this one-dimensional plan. The plan to transfer two estates and around 140 to a private company is predicated on this local plan – they go hand in hand. This makes housing and development even more vulnerable to the market and leaves hundreds of tenants and residents exposed.</p>		<p>flooding on the site, or elsewhere.</p> <p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the</p>
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							borough's residents.
4	NP S13	General	no	No response given	<p><i>Is it flexible?</i></p> <p>No. The reverse appears to be the case. It is one-dimensional as described above, with too much reliance on large private developers. Should the economy go into a downturn, where property prices fall, what will happen to these plans? Alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards are now well-tested strategies for this. Estates could be refurbished and improved instead of being redlined for demolition.</p> <p>A further issue is the need for flexibility if the new Mayor of London wants to make substantial changes to the London Plan. For example, at least two candidates have declared themselves in favour of a strict target of 50% or more 'affordable housing' so that the plan's revised target of 40% may well be at odds with any revisions to the plan that the new Mayor may put forward.</p>		The argument posited appears to suggest alternative methods of delivering new homes on housing estates. The Local Plan does not shoehorn estate renewal into a demolish and rebuild model. It proposes a masterplanned approach, in co-ordination with local residents.
4	NP S14	General	no	No response given	<p><i>Will it be able to be monitored?</i></p> <p>No. The site allocation documents do not specify the number of affordable units envisaged for particular sites. Thus as agreements are reached with developers for</p>		There is an overall borough-wide target of 40% affordable housing. It is not considered appropriate that each

				<p>particular sites, it will be impossible to say whether meeting targets for total units or affordable units are likely to be met taking into account the remaining sites. Table 2 in Appendix 2 says nothing about how much 'affordable' housing will be built on each main site.</p> <p>The 'housing trajectory' graph which states how many units will be built in each year does not say how many will be affordable at each stage. This means that the 'affordable housing' proportion of the total cannot be monitored against the target year by year.</p> <p><i>Is it consistent with national policy?</i></p> <p>The Plan fails to demonstrate how it will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on). National policy would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, it is likely the plan will not support existing residents of Tottenham and will disproportionately affect ethnic minority people.</p>		<p>site will be expected to deliver 40% affordable, as the circumstances will differ site-by-site.</p> <p>It is considered that the Local Plan is in compliance with the NPPF, and London Plan.</p> <p>The Council does not agree that the local plan's housing plan will disadvantage BME residents. The respondent refers to the EQiA that was carried out in relation to the Housing Strategy. The EQiA that was published with the draft Housing Strategy identified a cause of concern in the take up of one particular type of housing, which is Shared Ownership. Shared ownership (part-rent part-buy homes) consisted of around 135 units a year during the last two years, whilst</p>
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						<p>social housing lets over the last two years were around 600 a year. The findings related to the shared ownership take up, are not directly related to the issue of estate renewal. The Council is taking action to mitigate the imbalance of households who buy into shared ownership schemes, by undertaking further research and monitoring, and by ensuring that its marketing and sales are targeted at local households.</p> <p>The housing policy governing estate renewal, which has been the subject of extensive consultation between November 2015 and February 2016, and which is due to report back to Cabinet in July 2016. There will be a</p>
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							separate Equalities Impact Assessment published when that report is presented to Cabinet. The Local Plan has been subject to its own EQiA as part of the Sustainability Appraisal.
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Respondent 5: Gary Phoenix

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
5	NPS15	Not stated	No response given	No response given	<p>We object to the Local Plan, which is inconsistent with its declared objective of providing decent and inclusive housing for all.</p> <p>Instead, the demolition of really-affordable council and housing association homes clears the way for new private housing, with the risk of higher rents and sky-high service charges.</p> <p>This plan to increase house prices and rents would mean social cleansing for many local people.</p> <p>House ownership requires deposit payments and adequate incomes,</p>	The Council should drop the Local Plan, and instead work with residents to improve existing homes and invest in local communities.	

					<p>but 48% of local people surveyed have no savings or are in debt, and many have low and uncertain incomes.</p> <p>The Council should drop the Local Plan, and instead work with residents to improve existing homes and invest in local communities.</p> <p>We need more and better council houses in Haringey.</p>		
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Respondent 6: Our Tottenham

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	NP S1 6	Consultation of the Local Plan			<p>In asking if this plan is justified, one of the required criteria is 'evidence of participation of the local community and others having a stake in the area'. There is not enough evidence of community participation encouraged or promoted by the LPA in this final round of consultation which goes beyond a minimum. Independently of this part of our submission, we presented a more detailed analysis of the consultation process and its shortcomings (see text box below). The Council posted the consultation on its website and offered two hour sessions for people to attend at local libraries, at hours most people could not make, even if they were aware of the sessions. These were not very well publicized, and were very poorly attended. This is not the fault of local people. There were no public meetings to explain these plans even though the consultation</p>		<p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>runs for several weeks. The Council's borough-wide magazine <i>Haringey People</i> – which goes to households directly – did not include one word or reference to this consultation (see http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-peoplearchive). This would have been the most effective method for directly communicating with residents.</p> <p>The documents are hard to read on line yet active residents' groups had to ask and press for printed copies in order to meet with their members. The Supreme Court in the Moseley v Haringey Council judgement set out conditions for fair consultation. Amongst the four criteria it states that 'the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.' It is questionable as to whether this condition to allow for 'intelligent consideration and response' has been met with regard to this vital consultation on the Local Plan.</p> <p>The Council's 'Statement of Community Involvement' says that the Council will provide summaries in plain language. Although in correspondence with Our Tottenham last year, a senior Council officer expressed the view that to provide summaries would lead to confusion about whether the public should respond to the summary without reading the full text, we think summaries should have been provided at the library drop-in sessions and elsewhere (community centres, online, and in Haringey People) and that without them, it is difficult for residents to gain interest in or grasp the meaning and significance of the full text to which they are required to respond.</p> <p>The Council did not pro-actively seek to involve non-English speaking communities with special meetings for example with Turkish translators. There was also some delay from the start of the consultation period in accessing translation apps for the documents online.</p> <p>From the start of the consultation the Council were reluctant to provide</p>		<p>Statement of Community Involvement.</p> <p>As a result of the last consultation the decision was taken to remove the MOL of Lordship Rec from the site boundary. The MOL boundary at present passes through the Broadwater Farm Community Centre. As there are not any firm plans for the whole of the site at the time being, it is considered that any proposals affecting the Community</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>any hard copies of the documents. They claimed that a set of the documents were available in libraries and that was good enough. Latterly they accepted it was not sufficient and provided copies to community representatives and groups. In addition, an extra two sets were provided to each of the open public libraries and a set was sent to elected councillors with the instruction that they should make their copy available to their electors.</p> <p>The first tranche of consultation events were held at Haringey's public libraries during the day time. This prevented those with 9-5 Monday to Friday jobs from attending. At Coombes Croft and Alexandra Library our members observed that they were the ONLY members of the public present. At Wood Green there were only 5. Cllr Clive Carter reported to Friends of Finsbury Park that only one person had been recorded as attending the consultation at Highgate Library. Later in the consultation period a number of evening events were organised. However, these were poorly advertised - mainly through the council website - and since most residents only use the Council web site, if at all, if they are looking for something they already want or know about, it was no surprise that they failed to attract people to get along. One evening event - held at 639 High Road, where the council's Tottenham regeneration team have an office - was attended by only one member of the public. In desperation, council officers resorted to standing on the High Road failing to entice passers-by inside. There was no mention of the consultation in the February-March 2016 edition of the Council's borough-wide publication Haringey People. Not having a major article on the Local Plan in the one publication going to all households, and not placing advertisements in the local press, is a serious failure to engage as many people as possible in the consultation. Indeed, many residents may have known nothing about the consultation until some residents complained to the press</p>		<p>Centre will be managed once greater detail becomes available.</p> <p>It is noted that at present the table on SA62 states that the ownership is simply "LBH". It is recognised that this is overly simplistic. This will be replaced withj "mix of public and private freeholds and leaseholds".</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>(see http://www.thetottenhamindependent.co.uk/news/14246972.Council_criticism_over_Local_Plan_consultation_timings/).</p> <p>The provided documents contain many mistakes. For example, in the Site Allocation DPD, section SA62 on Broadwater Farm gives a contradictory account in different parts of the page about who owns the land and neglects the private ownership of houses in Lordship Lane which may be marked for demolition under the proposed plan. The map for this page shows the boundary of the redevelopment zone going through the middle of a very large and important building, the Broadwater Farm Community Centre. Section SA15 concerning Whymark Avenue, N22, contains the extraordinary statement that 'no buildings need be retained' even though it contains a new block of mixed residential and retail units only about three years old which presumably had planning permission when constructed. Another mistake is that on the map Bruce Grove station is represented as a national rail station, when it has been a London Overground station for several months.</p>		

Respondent 7: Bob Lindsay-Smith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
7	NPS17	Not stated	No response given	No response given	Please note that I may wish to speak in person at the examination in public. I live in Northumberland Park which is an area likely to be affected in particular.		Concerns are noted. On points 1 & 2, the Local Plan is required to respond to these stipulations which are stemming from the London Plan.

				<p>I welcome some aspects of the Local Plan, such as keeping most industrial areas as employment centres, rather than converting them to housing.</p> <p>The Local Plan is however based on assumptions that I challenge:</p> <ol style="list-style-type: none"> 1) that growth of London's population is to be encouraged, rather than the growth of employment in other parts of the country; 2) that this extra population should be concentrated in certain boroughs, including Haringey - leading to a requirement for 20,000 new dwellings between 2011 and 2026; 3) that the associated rise in land values is something to be welcomed (I heard a Haringey Cabinet member say this at the Planning committee meeting at which Spurs' latest plan was passed); 4) that the loss of social housing cannot be prevented; 5) that demolition followed by new building is preferable to refurbishment. <p>On the last point, the demolition option in most cases involves double decanting of people, and the new dwellings for rent are almost invariably going to be on worse terms than the existing ones. Leaseholders will also be in great difficulties because of rising house prices.</p>		<p>Point 3: The Local Plan seeks to increase supply of new homes, including new affordable homes. It does not itself seek to increase house prices.</p> <p>4. The Plan will not create a net loss of affordable housing, on a floorspace basis. The Council's housing strategy will determine how new and existing social housing terms are to be proposed in the future.</p> <p>5. The Local Plan proposes that on some sites, it is possible to increase the number of homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>Regarding carbon management, the Council will always seek to ensure that any development will be brought forwards in an environmentally sustainable fashion, and there are Policies in the Plan to secure this.</p>
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					The embodied carbon of new build is also far greater than that of refurbishment - which contradicts green policies at national and local level.		
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Respondent 8: Noah Tucker

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
8	NPS18	Not stated	No response given	No response given	<p>I am writing to formally object to the Haringey Local Plan.</p> <p>I object because developments encompassed in the plan involve the proposed demolition of reportedly over 3,000, mainly structurally sound council homes, an overall reduction in the stock and availability of council housing, a worsening of the housing situation for the black and ethnic minority population as evaluated by the Council's own Equalities Impact Assessment, and the building by developers of thousands of private sector homes which will be unaffordable to the vast</p>	<p>Haringey Council should cancel the Regeneration Plan, and instead, seeking and taking into account the experience and plans of other local authorities which are aiming to increase their council and social housing provision, and the limits of the legal context, put forward a new Plan which should prioritise:</p> <p>Maintaining, improving and if possible extending the stock, availability and the security of tenure of council housing, and also that of wider social housing.</p> <p>Maintaining communities and their cohesion.</p>	<p>The Local Plan seeks to increase the stock of both overall, and affordable housing within the borough.</p> <p>The Council does not agree that the local plan's housing plan will disadvantage BME residents. The respondent refers to the EQiA that was carried out in relation to the Housing Strategy. The EQiA that was published with the draft Housing Strategy identified a cause of concern in the take up of one particular type of housing, which is Shared Ownership. Shared ownership (part-rent part-buy homes) consisted of around 135 units a year during the last two years,</p>

					<p>majority of Tottenham residents, particularly those who are in most need in terms of housing.</p>	<p>Ensuring positive benefit, or at least no detriment, in terms of equalities.</p>	<p>whilst social housing lets over the last two years were around 600 a year. The findings related to the shared ownership take up, are not directly related to the issue of estate renewal. The Council is taking action to mitigate the imbalance of households who buy into shared ownership schemes, by undertaking further research and monitoring, and by ensuring that its marketing and sales are targeted at local households.</p> <p>The housing policy governing estate renewal, which has been the subject of extensive consultation between November 2015 and February 2016, and which is due to report back to Cabinet in July 2016. There will be a separate Equalities Impact Assessment published when that report is presented to Cabinet. The Local Plan has been subject to it's own EQiA as part of the Sustainability Appraisal.</p>
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Respondent 9: Canal and River Trust

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	NPS19	Not stated	No response given	No response given	<p>The Canal & River Trust (the Trust) is a statutory consultee under the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.</p> <p>The Trust has a range of charitable objectives including:</p> <ul style="list-style-type: none"> - To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment; - To protect and conserve objects and buildings of heritage interest; - To further the conservation, protection and improvement of the natural environment of inland waterways; and - To promote sustainable development in the vicinity of any inland waterways for the benefit of the public. <p>Within LB Haringey, the Trust owns and manages the River Lee Navigation (or Lee Navigation) and its towpath. We encourage its use for a variety of activities, including boating, waterborne freight, moorings</p>	Not stated	Noted.

11	NPS21	Not stated	No	No response given	<p>I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham, especially Tottenham Hale ward where I live.</p> <p>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with insecure private renting arrangements. If it were to meet their housing needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future consultation.</p> <p>Instead, these plans reveal the priority is for very tall buildings, with very dense housing which will consist largely of one and two bedroom flats in high towers. These will be largely private developments and well out of the price range of most people who live in Tottenham. The average wage in our</p>	Not stated	<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in he Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the</p>
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				<p>area is much lower than that needed to purchase a flat, so what will local residents do as they are priced out of their homes, or face their homes being demolished?</p> <p>This plan seems to be, instead, driven by a clear agenda which favours working with private developers who will be leading on the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</p> <p>The Council, in its plans, repeatedly claims their intention is to develop a 'mixed community'. Our community is already mixed with people from all over the world. It includes all ethnic groups, from different countries, different religions and in a range of jobs. The Council's plans will undermine this as these developments are far more likely</p>	<p>preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The pattern of development that has been set out in the Local Plan has been subject to the statutorily required sequential test, and all sites have been included in a borough-wide SFRA. Additionally, upon development, all sites will be required to not increase the risk of flooding on the site, or elsewhere.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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				<p>to segregate people according to money and income.</p> <p>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to 22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our community's quality of life. What will be the impact of these buildings on the environment given that much of the proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be developed with very high densities.</p> <p>The Local Plan is unsound in concept</p>		
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					<p>and vague on the detail of how this massive plan will be achieved. Rather than address the concerns of today it would, if implemented result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site</p> <p>I would also make the following points. There is no evidence that the council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion. There appears to be no alternative plan should this happen, and the danger is our communities will be blighted.</p> <p>The consultation for this round of the plan has been minimal and has not engaged people widely although it is of vital importance. Few printed copies have been provided to people or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just through the Council website. And even</p>	
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					the advice meetings were advertised only on the website and were at very difficult times for most people.		
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Respondent 12: Keith Flett

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
12	NPS22	Not stated	No	No response given	<p>I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham , especially Tottenham Hale ward where I live.</p> <p>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with insecure private renting arrangements. If it were to meet their housing needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future</p>	Not stated	<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as</p>

				<p>consultation.</p> <p>Instead, these plans reveal the priority is for very tall buildings, with very dense housing which will consist largely of one and two bedroom flats in high towers. These will be largely private developments and well out of the price range of most people who live in Tottenham. The average wage in our area is much lower than that needed to purchase a flat, so what will local residents do as they are priced out of their homes, or face their homes being demolished?</p> <p>This plan seems to be, instead, driven by a clear agenda which favours working with private developers who will be leading on the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</p>	<p>evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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				<p>The Council, in its plans, repeatedly claims their intention is to develop a 'mixed community'. Our community is already mixed with people from all over the world. It includes all ethnic groups, from different countries, different religions and in a range of jobs. The Council's plans will undermine this as these developments are far more likely to segregate people according to money and income.</p> <p>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to 22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our</p>		
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				<p>community's quality of life. What will be the impact of these buildings on the environment given that much of the proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be developed with very high densities.</p> <p>The Local Plan is unsound in concept and vague on the detail of how this massive plan will be achieved. Rather than address the concerns of today it would, if implemented result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site</p> <p>I would also make the following points. There is no evidence that the council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion. There appears to be no alternative plan should this happen, and the danger is our communities will be blighted.</p>		
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					The consultation for this round of the plan has been minimal and has not engaged people widely although it is of vital importance. Few printed copies have been provided to people or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just through the Council website. And even the advice meetings were advertised only on the website and were at very difficult times for most people.		
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Respondent 13: Ruth Gordon

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	NPS23	Not stated	No	No response given	<p>I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham , especially Tottenham Hale ward where I live.</p> <p>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with insecure private renting arrangements. If it were to meet their housing</p>	Not stated	<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential</p>

				<p>needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future consultation.</p> <p>Instead, these plans reveal the priority is for very tall buildings, with very dense housing which will consist largely of one and two bedroom flats in high towers. These will be largely private developments and well out of the price range of most people who live in Tottenham. The average wage in our area is much lower than that needed to purchase a flat, so what will local residents do as they are priced out of their homes, or face their homes being demolished?</p> <p>This plan seems to be, instead, driven by a clear agenda which favours working with private developers who will be leading on the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</p>	<p>that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the</p>
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				<p>The Council, in its plans, repeatedly claims their intention is to develop a 'mixed community'. Our community is already mixed with people from all over the world. It includes all ethnic groups, from different countries, different religions and in a range of jobs. The Council's plans will undermine this as these developments are far more likely to segregate people according to money and income.</p> <p>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to 22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our community's quality of life. What will be the impact of these buildings on the environment given that much of the proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be</p>	<p>Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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				<p>developed with very high densities.</p> <p>The Local Plan is unsound in concept and vague on the detail of how this massive plan will be achieved. Rather than address the concerns of today it would, if implemented result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site</p> <p>I would also make the following points. There is no evidence that the council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion. There appears to be no alternative plan should this happen, and the danger is our communities will be blighted.</p> <p>The consultation for this round of the plan has been minimal and has not engaged people widely although it is of vital importance. Few printed copies have been provided to people or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just through the Council website. And even the advice meetings were advertised only on the website and were at very difficult times for most people.</p>		
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Respondent 14: Marcin Korowiecki

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
14	NPS24	Not stated	No	No response given	<p>I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham , especially Tottenham Hale ward where I live.</p> <p>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with insecure private renting arrangements. If it were to meet their housing needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future consultation.</p> <p>Instead, these plans reveal the priority is</p>		<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in he Infrastructure Delivery Plan.</p>

				<p>for very tall buildings, with very dense housing which will consist largely of one and two bedroom flats in high towers. These will be largely private developments and well out of the price range of most people who live in Tottenham. The average wage in our area is much lower than that needed to purchase a flat, so what will local residents do as they are priced out of their homes, or face their homes being demolished?</p> <p>This plan seems to be, instead, driven by a clear agenda which favours working with private developers who will be leading on the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</p> <p>The Council, in its plans, repeatedly claims their intention is to develop a</p>	<p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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				<p>'mixed community'. Our community is already mixed with people from all over the world. It includes all ethnic groups, from different countries, different religions and in a range of jobs. The Council's plans will undermine this as these developments are far more likely to segregate people according to money and income.</p> <p>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to 22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our community's quality of life. What will be the impact of these buildings on the environment given that much of the</p>		
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				<p>proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be developed with very high densities.</p> <p>The Local Plan is unsound in concept and vague on the detail of how this massive plan will be achieved. Rather than address the concerns of today it would, if implemented result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site</p> <p>I would also make the following points. There is no evidence that the council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion. There appears to be no alternative plan should this happen, and the danger is our communities will be blighted.</p> <p>The consultation for this round of the plan has been minimal and has not engaged people widely although it is of</p>		
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					vital importance. Few printed copies have been provided to people or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just through the Council website. And even the advice meetings were advertised only on the website and were at very difficult times for most people.		
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Respondent 15: Lilian Kaluma

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
15	NPS25	Not specified	Not stated	Not stated	<p>I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham , especially Tottenham Hale ward where I live.</p> <p>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with</p>	<p>The map needs to be corrected as per page 4 of our accompany submission "Statement of Case TH12 – Herbert Road, dated 4th March 2016</p>	<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>insecure private renting arrangements. If it were to meet their housing needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future consultation.</p> <p>Instead, these plans reveal the priority is for very tall buildings, with very dense housing which will consist largely of one and two bedroom flats in high towers. These will be largely private developments and well out of the price range of most people who live in Tottenham. The average wage in our area is much lower than that needed to purchase a flat, so what will local residents do as they are priced out of their homes, or face their homes being demolished?</p> <p>This plan seems to be, instead, driven by a clear agenda which favours working with private developers who will be leading on</p>		<p>development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</p> <p>The Council, in its plans, repeatedly claims their intention is to develop a 'mixed community'. Our community is already mixed with people from all over the world. It includes all ethnic groups, from different countries, different religions and in a range of jobs. The Council's plans will undermine this as these developments are far more likely to segregate people according to</p>		<p>the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>money and income.</p> <p>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to 22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our community's quality of life. What will be the impact of these buildings on the environment given</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>that much of the proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be developed with very high densities.</p> <p>The Local Plan is unsound in concept and vague on the detail of how this massive plan will be achieved. Rather than address the concerns of today it would, if implemented result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site</p> <p>I would also make the following points. There is no evidence that the council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market falls. The assumption in this plan is that property endlessly rises. But</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>this is not a forgone conclusion. There appears to be no alternative plan should this happen, and the danger is our communities will be blighted.</p> <p>The consultation for this round of the plan has been minimal and has not engaged people widely although it is of vital importance. Few printed copies have been provided to people or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just through the Council website. And even the advice meetings were advertised only on the website and were at very difficult times for most people.</p>		

Respondent 16: Jon Hughes

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
16	NPS26	Not stated	Not stated	Not stated	I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this		The council has a requirement to meet the borough's objectively identified housing and employment needs.

				<p>plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham , especially Tottenham Hale ward where I live.</p> <p>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with insecure private renting arrangements. If it were to meet their housing needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future consultation.</p> <p>Instead, these plans reveal the priority is for very tall buildings, with very dense housing which will consist largely of one and two bedroom flats in high towers. These will be largely private developments and well out of the price range of most people who live in Tottenham. The average wage in our area is much lower than that needed to purchase a flat, so what</p>	<p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in he Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of</p>
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				<p>will local residents do as they are priced out of their homes, or face their homes being demolished?</p> <p>This plan seems to be, instead, driven by a clear agenda which favours working with private developers who will be leading on the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</p> <p>The Council, in its plans, repeatedly claims their intention is to develop a 'mixed community'. Our community is already mixed with people from all over the world. It includes all ethnic groups, from different countries, different religions and in a range of jobs. The Council's plans will undermine this as these</p>	<p>Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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				<p>developments are far more likely to segregate people according to money and income.</p> <p>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to 22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our community's quality of life. What will be the impact of these buildings on the environment given that much of the proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be developed with very</p>		
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				<p>high densities.</p> <p>The Local Plan is unsound in concept and vague on the detail of how this massive plan will be achieved. Rather than address the concerns of today it would, if implemented result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site</p> <p>I would also make the following points. There is no evidence that the council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion. There appears to be no alternative plan should this happen, and the danger is our communities will be blighted.</p> <p>The consultation for this round of the plan has been minimal and has not engaged people widely although it is of vital importance. Few printed copies have been provided to people</p>		
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					or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just through the Council website. And even the advice meetings were advertised only on the website and were at very difficult times for most people.		
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Respondent 17: Marco Consolaro

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
17	NPS27	Not stated	Not stated	Not stated	<p>I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham, especially Tottenham Hale ward where I live.</p> <p>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with insecure private renting</p>	Not stated	<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct</p>

				<p>arrangements. If it were to meet their housing needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future consultation.</p> <p>This plan seems to be, instead, driven by a clear agenda which favours working with private developers who will be leading on the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</p> <p>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to</p>	<p>place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p>
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				<p>22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our community's quality of life. What will be the impact of these buildings on the environment given that much of the proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be developed with very high densities.</p> <p>The idea of a town center in the direction north-south from Ashley Road until the shopping center as opposite of the main vehicle traffic direction which is east-west from Monument Way to Watermead Way</p>		<p>The introduction of improved green spaces, with improved connections between them is supported by the Local Plan as it will provide improved, and improved access to, open space.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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				<p>and Ferry Lane will generate loads of problems which you aren't yet aware of. I spoke to the architect about it and he agreed that there are important scenarios to think about there. The problem is that the road crossing of Watermead Way outside the station and even the crossing toward the mall center are already congested now. I attach a picture of January 23rd where you can see that a car crash exactly on the road crossing cause the police to even close the road!!! Imagine what happens if you add another 10.000 people leaving there. Do you realize that Ferry Lane is the only bridge on the Lea River for miles? At north the first next bridge is the A406, at south it is in Lower Clapton near Homerton Hospital!!</p> <p>The Local Plan is unsound in concept, vague on the detail of how this massive plan will be achieved and thoughtless of the consequences it will have for the residents. Rather than address the concerns of today it would, if implemented result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site.</p> <p>I would also make the following points. There is no evidence that the</p>		
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				<p>council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion.</p> <p>There appears to be no alternative plan should this happen, and the danger is our communities will be blighted. Be aware that many independent economists and analysts call the property market of London "the biggest property bubble in the World". Would it burst what would happen?</p> <p>Furthermore the "Green Link" idea which you claim to come from "the people" has been something that we have learnt at the first meeting with the architects about the planning . No one in my neighborhood that I have talked to has ever knew anything about that. It is supposed to pass exactly in the middle of our estate and NO ONE living there has been asked anything about it. What are you talking about?</p> <p>Maybe "the people" would like to</p>		
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					<p>know that your "Green Link" is supposed to pass exactly on top of the recently completed kid section of Down Lane Park and there will be the need to build a huge bridge to go over both the railroad and Watermead Way - the most useless WASTE OF MONEY for something WE DON'T NEED and also in itself NOT GREEN AT ALL - just more cement. I am firmly opposed to this and I know also the association "Friends of Down Lane Park" is.</p> <p>The consultation for this round of the plan has been minimal and has not engaged people widely although it is of vital importance. Few printed copies have been provided to people or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just through the Council website. And even the advice meetings were advertised only on the website and were at very difficult times for most people.</p>		
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Respondent 18 : Lena Elliott

ID	Rep ID	Allocation / Policy / Figure /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Para				
18	NPS28	Not stated	No	No	<p>I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham , especially Tottenham Hale ward where I live.</p> <p>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with insecure private renting arrangements. If it were to meet their housing needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future consultation.</p> <p>Instead, these plans reveal the priority is for very tall buildings, with very dense housing which will consist largely of one and two bedroom flats in high towers. These will be largely private developments and well out of the price range of most people who live in</p>	<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in he Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p>

				<p>Tottenham. The average wage in our area is much lower than that needed to purchase a flat, so what will local residents do as they are priced out of their homes, or face their homes being demolished?</p> <p>This plan seems to be, instead, driven by a clear agenda which favours working with private developers who will be leading on the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</p> <p>The Council, in its plans, repeatedly claims their intention is to develop a 'mixed community'. Our community is already mixed with people from all over the world. It includes all ethnic groups, from different countries, different religions and in a range of jobs. The Council's plans will undermine this as</p>	<p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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					<p>these developments are far more likely to segregate people according to money and income.</p> <p>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to 22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our community's quality of life. What will be the impact of these buildings on the environment given that much of the proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be developed with very high densities.</p>		
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				<p>The Local Plan is unsound in concept and vague on the detail of how this massive plan will be achieved. Rather than address the concerns of today it would, if implemented result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site</p> <p>I would also make the following points. There is no evidence that the council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion. There appears to be no alternative plan should this happen, and the danger is our communities will be blighted.</p> <p>The consultation for this round of the plan has been minimal and has not engaged people widely although it is of vital importance. Few printed copies have been provided to people or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just</p>		
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					through the Council website. And even the advice meetings were advertised only on the website and were at very difficult times for most people.		
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Respondent 19: Nicholas Fenton

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	NPS29	Not stated	No	Not stated	<p><i>I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham, especially Tottenham Hale ward where I live.</i></p> <p><i>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with insecure private renting arrangements. If it were to meet their housing needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future consultation.</i></p> <p><i>Instead, these plans reveal the priority is for</i></p>		<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is</p>

				<p><i>very tall buildings, with very dense housing which will consist largely of one and two bedroom flats in high towers. These will be largely private developments and well out of the price range of most people who live in Tottenham. The average wage in our area is much lower than that needed to purchase a flat, so what will local residents do as they are priced out of their homes, or face their homes being demolished?</i></p> <p><i>This plan seems to be, instead, driven by a clear agenda which favours working with private developers who will be leading on the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</i></p> <p><i>The Council, in its plans, repeatedly claims their intention is to develop a 'mixed community'. Our community is already mixed with people from all over the world. It includes all ethnic groups, from different countries, different religions and in a range of jobs. The Council's plans will undermine this as these</i></p>		<p>located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of</p>
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				<p><i>developments are far more likely to segregate people according to money and income.</i></p> <p><i>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to 22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our community's quality of life. What will be the impact of these buildings on the environment given that much of the proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be developed with very high densities.</i></p> <p><i>The Local Plan is unsound in concept and vague on the detail of how this massive plan will be achieved. Rather than address the concerns of today it would, if implemented</i></p>		<p>affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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				<p><i>result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site</i></p> <p><i>I would also make the following points. There is no evidence that the council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion. There appears to be no alternative plan should this happen, and the danger is our communities will be blighted.</i></p> <p><i>The consultation for this round of the plan has been minimal and has not engaged people widely although it is of vital importance. Few printed copies have been provided to people or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just through the Council website. And even the advice meetings were advertised only on the website and were at very difficult times for most people.</i></p>		
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Respondent 20: Luci Davin

ID	Rep	Allocation	Sound	Legally	Reason	Change	Council's
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	ID	/ Policy / Figure / Para		Compliant		Sought	Comments / Response
20	NPS30	Not stated	No	Not stated	<p>I am writing to formally object to the Haringey Local Plan. My representation is below.</p> <p>There has been a significant lack of consultation in this final step of the process. In asking if this plan is justified, one of the required criteria is ‘evidence of participation of the local community and others having a stake in the area’. There is little evidence of community participation encouraged or promoted by the LA in this final round of consultation which goes beyond a minimum. The main means of consultation were:</p> <ul style="list-style-type: none"> • Documents posted on the Council website • Two hour sessions for people to attend at local libraries. <p>This is a formal process, and the documents are technical and complex. This is a challenge for the layperson, and even more so when reading online as it is very hard to cross reference. But, even before attempting to read them online, residents had to know they were there. This was not straightforward. There were no public meetings called by Haringey to explain these plans even though the consultation ran for several weeks. The Council’s borough wide magazine Haringey People – which goes to households directly – did not include one word or reference to this consultation - http://www.haringey.gov.uk/.../haring.../haringey-people-archive . This would have been the most effective method for directly communicating with residents. The documents are hard to read online yet active residents’ groups had to ask and press for printed copies in order to meet with their members. Consultation sessions in the public libraries were poorly promoted and publicised, running at times most people</p>		<p>The council has a requirement to meet the borough’s objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it’s own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough’s needs are delivered. The Local Plan aims to ensure that private</p>

				<p>could not make, even if they were aware of the sessions. Given these circumstances, it would not be surprising if there was not a large response to this very limited consultation exercise and local people should not be blamed.</p> <p>Haringey Council was criticised in the Supreme Court regarding consultation. Their judgement set out conditions for fair consultation. Amongst the four criteria it states that ‘the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.’ I would question whether this condition to allow for ‘ intelligent consideration and response’ has been met in relation to consultation on the Local Plan. This plan depends on private property development. This is its single dimension – there appears to be no alternative. This is high risk and runs counter to other soundness criteria of flexibility and deliverability. There are many alternatives to private sector development, including working with community land trusts, building higher on existing buildings or refurbishment. None of these are mentioned as alternative options for consideration.</p> <p>Instead this plan is predicated on demolition of estates, including Broadwater Farm and Northumberland Park, where many people will be at risk of losing their homes and their security</p> <p>The local authority is also planning to enter into a joint venture with a private development company where the Council will transfer two large council estates, a public library building and many other properties. It is evident from recent news that the economy is fragile and any downturn could have a serious impact on the viability of these plans, which appear predicated solely on a strong and rising property market. I consider it irresponsible for the local authority to invest all its efforts in one single</p>	<p>development is located in the correct place, well designed, and delivers positive outcomes for the borough’s residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan’s housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning</p>
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				<p>approach which could have a devastating impact on tenants living on estates, and families waiting for housing.</p> <p>As a resident of Tottenham, I am very concerned about plans to build such tall buildings in our communities. Tottenham is essentially a low-rise area and it is noticeable that this mass of tall buildings, (many over 20 storeys) is being proposed in the east of the borough. The argument put forward in the local plan is that these high rise buildings will support the development of “mixed communities” in Tottenham.</p> <p>This is entirely spurious and misleading. Tottenham is already a hugely mixed community with N15 and N17 reputed to be the most diverse postcodes in Europe. The community is mixed by race, age, class and employment. There are people from all walks of life living alongside each other. Council estates are similarly mixed and to argue otherwise is misleading. They have leaseholders, council tenants, private sector tenants, and where there are houses, freeholders. Council estate residents are located firmly in our communities.</p> <p>Demolition in favour of high rise towers is likely to result in the reverse happening, with the development of more single or limited mix of tenure communities, and exclusion of families on low income and those needing affordable social housing. Instead, these plans promote demolitions, with no detail about how people will be rehoused. I understand that high rise blocks are considered too expensive (by those proposing to build them) to be built as social housing or affordable housing.</p> <p>In the Evening Standard Comment section, Tuesday 29th February, they argue that ‘Housing needs a more imaginative approach’ to high-rise. “[I]t is simply not true that for central London the best options are</p>	<p>Regulations, and the Council’s Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Plan introduces policies that protect existing family</p>
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				<p>skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular with residents; the same is true of the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] not the best answer.” The same argument could be made for Tottenham.</p> <p>The Local Plan is, at best, vague on what will happen to the existing communities who need housing. Paragraph 3.21.18 of the Alterations to Strategic Policies, Pre-Submission version January 2016, states that the council “aim to ensure an adequate mix of dwellings is provided”. There is no detail as to how this will be achieved especially with housing for families. The proposed developments are largely high density flats, most likely one and two bedrooms. There is no consideration of the needs of those on the Housing List, or of people who are accepted by the Council to in need of housing or rehousing. These will not cater for local families and it is likely that current residents living in either private sector rented, temporary or threatened council homes will be left out. The Council can claim its plans will meet housing need. But this plan does not meet the needs of people in housing need who live here now.</p>		<p>homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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Respondent 21: Luan Hoxh

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
21	NPS31	Not stated	Not stated	Not stated	I agree with you regarding to object the local plan for "decent house" Everybody likes or is pleased to have decent house but I see too many uncertainty what council try to do.	No response given	It is unclear what is creating this uncertainty, thus responding is not possible.

Respondent 22: Patrick Watson

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	NPS32	Not stated	Not stated	Not stated	For years we the people of Haringey and in particular North Tottenham have had to endure second-class housing facilities and infrastructure now that the council finally has plans to make improvements you also plan to force out the poorest and neediest people presumably to some other deprived area and bring in the rich to benefit from all the swanky improvements once again you are using stealth to perform an act of ethnic and social cleansing not dissimilar to the lairds clearing of farmers in Scotland why can we put local people not benefit from all these improvements why do we have to be pushed out		The Council is seeking to build more affordable housing to meet it's overall housing need. The aim is not to displace existing residents, but to build better homes for everybody.

Respondent 23: Shirley Ritchie

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
23	NPS33	Not stated	Not Stated	No	<p>I have been a resident of Tottenham since the age of 4 years old, therefore I have seen Tottenham's highs and 'lows'...</p> <p>To quote my neighbour's paragraphs:</p> <p>-</p> <p>'It has come to my attention that developers want to build by the end of the lock 3 blocks of 14, 15 and 21 storeys.</p> <p>This will dominate the skyline, end the sense of openness, overshadow the Paddock and the reservoirs, and create a "canyon" like effect with the 12-storey pavilion blocks of Hale Village on the other side.'</p> <p>I am sure this in turn will have some effect on the wildlife in this area.</p> <p>I also believe that this site is inappropriate for such high buildings.</p> <p>NB Haringey can still meet it's 5 year Housing Zone target of 2,000 homes within 5 years, and 5,000 in total at Tottenham Hale, without building so high on this site.</p> <p>Whilst I am in agreement of the building of new homes in the Tottenham area, high rise skyscrapers are not the answer. It will ruin the</p>		<p>The Local Plan identified Hale Wharf as a potential development site, but does not set height limits (or minimums). It is considered that concerns over heights should be directed to the planning application on this site.</p>

					ambience of the Tottenham lock area. However I do agree to the building of 3 to 4 storey townhouses.		
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Respondent 24: Martin Ball

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
24	NPS34	Not stated	Not stated	Not stated	<p>I object to the Local Plan, which is inconsistent with its declared objective of providing decent and inclusive housing for people in Haringey. Instead, the demolition of social rent council and housing association homes clears the way for new private housing for sale at prices not affordable by most, along with the risk of higher private sector rents and excessive service charges.</p> <p>The council's plan to increase house prices and rents would mean social cleansing for many local people. This policy you pursue alongside the demolition plans for Love Lane Estate and large parts of Northumberland Park. The replacement housing is clearly not intended for local people. House ownership requires deposit payments and adequate incomes, but 48% of local people surveyed have no savings or are in debt, with many having low and uncertain incomes.</p> <p>The Council should drop the Local Plan, which is wrong for the area and its people. Instead you should work with residents to improve existing homes and invest in resources for local communities. We need more quality new council housing to meet the housing need in the borough. Yet, on high-profile developments such as that next to the Spurs stadium the council is incapable of getting even any so-called affordable flats. A serious failure of the council's regeneration policy.</p>		<p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement. The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development</p>

					<p>You are entrusted with the responsibility to govern the local area fairly and support the community to have better lives. Having genuinely affordable housing is vital to this and a key aspect of the Local Plan discussion. However, throughout the consultation process you shamelessly avoided genuine engagement with the public. I will speak at any public examination of these dreadful proposals, and look forward to the opportunity to finally scrutinise you and others responsible.</p>	<p>capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents</p>
24		Not stated	Not stated	No	<p>The consultation process has been inadequate in engaging the public in the discussion and this has seriously disadvantaged people in being able to comment on the future of their community.</p> <p>There were a serious number of flaws in the consultation, and I outline them below.</p> <p>1. The consultation was effectively at least 2 days shorter than claimed. Firstly the consultation didn't start in the morning of Friday 8th January 2016 as claimed, because the documents only went online during the afternoon. The emails notifying people also went out in the afternoon. I</p>	<ol style="list-style-type: none"> 1. The consultation was exactly as long as advertised. 2. In our SCI we endeavour to provide a translations service that everybody can use. The most

				<p>received my notice – i.e. sent to my personal email address - at 17.57 on 8th January. No sooner had the documents gone online, then the Building Control and Planning online systems were unavailable from 7pm on Friday 8th January until 9pm on Saturday 9th January because of website maintenance. Not just a day of the consultation period, but the entire first Saturday of the consultation when it would be expected that initial interest would mean people having a look at the website.</p> <p>2. No translated copies of the documents were provided in printed format, and this has limited the ability of those for whom English is not their first language to participate. The council did not pro-actively seek to involve non-English speaking communities with special meetings for example with Turkish translators. There were problems from the start of the consultation period in accessing translation apps for the documents online. This is confirmed in an email (see appendix 1) from Haringey Council to Our Tottenham says "We're also working with the web team to ensure the documents are published in a format that enables people to use translation apps if needed". While the translation did eventually work, the initial fault meant the consultation was shortened for those for whom English is not their first language.</p> <p>3. The notice for the consultation referred to copies being at all Haringey libraries and listed all the libraries. This included the closed (for refurbishment) Marcus Garvey Library. While this library being closed is not a serious breach of engagement, it does limit the ability of Tottenham residents to access the documents as Marcus Garvey Library is the main Tottenham library. There is evidence that the copies of the consultation documents were not in the libraries from the start. I visited Coombes Croft Library on 19th January to enquire after the documents. To begin with I was presented with documents from a previous consultation. Then, a member of staff announced that there was a package in the back room. These were brought out and it was discovered they were the correct documents. So, ten days after the start of the consultation the correct documents were not on displayed in Coombes Croft Library.</p>		<p>effective way of doing this is by having HTML processing software that enables all computers to read consultation documents in their native language.</p> <p>3. The documents were sent for display in the library, and when requested were made available. It is noted that having them more visible would be better, but it is considered that they were successfully made available.</p> <p>4. Sufficient copies were printed specifically that they could be made available to community groups.</p> <p>5. The majority of consultation</p>
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				<p>4. From the start of the consultation the council were reluctant to provide any hard copies of the documents. They claimed that a set of the documents were available in libraries and that was good enough. This was despite officer privately admitting that the complex documents are difficult enough to read without being required to. Latterly they accepted it was not sufficient and provided copies to community representatives and groups. In addition, an extra two sets were provided to each of the open public libraries and a set was sent to elected councillors with the instruction that they should make their copy available to their electors.</p> <p>5. The first series of consultation events were held at Haringey's public libraries during the day time. This prevented those with 9-5 Monday to Friday jobs from attending. At Coombes Croft Library and Alexandra Library Our Tottenham members observed that they were the only members of the public present. At the 21st January Wood Green Library event there were only 5 people who stopped to chat with the officers present across a busy lunchtime. Cllr Clive Carter reported to Friends of Finsbury Park that only one person had been recorded as attending the consultation at Highgate Library. Later in the consultation period a number of evening events were organised. However, these were poorly advertised - mainly through the council website - and since most residents only use the Council website, if at all, if they are looking for something they already want or know about, it was no surprise that they failed to attract people to get along. The 15th February evening event - held at 639 High Road, where the council's Tottenham regeneration team have an office - was attended by only one member of the public. In desperation, council officers resorted to standing on the High Road attempting to entice passers-by inside.</p> <p>6. The council was not pro-active from the start of the consultation in using its contact lists to tell residents about it. It was not until Wednesday 13th January that news about the consultation was posted on the council website in the news section. This is five days after the start. So, unless you were already on the planning team's email list then</p>		<p>events in libraries went into the evening to enable as wider number of people to visit as possible. In addition extra meetings were held at Tottenham Town Hall, Tottenham's Living Room, and Ferr Lane Primary School.</p> <p>6. The Council contacted everyone on the planning consultation database, which is considered comprehensive.</p> <p>7. This is not a statutory requirement, and Planning Policy do not control the editorial content of this publication.</p> <p>8. The Council put forward a response form which would be the most efficient</p>
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				<p>you wouldn't necessarily have been alerted until nearly a week had passed. And that was only because a notice was in the email circular Haringey People Extra, which reaches only a small minority of the population.</p> <p>7. There was no mention of the consultation in the February-March 2016 edition of the council's borough-wide publication Haringey People. (see http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey-people-feb-mar-2016.pdf) Not having a major article on the Local Plan in the one publication going to all households, and not placing advertisements in the local press, is a serious failure to engage as many people as possible in the consultation. Indeed, many residents may have known nothing about the consultation until some residents complained to the press (see http://www.thetottenhamindependent.co.uk/news/14246972.Council_crit_licised_over_Local_Plan_consultation_timings/).</p> <p>8. The process of actually submitting a response was portrayed as only being possible by using the official form. This has clearly deterred people and the approach of the council is questionable in that the claim that only responses using the official form would be allowed is not true. The council should have been encouraging people to respond, not telling them about the bureaucratic barriers to having their say. The Reg 19 Response Forum is cumbersome and tricky to complete even for those used to such documents.</p> <p>9. Despite numerous requests by myself (acting on behalf of Our Tottenham) to arrange a meeting with Cllr Ali Demerci (the Haringey Council cabinet member for Planning) he avoided meeting us. In fact, during the consultation period he did not participate in any public meetings where he alone answered questions about the Local Plan and was an occasional attendee of the library and other events. The only meeting he did during the consultation was at a private meeting for Tottenham Labour Party members. The council did not organise a meeting where there were any detailed presentation of the Local Plan or the opportunity to question the proposals. At no point did any of the</p>		<p>manner of getting representations to the Inspector to be viewed. Monay respondents have chosen not to use this, and all reps have been forwarded on to the Planning Inspectorate.</p> <p>9. The attendance of the lead member for Planning at consultation events is not a conformity matter.</p> <p>10. missing</p> <p>11. Noted.</p> <p>Replace "LBH" with "Mix of public and private freeholds and leaseholds"</p>
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				<p>community groups I am an officer of receive a request for a meeting. Only when we organised a meeting of the Dowsett Road Residents Association - attended by 30 people - could with have a detailed discussion of the Local Plan with the council's lead planning officer. I am not aware of either Cllr Demirci or any council officer attending a community organised meeting.</p> <p>We asked on 18th January for a copy of the Council's 'self-assessment' document in relation to this plan, because it was not on the web site. To the best of my knowledge it was not provided when requested.</p> <p>11. The provided documents contain many mistakes that mislead, but also reveal that the documents were rushed. For example the page SA62 on Broadwater Farm gives a contradictory account in different parts of the page about who owns the land and neglects the private ownership of houses in Lordship Lane which may be marked for demolition under the proposed plan. The map for this page shows the boundary of the redevelopment zone going through the middle of a very large and important building, the Broadwater Farm Community Centre. The page SA15 number concerning Whymark Avenue, N22, contains the extraordinary statement that 'no buildings need be retained' even though it contains a new block of mixed residential and retail units only about three years old which presumably had planning permission when constructed. Another mistake is that on the map Bruce Grove station is represented as a national rail station, when it has been a London Overground station for several months.</p> <p>I am willing to explain these criticisms, and wish to be part of any public examination of the council's proposals relating to the consultation process and how it failed to support the involvement of residents. By failing to engage with any significant number of people the consultation has not been adequate and therefore its suitability or soundness has not been thoroughly scrutinised. The process should be re-run, and then with professional advice being provided to those wanting to respond. Along with the flaws above being addressed in ensuring a fair process of</p>		
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					consultation.		
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Respondent 25: Kelly Arnstein

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	NPS35	Not stated	Not Stated	No	<p>There has been a significant lack of consultation in this final step of the process. In asking if this plan is justified, one of the required criteria is 'evidence of participation of the local community and others having a stake in the area'. There is little evidence of community participation encouraged or promoted by the LA in this final round of consultation which goes beyond a minimum. The main means of consultation were:</p> <ul style="list-style-type: none"> • Documents posted on the Council website • Two hour sessions for people to attend at local libraries. <p>For my own part, I have only learned about the Local Plan through my recent involvement with the local Labour Party - which I think is untypical of most Haringey residents!</p> <p>This is a formal process, and the documents are technical and complex. This is a challenge for the layperson, and even more so when reading online as it is very hard to cross reference. But, even before attempting to read them online, residents had to know they were there. This was not straightforward. There were no public meetings called by Haringey to explain these plans even though the consultation ran for several weeks. The Council's borough wide magazine Haringey</p>		<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure</p>

				<p>People – which goes to households directly – did not include one word or reference to this consultation - http://www.haringey.gov.uk/.../haring.../haringey-people-archive . This would have been the most effective method for directly communicating with residents. The documents are hard to read on line yet active residents’ groups had to ask and press for printed copies in order to meet with their members.</p> <p>Consultation sessions in the public libraries were poorly promoted and publicised, running at times most people could not make, even if they were aware of the sessions. Given these circumstances, it would not be surprising if there was not a large response to this consultation and local people should not be blamed.</p> <p>Haringey Council was criticised in the Supreme Court regarding consultation. Their judgement set out conditions for fair consultation. Amongst the four criteria it states that ‘the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.’ I would ask if this condition to allow for ‘ intelligent consideration and response’ has been met in relation to consultation on the Local Plan.</p> <p>This plan depends on private property development. This is its single dimension – there appears to be no alternative. This is high risk and runs counter to other soundness criteria of flexibility and deliverability. There are many alternatives to private sector development, including working with community land trusts, building higher on existing buildings or refurbishment. None of these are mentioned as alternative options for consideration. Instead this plan is predicated on</p>	<p>that private development is located in the correct place, well designed, and delivers positive outcomes for the borough’s residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in he Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan’s housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council’s Statement</p>
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				<p>demolition of estates, including Broadwater Farm and Northumberland Park, where many people will be at risk of losing their homes and their security. With a clear lack of truly affordable and social housing in London at the present time, and with homelessness rates on the rise, this is a risk that I think the Council cannot afford to take.</p> <p>The local authority is also planning to enter into a joint venture with a private development company where the Council will transfer two large council estates and many other properties. It is evident from recent news that the economy is fragile and any downturn could have a serious impact on the viability of these plans, which appear predicated solely on a strong and rising property market. I consider it irresponsible for the local authority to invest all its efforts in one single approach which could have a devastating impact on tenants living on estates, and families waiting for housing.</p> <p>As a resident of Tottenham, I am very concerned about plans to build such tall buildings in our communities. Tottenham is essentially a low-rise area and it is noticeable that this mass of tall buildings, (many over 20 storeys) is being proposed in the east of the borough. The argument put forward in the local plan is that these high rise buildings will support the development of “mixed communities” in Tottenham.</p> <p>This is entirely spurious and misleading. Tottenham is already a hugely mixed community with N15 and N17 reputed to be the most diverse postcodes in Europe. The community is mixed by race, age, class and employment. There are people from all walks of life living alongside each other. Council estates are similarly mixed</p>	<p>of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Council’s tall buildings policy identifies potential locations for tall buildings, and how they need to be designed to make them acceptable in planning terms.</p> <p>The justification for</p>
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				<p>and to argue otherwise is misleading. They have leaseholders, council tenants, private sector tenants, and where there are houses, freeholders. Council estate residents are located firmly in our communities. Demolition in favour of high rise towers is likely to result in the reverse happening, with the development of more single or limited mix of tenure communities, and exclusion of families on low income and those needing affordable social housing. Instead, these plans promote demolitions, with no detail about how people will be rehoused.</p> <p>In the Evening Standard Comment section, Tuesday 29th February, they argue that ‘Housing needs a more imaginative approach’ to high-rise. “[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular with residents; the same is true of the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] not the best answer.” The same argument could be made for Tottenham.</p> <p>The Local Plan is, at best, vague on what will happen to the existing communities who need housing. Paragraph 3.21.18 of the Alterations to Strategic Policies, Pre-Submission version January 2016, states that the</p>	<p>tall buildings is not simply “to create mixed communities” as posited, but is much more nuanced, as set out in DM6 of the Local Plan. In addition to generating additional floorspace to provide much needed new homes and employment space, they can act as markers of the urban realm, identifying key transport nodes and town centres, and when well designed, contribute to the attractiveness of an area.</p> <p>The Council’s Hosuing Strategy is the key document regarding how residents who are affected’s tenancies will be managed.</p>
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					council “aim to ensure an adequate mix of dwellings is provided”. There is no detail as to how this will be achieved especially with housing for families. The proposed developments are largely high density flats, most likely one and two bedrooms. These will not cater for local families and it is likely that current residents living in either private sector rented, temporary or threatened council homes will be left out. The Council can claim its plans will meet housing need. But this plan does not meet the needs of people in housing need who live here now.		
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Respondent 26: David Stoker

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
26	NPS36	Not stated	Not Stated	No	<p>I am writing to formally object to the Haringey Local Plan. My representation is below.</p> <p>There has been a significant lack of consultation in this final step of the process. In asking if this plan is justified, one of the required criteria is ‘evidence of participation of the local community and others having a stake in the area’. There is little evidence of community participation encouraged or promoted by the LA in this final round of consultation which goes beyond a minimum. The main means of consultation were:</p> <ul style="list-style-type: none"> • Documents posted on the Council website • Two hour sessions for people to attend at local libraries. <p>This is a formal process, and the documents are</p>		<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create its own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential</p>

				<p>technical and complex. This is a challenge for the layperson, and even more so when reading online as it is very hard to cross reference. But, even before attempting to read them on line, residents had to know they were there. This was not straightforward. There were no public meetings called by Haringey to explain these plans even though the consultation ran for several weeks. The Council's borough wide magazine Haringey People – which goes to households directly – did not include one word or reference to this consultation - http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-people-archive . This would have been the most effective method for directly communicating with residents. The documents are hard to read online yet active residents' groups had to ask and press for printed copies in order to meet with their members.</p> <p>Consultation sessions in the public libraries were poorly promoted and publicised, running at times most people could not make, even if they were aware of the sessions. Given these circumstances, it would not be surprising if there was not a large response to this consultation and local people should not be blamed.</p> <p>Haringey Council was criticised in the Supreme Court regarding consultation. Their judgement set out conditions for fair consultation. Amongst the four criteria it states that 'the proposer must give sufficient consideration and response.' I would ask if this condition to allow for 'intelligent consideration and response' has been met in relation to consultation on</p>	<p>that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan</p>
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				<p>the Local Plan.</p> <p>This plan depends on private property development. This is its single dimension – there appears to be no alternative. This is high risk and runs counter to other soundness criteria of flexibility and deliverability. There are many alternatives to private sector development, including working with community land trusts, building higher on existing buildings or refurbishment. None of these are mentioned as alternative options for consideration. Instead this plan is predicated on demolition of estates, including Broadwater Farm and Northumberland Park, where many people will be at risk of losing their homes and their security</p> <p>The local authority is also planning to enter into a joint venture with a private development company where the Council will transfer two large council estates and many other properties. It is evident from recent news that the economy is fragile and any downturn could have a serious impact on the viability of these plans, which appear predicated solely on a strong and rising property market. I consider it irresponsible for the local authority to invest all its efforts in one single approach which could have a devastating impact on tenants living on estates, and families waiting for housing.</p> <p>As a resident of Tottenham, I am very concerned about plans to build such tall buildings in our communities. Tottenham is essentially a low-rise area and it is noticeable that this mass of tall buildings, (many over 20 storeys) is being proposed in the east of the borough. The argument put forward in the local</p>	<p>have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically-owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Council's tall buildings policy identifies potential locations for tall buildings, and how they need to be designed to make them acceptable in planning terms.</p>
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				<p>plan is that these high rise buildings will support the development of “mixed communities” in Tottenham.</p> <p>This is entirely spurious and misleading. Tottenham is already a hugely mixed community with N15 and N17 reputed to be the most diverse postcodes in Europe. The community is mixed by race, age, class and employment. There are people from all walks of life living alongside each other. Council estates are similarly mixed and to argue otherwise is misleading. They have leaseholders, council tenants, private sector tenants, and where there are houses, freeholders. Council estate residents are located firmly in our communities. Demolition in favour of high rise towers is likely to result in the reverse happening, with the development of more single or limited mix of tenure communities, and exclusion of families on low income and those needing affordable social housing. Instead, these plans promote demolitions, with no detail about how people will be rehoused.</p> <p>In the Evening Standard Comment section, Tuesday 29th February, they argue that ‘Housing needs a more imaginative approach’ to high-rise. “[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular</p>	<p>The justification for tall buildings is not simply “to create mixed communities” as posited, but is much more nuanced, as set out in DM6 of the Local Plan. In addition to generating additional floorspace to provide much needed new homes and employment space, they can act as markers of the urban realm, identifying key transport nodes and town centres, and when well designed, contribute to the attractiveness of an area.</p> <p>The Council’s Hosuing Strategy is the key document regarding how residents who are affected’s tenancies will be managed.</p>
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					<p>with residents; the same is true of the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] not the best answer. The same argument could be made for Tottenham.</p> <p>The Local Plan is, at best, vague on what will happen to the existing communities who need housing. Paragraph 3.21.18 of the Alterations to Strategic Policies, Pre-Submission version January 2016, states that the council “aim to ensure an adequate mix of dwellings is provided”. There is no detail as to how this will be achieved especially with housing for families. The proposed developments are largely high density flats, most likely one and two bedrooms. These will not cater for local families and it is likely that current residents living in either privates sector rented, temporary or threatened council homes will be left out. The Council can claim its plans will meet housing need. But this plan does not meet the needs of people in housing need who live here now.</p> <p>I wish to speak because I am a Tottenham resident and these plans affect me.</p>		
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Respondent 27: Pavlos Mastiki

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
27	NPS37	Not stated	Not Stated	No	I am writing to formally object to the Haringey Local Plan. My representation is below.		The council has a requirement to meet the

				<p>There has been a significant lack of consultation in this final step of the process. In asking if this plan is justified, one of the required criteria is 'evidence of participation of the local community and others having a stake in the area'. There is little evidence of community participation encouraged or promoted by the LA in this final round of consultation which goes beyond a minimum. The main means of consultation were:</p> <ul style="list-style-type: none"> • Documents posted on the Council website • Two hour sessions for people to attend at local libraries. <p>This is a formal process, and the documents are technical and complex. This is a challenge for the layperson, and even more so when reading on line as it is very hard to cross reference. But, even before attempting to read them on line, residents had to know they were there. This was not straightforward. There were no public meetings called by Haringey to explain these plans even though the consultation ran for several weeks. The Council's borough wide magazine Haringey People – which goes to households directly – did not include one word or reference to this consultation - http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-people-archive . This would have been the most effective method for directly communicating with residents. The documents are hard to read on line yet active residents' groups had to ask and press for printed copies in order to meet</p>	<p>borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from</p>
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				<p>with their members.</p> <p>Consultation sessions in the public libraries were poorly promoted and publicised, running at times most people could not make, even if they were aware of the sessions. Given these circumstances, it would not be surprising if there was not a large response to this consultation and local people should not be blamed.</p> <p>Haringey Council was criticised in the Supreme Court regarding consultation. Their judgement set out conditions for fair consultation. Amongst the four criteria it states that ‘the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.’ I would ask if this condition to allow for’ intelligent consideration and response’ has been met in relation to consultation on the Local Plan.</p> <p>This plan depends on private property development. This is its single dimension – there appears to be no alternative. This is high risk and runs counter to other soundness criteria of flexibility and deliverability. There are many alternatives to private sector development, including working with community land trusts, building higher on existing buildings or refurbishment. None of these are mentioned as alternative options for consideration. Instead this plan is predicated on demolition of estates, including Broadwater Farm and Northumberland Park, where many people will</p>	<p>the Local Plan’s housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council’s Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Council’s tall buildings policy identifies potential locations for tall buildings, and how they need to be designed to make them acceptable in planning terms.</p>
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				<p>be at risk of losing their homes and their security</p> <p>The local authority is also planning to enter into a joint venture with a private development company where the Council will transfer two large council estates and many other properties. It is evident from recent news that the economy is fragile and any downturn could have a serious impact on the viability of these plans, which appear predicated solely on a strong and rising property market. I consider it irresponsible for the local authority to invest all its efforts in one single approach which could have a devastating impact on tenants living on estates, and families waiting for housing.</p> <p>As a resident of Tottenham, I am very concerned about plans to build such tall buildings in our communities. Tottenham is essentially a low-rise area and it is noticeable that this mass of tall buildings, (many over 20 storeys) is being proposed in the east of the borough. The argument put forward in the local plan is that these high rise buildings will support the development of “mixed communities” in Tottenham.</p> <p>This is entirely spurious and misleading. Tottenham is already a hugely mixed community with N15 and N17 reputed to be the most diverse postcodes in Europe. The community is mixed by race, age, class and employment. There are people from all walks of life living alongside each other. Council estates are</p>	<p>The justification for tall buildings is not simply “to create mixed communities” as posited, but is much more nuanced, as set out in DM6 of the Local Plan. In addition to generating additional floorspace to provide much needed new homes and employment space, they can act as markers of the urban realm, identifying key transport nodes and town centres, and when well designed, contribute to the attractiveness of an area.</p> <p>The Council’s Housing Strategy is the key document regarding how residents who are affected’s tenancies will be managed.</p>
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				<p>similarly mixed and to argue otherwise is misleading. They have leaseholders, council tenants, private sector tenants, and where there are houses, freeholders. Council estate residents are located firmly in our communities. Demolition in favour of high rise towers is likely to result in the reverse happening, with the development of more single or limited mix of tenure communities, and exclusion of families on low income and those needing affordable social housing. Instead, these plans promote demolitions, with no detail about how people will be rehoused.</p> <p>In the Evening Standard Comment section, Tuesday 29th February, they argue that 'Housing needs a more imaginative approach' to high-rise. "[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular with residents; the same is true of the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] not the best answer." The same argument could be made</p>		
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					<p>for Tottenham.</p> <p>The Local Plan is, at best, vague on what will happen to the existing communities who need housing. Paragraph 3.21.18 of the Alterations to Strategic Policies, Pre-Submission version January 2016, states that the council “aim to ensure an adequate mix of dwellings is provided”. There is no detail as to how this will be achieved especially with housing for families. The proposed developments are largely high density flats, most likely one and two bedrooms. These will not cater for local families and it is likely that current residents living in either private sector rented, temporary or threatened council homes will be left out. The Council can claim its plans will meet housing need. But this plan does not meet the needs of people in housing need who live here now.</p>		
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Respondent 28: Seema Chandwani

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
28	NPS38	Not stated	Not Stated	No	<p>I am writing to formally object to the Haringey Local Plan. My representation is below.</p> <p>There has been a significant lack of consultation in this final step of the process. In asking if this plan is justified, one of the required criteria is ‘evidence of participation of the local community and others having a stake in the area’. There is little evidence of community participation</p>		<p>The council has a requirement to meet the borough’s objectively identified housing and employment needs.</p> <p>While the Council is</p>

				<p>encouraged or promoted by the LA in this final round of consultation which goes beyond a minimum. The main means of consultation were:</p> <ul style="list-style-type: none"> • Documents posted on the Council website • Two hour sessions for people to attend at local libraries. <p>This is a formal process, and the documents are technical and complex. This is a challenge for the layperson, and even more so when reading o line as it is very hard to cross reference. But, even before attempting to read them on line, residents had to know they were there. This was not straightforward. There were no public meetings called by Haringey to explain these plans even though the consultation ran for several weeks. The Council’s borough wide magazine Haringey People – which goes to households directly – did not include one word or reference to this consultation - http://www.haringey.gov.uk/.../haring.../haringey-people-archive . This would have been the most effective method for directly communicating with residents. The documents are hard to read on line yet active residents’ groups had to ask and press for printed copies in order to meet with their members.</p> <p>Consultation sessions in the public libraries were poorly promoted and publicised, running at times most people could not make, even if they were aware of the sessions. Given these circumstances, it would not be surprising if there was not a large response to this consultation and local people should not be blamed.</p> <p>Haringey Council was criticised in the Supreme Court regarding consultation. Their judgement set out</p>	<p>beginning to create it’s own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough’s needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough’s residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in he Infrastructure Delivery Plan.</p>
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				<p>conditions for fair consultation. Amongst the four criteria it states that 'the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.' I would ask if this condition to allow for 'intelligent consideration and response' has been met in relation to consultation on the Local Plan.</p> <p>This plan depends on private property development. This is its single dimension – there appears to be no alternative. This is high risk and runs counter to other soundness criteria of flexibility and deliverability. There are many alternatives to private sector development, including working with community land trusts, building higher on existing buildings or refurbishment. None of these are mentioned as alternative options for consideration.</p> <p>Instead this plan is predicated on demolition of estates, including Broadwater Farm and Northumberland Park, where many people will be at risk of losing their homes and their security</p> <p>The local authority is also planning to enter into a joint venture with a private development company where the Council will transfer two large council estates and many other properties. It is evident from recent news that the economy is fragile and any downturn could have a serious impact on the viability of these plans, which appear predicated solely on a strong and rising property market. I consider it irresponsible for the local authority to invest all its efforts in one single approach which could have a devastating impact on tenants living on estates, and families waiting for housing.</p> <p>As a resident of Tottenham, I am very concerned about</p>		<p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will</p>
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				<p>plans to build such tall buildings in our communities. Tottenham is essentially a low-rise area and it is noticeable that this mass of tall buildings, (many over 20 storeys) is being proposed in the east of the borough. The argument put forward in the local plan is that these high rise buildings will support the development of “mixed communities” in Tottenham.</p> <p>This is entirely spurious and misleading. Tottenham is already a hugely mixed community with N15 and N17 reputed to be the most diverse postcodes in Europe. The community is mixed by race, age, class and employment. There are people from all walks of life living alongside each other. Council estates are similarly mixed and to argue otherwise is misleading. They have leaseholders, council tenants, private sector tenants, and where there are houses, freeholders. Council estate residents are located firmly in our communities.</p> <p>Demolition in favour of high rise towers is likely to result in the reverse happening, with the development of more single or limited mix of tenure communities, and exclusion of families on low income and those needing affordable social housing. Instead, these plans promote demolitions, with no detail about how people will be rehoused.</p> <p>In the Evening Standard Comment section, Tuesday 29th February, they argue that ‘Housing needs a more imaginative approach’ to high-rise. “[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is</p>	<p>be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Council’s tall buildings policy identifies potential locations for tall buildings, and how they need to be designed to make them acceptable in planning terms.</p> <p>The justification for tall buildings is not simply “to create mixed communities” as posited, but is much more nuanced, as set out in DM6 of the Local Plan. In addition to generating additional floorspace to provide much needed new homes and employment space, they can act as markers of the urban realm, identifying key</p>
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				<p>possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular with residents; the same is true of the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] not the best answer.” The same argument could be made for Tottenham.</p> <p>The Local Plan is, at best, vague on what will happen to the existing communities who need housing. Paragraph 3.21.18 of the Alterations to Strategic Policies, Pre-Submission version January 2016, states that the council “aim to ensure an adequate mix of dwellings is provided”. There is no detail as to how this will be achieved especially with housing for families. The proposed developments are largely high density flats, most likely one and two bedrooms. These will not cater for local families and it is likely that current residents living in either private sector rented, temporary or threatened council homes will be left out. The Council can claim its plans will meet housing need. But this plan does not meet the needs of people in housing need who live here now.</p>	<p>transport nodes and town centres, and when well designed, contribute to the attractiveness of an area.</p> <p>The Council’s Hosuing Strategy is the key document regarding how residents who are affected’s tenancies will be managed.</p>
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Respondent 29: Milena Buyum

ID	Rep ID	Allocation / Policy /	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
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		Figure / Para					
29	NPS39	Not stated	Not Stated	No	<p>I am writing to formally object to the Haringey Local Plan. My representation is below.</p> <p>There has been a significant lack of consultation in this final step of the process. In asking if this plan is justified, one of the required criteria is 'evidence of participation of the local community and others having a stake in the area'. There is little evidence of community participation encouraged or promoted by the LA in this final round of consultation which goes beyond a minimum. The main means of consultation were:</p> <ul style="list-style-type: none"> • Documents posted on the Council website • <p>Two hour sessions for people to attend at local libraries.</p> <p>This is a formal process, and the documents are technical and complex. This is a challenge for the layperson, and even more so when reading online as it is very hard to cross reference. But, even before attempting to read them on line, residents had to know they were there. This was not straightforward. There were no public meetings called by Haringey to explain these plans even though the consultation ran for several weeks. The Council's borough wide magazine Haringey People – which goes to households directly – did not include one word or reference to this consultation - http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-people-archive . This would have been the most</p>		<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in he Infrastructure Delivery Plan.</p>

				<p>effective method for directly communicating with residents. The documents are hard to read on line yet active residents' groups had to ask and press for printed copies in order to meet with their members.</p> <p>Consultation sessions in the public libraries were poorly promoted and publicised, running at times most people could not make, even if they were aware of the sessions. Given these circumstances, it would not be surprising if there was not a large response to this consultation and local people should not be blamed.</p> <p>Haringey Council was criticised in the Supreme Court regarding consultation. Their judgement set out conditions for fair consultation. Amongst the four criteria it states that 'the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.' I would ask if this condition to allow for 'intelligent consideration and response' has been met in relation to consultation on the Local Plan.</p> <p>This plan depends on private property development. This is its single dimension – there appears to be no alternative. This is high risk and runs counter to other soundness criteria of flexibility and deliverability. There are many alternatives to private sector development, including working with community land trusts, building higher on existing buildings or refurbishment. None of these are mentioned as</p>	<p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Council's tall buildings policy identifies potential locations for tall buildings,</p>
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				<p>alternative options for consideration. Instead this plan is predicated on demolition of estates, including Broadwater Farm and Northumberland Park, where many people will be at risk of losing their homes and their security</p> <p>The local authority is also planning to enter into a joint venture with a private development company where the Council will transfer two large council estates and many other properties. It is evident from recent news that the economy is fragile and any downturn could have a serious impact on the viability of these plans, which appear predicated solely on a strong and rising property market. I consider it irresponsible for the local authority to invest all its efforts in one single approach which could have a devastating impact on tenants living on estates, and families waiting for housing.</p> <p>As a resident of Tottenham, I am very concerned about plans to build such tall buildings in our communities. Tottenham is essentially a low-rise area and it is noticeable that this mass of tall buildings, (many over 20 storeys) is being proposed in the east of the borough. The argument put forward in the local plan is that these high rise buildings will support the development of “mixed communities” in Tottenham.</p> <p>This is entirely spurious and misleading. Tottenham is already a hugely mixed community with N15 and N17 reputed to be the most</p>	<p>and how they need to be designed to make them acceptable in planning terms.</p> <p>The justification for tall buildings is not simply “to create mixed communities” as posited, but is much more nuanced, as set out in DM6 of the Local Plan. In addition to generating additional floorspace to provide much needed new homes and employment space, they can act as markers of the urban realm, identifying key transport nodes and town centres, and when well designed, contribute to the attractiveness of an area.</p> <p>The Council’s Hosuing Strategy is the key document regarding how residents who are affected’s tenancies will be managed.</p>
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				<p>diverse postcodes in Europe. The community is mixed by race, age, class and employment. There are people from all walks of life living alongside each other. Council estates are similarly mixed and to argue otherwise is misleading. They have leaseholders, council tenants, private sector tenants, and where there are houses, freeholders. Council estate residents are located firmly in our communities. Demolition in favour of high rise towers is likely to result in the reverse happening, with the development of more single or limited mix of tenure communities, and exclusion of families on low income and those needing affordable social housing. Instead, these plans promote demolitions, with no detail about how people will be rehoused.</p> <p>In the Evening Standard Comment section, Tuesday 29th February, they argue that 'Housing needs a more imaginative approach' to high-rise. "[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is possible to envisage far more medium-rise developments that we have at present – four to eight or nine storeys, say – which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density but aesthetically pleasing and popular with residents; the same is true of the Peabody and Guinness estates, which are</p>		
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					<p>medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] not the best answer.” The same argument could be made for Tottenham.</p> <p>The Local Plan is, at best, vague on what will happen to the existing communities who need housing. Paragraph 3.21.18 of the Alterations to Strategic Policies, Pre-Submission version January 2016, states that the council “aim to ensure an adequate mix of dwellings is provided”. There is no detail as to how this will be achieved especially with housing for families. The proposed developments are largely high density flats, most likely one and two bedrooms. These will not cater for local families and it is likely that current residents living in either private sector rented, temporary or threatened council homes will be left out. The Council can claim its plans will meet housing need. But this plan does not meet the needs of people in housing need who live here now.</p>		
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Respondent 30: Broadwater Farm Residents’ Association

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
30	NPS40	Not stated	Not Stated	Not stated	Haringey Council’s Unwillingness to Re-provide Genuinely Affordable Housing on Regeneration Estates	Not stated	The council has a requirement to meet the borough’s objectively identified housing and employment needs.

				<p>SA62 indicates that any redevelopment will lead to no loss of affordable housing. Other than the concerns about the development vehicle outlined above, we have serious concerns about the concept of so-called 'affordable housing' in this connection. 'Affordable housing', is a broad term and is not the same thing as social housing with a permanent tenancy, that is let at a social housing rent similar to those currently charged for council housing. Shared ownership or 'affordable' rented housing that can be let at up to 80% of market rent will not be affordable to most residents. If we look at Appendix C of the Consultation on Haringey's Draft Housing Strategy 2015-2020, neither option is likely to be affordable for Broadwater Farm residents. Let us take rents set at 65% of the average private sector rent for Haringey (65% is the blended average of rents for Affordable Homes in London and Haringey). We see that this figure is £812.50 per month². Appendix C to the report finds this just about affordable for a household on the median Haringey household income of £33,140 a year. The same report, however, indicates that the median</p>	<p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The Council's Hosuing Strategy is the key document regarding how residents who are affected's tenancies will be managed.</p> <p>The Council does not agree that the local plan's housing plan will disadvantage BME residents. The respondent refers to the EQiA that was carried out in relation to the Housing Strategy. The EQiA that was published with the draft Housing Strategy identified a cause</p>
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² See Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C

[http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/A100041306/\\$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf](http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/A100041306/$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf)
page 53-4.

				<p>household income for West Green ward is barely over £20,000 a year.³ This would indicate that ‘affordable’ housing built on the Broadwater Farm site is likely to be unaffordable for local residents. The report is quite clear that shared ownership homes will not be affordable to the majority of Broadwater Farm residents. It indicates that new shared ownership homes in Tottenham require a minimum household income of £34,709 a year⁴.</p> <p>Paragraph 3.2.2 of <i>Haringey’s Local Plan: Strategic Policies 2013-2026</i> states that:</p> <p>‘The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community they want to live.’</p> <p>For the above reasons, we believe that the demolition of the Broadwater Farm and other council estates in Tottenham contravenes the Council’s own policies.</p> <p>We therefore state that the only way to maintain the current supply of truly affordable housing in</p>	<p>of concern in the take up of one particular type of housing, which is Shared Ownership. Shared ownership (part-rent part-buy homes) consisted of around 135 units a year during the last two years, whilst social housing lets over the last two years were around 600 a year. The findings related to the shared ownership take up, are not directly related to the issue of estate renewal. The Council is taking action to mitigate the imbalance of households who buy into shared ownership schemes, by undertaking further research and monitoring, and by ensuring that its marketing and sales are targeted at local households.</p> <p>The housing policy governing estate renewal, which has been the subject of extensive consultation between November 2015 and February 2016, and which is due to report back to Cabinet in July 2016. There will be a separate Equalities Impact Assessment published when that report is presented to Cabinet. The Local Plan has been subject to it’s own EQiA as part of the Sustainability Appraisal.</p>
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³Ibid., page 58.

⁴Ibid., note 5, page 53.

				<p>Tottenham and on the Broadwater Farm site is not to carry out demolitions of council homes.</p> <p>The Negative Equalities Impact of Demolitions on Broadwater Farm</p> <p>In reference to the above section the following should be noted from the Equalities Impact report:</p> <p>'Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period.</p> <p>Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east.</p> <p>Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are over-represented in comparison with their representation in the general population of Haringey...</p> <p>The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit</p>		
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				<p>from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily.'⁵</p> <p>We would also note council plans to house more homeless families outside London (see Haringey Council's <i>Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18</i>)⁶. (This was a report made to the Cabinet as part of agenda papers on 16/12/2014.). Clearly demolishing social housing without appropriate replacement in areas like Broadwater Farm will lead to increasing numbers of Haringey's homeless families being forced out of London. This pressure to move out of London, adds to the discriminatory nature of any proposal to demolish social housing. As Appendix C of the <i>Consultation on Haringey' Draft Housing Strategy 2015-2020</i> states:</p> <p>'Black households approach as homeless at a level which is more than twice their representation in Haringey's population compared with White households who present in numbers which are around two thirds of their</p>	
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⁵Ibid., page 12

⁶ *Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18* at

[http://www.minutes.haringey.gov.uk/Published/C00000118/M00007188/\\$\\$ADocPackPublic.pdf](http://www.minutes.haringey.gov.uk/Published/C00000118/M00007188/$$ADocPackPublic.pdf) page 205

					<p>representation in Haringey's general population. This indicates that Black households are particularly affected by homelessness in the borough.'⁷</p> <p>Therefore reducing the amount of genuinely affordable social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. We believe that Appendix C clearly demonstrates that Haringey Council's policy is likely to lead to a greater reliance on home ownership schemes like Shared Ownership at the expense of genuinely affordable socially rented housing. This is additional evidence of the discriminatory nature of the Council's plan for Broadwater Farm and Tottenham as a whole.</p> <p>We are also concerned that the letters regarding this consultation have only gone out in English and that a member of the Residents' Association committee was informed on 16/03/2015 by Haringey Council's Planning Department that consultation responses in Turkish would not be considered. We believe this contravenes that duty of Haringey Council to consult all sections of the community equally about the</p>	
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⁷ Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C, page 5.

				<p>Local Plan.</p> <p>We believe that the Local Plan policy will discriminate against black households and the consultation on it was carried out in a way that excluded Turkish speakers. We believe that both of these factors breach the commitment in Haringey Council's Equal Opportunities Policy of April 2012 to the fair provision of services.</p> <p>In addition the official summary in the DPD of what the S62 zone proposal would mean is inaccurate, vague, misleading and meaningless. This renders any meaningful 'consultation' impossible, or more likely biased in favour of the Council's unilateral agenda for the area.</p> <p>We are concerned that a 'regeneration' of the Broadwater Farm that leads to the building of a an increase in schemes like Shared Ownership at the expense of genuinely socially rented housing would disadvantage the black community and contravene Haringey Council's commitment to equal opportunities as indicated by their own Equalities Assessment. We also believe that providing homes at 65%</p>		
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				<p>market rent would have a similar impact due to lower median incomes in the East of the borough as indicated on page 58 of the Equalities Assessment document.</p> <p>Where will Secure Housing Tenants be Re-housed?</p> <p>Thousands of council homes are potentially at risk of demolition in Haringey. Alteration 53 to the Strategic Policies lists Northumberland Park, Love Lane, Turner Avenue and other smaller sites on the list for estate regeneration. There is a proposal to build 2,000 extra homes on the Northumberland Park Site Allocation area, according to a recent council newsletter ⁸. Given the location and size of the 'regeneration area' this will clearly involve the demolition of many council homes in Northumberland Park. Residents across Haringey are being consulted about regeneration and therefore potential demolition at many other sites such as Tamar Way, Reynardson Court, Leabank View/Lemsford Close and some blocks on Imperial Wharf.</p> <p>We are concerned that with such a reduction in the supply of council</p>	
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⁸http://www.haringey.gov.uk/sites/haringeygovuk/files/northumberland_park_newsletter_january_-_lores.pdf

					<p>housing, decanted residents from Broadwater Farm may end up with a very limited choice, if any, of where to move to.</p> <p>Leaseholders and Their Tenants</p> <p>Flats on Broadwater Farm often sell for a fairly low value of between £150,000 to £200,000 depending on size, as a quick survey of the Zoopla website indicates. Property values in the rest of Haringey and indeed London are much higher. Many leaseholders on Broadwater Farm will face having to move out of London entirely if their homes are demolished, even if they receive the current market value for their home.</p> <p>In addition, it must be noted that the private tenants of leaseholders may end up homeless if their homes are demolished and they do not fall into one of the Council's 'priority need' categories, such as having dependent children or having a disability.</p>		
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Respondent 31: Sainsburys Supermarkets Ltd

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
31	NPS41	Not stated	No	Not stated	we are extremely concerned that the Council has not		See response to

					<p>based these proposed allocations on appropriate co-operation with Sainsbury's in accordance with guidance contained within paragraph 157 of the National Planning Policy Framework (NPPF). In addition, the paragraph 160 of the NPPF clearly advises that: <i>Local Planning Authorities should have a clear understanding of business needs within the economic markets operating in and across their area.</i></p> <p>To achieve this, LPA's should "work closely with the business community to understand their changing needs and identify and address any barriers to investment..."</p> <p>Having considered the proposed policies, Sainsbury's does not consider that the Council has discharged its duty in respect of these elements and, therefore, these policies cannot be considered to be justified or consistent with national policy. As such, the aforementioned policies cannot be considered as sound.</p>		Sainsbury's in the Consultation Statement to the Site Allocations DPD
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Respondent 32: Michael Hodges

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
32	NPS42	Not stated	No	No	Primarily, the plan is unsound because it is not objective. The plan does not apply its own criteria equally to all parts of Haringey. In effect, by selectively applying these criteria, it protects the electorally marginal council wards in the west of the borough, from all major construction. The requirements of the London Plan are hence concentrated here in the east. This resulting		The Plan is required to be in conformity with the London Plan and existing Strategic Policies DPD, which set the pattern of growth within the borough. This identifies Tottenham and Wood Green as the

				<p>concentration makes it easier to justify high density, tall buildings as the only way to meet the targets in the London Plan.</p> <p>Secondly, an invisible ‘consultation’ process has further smoothed the path for the plan.</p> <p>Finally, but for me most significantly, these proposals do not attempt to address the dire housing need of the families currently living in Tottenham (the children of whom I teach). This omission creates the perception that the ‘Local Plan’ is being misused as a tool for social and ethnic cleansing. To some councillors, Tottenham’s problem is its people, rather than its poverty. Instead of meeting the objectives of the London Plan, whilst protecting our community cohesion, it will ferment a sense of injustice. In short, it risks ripping our community to pieces for the third time.</p> <p>I will now address each of these objections.</p> <p><u>Objectivity</u></p> <p>Viewpoints</p> <p>The plan specifies 15 local viewpoints (Map 2.3 and Appendix B) that should be protected and with which developments would not be permitted to interfere.</p> <p>Thirteen of these viewpoints are within the west of the borough and the remaining two, although in the east, look out to Alexander Palace in the</p>	<p>principal growth areas in Haringey.</p> <p>The council has a requirement to meet the borough’s objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it’s own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough’s needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough’s residents.</p> <p>The proposed new health facilities are predicated on the growth included in the</p>
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				<p>west!</p> <p>Both the historical townscape of Tottenham, and the views across Tottenham Marshes have been completely ignored for designation. Hence viewpoints have been used to protect the west whilst disregarded in Tottenham. This is despite the fact that we have many buildings of architectural and historical interest. This plan fails to consider a single Tottenham townscape worthy of designation – in contrast to two townscapes in the west.</p> <p>I would like the following views considered for addition to the list of Local Views:</p> <p>1) The views across Tottenham Marshes, from within the marshes itself.</p> <p>When I take my class to the marshes and canal, they enjoy a real sense of space – they even ask, “Are we in the countryside?” This sense of openness will be completely destroyed by the proposed tall buildings at Tottenham Hale and Hale Wharf, looming over it. Also, future developments in neighbouring Enfield may affect the view. I believe this is a serious omission from an objective analysis of ‘Local Views’.</p> <p>2) Tottenham High Road, across Tottenham Green to the old Town Hall and Fire Station.</p> <p>3) From the War Memorial to Holy Trinity Church.</p> <p>These views uniquely display Tottenham’s</p>	<p>Local Plan, as evidenced in he Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan’s housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council’s Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically- owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has</p>
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				<p>heritage across a rare open space. They can currently be seen, by all people travelling through Tottenham along the High Road.</p> <p>Proposals have in the past been suggested for a development on ground adjacent to Tottenham Green, which would detract from this currently unprotected townscape.</p> <p>4) The view on Bruce Grove towards the historic Bruce Castle.</p> <p>5) The view across Bruce Castle Park, towards the Georgian Houses and public house on Church Road - the remaining part of the original Tottenham village. (A designation as ‘an asset of community value’ prevented the Antwerp Arms actually being replaced by flats.)</p> <p>The fact that these views were not identified in the plan is evidence that views in Tottenham were not considered objectively on their merits.</p> <p>6) The view south, down Tottenham High Road, towards the Tower of St Ignatius Church.</p> <p>For over 100 years, this Tower has been the tallest landmark looking down the High Road, towards Stamford Hill. Built by the architect Benedict Williamson, it was “designed in the spirit of the early Middle Ages,” as a signpost for Tottenham. A tall building at Seven Sisters will detract from this ‘tower’ and its significance.</p>	<p>and will be supported.</p> <p>The pattern of development that has been set out in the Local Plan has been subject to the statutorily required sequential test, and all sites have been included in a borough-wide SFRA. Additionally, upon development, all sites will be required to not increase the risk of flooding on the site, or elsewhere.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p> <p>The protected views set out in DM5 are considered sound, and are based on evidence contained in the Urban Characterisation Study.</p>
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				<p>Proximity to transport hubs.</p> <p>The plan states:</p> <p>“The Council considers that currently only two areas, Haringey Heartlands/Wood Green and Tottenham Hale, have sites that may be suitable for some tall buildings, because they are close to major transport interchanges, “</p> <p>Bounds Green station lies in the west of the borough in the ward represented by the councilor for planning Ali Demirci. It is on the Piccadiilly Line – one stop from Wood Green. Thus if tall buildings were appropriate due to proximity to a ‘transport interchange’, it too should be considered as an area suitable for ‘some tall buildings.’ This criterion has not been applied to this part of the borough.</p> <p>Height of Local Buildings</p> <p>Point 2.29 of the plan states that ‘Elsewhere tall buildings are considered inappropriate to Haringey’s predominately 2 - 6 storey prevailing heights and character. ‘</p> <p>The buildings opposite and surrounding Seven Sisters station are also within this height range yet a council building, Apex House, has been sold by the council with planning permission for a tall building.</p> <p>The criterion for considering ‘prevailing heights’ has been applied to Bounds Green station in the</p>		
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				<p>west, yet ignored at Seven Sisters in Tottenham.</p> <p>No consideration to alternatives to tall buildings.</p> <p>The plan fails to consider meeting the objectives of the London Plan, through a borough wide development of lower rise family homes. The council has an estate a few yards from Bounds Green station – which too could be demolished and rebuilt, as is proposed for estates in Tottenham. Ali Demirci cabinet member for planning, has not proposed this for Bounds Green, his own ward. If this is inappropriate for Bounds Green it is also inappropriate for areas of Tottenham which meet the same criteria.</p> <p>A Tottenham community group won planning permission for a medium density development at Wards Corner, adjacent to Seven Sisters in Tottenham. The plan fails to mention this alternative. Instead point 2.30 states, ‘Tall can contribute to townscape Place making’. The name ‘Wards Corner’, comes from the former Edwardian department store which still stands on this site. As the name suggests, this is already a current historical place making landmark, which has established the ‘prevailing heights’ criterion.</p> <p>Other groups have proposed low family developments e.g. over car parks – maintaining the community car parks but also providing housing. The Local Plan has not considered these or similar strategies. The Local Plan has</p>		
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				<p>failed to consider alternatives to high - density development in the east of the borough, such as borough wide medium density family developments.</p> <p><u>Consultation</u></p> <p>I do not believe the consultation has been satisfactory.</p> <p>Publicising the Local Plan</p> <p>When I asked the parents of children I teach, about their opinions of the Local Plan, they had no knowledge of it. The council circulate the magazine: 'Haringey People' to every household, yet this has not mentioned the consultation and the closing date for comments.</p> <p>Yesterday, 2/3/16, two days before the consultation closes, a local ward councillor sent out an email suggesting residents should send in any comments by Friday. I do not believe this is adequate notification and only those people that are on a councillor's email list would receive it.</p> <p>Meetings</p> <p>The public meetings held have all been on weekdays and finished before many are home from work. I would have attended a Saturday meeting if it had been organized or a later evening meeting starting at 7pm. (In any case – I only knew they were taking place from the website, which I was only consulting because I</p>		
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				<p>already knew of the Local Plan.)</p> <p>If a resident did discover that there was a Local Plan for consultation, it has not been easy to find out more.</p> <p>Website Copies</p> <p>I have used these to try and discover what is happening – but it has been difficult moving between four separate documents. In particular, the keys on the maps in the versions available on the website (Map 2.2 and 2.3) are not readable even on maximum zoom. Hence it is not possible to see clearly what the colours designate and the planned sites for tall buildings. A red speck may be indicated at Seven Sisters, but is easily missed with out very close attention. This lack of clarity remained the case when I printed the maps out. Ideally I would have liked to have use of a printed copy.</p> <p>Printed copies</p> <p>Apparently the council printed 200 copies of the local plan – 57 of which were for the personal use of councillors. Although a copy was given to each library for reference - the main library in Tottenham, Marcus Garvey, has been closed for refurbishment for the past 6 months. I enquired at 329 High Road, where the website indicated there was a copy, but the assistant was unable to locate it. Eventually my local resident's association obtained a single copy, which I was able to briefly consult, although referring across</p>		
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				<p>four documents in a limited time was still confusing.</p> <p><u>The need for the protection of social housing.</u></p> <p>The plan should specify the target for social housing that it will provide. Currently a separate 'development vehicle' is being proposed in which council estates will be handed over to developers without any guarantee of the continuance of social housing. The proposals should be brought within the Local Plan so that they are open to scrutiny by the inspector.</p> <p>Tottenham is the centre of the Ghanaian community in the UK. These and other West African children represent the majority of those attending the school in which I teach. The council's own equalities assessment has shown that black people will be adversely affected by the plans as they will not be able to afford properties in the proposed new developments. I asked the leader of the council if she could guarantee that council housing would be protected as part of the 'development vehicle.' She stated that she could not make any guarantees. If the current families cannot be accommodated in new developments, they will not leave Tottenham. Family and community connections will keep them homeless here, either living in sheds or living in cars. The latter is what happened to a child I taught after being burnt out of her home in the riots of 2011 (despite her parents being offered accommodation outside of the borough). Hence</p>		
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					<p>people will see new towers arise on the site of their old homes, which they can neither afford to rent or buy. They will see these occupied by wealthy new residents, who are unaware that the rough sleepers they step over are the former residents they have displaced.</p> <p>I honestly hope a future enquiry will not identify the Local Plan and its inspection as yet another missed opportunity to have averted the physical destruction of this community.</p>		
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Respondent 33: Ann McTaggart

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
33	NPS43	Not stated	Not stated	Not stated	<p>We are in the middle of a housing CRISIS. The word 'housing' is never far away from the word 'crisis'. I believe the council to be complacent (at best) with regard to the housing crisis by not providing decent and inclusive housing for all. Haringey Council should be demanding help from the government and standing up for the members of the borough that voted its councillors into power.</p> <p>Instead, the council is showing blatant disregard for the people of this borough and is going as far as to do the government's dirty work for them. Shocking! What's the point of being a councillor if you fail to serve the voter?</p> <p>The Council should drop the Local Plan, and instead work with residents to improve existing homes and</p>		It is considered that the Local Plan meets objectively identified housing needs.

					invest in local communities. We need more and better council housing. It is your duty.		
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Respondent 34: Walter Lee

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
34	NPS44	Not stated	Yes	Yes	It is in compliance with the SCI. It is deliverable and based on robust and credible evidence It is in line with the objective set out in Haringey's sttainable community		Noted.

Respondent 35: Suat Asan

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
35	NPS45	Not stated	No	No	None given		Noted.

Respondent 36: Habiezium Hagos

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
36	NPS46	Not	Not	Not stated	None given	None	No issues have been

		stated	stated				identified, so no response is provided.
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Respondent 37: Haringey Defend Council Housing

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
37	NPS 47	Not stated	Not stated	Not stated	<p>No reasonable person who has examined the Local Plan, its evidence base and its policy context, could believe that it aims to fulfill Housing policy objective 3.2:</p> <p style="text-align: center;">The council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of.</p> <p>Unfortunately, the opposite has been the case. This is a plan for social exclusion. We therefore recommend that the Local Plan should be rejected in its present form.</p> <p>We will present evidence under the following headings:</p> <ol style="list-style-type: none"> 1. Lack of response to the housing needs Evidence Base 2. Adverse Equalities Impact 3. Lack of consideration of the adverse social impact of Superdensity schemes 4. The Tottenham Hotspur planning application (Site allocation NT7) 5. Inadequate consultation 6. Policy recommendation and proposed alternatives 7. Arrangements for meeting the Planning inspector, including the pre-meeting 	Not stated	The Plan is required to be in conformity with the London Plan and existing Strategic Policies DPD, which set the pattern of growth within the borough. This identifies Tottenham and Wood Green as the

				<p>1. <u>Lack of response to the housing needs Evidence Base</u></p> <p>The Evidence Base of the Local Plan includes a Housing Needs Assessment and a Strategic Housing Market Assessment, which both show what needs to be done to provide decent secure and affordable housing for the people in this borough, but the Local Plan completely fails to address these requirements.</p> <p style="text-align: center;"><u>Haringey Housing Needs Assessment, June 2007</u></p> <p>http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_housing_needs_assessment_2007_0.pdf</p> <p>This report found that there was a shortfall of 3,405 social units a year over the next 5 years (p98). The report commented that, “The analysis suggests that any target of affordable housing would be perfectly justified in terms of the need.” (Executive Summary, p 6). The report called for affordable housing targets of 60% in Haringey Heartlands and Tottenham Hale, the two projected growth areas that were then expected to be built within the next five years. Furthermore, ‘the profile of households in need suggests that 70% of affordable homes should be social rented and 30% should be intermediate housing priced halfway between social rents and minimum market levels’ (p98).</p> <p>By planning to demolish council housing, and with its vagueness about replacement properties and silence on rents and service charges, the Local Plan does not address the housing needs of lower income people, fails to respond to the analysis in this report, and fails to address Housing policy objective 3.2.</p> <p style="text-align: center;"><u>Strategic Housing Market Assessment, May 2014</u></p> <p>http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf</p>	<p>principal growth areas in Haringey.</p> <p>The council has a requirement to meet the borough’s objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it’s own development capacity, it is recognised that this will not be sufficient to meet the needs</p>
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				<p>This report shows that the need in Haringey is for really-affordable housing, and not for the unaffordable private housing developments which the Plan would facilitate. It states that there is a gap between Total affordable supply (13,132 dwellings) and Total affordable need (24,889 dwellings). This identifies an affordable housing requirement deficit of 11,757 homes, which as a proportion of the total net housing requirement for all tenures (20,172), equates to 59% (paras 8.39 and 8.40).</p> <p>To meet this need for 59% affordability within the program, the report concludes that “Overall, the evidence advocates limited potential for intermediate forms of affordable housing to contribute towards meeting housing needs in Haringey.” (para 8.66).</p> <p>Based on rental costs at 30% of household income, so-called ‘Affordable rent tenures are only affordable to 25% (80% of mean market rent) and 30% (80% of median market rent) of households’ (para 5.115).</p> <p>The so-called ‘affordable housing’ to be built under the plan is therefore unaffordable to 70-75% of all Haringey households; and 39% of Haringey households are owner-occupiers.</p> <p>Furthermore, ‘the minimum deposit required to attain a mortgage of any type for the purchase of a property would be £11,500, however this comes with monthly payments in the region of £1,154.’ (para 5.81)</p> <p>Yet, 48% of resident households have no savings or are in debt, and a further 22% have less than £5,000 savings. (para 5.101). This is a devastating picture of the disconnect between the policies of the Local Plan, and the limited options which ordinary people have at their disposal. Shame on the planners who offer so little to so many local people.</p> <p>We are pleased to deduce from the data in the report that local authority rents average just 34.5% of unaffordable, average private rents, and that private registered provider (housing association) rents average just 40% of market. Yet</p>	<p>identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough’s needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers</p>
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				<p>much of this really-affordable housing is set to be demolished under the Plan.</p> <p>The Local Plan makes no serious attempt to meet the dire housing need which the Strategic Housing Market Assessment reveals. The Plan’s minimal provision for small amounts of so-called ‘affordable housing’ does not seriously address Housing policy objective 3.2. No reasonable person could think that the plan attempts to meet this objective, taking into account the mass demolition of actually-existing, really-secure, really-affordable dwellings which the plan entails; and the proposed reductions in affordability requirements to meet developer profits.</p> <p>The council does not produce numerical estimates of demolitions. Our latest estimates show that 4,687 Haringey homes are at risk of demolition from the renewal and regeneration plans, including 3,662 homes on council estates, 630 Private Registered Provider (Housing Association) homes, and 395 more private dwellings. These estimates are based on Freedom of Information requests, the contents of the Local Plan and many other council documents, and years of campaigning work around the estates.</p> <p><u>2. Adverse Equalities Impact</u></p> <p><u>The Equalities Impact Assessment on Haringey’s Draft Housing Strategy</u></p> <p>In March 2015, Haringey Council published an Equalities Impact Assessment on its Draft Housing Strategy, a document which is integral to the Local Plan and to the project to demolish council housing and build mainly market dwellings (Cabinet, 17/03/2005). The impact assessment stated that “there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily.” The startling Mitigation offered was:</p> <p style="text-align: center;">The ability of local people to afford the new homes being built,</p>	<p>positive outcomes for the borough’s residents. The Local Plan proposes that on some existing publically-owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be</p>
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				<p>especially in the east of the borough, is dependent on them accessing jobs and also increasing their incomes to a sufficient level to afford the new homes on offer as a result.</p> <p>It is planned to change the profile of Haringey-based jobs so that retail and public sector employment are less dominant, and there is a better range of jobs, including a greater proportion of jobs in more highly-skilled sectors, such as sustainable technology, digital design and skilled/ craft manufacturing.</p> <p>In response, Tottenham Labour Party passed an emergency motion at its General Committee on 25/03/15,</p> <p>This GC expresses concerns about the findings of the Council’s Equality Impact Assessment (EqIA) of the Draft Housing Strategy. It clearly states that there is a “possibility, over time, Black residents of Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in the east of Haringey”.</p> <p>Despite what the council state on their website about needing to “consider” the EqIA in their decisions, it is in fact a ‘public sector equality duty under the 2010 Equality Act’ not just to “consider”, but to “eliminate unlawful discrimination” and “advance equality of opportunity between people who share a protected characteristic (i.e. Race) and those who do not”.</p> <p>This GC is concerned the mitigation has placed the onus on “Black Residents” to “increase their income” to be able to afford the new homes on offer and not required or considered what the council should be doing to enable equality of opportunity and eliminate discrimination. The GC requires an urgent review and response so not to disadvantage residents based upon race and their related socio-economic status.</p> <p><u>Cllr Alan Strickland’s Letter</u></p>	<p>required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported .</p> <p>The Council’s Hosuing Strategy is the key document regarding how residents who are affected’s tenancies will be managed.</p>
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				<p>Councillor Alan Strickland, Cabinet Member for Regeneration and Housing, wrote to Haringey Defend Council Housing on 10 April 2015. His letter included these points:</p> <p>A resident's ability to access a particular type of housing relies on their income and circumstances. The assessment finds that black residents will receive significant support from the council's housing approach, through council housing, temporary accommodation and HMO [houses in multiple occupation] licensing, but that black and minority ethnic groups tend to be less able to afford other housing options such as shared ownership homes.</p> <p>Claims made by some local campaigners that the council's housing approach would discriminate against black residents are clearly disproved by the facts in the equalities assessment. The assessment finds that black residents receive significant support through council housing - 18% of Haringey residents are black, but 34% of Haringey's council housing is allocated to black residents. Black residents also benefit most from support provided through temporary accommodation - the biggest single group provided with temporary accommodation by the council are black female households (36% of all temporary accommodation placements).</p> <p>We believe that this brazen disregard for equality of outcomes for poor and black people informs the Council's whole approach. The Local Plan is set to deliver the Housing Strategy in the unequal and inequitable way that Cllr Strickland describes here, and this is a gross failure to seriously address Housing policy objective 3.2.</p> <p>3. The Tottenham Hotspur planning application (Site allocation NT7)</p> <p>The Tottenham Hotspur planning application for Site allocation NT7, agreed by the Planning Sub Committee on 16/12/2015, includes provision for 585 homes,</p>		
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				<p>none of them affordable, and with no guaranteed provision for offsite provision of affordable housing either. Sadly, the acceptance of 0% affordability in this keynote scheme tells us that the Council is not serious about the proclaimed inclusivity of Housing policy objective 3.2. The Council's acceptance of the bizarre claim by Tottenham Hotspur that it cannot afford any affordable housing at all, within a £600,000 development, gives a disastrous signal in respect of discussions with any developer or private sector partner about other developments within the Local Plan. If the most lucrative and iconic development can have 0% affordability, what chance is there of council officers delivering on any of the affordability targets within the plan? This is yet another failure to seriously address Housing policy objective 3.2.</p> <p>4. Lack of consideration of the adverse social impact of Superdensity schemes</p> <p>The Plan does not at any point consider the adverse social impact of Superdense private developments, both those planned to replace council estates, and those to be built elsewhere in Haringey. Our research into Superdensity, some details of which follow, indicates that these schemes will be managed to meet the aspirations of middle-income occupants, and to deliver developer and landlord profits. This will have many adverse consequences for the life chances of lower income residents and homeseekers in the borough.</p> <p>Please see the two reports 'Recommendations for living at Superdensity' (2007), http://www.designforhomes.org/wp-content/uploads/2012/03/Superdensity2.pdf and 'Superdensity: the sequel' (2015), http://www.pollardthomasedwards.co.uk/download/SUPERDENSITY_2015_download.pdf</p> <p>These reports were both produced by architects from four leading London practices: HTA Design LLP, Levitt Bernstein, Pollard Thomas Edwards, and</p>		
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				<p>PRP Architects. They are complemented by two revealing YouTube videos, 'Recommendations for living at superdensity' and 'Superdensity: the sequel', which disclose some of the issues which residents will face under the Local Plan:</p> <ul style="list-style-type: none"> • Additional and very high service charges on these estates could price-out returning resident owners, former secure council tenants, and new, poorer homeseekers. These high service charges are driven by the maintenance needs of superdense developments, by the demand of higher income residents for more services; and also by the drive of the new landlords to increase their income from chargeable services. • Lettings or allocations policies after redevelopment could impose restrictive quotas on homeseekers who are economically inactive, or who simply have children. These are anti working class policies, and restrictions on child density are also racist in practice, because they discriminate against those cultural groups which tend to prefer larger family sizes. • Council estates are mixed and inclusive communities at present, where council tenants, leaseholders and private renters use the same entrances and lifts. In the new housing schemes to be built under the plan, developers and scheme owners may introduce segregated blocks for homeowners and renters, separate entrances for owners and renters (so-called poor doors) and distinctions by different dwelling sizes, or separate designs, or standards of facilities or materials, for owners and renters. <p>Here are the comments of Duncan Bowie of the University of Westminster, who helped to draft the density guidance in the London Plan in 2004 and 2008. Duncan was speaking in a discussion amongst architects on 'Superdensity - the Sequel: Designing high density housing and sustainable places', available on YouTube: https://www.youtube.com/watch?v=fsiFU-BzsnM</p>		
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				<p>The density limits in the London Plan were called rigid. When you have got a situation where a half to two-thirds of schemes given planning consent breach the density policy, I don't know how loose you want it to be. Higher densities came about, because lower densities were seen as getting in the way of maximising units, and seen as getting in the way of developer profit.</p> <p>But it actually has meant we have driven a coach and horses through the principles of sustainable residential quality, and we are not getting the mix of either affordable housing or family-sized housing out of hyperdensity, and some of the superdensity schemes are struggling at higher ranges of 300 and 400 dwellings per hectare as well.</p> <p>The issue of service charges is critical. We are not getting social rents any more, you are getting higher rents anyway, service charges are not covered by Housing Benefit, you are not getting affordable housing out of hyperdensity schemes, and not much out of superdensity either. We have got it completely wrong, we need to go back and implement the policy on lower densities that we wrote in the London Plan back in 2004.</p> <p>We are aware that Housing Benefit covers most service charges at present. However that can change with benefit caps now and in the future, under this government. In the meantime, people would be hit hard by these charges, as soon as they go into low paid work. Car parking (presently free to Haringey council estate residents) is another everyday cost that is a source of financial risk to tenants and residents, which council officers and planners need to be honest about. But we see no sign of that. The Plan's failures to address any issue of potential social exclusion mean that its authors have made no serious attempt to address Housing policy objective 3.2.</p> <p>5. <u>Inadequate Consultation</u></p> <p>The resident consultation on the plan has been unacceptable. Denial of policy</p>		
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				<p>has been standard, with council officers repeatedly claiming that there are no plans at all to demolish council estates. Of course there are no specific plans, but there are plenty of plans to make such plans, in the Local Plan itself.</p> <p>The Council has not followed the consultation model proposed by the Housing Committee of the Greater London Assembly in its report <i>'Knock it down or do it up? The challenge of estate regeneration'</i> (February 2015): respectful, inclusive, truthful, engaging properly with those citizens who do not agree with mass demolitions, and allowing estate residents to have a Yes/No vote on demolition proposals in a secret ballot, with a No vote to be respected; as is the practice in the London Borough of Westminster.</p> <p>A serious attempt to address Housing policy objective 3.2 would mean engaging properly with residents, including those who disagree. But that has not been the case in respect of this Local Plan.</p> <p>6. <u>Policy recommendation and Alternative proposals</u></p> <p>The present Local Plan fails to properly address issues of social inclusion, and indeed it seems actively to promote social exclusion and social cleansing. The Plan therefore tends to bring the borough into disrepute: something that we neither need nor deserve.</p> <p>The Plan should be redesigned to minimise the impact of government cuts and austerity policies on the many low-income households within Haringey. There should be a proper discussion about the risks as well as the opportunities of working with private developers. The council must make its partnerships work for the people, rather than primarily for developer profits. New housing schemes must be designed with social inclusion to the fore, meeting the existing high standard of multi tenure council housing estates, and without poor doors or exclusionary lettings policies. Any new high density estates must feature developer capitalisation of service charges, to avoid pricing out tenants and lower-income property owners. Where densification is needed, it must be accomplished sensitively and without being targeted against a single tenure, whether that be council housing, as in the Local Plan under consideration, or</p>	
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					<p>against any other tenure.</p> <p>The present Local Plan should therefore be withdrawn and a new one prepared, based on meeting the housing and community needs of existing and likely future Haringey residents. An important element in the new plan should be the retention of, and proper investment in, the borough's council housing estates. We also need a substantial new build programme of more and better council housing. The new Plan should promote secure, decent and really-affordable housing for residents of all incomes, including those on lower incomes, the poor, and benefit claimants.</p> <p>We look forward to working with the Council on the preparation of such a revised Plan, which actually addresses the needs of local people.</p>		
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Respondent 38: House Builders Federation

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
38	NPS48	Duty to Co-operate	No	No	<p><u>The plan is unsound in terms of the duty to cooperate: legally and with respect to the positively prepared test of the NPPF.</u></p> <p>We have noted the local plan (the alterations to the strategic policies of Haringey's local plan). This is the pre-submission version dated January 2016.</p> <p>It appears from the document that the Council has not taken into account the legal and procedural aspects of the duty to co-operate. It is not an uncommon error for the London local authorities to assume that the Mayor of London has discharged the duty to co-operate on their behalf. It is assumed that the legal duties of the Duty</p>		The Council considers that the Plan meets housing need as set out in both the GLA's London Plan, and in Haringey's SHMA.

				<p>have been met by the Mayor who has discharged this by producing the London Plan. Unfortunately this is incorrect although the ambiguity surrounding this issue is understandable because the Mayor is deliberately vague about this issue.</p> <p>Part E of Policy 2.2 of the London Plan – the London Wider Metropolitan Area – which is the section related to LDF preparation, does require the London Boroughs to work with authorities and agencies in neighbouring regions outside of Greater London to develop common approaches to issues across borders significance. It is unclear from the local plan and the supporting documentation whether Haringey has done this. It is important that the council does engage with its neighbours and the authorities outside of London with whom Haringey has a migration relationship to ensure that these authorities understand the implications of the Mayor of London’s demographic assumptions. The inspector for the London Plan, in his report (dated 18 November 2014), does refer to this effect. He notes that the Mayor’s SHMA “includes assumptions relating to migration...likely to be material to the preparation of local plans outside London.” (Paragraph 8).</p> <p>We note from the Council’s SHMA supporting these alterations (dated May 2014 Version 2) that the Council has defined a housing market area (HMA). This is an HMA that the Council shares with a number of other local authorities in north London. We do not dispute this delineation of the housing market area but there is a need to consider how the Mayor of London’s migration assumptions will impact upon the wider South East of England. Haringey, either individually or collectively through the HMA, will need to demonstrate how it has</p>		
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				<p>engaged with the authorities outside of London on the strategic question of migration and London's unmet need (which is at least 7,000 dwellings a year and rising owing to the inability of many of the London boroughs to meet the new housing benchmarks).</p> <p>Too this end it is necessary to consider migration trends, the Mayor's assumptions relating to migration, and whether local authorities outside of London are compensating for these assumptions. This is an important planning question. These migration trends may well have an important bearing on the objective assessment of housing needs for Haringey. The Mayor of London's objective assessment of need – the study which underpins the Further Alterations to the London Plan – makes a very considerable assumption about outward and inward migration to London which means that the Mayor's own starting point in terms of his demographic assessment of housing need is very much lower than the official projections. The Mayor's starting point is 12,000 households fewer per year than the official projections available at the time (the DCLG 2011-interim Household Projections). See paragraph 3.69 and figure 29 of the Mayor's 2013 SHMA.</p> <p>The Mayor of London considers that his demographic projections are more reliable than the official projections (I refer to paragraph 3.1.7 of the Mayor's supplementary planning guidance of the housing May 2015 in which he states this). Also the inspector considering the London Plan endorsed the Mayor's migration assumption.</p> <p>However, for those migration assumptions to be proved correct it is necessary for Haringey to engage with the authorities outside of London who will be most directly</p>		
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				<p>affected by this migration assumptions to ensure that these assumptions are being reflected in their own local plans.</p> <p>If those migration assumptions are not been taken into account by those local authorities outside London and they are not making sufficient compensation for the likelihood of higher inward migration and decreased inward migration then there is a risk that the housing need in Haringey maybe higher. While we recognise, as documented in the Council's 2014 SHMA, that most net migrations flows into Haringey come from other London Boroughs many people leave Haringey for the south east. We refer to the figures 4 and 5 on page 28 of the SHMA 2014.</p> <p>Under the Mayor of London's demographic Central Variant the Mayor assumes that there will be a 5% increase in outward migration from London and a 3% decrease in inward migration to London compared to the DCLG 2011-interim Household Projections. As previously stated, this results in some 12,000 fewer households a year projected to form in London.</p> <p>Figure 5 of the 2014 SHMA is interesting. This shows the chief migration destinations for people leaving Haringey. Among these destination authorities are Brighton & Hove, Hertsmere, St Albans and Broxbourne. The HBF has been engaged in the local plans that have been produced in these districts or are in the process of being produced. All these authorities either have large unmet needs, like Brighton & Hove (it has a very substantial unmet need which amounts to about 28,000 dwellings over its plan period) or like St Albans, they planning on the basis of an assumption that they will experience much lower inward</p>		
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				<p>migration from London. In short, there is a worrying lack of consistency in the demographic assumptions being made by London and the south east authorities.</p> <p>The net result is that actually less capacity is being created in the wider South East to accommodate the Mayor of London's own migration assumptions than the Mayor had perhaps previously hoped. This could mean that there will be a higher demand within Haringey itself over the next 15 years because an increase in supply is not being built into the system elsewhere to compensate for the Mayor's demographic assumptions. An adequate supply of housing is not been planned for in the wider south east (by which we mean the former East of England and South East government regions) to enable out migration to occur at levels expected by the Mayor of London.</p> <p>We consider this is an important strategic issue that Haringey needs to take seriously. It needs to demonstrate through its plan how it has alerted the authorities outside of London to this issue. If it has not demonstrated that it has done this then it is questionable whether it is legitimate for the Council to assume that the 2013 SHMA that underpins the London Plan is based upon a sound analysis of the demographics. We consider that the levels of housing need in Haringey are likely to be much closer to the recent official DCLG 2012 Household Projections than the Mayor of London's own underlying demographic assumptions.</p> <p>To this extent we are not convinced that the Mayor of London's own projections are proving to be more accurate than the official projections. That may have been the case in the past but we think the scale of the</p>		
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					under supply in the South East when measured against the official projections and local SHMA-based OAN assessments is now militating against that historic trend. We actually think that the base-line starting point really needs to be the official DCLG 2012 projections.		
38	NPS49	Objectively Assessed Need	No	Not stated	<p>It is encouraging to see that Haringey is updating its plan to reflect the new housing bench mark figures in the new London Plan (what had been the Further Alterations to the London Plan). This means that Haringey has updated its plan to reflect the new housing benchmark targets in table 3.1 of the London Plan and will be providing between 2015 and 2025 an annual average of 1,502 homes per year. The Council of course will be aware of Part G of Policy 3.3 of the London Plan which requires local authorities to undertake their own NPPF compliance assessments of housing need.</p> <p>In accordance with the NPPF, these Borough level assessments also need to be conducted on housing market area basis. This is necessary to ensure that the requirements of the NPPF and the guidance in the NPPG are being addressed by the local authority. Haringey Council will be aware that the Mayor of London's own objective assessment of housing need in London through the 2013 SHMA that supported the London Plan was essentially only the demographic projection (albeit it did take into account that the housing backlog which is very positive). Because it was essentially just a demographic assessment it did address all those elements required of a SHMA as set out in the NPPF and NPPG. This is why the London Plan includes a reminder that the Boroughs must undertake NPPF and NPPG compliant assessments of the OAN.</p> <p>To this extent it is right that the council has produced an</p>		<p>The Council considers that the Plan meets housing need as set out in both the GLA's London Plan, and in Haringey's SHMA.</p> <p>It is a requirement of the Local Plan to be deliverable. As such a viability assessment of the borough was undertaken, which demonstrated that a 40% target for affordable housing was appropriate.</p>

				<p>updated SHMA dated May 2014. However, the starting point of this report is an assumption that the Mayor's demographic migration assumptions under his Central Variant serves as a sound starting point.</p> <p>We have questioned under the duty to co-operate section why this may be an unsound assumption. This is because there is no evidence at all that any authority outside of London is compensating for the Mayor's assumptions. Therefore this is an unreliable demographic scenario. However, notwithstanding that point, we also note that the SHMA is essentially just a demographic assessment in terms of the objective assessment of need, albeit it does consider what the affordable housing needs might be. Unfortunately the report does not address itself to the other elements of the NPPG such as considering factors such as employment needs, the impact of past under-delivery on the ability of households to form, market signals, and whether an adjustment in overall supplies is necessary to facilitate this apart more of affordable homes.</p> <p>These are factors that are normally considered at local planning examinations. It is curious that the Council has chosen to neglect these issues. Therefore we are not convinced that the figure that the council has alighted upon as being representative of its OAN (which is 20,172 homes - see footnote 4 on page 42 of the Draft Local Plan) does represent the objectively assessed need in the Borough. This is merely a baseline demographic projection. It does not address issues of affordability. The problem of affordability in Haringey would suggest that an upward adjustment on this baseline is necessary to try and alleviant some of the effects of the affordability crisis in London and to provide a 'significant boost' to supply</p>		
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				<p>as required by the NPPF.</p> <p>An indication of the housing stress in Haringey is expressed by the fact that the total net of affordable housing need over the period 2011-2026 has been calculated to be 11,757 homes (see page 149 of the SHMA). The affordable housing need therefore is 59% of the overall planned supply. The Council's objective assessment of housing need is only as low as 20,172 dwellings subject to the Mayor of London's migration assumptions proving to be correct. If these assumptions are wrong, then the default position might actually have to be the DCLG 2012 Household Projections. These indicate between 2011 and 2026 that household formation within Haringey might be as high as 32,000 households.</p> <p>It is clear from this there is significant difference between the official projections and the Mayor of London's projections. Everything depends upon whose assumptions about migration ultimately prove to be correct. It is interesting the council makes this observation itself on page 7 of the SHMA 2014. As it says <i>"population of household projections are only as good as he assumptions made"</i>. We have already stated we are very concerned that the districts outside of London are not making compensatory upward adjustments to their own projections to account for increased migration from London. Unfortunately, we will only know who was right about migration long after the event, by which time the damage will have been done. However, it should be noted that no district outside of London is planning for increased migration (I know because I've looked at every plan). Indeed some like St Albans are assuming much lower inward migration over</p>		
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				<p>the whole of its new plan period until 2036.</p> <p>The problem of planners getting their predictions wrong will eventually manifest itself in other ways such as evidence of high affordable housing need and high instances of over-crowding. One could argue that this is what has already happened in London.</p> <p>We think the evidence of a very high affordable housing need indicates the housing stress within the market in London and also in Haringey. For this reason we are not convinced that running a trend based projection – namely just the figure that is contained in the Mayor of London’s SHMA – does necessarily reflect the requirements of the NPPF and the NPPG in terms of the objective assessment of need. The OAN for Haringey therefore is unsound because it is unjustified. We recognise that capacity for 22,000 homes has been identified see paragraph 3.2.6 of the local plan. This demonstrates an increase in supply above the council’s own objective assessment of need figure of 20,172 net new homes. But this figure is still considerably below the indications provided by the latest official DCLG household projections which indicates that some 32,000 households may form over the same planned period.</p> <p>We consider it necessary that Haringey works with its other part authorities in the housing market area to undertake an updated assessment of its housing needs for the HMA through an up-to-date SHMA report that uses the DCLG 2012 household projections as the baseline position (or whichever latest official projections are released since the 2014 Household Projections are expected later on this year). The Council should update its assessment accordingly.</p>		
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38	NPS50	Self build	No	Not stated	<p>The local plan is silent on self-build and custom-build. The Council may wish to consider how it might want to respond to the Government's desire to increase opportunities in this area.</p>		<p>It is not considered that a specific policy is required to bring forward self/custom build products.</p>
38	NPS51	Student housing	No	Not stated	<p><u>The plan is unsound with regard to planning for student needs because the plan neglects this aspect of the London housing problem. The plan is unsound in respect of national and London planning policy. The council is wrong in counting student accommodation towards the OAN.</u></p> <p>The Haringey SHMA 2014 report does not provide an analysis of student housing needs. Policy 3.8 part h of the London Plan requires the London boroughs to plan to meet <u>strategic and local requirements</u> for student housing. This is necessary to avoid detracting from the supply of conventional homes. The London Plan supporting 2013 SHMA includes an assessment of London's likely overall strategic need for student accommodation (see table 29 and paragraph 8.31). This concludes that there is a need to plan to provide for between 2,500 and 3,100 bed spaces per year. This need is <u>additional</u> to the housing benchmark targets in table 3.3 of the London Plan.</p> <p>The Council will need to set out its strategy to help meet this London-wide strategic need.</p> <p>We note that paragraph 3.2.5 of the local plan states that the OAN will be met partly through the provision of non-self contained homes including student accommodation. However, institutional needs (and thus the need to</p>		<p>It is not considered that there is a specific housing target for student accommodation in Haringey. It is agreed that this is a non-conventional housing type. The council is planning positively for this type of use, identifying suitable areas within which applications for student accommodation will be supported.</p>

				<p>provide for C3 use class units) have traditionally not formed part of the ONS population projections and DCLG household projections. We refer the council to paragraphs 8.23 and 8.24 of the London 2013 SHMA which refers to this point. Consequently there is a risk that in having failed to account for students on the need side, it will be losing capacity on the supply side to students. This was acknowledged to be an issue at the recent Norwich City local plan examination, where the council acknowledged the importance of accounting for and planning separately for student needs lest student housing completions detracted from the supply of homes for the (longer term) resident population.</p> <p>Planning for student needs is essential as they will compete for housing with the general non student population. It is important to avoid double-counting. If the student population increases in Haringey they will compete with locals for access to the scarce housing stock.</p> <p>We are also concerned that bed-spaces in new hostels and residential care homes will be counted towards the OAN. Planning for C3 uses is important but it should not be at the expense of conventional supply.</p>		
38	NPS52	Older persons housing		<p><u>The local plan is unsound with regard to planning for the housing needs of older people. The plan conflicts with national and London Plan policy.</u></p> <p>We refer to table A5.1 of the London Plan and the benchmark targets for specialist housing for older people. The local plan is ambiguous about how Haringey Council will plan to meet these needs. These needs are additional to conventional housing supply benchmark figures in table 3.1 of the London Plan.</p>		<p>The Council considers that there is sufficient sites identified in the Plan to meet this need. In terms of meeting this indicative target, the Council is</p>

							monitoring completions of this type and will compare over the plan period.
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Respondent 39: Deloitte on behalf of National Grid

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
39	NPS53	All documents	Not stated	Not stated	<p>National Grid are owners of the decommissioned gas holders site at Haringey Heartlands, land bounded by Hornsey Park Road, Mayes Road, Clarendon Road and the Kings Cross Mainline. The site is subject to an extant planning permission for a residential led mixed use development which includes all of the National Grid land. The planning permission also covers the land immediately to the north which is owned by the Greater London Authority (GLA) known as the Olympia Trading Estate.</p> <p>As a key stakeholder in the area, National Grid have previously made representations to the earlier consultations drafts of the Local Plan and the Site Allocations DPD.</p> <p>Since the previous representations, National Grid and the Berkeley Groups Holdings plc have established a Joint Venture to develop major residential and mixed use development scheme across London and the South East. The Joint Venture is named St William Homes LLP (St William). St William will develop the Site and the Olympia Trading Estate.</p> <p>National Grid will still be involved in the development of the site as part of the Joint Venture. In addition, National Grid will be responsible for the demolition of the existing gas holders on the site and the relocation of the gas</p>		Noted.

					<p>infrastructure which forms part of the extant planning permission.</p> <p>St William have made detailed representations to the above documents (enclosed with this letter). As part of the Joint Venture, National Grid fully endorse these representations and the future potential of the site to contribute to the objectives of the Wood Green area. National Grid will not therefore be submitting separate representations.</p>		
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Respondent 40: Lynne Zilkha

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
40	NPS54	Air Quality	Not stated	Not stated	<p>I am pleased to note that it is proposed that AQ assessments should be done for all major developments. It is becoming increasingly clear that air pollution in London is a serious problem, leading to ill health and early deaths. Planning has a vital role to play in driving down air pollutants.</p> <p>I enclose a legal opinion made available by the campaign group Clean Air in London. It shows that development which leads to a breach of limit values should not be permitted. This is relevant to any development or plan which would lead to an increase in congestion (such as the increasing number of basement excavations in already trafficked roads, the trafficked Wood Green High Rd and developments in areas near SINCS, woodland and parks)</p> <p>It is said that Air Quality is better in the West of the borough (The Sustainability Appraisal of Site Allocations document- Page 36 para 10.19.1) but no</p>		<p>The whole of the borough is an AQMA, and as such the Council's Air Quality management policy will be applied on sites across the borough.</p>

					evidence has been provided to show this. If there is that evidence, then please provide it to me under the Environmental Information Regulations. If not, then this should not be included as fact.		
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Respondent 41: Stroud Green CAAC

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
41	NPS55	Urban Characterisation Studies	Not stated	Not stated	<p>Unsound because not adopted and not evidence-based. There are many typographical errors throughout the documents and road names are wrong. We suggest these documents are not fit for purpose.</p> <p>The area on the Stroud Green Map does not follow the outline of the Conservation Area. We do not know what the outline represents.</p> <p>While we welcome these studies, we consider that it is regrettable that they appear to have been have been produced without any consultation with CAACs, amenity societies or local people. It is not clear on what basis they have been included on the Council website or referenced in the Development Management Policies. We consider they should be given little or no weight in decision-making and references to them should be removed.</p> <p>There is no mention of the Conservation Area</p>	Not stated	The UCS is an evidence document which informs the Local Plan, and as such is not the subject of the consultation.

					How does it relate to DM1 and DM9? SGCAAC considers this document should be withdrawn		
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Respondent 42: Highgate Society

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
42	NPS56	Not stated	Not stated	Not stated	The Highgate Society Sustainable Homes Group commends the policy put forward to Highgate Neighbourhood Forum: "The Forum encourages alterations to existing buildings to enhance energy efficiency, provided that the character of the building is not prejudiced and the risk of long-term deterioration of the building fabric or fittings is not increased. Where applicants intend to invoke the energy efficiency exemptions allowed in Part L1B for historic and traditional buildings, they must explain how they have followed the English Heritage guidance that the regulations say they 'should take into account' ". eg https://www.historicengland.org.uk/images-books/publications/eehb-insulating-solid-walls/ "		Noted.
42	NPS57	Urban Characterisation Study	No	Not stated	Unsound because not adopted and not evidence-based. There are many typographical errors throughout the documents and road names are wrong. We suggest these documents are not fit for purpose. Suggestions such as those for Highgate Golf Club and Hornsey Lane Reservoir could be presumed to indicate a presumption in favour of development. How do they relate to DM9?		The UCS is an evidence document which informs the Local Plan, and as such is not the subject of the consultation.

				<p>The Highgate Society has many reservations about the content of the document for the Highgate Conservation Area but we mention here :</p> <p>From SWOT Analysis under 'BAD':</p> <ul style="list-style-type: none">• Mono-culture and exclusive• Old people and ageing population – not mixed [The latter statement is not factually correct] <p>From SWOT Analysis under 'CONSTRAINTS'</p> <ul style="list-style-type: none">• Resistance from public to growth, development and change <p>From SWOT Analysis under 'OPPORTUNITIES':</p> <ul style="list-style-type: none">• Covered reservoir on Hornsey Lane – not needed by Thames Water• Persuade older residents to down size and free up family sized housing [This is not achievable through Planning Policy]• Highgate golf course – is it really the best use of land? <p>Some of these SWOT Analysis statements would surely not pass Scrutiny and Equalities tests</p> <p>While we welcome these studies, we consider that it is regrettable that they appear to have been produced without any consultation with CAACs, amenity societies or local people. It is not clear on what basis they have been included on the Council website or referenced in the Development Management Policies. We presume as unadopted documents they are for information only. We consider they should be given little or no weight in decision-making and references to them</p>		
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					<p>should be removed.</p> <p>The Highgate Society has been advised that Thames Water does require the Hornsey Lane Reservoir operationally. Clarification on this point is urgently required.</p> <p>The Highgate Society requests that the Urban Characterisation Study for Highgate be withdrawn</p>		
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Respondent 43: Icen Projects on behalf of Berkeley Homes (North East London Limited)

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
43	NPS58	Not stated	Not stated	Not Stated	<p>As the Council are aware, the Government have recently published a number of planning documents for consultation. These include changes to the NPPF as well as a technical consultation on the implementation of planning changes as part of the forthcoming Housing and Planning Bill.</p> <p>Given the Councils Development Plan Documents (DPD) were prepared and published in draft before these Government documents were released, we would recommend that the Council review their DPD's for consistency and compatibility prior to the EIP and trust our comments on individual policies above are helpful this respect.</p>	Not stated	These policies are prepared in such a way as they will be flexible enough to respond to potential changes in government Policy.

Respondent 44: Mrs Deman Abdulla

ID	Rep	Allocation /	Sound	Legally	Reason	Change Sought	Council's Comments
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	ID	Policy / Figure / Para		Compliant			/ Response
44	NPS59	Not stated	No	No	I do not like the plan because it will interrupt with community life. People who have lived in the area for many years enjoy the familiar surrounds and so to change the area so much will cause communities which have lived together for many years to be dissolved.	I think it would be better if the plans were not implemented. The area is very good as it is already and it would become bad if the area were to change so drastically.	Objection noted. It is considered that the Local Plan is an appropriate method to meeting the Council's development needs.

Respondent 45: Ms Ozgul Aslan

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
45	NPS60	Not stated	Yes	Yes			Noted.

Respondent 46: Mario Petrou

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	NPS61	Not stated	No	Not stated	I write to object to the DPDs on the grounds that the aims of social documents, namely the promoting and managing of the built environment, shall have a detrimental impact on the existing population. The aims, seemingly justified to accommodate a growing population are unsound, as evidenced by the GLA's well-being index , dangerous air pollution levels and worsening life expectancy		Objection is noted. The Council has a requirement to plan for growth to meet housing and employment needs.

					<p>between east & west Haringey. Even since the draft London Plan (1999/2000) raised housing targets and increased intensification levels, and required boroughs to comply, the quality of life in Haringey has worsened.</p> <p>Intensification in deprived areas leads to the collapse of sustainable communities. This was demonstrated by the national riots, which began in Haringey in 2011.</p> <p>The aims of the DPDs don't work best for local people's interest, but benefit most the foreign investors and decision makers whose pockets are overflowing with profit derived from the exploitation of our area.</p>		
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Respondent 47: Constantine J. Smith

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
47	NPS62	Not stated	Yes	Yes	I can over my 87, more that 3 quarters of the people living on the estate do not no what you are talking about. Are you going to build to **** 800 people no you cannot. Just make people angry.		It isn't considered that this is responsible.

Respondent 48: Chris Roche

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
48	NPS63	Not specified	No	No	I believe LBH has a duty to Consult frequent users of Planning Services and in particular Local Architects	I believe Local Architects should be consulted and allowed time to respond to this Consultation.	The consultations undertaken in the preparation of the Plan have been held in accordance

					and wish to have it recorded that I have received no Consultation from the Council. I have attempted to obtain documents from the Council but have not been provided with any.		with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.
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Respondent 49: Martin Hyacinth

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
49	NPS64	Not specified	No	No	I am not willing to commons in this consultation because is not easy to understand your wording. I do not know whether the legally complaints or not- so on.		Noted.

Appendix J - Respondents to the Pre-Submission Consultation – No Plan Specified

ID	Respondent	Wishes to Attend Hearings
50	Jane Wilkin of the Environment Agency	No
51	Bruce Roberts	Yes
52	Malgorzata Urbanska	Not stated
53	Alan Stanton	Not Stated
54	Stewart Murray, Assistant Director, Planning, GLA	Not Stated
55	Graham Saunders of Historic England	Not Stated

Appendix K -Responses to the Pre-Submission Consultation: No Plan Specified – Respondent Order

Respondent 50: Environment Agency

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
50	NPS65	SFRA			<p>There are several sites which still state an incorrect flood zone and grid reference. It is imperative that you revisit the SFRA to check that the flood zones referred to are as up to date as possible. Currently it is difficult to cross reference some sites with the Site Allocations document and Sequential Test and some sites state different flood zones between the documents, which may cause confusion when sites are brought forward as planning applications.</p> <p>To reflect the fact that flood zones change over time as modeling is refined, it may be sensible to outline this in the main body of the SFRA and make applicants aware that they should check the Environment Agency Flood Maps for the most up to date information.</p>	<p>-Revisit the SFRA to check flood zones are up to date - To reflect the fact that flood zones change over time as modeling is refined, it may be sensible to outline this in the main body of the SFRA and make applicants aware that they should check the Environment Agency Flood Maps for the most up to date information.</p>	<p>It is only possible to produce evidence at a point in time. It is considered that the SFRA supports the current level of development allocated in the Local Plan.</p> <p>It will be required that all qualifying development requires a FRA as part of the planning application, and that the most up-to-date flood zones will be used.</p>
50	NPS66	Sequential Test			<p>We are pleased to see that the sequential test has now been made available on your website along the other evidence documents.</p>		<p>This will be updated.</p>

					<p>Although many of our comments have been taken on board, the site IDs and names remain unchanged, which again has made it difficult and more time consuming when cross-referencing all of the documents. It is also disappointing that you have not considered our previous comments regarding sites which fall within Critical Drainage Areas and considered all forms of flooding in the sequential test. Additionally there could be much greater clarity as to the criteria that have been used to select the sites which have been sequentially tested.</p> <p>We are pleased that site SA52 (Pinkham Way) has now been included in the sequential test. As outlined in the response form, the Site Allocations documents should reflect the wording in the sequential test and be clear that no more vulnerable development will be permitted in areas of Flood Zone 3.</p> <p>We note that the Development Management DPD now includes reference for sequentially testing windfall sites in the supporting text.</p>		
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Respondent 51: Bruce Roberts

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
51	NPS67	Not specified (Tottenham Area)	Not Stated	Not Stated	The developments, if allowed to go ahead as planned, will destroy the positive effects of the more gradual, organic improvements which have occurred in Tottenham in recent		The council has a requirement to meet the borough's objectively identified housing and employment needs. With

					<p>years.</p> <p>I have lived in Tottenham for about 17 years and in the last 10 or so have noticed that more families have been settling in the area. I don't believe that this healthy addition to the demographic has been brought about by anything that Haringey Council has done though. Rather, I believe that it has come about simply because Tottenham is perhaps the last area in London in which family houses are still affordable, albeit even then, only by those on relatively high incomes. I believe that the riots actually <i>helped</i> this particular process more than any action taken by Haringey Council. I am not of course suggesting that the riots were a good thing – they were incredibly frightening and upsetting for those of us who live with our families very close to the sites of huge destruction and great danger.</p> <p>If the planned development, consisting primarily as it does of one and two bedroom flats goes ahead, families (and the positive influence they bring in terms of stability, responsibility and consistency) will once again become a tiny minority of the overall population and their influence will again diminish to nothing.</p>		<p>regards to mix of family and smaller units, this is evidenced through the SHMA, and in the Council's Housing Strategy. It is considered that the Local Plan helps to meet this need.</p>
51	NPS68	Not specified (Tottenham Area)	Not Stated	Not Stated	<p>It is a mistake to concentrate the vast majority of the new housing in one small area.</p> <p>It has become a cliché to say "they wouldn't</p>		<p>The DPDs in question do not set the overall pattern of growth for the borough, which is set out in the Strategic Policies Document</p>

					<p>get away with this in Muswell Hill" but I'm afraid that is absolutely true. The local infrastructure in Tottenham is already insufficient to support its existing population and adding another 5000 homes will, I believe, be catastrophic. A new school will be provided of course and that may well satisfy the <i>existing</i> shortage of school places but it will not be sufficient to accommodate any new children moving into or being born in the area.</p> <p>In addition, it is already incredibly difficult to get an appointment with a GP or a dentist in Tottenham. To provide a somewhat trivial example, when my dentist closed his practice last year it took me 3 months to find another one who was accepting new patients and a further 3 months to get an appointment with him.</p> <p>I believe that the decision to focus the vast majority of the new homes in one small area was taken because Haringey Council consider that it will be easier to fight a single battle in a relatively poor area with a generally less well organized population (because most people's main concern in Tottenham is simply to survive) than to distribute the massive impact more wisely and evenly.</p>		<p>(adopted 2013).</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p>
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Respondent 52: Malgorzata Urbanska

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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52	NPS69	General	No	Not Stated	<p>I am writing as a local resident to make a formal representation regarding the Haringey Local Plan. I have set out my objections to this plan below, and urge the Council to think again about unleashing this massive building programme on the borough. I object in particular about the plans for such intensive development across North Tottenham , especially Tottenham Hale ward where I live.</p> <p>The Local Plan is not based on the needs of current Tottenham residents, many of whom are living in very poor housing, in over crowded conditions and with insecure private renting arrangements. If it were to meet their housing needs, it would include provision for council and family housing at a properly affordable rent and enforcement plans to tackle slum landlords. These were the main improvements called for by residents in the Soundings Tottenham's Future consultation.</p> <p>Instead, these plans reveal the priority is for very tall buildings, with very dense housing which will consist largely of one and two bedroom flats in high towers. These will be largely private developments and well out of the price range of most people who live in Tottenham. The average wage in our area is much lower than that needed to purchase a flat, so what will local residents do as they are priced out of their homes, or face their homes being demolished?</p> <p>This plan seems to be, instead, driven by a</p>		<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in he Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place</p>
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				<p>clear agenda which favours working with private developers who will be leading on the changes in our area. The aim seems to be to provide a framework where the developers and the Council together can pursue a policy whereby our local population of Tottenham changes to exclude people who live here now, and instead to bring in those who are wealthier. We are a mixed community now, and these changes will undermine that mix. There is also a danger that these policies will not build on existing stable and flourishing communities in Tottenham, but could instead lead to sales being to investors who don't live here and have little or no interest in our area.</p> <p>The Council, in its plans, repeatedly claims their intention is to develop a 'mixed community'. Our community is already mixed with people from all over the world. It includes all ethnic groups, from different countries, different religions and in a range of jobs. The Council's plans will undermine this as these developments are far more likely to segregate people according to money and income.</p> <p>As a Tottenham Hale resident, I have particular concerns about the proposals for my local area. These include plans to build towers up to 22 storeys in Tottenham Hale with a target of 5000 homes. How much of this will be for local families with children? What services will be provided for people here? How will the traffic be managed given the fact that the gyratory system is still</p>	<p>Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that on some existing publically-owned housing sites, it is possible to increase the number of affordable homes. This will create new affordable stock in the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many non-allocated sites, refurbishment has and will be supported.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared</p>
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				<p>gridlocked, even after £37m investment. What health provision will there be for this vast new community envisaged in this plan? It is already incredibly difficult to find a doctor in this area, and there is no indication that things will improve significantly. I would like to see a local plan which was clear about how services would be provided, which focused on improved services, cleaner environment, and investment in resources which improve my and our community's quality of life. What will be the impact of these buildings on the environment given that much of the proposed area for development is on a flood plain? Instead the plan is focused very largely on how many tall buildings can be developed with very high densities.</p> <p>The Local Plan is unsound in concept and vague on the detail of how this massive plan will be achieved. Rather than address the concerns of today it would, if implemented result in long-term harm to those in the target areas of over-growth and subject residents to a two decade long building site</p> <p>I would also make the following points. There is no evidence that the council has considered refurbishment of estates, and there is no evidence it has considered any alternatives for regeneration beyond creating a framework which favours private developers. As there are no alternatives proposed, what will happen if the economy goes into a downturn and the property market</p>		<p>in this regard.</p>
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					<p>falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion. There appears to be no alternative plan should this happen, and the danger is our communities will be blighted.</p> <p>The consultation for this round of the plan has been minimal and has not engaged people widely although it is of vital importance. Few printed copies have been provided to people or organisations representing the community. It is very difficult for local residents who are not planning professionals to grasp everything just through the Council website. And even the advice meetings were advertised only on the website and were at very difficult times for most people.</p>		
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Respondent 53: Alan Stanton

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
53	NPS70	General	No	No	I read the documents and discussed them with family, some local friends, some neighbours and other residents. I am aware of a number of other objections which have been sent in, many of which I agree with and strongly endorse. What I write here is only a summary of some of my concerns and objections, and my challenge to the Soundness of the proposed plans in general and in relation to specific matters. It fails the "Soundness Test" .		Noted.
53	NPS71	Consultation			Flawed Consultation - I also consider that it is legally flawed in failing to meet the requirements on		The consultations undertaken in the

				<p>consultation recently laid down by the UK Supreme Court.</p> <p>I am not suggesting that Haringey staff carrying out the consultation have deliberately tried to obstruct public involvement. However, I do think that there have been inadequate resources allocated to the process by the Council, and the aim giving sufficient timely and clear information to residents so they can understand and grasp the sheer size and enormity of what is proposed and decide whether or not to make a representation.</p> <p>In my view it is only reasonable for a local council to adopt a proportionate approach so that the larger and more far-reaching the proposed changes and plans, the greater the need to ensure the widest dissemination of information, and to make consultation as simple and straightforward as possible for as many residents as are potentially affected.</p> <p>Again in my view, the Council has failed to take this proportionate approach. A fact that as a former councillor I regret.</p> <p>In summary, these plans – especially for the area where I and my wife live - are simply enormous in their potential. And this applies whether in numbers of homes and other buildings to be demolished and built; in the physical scale of the areas affected, and in the timescale of the plans (some fifteen-twenty years). These plans are likely to lead to one of the largest programme of changes the area – and the borough has seen for many decades.</p>		<p>preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p>
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					<p>Not to allocate sufficient resources to consultation is an indication of a massive failure. And one which will be difficult to rectify as people learn about the implications for their own homes, streets, and neighbourhoods.</p> <p>It is also clear that the overall plans for Haringey are discriminatory as between the poorer east and richer west of the borough. That is evident even in the basic tools used to conduct the consultation. The “digital divide” between residents who routinely use the internet and fill in forms online and those who do not, is likely to match the divide between those areas of the borough which will not on the whole be the victims of these plans, and those whose homes and neighbourhoods are likely to suffer planning blight and social dislocation, community disruption, and displacement or the next twenty years.</p>		
53	NPS72	General with mention of Para 3.21.18 of the Alterations to Strategic Policies			<p><i>Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?</i></p> <p>There is now a large body of academic research which challenges the hypothesis that the types of plans proposed by Haringey will achieve “Mixed Communities”. I particularly refer to the collection of essays called <i>Mixed Communities: Gentrification by stealth?</i> (Policy Press 2012). I do not accept in its entirety an argument that gentrification is a negative. I am however persuaded by the argument that developer-led and market-led plans (such as those now envisaged by Haringey Council) have the effect of deepening class and racial divides and further segregating class, race, age; and ethnic divisions.</p>		<p>The Plan will deliver nearly 20,000 new homes across the borough, with 40% of those being affordable housing. It is considered that it is positively prepared in this regard.</p> <p>The Local Plan contains policies that ensure delivery of new schools and health services</p>

				<p>Haringey is one of the most unequal boroughs in London. Our local Council should not be pursuing plans which widen that gap. Or if they achieve an apparent narrowing, are likely to do so only by displacing poorer residents who will no longer be able to afford to live here.</p> <p>Haringey should in any case begin by assessing and trying to meet the needs of its existing residents. Instead, it is my view that these plans are part of a political agenda for “social cleansing” which has taken place in other parts of London where the class and racial divides are accentuated by the displacement of poorer residents whose homes are demolished, destroyed or sold-off to private companies.</p> <p>Most of the people displaced or whose homes are demolished to make way for new privately-owned blocks and towers will be unable to afford the new flats. Which are in any case being planned for one and two bedroom private “apartments” in areas where there is are enormous pressures for family housing - often large families.</p> <p>It is likely that even the maintenance charges are likely to operate to “select-out” less well-off residents.</p> <p>Not only does the plan not meet the community’s requirements, it is vague and unconvincing in what these needs are and what alternative options may be available.</p> <p>The plan proposed is actually a large-scale undeclared experiment with people’s lives and futures. It treats them as experimental objects in a social engineering scheme where none of the</p>	<p>through site allocations. It is considered that it is positively prepared in this regard.</p> <p>The Plan introduces policies protecting, and facilitating improvements to local community facilities. It is positively prepared in this regard.</p> <p>The Plan introduces policies that protect existing family homes from subdivision, and controlling Homes in Multiple Occupation. It is considered that it is positively prepared in this regard.</p>
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				<p>potential risks and dangers have been considered, let alone set out so that local residents can be aware of them.</p> <p>I do not deny that there is a need for more homes to meet the housing targets – and needs - of a growing population. Some of Haringey population may well be by poorer people displaced from inner London boroughs which are engaged in the same processes.</p> <p>However, there are alternative options to building more homes. Many have been successfully pursued or approved by Haringey over recent years. Here I am thinking of options such as sensitive infill, backland developments, brownfield site developments, additional of extra storeys to existing buildings etc etc. All of which can and often have been achieved with sympathy to the scale, mass, and character of existing buildings and areas.</p> <p>I accept that not all have been in harmony with local heritage, and conservation area requirements. But it is a serious flaw in the proposed new local plan that conservation is not given a far higher priority. The plan fails to demonstrate and the character of Tottenham in particular will be protected.</p> <p>So overall the plan is focused on pushing through demolition, and enforcing a 'top-down' social and physical re-engineering of large parts of Tottenham to the detriment of current communities. It appears from the plans, drawings and models I have seen that the new towers and blocks are likely to be what the architect and urbanist Jan Gehl has often described as "birdshit" architecture.By which he means tall</p>		
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				<p>buildings apparently dropped from the sky without any proper relationship to the existing uses and street-level living.</p> <p>The conventional wisdom about densification near stations appears to collude with this view, seeing or welcoming new residents attracted to buy these apartments, principally as commuters travelling to and from work, rather than as residents who wish to join a cohesive community.</p> <p>Most crucially the plan does not respect the overwhelming views of Tottenham's residents (as made clear in the Soundings run consultation) that their priorities were for the provision of Council and social housing at a genuinely affordable rent. Housing Policy 3.2 states <i>'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of'</i>.</p> <p>I entirely approve and endorse this aim. But I do not see how the proposed local plan can actually achieve it. So an aim and priorities clearly expressed by local people will not be achieved. In fact it is highly likely that it will achieve the reverse.</p> <p>By focusing on and promoting private sector development the result is likely to be neither affordable or accessible homes for to the thousands of families who now live in Tottenham - some on the housing waiting list. While others are in private rented accommodation which is both insecure, and is highly likely to be rising in cost to match the "uplift" in property prices our Council are so pleased about.</p>		
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				<p>The “Generation Rent” problem has long been a problem in Haringey. Giving it a new name has sharpened awareness of the damaging impacts it has – for example on family life, health and children’s education, where renting leads to increased churn of households and lack of stability for residents. I mentioned my objection to the term “Mixed community” being frequently applied to Haringey Council’s plans. I now go further and suggest that – based on the academic research I have read – that this term is untruthful.</p> <p>The Local Plan, (Para 3.21.18 of the Alterations to Strategic Policies, Pre-submission version January 2016) states that the Council “<i>aims to ensure an adequate mix of dwellings is provided</i>” but there is no detail as to how this will be achieved, especially with regard to social housing for families. The proposals for new developments are primarily for high density flats including many very tall buildings. It appears these are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs covered. (See Tottenham AAP)</p> <p>Given the extensive need in Haringey for social housing for families how on earth can this approach be described as a ‘strategy which seeks to meet objectively assessed requirements?’ The Council says responding to family housing need is ‘a priority for the Council’, so the question is, will this plan address this in making provision of family housing for people living here?</p> <p>Alongside the Housing Policy, The Council’s Sustainable Community Strategy (2010-2016) states ‘We will continue to increase the availability of</p>		
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					<p>affordable housing through the optimum use of existing dwellings and by building more affordable homes' for people in housing need. In Haringey this means social rented housing. But no alternative option which demonstrates how this might be achieved is included in the plan even within the current housing and planning environment. How can it be 'the most appropriate strategy when considered against the alternatives' if no alternative has been proposed or evidenced?</p> <p>The "Our Tottenham" community group has made its own Submission which discusses further housing aspects of the plan great detail. I refer you to that document which I in large measure, endorses and complements my own objection submission.</p>		
53	NPS73	General and consultation			<p><i>Is the plan justified?</i></p> <p>No. This whole plan is predicated on a vision of Tottenham driven and underpinned by private property development. This is Plan A. But there are no Plans B nor C. So the risk is enormous and the people whose lives and futures are on the line are the present residents. If as is likely, the plan displaces people then the existing residents will not only fail to have their needs met; their lives may be severely damaged.</p> <p>At no point has Haringey asked how far we have Mixed Communities at present. To assume that we don't and that social change is needed to achieve this, shows a high degree of ignorance as well using confirmation bias with the evidence. If there an implicit aim of changing the social mix of our communities in Tottenham then the evidence and aims should be made explicit so local residents can understand and comment on this.</p> <p>There is an assumption that bringing in higher-income</p>		<p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p>

				<p>residents by intensive high-rise development will produce 'mixed communities' But Tottenham is already a mixed community – but evidently not mixed in the way the Local Authority prefers. N15 and N17 are reputed to be the most diverse postcodes in Europe. People from all ethnicities, races, religions, professions, jobs and classes live side by side as homeowners, renters, council tenants, or in temporary accommodation.</p> <p>The council estates are well-integrated into our areas, and are equally mixed – a fact accelerated by right to buy which has meant estates are now more socially mixed, including mixed tenure. Yet at least two of these are proposed for demolition with no detailed alternative being provided for the hundreds of displaced families. How can the plan deliver its objective of providing for the housing needs of the Haringey population with extensive private sector development and council estate demolitions? The plan offers no detail on these critical points.</p> <p>The whole process underway in Haringey reminds me of a poem by the German playwright Bertolt Brecht. He wrote that:</p> <p>“... the people <i>Had forfeited the confidence of the government</i> <i>And could win it back only</i> <i>By redoubled efforts. Would it not be easier</i> <i>In that case for the government</i> <i>To dissolve the people</i> And elect another?”</p> <p>Haringey’s Plan appears to start from the position that the problem with Tottenham is its people. A “problem” because they are poorer and not being able to buy</p>	
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				<p>their own homes. People who have therefore let down the Council and its planners. So our elected Council will “dissolve” the existing people; demolish or selloff their homes. The Plans will provide shiny new homes in towers for shiny new people who will form new communities.</p> <p>This betrays not just a lack of understanding, a lack of liking and respect for the people who now live here. It also assumes some sort of implicit trickle-down theory a work. And that changing the social make-up of the area will somehow benefit everyone in it. If this is the implicit theory being used, it is open to serious challenge.</p> <p>A required criterion for this plan is ‘evidence of participation of the local community and others having a stake in the area’.</p> <p>There is little evidence of broad based community participation encouraged or promoted by Haringey in this final round of consultation. The Council posted the consultation on its website and offered two hour sessions for people to attend at local libraries, at hours most people could not make, even if they were aware of the sessions. These were poorly publicized, and were very poorly attended and run at times inconvenient for many working people. The lack of participation at these sessions is not the fault of local people. There were no public meetings to explain these plans even though the consultation runs for several weeks. The Council’s borough wide magazine – which goes to households directly – did not include one word or reference to this consultation - http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-people-archive. This</p>		
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					would have been the most effective method for directly communicating with residents. The documents are very hard to read on line, and the on line forms are extremely difficult to complete. The number of printed sets of documents is limited yet this is the most effective way to read this complex material.		
53	NPS74	General			<p><i>Is it based on robust and credible evidence?</i></p> <p>No. There is no evidence that the development of 'mixed' communities by densification of existing housing estates and change of use from industrial to residential on council-owned industrial estates will be beneficial to the local community, either in terms of housing or employment.</p> <p>Please see the Our Tottenham submission for a detailed response regarding the assumptions in the plan which emanate from the Housing Market Assessment which are, it is argued, far too low. It describes how prices have increased, and agrees with the conclusion of the SHMA that most of the new housing will be 'unaffordable' for existing Haringey residents.</p>		<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private</p>

							development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.
53	NPS75	General			<p><i>Is it the most appropriate strategy when considered against the alternatives?</i></p> <p>No. The Local Plan does not really give alternatives to private property development, high density/high rise flats and estate demolitions. Eleven alternative ideas have been set out in the Our Tottenham submission. If the intention is to have a genuinely mixed community which met the needs of local people on waiting lists and/or living in poor private sector or temporary accommodation, the Local Plan would include these other options and ideas.</p>		<p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private</p>

							development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.
53	NPS76	General			<p><i>Is the document effective?</i></p> <p>Not for local people who need decent, affordable homes. It is likely to result in many residents being 'priced out' or 'demolished out' of the area and possibly out of London altogether. In the meantime, rising rents brought about by the introduction of higher-value housing and the attendant uplift to the property market for older homes will mean a higher housing benefit bill, increasing arrears and increasing homelessness.</p> <p>There is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need. The assessment of the need for school places does not appear to reflect the implications of building high rise, largely one or two bedroom flats. What provision will there be for community facilities? Whilst the Council's recent school planning places document suggests an increased child population because of the regeneration, Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. The outcome of this policy is likely to be a shortage of childcare facilities, since commercial premises will rarely be appropriate for</p>		<p>The Local Plan includes proposals for new housing that meet overall housing need in the borough. Additionally there is a target for 40% of this to be affordable housing. This plan seeks to provide additional new, high quality, affordable housing.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes</p>

				<p>conversion to childcare use.</p> <p>In any event, especially for Tottenham Hale, the plan indicates that the bulk of new developments will be one and two bedroom flats. So there is a serious mismatch between the policies and the plans. There is a very serious lack of health provision, particularly in Tottenham Hale. Continuing and probable greater lack of affordable housing will have a knock-on effect on the availability of trained health staff. A further 5000 homes is now proposed but there is no detail of how services will be provided. The long struggle in getting even a GP practice on Hale Village indicates the serious obstacles to this.</p> <p>The Plans contains warm words and aspirations about traffic and the infrastructure (para 3.1.19 of the Alterations to Strategic Policies, Pre-submission version January 2016). It appears to relate as much to real experience as rainbows to crocks of gold. to rainbows but much of this does not relate to real experience. This section states that ‘the £37m Tottenham Hale transport scheme has sought to reduce the impact of traffic on the local area, and increase capacity to cope with future demand. This will enable the regeneration of the area as set out in the Area Action Plan...’</p> <p>Now that the Tottenham Hale gyratory works are complete, the traffic can be as heavy and sometimes gridlocked as it used to be. Access routes such as Ferry Lane are very congested. How will an additional 5000 homes, (possibly an additional 10,000 people) be accommodated?</p> <p>I often wonder if any of the planners and others involved in the local plan process have ever walked</p>		<p>development from the Local Plan’s housing trajectory.</p>
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				<p>around the streets within easy walking distance of the Tottenham Hotspur ground on a matchday as displacement from the matchway controlled zones expands. There seems to be a Council fantasy that improved transport links will solve this problem.</p> <p>But what we face is not only a significant enlargement of the stadium capacity but the aim by the football club to run a 365 days a year events programme. Does anyone seriously consider that the transport improvements planned will be able to cope with such an increase? Have they visited the area around the Etihad Stadium in Manchester during a pop concert? (I made a point of doing so.) Or visiting the O2 arena which had a new tube line meet the demand?</p> <p>No doubt we will hear more about car-free developments. It appears to me that this shows either a degree of hypocrisy or perhaps selective perception. Take for example Hale Village, where I understand that parking spaces are available for those who can afford to pay a very high premium. Or consider few people who are lucky enough to live in public housing with a free parking scheme. And there are those with a driveway, garage or back entrance which enables them to park off-street.</p>		
53	NPS77	General		<p><i>Is it deliverable?</i> No. Let me take one area I know a little about. For many years – including when I was a councillor - I tried to raise the issue of potential urban flooding. The area where we live is a river valley. One of the delta streams of the Moselle Brook runs in a culvert at the rear of our home. I think we have been extremely fortunate not to suffer the flash flooding which from</p>		<p>The pattern of development that has been set out in the Local Plan has been subject to the statutorily required sequential test, and all sites have been included in a</p>

				<p>time has badly affected other parts of London. With other reasons flooding elsewhere in the UK. Some of the sites in Haringey now proposed for very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will surely increase the flood risk with more land built over and unable to absorb even minimal amounts of rainwater (given London clay) in gardens and landscaped areas.</p> <p>I am sure there will be many assurances about flood defences being adequate. But that of course is what we've seen and heard in other towns and cities. Places which suffer the consequences of so-called "once in a hundred years weather events". But which turn out to be once every few years. I suggest that this is probably the only area of the Plan where "trickle-down" theory may actually work.</p> <p>Meanwhile the Council continues to pursue the irrational aim of "naturalizing watercourses". (Page 51 Development management DPD) I take this to mean deculverting. This ignores the very good reasons why culverting was done in the past. So presumably the fans of deculverting don't have a culverted stream near their house. Nor are they in the market to buy or sell such a property at a time when rapid climate change is science not opinion?</p> <p>Then let's take the Council's announced preference for a very small number of development partners. This makes the plan vulnerable to being 'beaten down' in negotiations on the proportion of 'affordable' units and on infrastructure contributions, as with the Spurs development. Everyone in this field knows about the</p>	<p>borough-wide SFRA. Additionally, upon development, all sites will be required to not increase the risk of flooding on the site, or elsewhere.</p> <p>The council has a requirement to meet the borough's objectively identified housing and employment needs.</p> <p>While the Council is beginning to create it's own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local</p>
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				<p>changes in legislation which favour developers. And the use by developers of viability assessments which inevitable “prove” the financial impossibility of many – if any -affordable units. (Actually unaffordable.)</p> <p>At the same time Haringey is pressing ahead with plans for a joint-venture company to lease some public social housing. Apparently ignoring the obvious point that owning land on an unencumbered freehold is the best way to stay in control. A fact which I doubt will have escaped either councillors or staff who are freeholders.</p> <p>Haringey has put forward a broadly one-dimensional plan. It relies on private developers and a buoyant housing market to achieve its objectives. In North Tottenham around the Spurs stadium the focus is narrower still – with concomitantly higher risks. Sport-led development is by no means a magic wand with guaranteed success. Yet the Council has out “all its begs in one ask it” by partnering with Spurs and assuming the clubs plans will not only succeed but “trickle down” to regenerate the local area. For the sake of local people I hope the plan succeeds. Again there seems to be no Plan ‘B’.</p> <p>Nationally there are already concerns that UK economy may not be recovering at the rate expected. There is no guarantee that a further recession might not happen, especially given the situation with possible exit from the EU.</p> <p>In my view it is the responsibility of the Council and its planning staff to develop alternative strategies for Tottenham. If the economy goes into downturn, what</p>	<p>Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough’s residents.</p>
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				<p>commitment would these developers have to Tottenham and its communities? Part of developing alternative approaches would be to examine eventualities which might occur –in other words, to carry out a risk assessment. Relying on this plan, should there be an economic collapse, would leave Tottenham blighted, with many communities caught within red lined zones. It also needs to be asked as a matter of urgency whether the red-lines on the plan are having a damaging effect. For example on the willingness if people to buy and invest, and for banks to give loans.</p> <p>Haringey’s proposal for a joint venture company comprising 50/50 ownership with a private development partner compounds the huge risk of this one-dimensional plan. The plan to transfer two estates and around 140 to a private company is predicated on this local plan – they go hand in hand. This makes housing and development even more vulnerable to the market and leaves hundreds of tenants and residents exposed.</p>	
53	NPS78	General		<p><i>Is it flexible?</i> Absolutely not. The reverse appears to be the case. It is one-dimensional as described above, with too much reliance on large private developers. Should the economy go into a downturn, where property prices fall, what will happen to these plans? Alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards are now well-tested strategies for this. Estates could be refurbished and improved instead of being redlined for demolition. A further issue is the need for flexibility if the new</p>	<p>The argument posited appears to suggest alternative methods of delivering new homes on housing estates. The Local Plan does not shoehorn estate renewal into a demolish and rebuild model. It proposes a masterplanned</p>

					Mayor of London wants to make substantial changes to the London Plan. For example, at least two candidates have declared themselves in favour of a strict target of 50% or more ‘affordable housing’ so that the plan’s revised target of 40% may well be at odds with any revisions to the plan that the new Mayor may put forward.		approach, in co-ordination with local residents.
53	NPS79	General			<p><i>Will it be able to be monitored?</i></p> <p>No. The site allocation documents do not specify the number of affordable units envisaged for particular sites. Thus as agreements are reached with developers for particular sites, it will be impossible to say whether meeting targets for total units or affordable units are likely to be met taking into account the remaining sites. Table 2 in Appendix 2 says nothing about how much ‘affordable’ housing will be built on each main site.</p> <p>The ‘housing trajectory’ graph which states how many units will be built in each year does not say how many will be affordable at each stage. This means that the ‘affordable housing’ proportion of the total cannot be monitored against the target year by year.</p>		There is an overall borough-wide target of 40% affordable housing. It is not considered appropriate that each site will be expected to deliver 40% affordable, as the circumstances will differ site-by-site.
53	NPS80	General			<p><i>Is it consistent with national policy?</i></p> <p>The Plan fails to demonstrate how it will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods.</p> <p>The issues topic of climate change avoidance and mitigation was completely ignored when it came the Tottenham Hotspur Stadium. Haringey aspires to be a ‘green’ Council but faced with a large developer saying ‘no-thanks’ thr Council and its planners roll over.</p>		It is considered that the Local Plan is in compliance with the NPPF, and London Plan. The Council does not agree that the local plan’s housing plan will disadvantage BME residents. The respondent refers to the EQiA that was

					<p>National policy would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, it is likely the plan will not support existing residents of Tottenham and will disproportionately affect ethnic minority people.</p>		<p>carried out in relation to the Housing Strategy. The EQiA that was published with the draft Housing Strategy identified a cause of concern in the take up of one particular type of housing, which is Shared Ownership. Shared ownership (part-rent part-buy homes) consisted of around 135 units a year during the last two years, whilst social housing lets over the last two years were around 600 a year. The findings related to the shared ownership take up, are not directly related to the issue of estate renewal. The Council is taking action to mitigate the imbalance of households who buy into shared ownership schemes, by undertaking further research and</p>
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							<p>monitoring, and by ensuring that its marketing and sales are targeted at local households.</p> <p>The housing policy governing estate renewal, which has been the subject of extensive consultation between November 2015 and February 2016, and which is due to report back to Cabinet in July 2016. There will be a separate Equalities Impact Assessment published when that report is presented to Cabinet. The Local Plan has been subject to it's own EQiA as part of the Sustainability Appraisal.</p>
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Respondent 54: Greater London Authority

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
54	NPS81	General	Not	Not Stated	Re: Consultation on Alterations to the Strategic		Noted.

			Stated	<p>Policies DPD and preferred options draft: Development Management Policies DPD, Tottenham Area Action Plan and Site Allocations DPD</p> <p>Thank you for consulting the Mayor of London on the Regulation 19 stage of Haringey Council's Alterations to Strategic Policies, Development Management Policies DPD, Tottenham AAP and Site Allocations DPD (Proposed Submission Development Plan Documents). As you are aware, all Development Plan Documents (DPDs) have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London are attached in Appendix 1.</p> <p>On 27 March 2015, my officers provided comments (reference LDF14/LDD15/LDD09/10/14/15/ EK01) on the Haringey's Regulation 18 stage of these draft DPDs. Since those representations were made, Haringey has engaged in further discussion with the GLA, and the Council has responded positively to matters raised.</p> <p>Having now considered the Proposed Submission Development Plan Documents against the London Plan, and also in the context of the parallel consultation by Enfield Council on its New Local Plan for Enfield, it is my opinion that the Proposed Submission Development Plan Documents are in general conformity with the London Plan. Notwithstanding this, a number of specific representations are provided below (and in the</p>		
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					accompanying appendices) to emphasise the Mayor's position, and/or to help clarify or improve policy.		
54	NPS82	General	Not Stated	Not Stated	The Council should note that the GLA intends to undertake a refresh of the Upper Lee Valley OAPF. This is particularly timely in the context of Crossrail 2, and is likely to provide an opportunity to identify additional housing capacity within the Opportunity Area. Clearly the role of the OAPF is to provide a strategic framework plan. However, as discussed in Appendix 2, GLA officers seek to ensure that key spatial diagrams coming forward locally in the Upper Lee Valley may be read clearly alongside each other (Appendix 4 illustrates the current situation). Accordingly, the Council is encouraged to engage particularly closely with neighbouring boroughs when working up key diagrams within the Proposed Submission Development Plan Documents. More generally, the GLA looks forward to facilitating further joint engagement between boroughs and other relevant stakeholders as part of the Upper Lee Valley OAPF review process.		Noted.

Respondent 55: Historic England

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
55	NPS83	Evidence Base, Housing			It is noted that the evidence provided, to support the uplift in expected capacity, is the Mayor's Strategic Housing Land Availability Assessment 2013 . This document summarises Haringey nominal capacity figures with that of the other Boroughs in London and does not provide site specific details, which can demonstrate robustly that the housing growth expected to be delivered in the life of		Noted.

					<p>the plan can be achieved. In particular it does not demonstrate the potential impact upon the historic environment as a result of the uplift in expected capacity. This is a point previously raised in our response to the 2015 version of the plan (letter dated 27th March 2015). We accept that there is increasing pressure to deliver more homes and growth, but our concern is the lack of evidence that provides assurances that the identification of additional capacity from sites will not cause unjustified harm to the significance of heritage assets (where there is potential impact). We would seek further clarification to ensure the principles of sustainable development including the delivery of net gain for all three dimensions (economic, social and environmental) are equally achieved (NPPF paragraph 152). In particular we are seeking to avoid significant adverse impacts on any of these dimensions including the historic environment as a result of the changes in the capacity figures.</p>		
55	NPS8 4	Tall Buildings, evidence base	Not stated	Not stated	<p>Tall Buildings We note that the Council have developed supporting evidence entitled 'Potential Tall Buildings Locations Validations Study' (November 2015) which seeks to justify the location of tall buildings in the Borough. In general we welcome the Council's commitment to developing this evidence. However there are concerns with regards to how the historic environment is considered. In particular the document does not consider robustly the significance of heritage assets, but limits itself to baseline information from the Borough's characterisation study and conservation area appraisals. This approach therefore does not take account of the tests that will be used when considering potential harm to heritage assets when developments such as tall buildings are proposed.</p>		Noted.

				<p>In addition we would suggest that Historic England's Good Practice Advice Note (GPA3) on Setting of Heritage Assets dated March 2015 should be reviewed and used to inform the evidence presented. In particular as this GPA focuses on the setting of heritage assets and the contribution a surrounding contributes to the significance of heritage assets. This could include views, but not exclusively. In reviewing the evidence provided it is clear that specific views are considered, but not the setting of heritage assets, and the contribution they make to the significance of the heritage asset. This omission in the evidence is contrary to our revised Guidance on Tall Buildings, GPA3 and national policy. This deficiency is reflected in the principles identified (for place-making, character and views), and the details of the area specific Summary of Initial Findings.</p> <p>It is however noted that the significance of heritage assets and their settings is incorporated as a general design requirement for 'taller' and 'tall' building proposals in Policy DM6 Building Heights (point B. c and C). This is welcomed however it is not clear on whether the concept of significance and setting of heritage assets was considered in the identification of appropriate locations for 'tall' buildings. At present this appears not to be the case and as such the evidence is incomplete and not fully compliant with national policy, Guidance on Tall Buildings, and GPA3. This deficiency should be addressed.</p> <p>Finally the literature review considers an old version of the CABE/Historic England (formerly English Heritage Guidance on Tall Buildings. The version considered is 2007, which has now been superseded by a revised publication dated December 2015 – link below: https://historicengland.org.uk/images-</p>		
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