

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 Undertake

Cross Boundary Consultee	How we Cooperated	Outcomes
Neighbouring authorities (see map 1)	<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 	<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)</p>

	<p>May 2014, 26 February 2016</p> <ul style="list-style-type: none"> • 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>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>
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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 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>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</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>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 process for delivery vehicle.</p>
Civil Aviation Authority	<p>Letters inviting representations on all Development Plan Documents and responses received.</p> <p>(See Consultation Statements for each DPD)</p>	<p>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.</p>
Haringey Clinical Commissioning Group (CCG)	<p>Letters inviting representations on all Development Plan Documents and responses received.</p> <p>(See Consultation Statements for each DPD)</p> <p>Infrastructure Delivery meetings and correspondence.</p>	<p>Details of representations received and the Council's actions as a result are detailed above.</p> <p>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.</p> <p>Continued engagement on healthcare requirements/priorities being reflected in local plan</p>

		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 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.
Office of Rail Regulation	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.

4. Who Responded and the Number of Representations Received

- 4.1 There were 55 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**.

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

- 5.2 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.
- 5.3 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.
- 5.4 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.
- 5.5 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

5.6 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

5.7 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.

5.8 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.

5.9 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.

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

Design

5.11 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.

5.12 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 form an important evidence base underpinning the Local Plan.

5.13 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

5.14 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

5.15 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.

5.16 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

5.17 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 instances, 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 1478 or at the above address.
Dated 8th January 2016

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

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- the online response form at www.haringey.gov.uk/localplan
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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 1478 or at the above address.
Dated 8th January 2016

LONDON BOROUGH OF HARINGEY

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:

- 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

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 January2015- 4th March2016

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

Lynne Zilkha	Elizabeth Sutton-Klein	Cllr Mallett Antonia	Cllr Christophides Joanna	Cllr Adamou Gina
Jasper Woodcock	Henriette Stuchtey	Cllr Mann Jennifer	Cllr Connor Pippa	Cllr Adje Charles
Heather Wood	Celeste Menich	Cllr Marshall Denise	Cllr Demirci Ali	Cllr Ahmet Peray
Kitty Wong	Margaret Stoves	Cllr McNamara Stuart	Cllr Diakides Isidoros	Cllr Akwasi-Ayisi Eugene
John Wise	Kevin Stanfield	Cllr McShane Liz	Cllr Doron Natan	Cllr Amin Kaushika
Teresa Wing	Michael Edwards	Cllr Meehan George	Cllr Ejiofor Joseph	Cllr Arthur Jason
Carolyn Whitehead	Evelyn Ryan	Cllr Morris Liz	Cllr Elliott Sarah	Cllr Basu Dhiren
Edward Webb	Tara Ryan	Cllr Morton Peter	Cllr Engert Gail	Cllr Beacham David
Julia Warburton	Nicholas Rusz	Cllr Newton Martin	Cllr Gallagher Tim	Cllr Berryman Patrick
Jonathan Vellapah	Joyce Rosser	Cllr Opoku Felicia	Cllr Goldberg Joe	Cllr Bevan John
Nick Triviais	Jeff Rollings	Cllr Ozbek Ali Gul	Cllr Griffith Eddie	Cllr Blake Barbara
Max Tomlinson	Chris Roberts	Cllr Patterson James	Cllr Gunes Makbule	Cllr Blake Mark
Joey Toller	Lorna Reith	Cllr Peacock Sheila	Cllr Hare Bob	Cllr Bull Clare
Jane Thompson	Barry Rawlings	Cllr Reith Lorna	Cllr Hearn Kirsten	Cllr Bull Gideon
Rachel Tedesco	Kimberley Pyper	Cllr Rice Reg	Cllr Ibrahim Emine	Cllr Carroll Vincent
Alison Taylor-Smith	Annabruna Poli	Cllr Ross Viv	Cllr Jogee Adam	Cllr Carter Clive
Simon Miller	Karl-Dirk Plutz	Cllr Ryan James	Cllr Kober Claire	Cllr Sahota Raj
Richard Perry	Chris McNamara	Gabrielle Kagan	Alexander Elliot Ltd	Cllr Stennett Anne
Andrew Papadopoulos	Louise McNamara	Petal Caddu	Alexandra Mansions Tenants Association	Cllr Strickland Alan
Pavel Pachovský	Peter McNamara	Francois Joubert	Adult Literature Group	Cllr Vanier Bernice
Christopher Owen	Richard Max	Nick Jenkins	African Caribbean Association	Cllr Waters Ann
Stephen Overell	Kim Mason	Tony Hopkins	African Cultural Voluntary Organisation	Cllr Weston Elin
Gerrit Ormel	Colin Marr	Marian Hone	African Women's Welfare Group	David Lammy MP
Christian Ogilvie-Browne	Jason MacKay	Elaine & Ben Holgado	Africans & Descendants Counselling Services Ltd	Lynne Featherstone MP
Juliet Oerton	Stephen Lubell	Susie Holden	Age UK	A Anva Ltd

Carol Norton	John Long	Michael Herbert	Agudas Israel	A P T Consulting
Joseph Nicholas	Alison Lister	Frances Heigham	AH Architects	A S Z Partners Ltd
Ollie. Natelson	Barry and Louise Lewis	Claudia Hawkins	Air Transport Users Council	A. E. Butler & Partners
Jill Naeem	Rebecca Lellis Ferreira	Lauritz Hansen-Bay	Aitch Group	A.C.H. Turkish Speaking Pensioners Club
Eleni Murphy	Ethan Lazell	Paul Hancock	AJ Architects	Abbeyfield (North London) Society
Dave Morris	Charlie Kronick	Laura and Marcus Graham	Alan Cox Associates	Abbeyfield Society
Said Moridi	Heather Kinnersley	Marcos Godinho	Albany & Culross Close Residents Association	ACHE (Action for Crouch End & Hornsey Environment)
Faye Morgan	Angie Kikkides	Joe Friedman	Avenue Mews Tenants Association	Alexandra Palace Action Group
Mary Mitchell	Hannah French	Tinu Cornish	Aztech Architecture Ltd	Alexandra Palace Residents Association
Elaine Graham	Paul Brown	Lucia Brusati	Bahai Community	
Sean Fewlass	Stephen Brice	Tim Brierley	Bangladesh Muslim Organisation	Alexandra Park/Grove Lodge Meadow Allotments
Carla Ferrarello	Jill Bowden	Arthur Leigh	Bangladeshi Cultural Society	Alexandra Primary School
Pasco Fearon	Tim Blake	Beatrice Hyams	Bangladeshi Women's Association	Alexandra Residents Association
Cindy Evans	Anna Blackburn	Valerie Rose Berry	Baptist Church	Alexandra Tenants Association Group
Sue Ettinger	Matthias Bauss	Bill Temple-Pediani	Barnet, Enfield and Haringey Health Authority	Allenson House Medical Centre
Chris Elser	Frances Basham	Laura Forrest-Hay	Bashkal & Associates	Ally Pally Allotment Society
Kieron Edwards	Miles Attenborough	Sarah Lane	Bedford Road Tenants Association	Al-Rasheed Dauda Architect
Johnny Dixon	James Athanassiou	Elizabeth Gray	Belcher Hall Associates	Altaras Architecture
Angharad Davies	Ruth Antoniadis	Nicola Venning	Bell Residents Association	Anatolitis Associates
Felipe Da Rocha	Paulette Amadi	Panos Nicolaidis	Belmont Infant & Junior School	Ancient Monuments Society
Ruth Cowan	Linda Alliston	Poppy Rose	Bethel United Church of	Andrew Kellock Architects

			Jesus Christ	
Stephen Cook	Andreas Adamides	Christopher Chadwick	Bhagwati Sai Culture & Social Centre	Andrew Mulroy Architects Ltd
Kenneth Connelly	Leila Sifri	Barry James	Bibles Christian's Assembly	Anglo Asian Women's Association
Anastasia Christofis	Eliza Kaczynska-Nay	Bob Maltz	Bicknell Associates Chartered Architects	Apcar Smith Planning
David Burrowes MP	Cynthia Jenkins	Flavio Poli	ASRA (GLHA)	Arbours Association
Paul Bumstead	Robert Franks	Selina & Dan Egerton	Aspire Design & Survey Ltd	Architectural Heritage Fund
Reuben Payne	Elizabeth Barnett	Broadwater Farm Community Health Centre	Blitzgold Ltd	Architectyourhome-Highgate
Hannah Redler Hawes	Angela Rossi Carter	Broadwater Farm Residents Association	Born Again Evangelistic	Archi-Tone Ltd
John Murray	Tony Baker	Broadwater Residents Association	Bostall Architecture Services	Archway Road Residents Association
Christine King	Gordon Forbes	Brown & Co (Surveyors) Ltd	Bounds Green & District Residents Association	Archway Road Tenants Association
Jon Brooks	Huub Nieuwstadt	Bruce Castle Village Residents Association	Bounds Green Group Practice	Archway Road Tenants Association
Chris Warburton	Bill Nottage	Brunswick Park Health Centre	Bounds Green Health Centre	ARHAG Housing Association
David Lichtenstein	Frederick Limbaya	Buckingham Lodge Residents Association	Bounds Green Infant & Junior School	Arnold Road Residents Association
Nick Oparvar	Feolezico Calboli	Building Design Consultants	Bounds Green Owner/Occupier Ass. & Neighbourhood Watch	Arnos Grove Medical Centre
Ruth Ortiz	Sue Penny	CA (UK) Ltd	Bowes Park Community Association	Arta Architectural
Ursula Riniker	J N Douglas	CAAC Highgate	Bowes Park Community Association	Ashdown Court Residents Association
David Baker	David Rennie	CABE	Bracknell Close/Winkfield Road Residents Association	Asian Carers Support Group

Michele Eastmond	Steve Roe	Campbell Court Residents Association	Brendan Woods Architects	Asian Community Centre
Chris Mayled	Katy Andrews	Campsbourne Baptist Church	Bridge House Health Care Centre	Asian Community Group
Jeremy Munday	Sophie Cattell	Campsbourne Centre	Briffa Phillips Architects	Asian Family Group
Nicholas Embling	Capital Architecture Ltd	Campsbourne Infant School	Britannia Hindu Temple Trust	Broadwater Farm Community Centre
Andrew Tiffney	Calvary Church of God in Christ	Chestnut Area Residents Association (CARA)	Client Design Services Ltd	Crawford Partnership
Carolyn Squire	Carr Gomm Society	Chestnut Northside Residents Association	Clyde Area Residents Association	Crouch End open Space (CREOS)
Corporation of London	Carter Surveying Associates	Chestnuts Community Centre	Coldfall Community Centre	CRH Tenants Association
London Borough of Haringey	Caryatid Architects	Chinese Community Centre	Coldfall Primary School	Cromwell Avenue Residents Association
London Borough of Sutton Planning and Transportation	Casa de la Salud Hispano Americana CASAHA	Chomley & Causton Residents Association	Coleraine Park Primary School	Crouch End Dental Practice
London Borough of Redbridge	CASCH	Christ Apostolic Church Kingswell	Collage Arts	Crouch End Health Centre
London Borough of Brent Planning Services	Charlton House Medical Centre	Christ Church	Commerce Road Tenants Association	Crouch End Health Centre
London Borough of Barking & Dagenham	Cherry Tree House Residents	Christchurch West Green	Community Action Sport	Crouch End Traders Association
London Borough of Barnet Planning Department	CASE	Christopher Wickham Associates	Community Church of God	Crouch End URC Church
London Borough of Bexley	Causeway Irish	Church Commissioners	Community Gay & Lesbian Association	Crouch Hall Road Surgery
London Borough of Croydon	CB Architects	Church Crescent Residents Association	Community Response Unit	Crowland Primary School
London Borough of Enfield	Cemex (UK) Operation Ltd	Crammond Browne Architects	Community Safety Unit	Cube Building Consultancy
London Borough of	Central & Cecil	Circle 33 Home Ownership	Confederation of British	CUE

Hammersmith and Fulham		Ltd	Industry	
London Borough of Harrow	Centre for Accessible Environments	Circle 33 Housing Group	Co-op Homes	CUFOS Community Centre
London Borough of Hillingdon	Charisma Baptist Church	Clark Designs Ltd	Coppetts Residents Association	Cypriot Centre
London Borough of Hounslow	Albany & Culross Close Residents Association	Clarke Desai Ltd	Corporation of London	Cypriot Women's League
RB Kensington & Chelsea	Alexandra Mansions Tenants Association	Claudio Novello Architects	Council for British Archaeology	Cyprus Turkey Democratic Association
RB Kingston upon Thames	Alexandra Palace Action Group	Cherry Tree House Residents	Edgcott Grove Residents Association	D R M Associates
London Borough of Lambeth	Alexandra Palace Residents Association	Chestnut Area Residents Association (CARA)	Eldon Road Baptist Church	DASH
London Borough of Lewisham	Alexandra Park/Grove Lodge Meadow Allotments	Chestnut Northside Residents Association	EMJCC Community Side	David Langan Architects
London Borough of Merton	Alexandra Residents Association	Chomley & Causton Residents Association	ENKI Architectural Design	Dental Health Centre
London Borough of Newham	Alexandra Residents Association	Church Crescent Residents Association	Eritrean Community in Haringey	Dental Practice
London Borough of Richmond Upon Thames Policy and Design	Alexandra Tenants Association Group	Clyde Area Residents Association	Ermine House Residents Association	Dental Surgery
London Borough of Tower Hamlets Strategic Planning	Archway Road Residents Association	Commerce Road Tenants Association	Ermine Road Residents Association	Department for Culture Media and Sport
London Borough of Waltham Forest	Campbell Court Residents Association	Coppetts Residents Association	Evering Pentecostal Church	Ecodomus
Westminster City Council Planning and City Development	Archway Road Tenants Association	CRH Tenants Association	FA Drawing Service	Devonshire Hill Primary School
London Borough of Havering	Arnold Road Residents Association	Cromwell Avenue Residents Association	Faith Baptist Church	Direct Planning Ltd
London Borough of	Ashdown Court Residents	Eastbourne Ward Residents	Faith Mosque	Discount Plans Ltd

Wandsworth	Association	Association		
London Borough of Ealing	Avenue Mews Tenants Association	Edgcott Grove Residents Association	Faith Restoration Ministry	Downhills Infant & Junior School
London Borough of Hackney	Bedford Road Tenants Association	Ermine House Residents Association	Family Health Service Authority	DPA (London) Ltd
City of London	Bell Residents Association	Ermine Road Residents Association	Family/Landmark Housing Association	DPDS Consulting Group
London Borough of Camden	Bounds Green Owner/Occupier Ass. & Neighbourhood Watch	Ferry Lane Estate Residents Association	Federation of African Peoples Organisation	Duckett Dental Surgery
Department for Transport	Bowes Park Community Association	Fortismere Residents Association	Ferry Lane Estate Residents Association	Earlsmead Primary School
Garden Residents Association	Bowes Park Community Association	Garden Residents Association	Finsbury Park Track & Gym	Eastbourne Ward Residents Association
Grosvenor Road Residents Association	Bracknell Close/Winkfield Road Residents Association	Muswell Colney Residents Association	Friends of Ivatt Way	Ebenezer Foundation Advisory Association
Hale Estate Residents Association	Broadwater Farm Residents Association	Nelson Mandela Residents Association	Friends of Lordship Rec	South Hornsey Residents Association
Harmony Close Residents Association	Broadwater Residents Association	Noel Park North Area Residents Association	Friends of Markfield Recreation Ground	Southwood Lane Residents Association
Hillcrest Tenants & Residents Association	Bruce Castle Village Residents Association	North Grove Residents Association	Friends of Muswell Hill Playing Fields	Springfield Avenue Residents Association
Hillside Road Residents Group	Buckingham Lodge Residents Association	Northumberland Park Tenants & Community Association	Friends of Muswell Hill Playing Fields & Coldfall Wood	Stokley Court Residents Association
Hilltop House Residents Association	Flower Michelin Ltd	Oakdale Resident Association / South Tottenham RA	Friends of Noel Park	Stroud Green Residents Association
Hornsey Lane/Colwick Close Residents Association	Forestry Commission England	Palace Gates Residents Association	Friends of Paignton Road	Suffolk Road Residents' Association
HTBG Residents Association	Fortismere Residents Association	Palace View Residents Association	Friends of Queen's Wood	Summersby Road Residents Association

Jackson's Lane Residents Association	Fortismere School	Park Lane Close Residents Association	Friends of Railway Fields	The Chine & Cascade Residents Association
James Place/Church Road Residents Association	FQW	Partridge Way Residents Association	Friends of Railway Fields	The Weymarks Residents Association
Kingsley Place Residents Association	Frederick Knight Sports Ground	Plevna Crescent Residents Association	Friends of Stationer's Park	Tiverton Tewkesbury Residents Association
Lancaster Road Residents Association	Freight Transport Association	Remington Road Residents Association	Friends of the Earth (London Region)	Tower Gardens Residents Network
Lomond Close & Brunswick Road RA	Friends of Albert Road Recreation Ground	Resident Association	Friends of Tottenham Cemetery	Turner Avenue Residents Association
Lomond Close Residents Association	Friends of Bowes Park Garden	Resident Association	Friends of Wood Green Common	Veryan Court Residents Association
Love Lane Residents Association	Friends of Bruce Castle	Robert Burns Residents Association	G T Project Management	Wood Green Black Tenants Group
Millicent Fawcett Tenants Association	Friends of Hornsey Church Tower	Seymour Road Residents Association	Gage Limited	Wood Green Central Area Tenants & Community Assoc.
Moselle Close Residents Association	Friends of Brunswick Road Open Space	Sophia House Residents Association	Garden Drive Neighbourhood Watch	Woodridings Court Residents Association
Friends of Chestnut Park	Friends of Cherry Tree Wood	Friends of Crouch End Open Space	Friends of Downhills Park	Woodside Residents Association
Garden Residents Association	Guyana People's Congress	West Green Residents' Association	Haringey Irish Cultural & Community Centre	The Queens Mansions Residents Association
Gf Planning Limited	Habinteg Housing Association	Woodlands Park Residents Association	Haringey Leaseholders Association	Avenue Gardens Residents Association
Gladesmore Community School	Haines Philip Architects	Woodstock Road Residents Association	Haringey Mencap	Beresford Road Residents Association
Gladesmore Girl's & Young Women's Club	Hale Estate Residents Association	Cranley Gardens Residents' Association	Haringey Pakistan Cultural Society	Burghley Road Residents Association
Gladesmore Youth Club	Hamilton Bishop Ltd.	Wood Lane Residents Association	Haringey Phoenix Group	Chestnuts Northsid Residents Assn
Globe Projects Ltd	Hancock Architects	Gardens Residents Association (GRA)	Haringey Police	Chitts Hill Residents Association

Goan Community Centre	Haringey African Organisation	Grovelands, Lemsford & Leabank Residents Assoc.	Haringey Solidarity Group	Glasslyn, Montenotte Tivoli Road Residents Assoc.
Grace Baptist Chapel	Haringey Area Youth Project	Torrington Park Residents Association	Haringey Sports Council	HFRA (Haringey Federation of Residents Association)
Greek Community Care	Haringey Arts Council	Tynemouth Area Residents' Association	Haringey United Church	Morrish Residents Association
Greek Orthodox Church	Haringey Asian Women Aid	Friern Village Residents' Association	Haringey Women's Aid	Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park
Greek Parents Association	Haringey Autism	The Bounds Green and District Residents Association	Harmony Close Residents Association	Parkside & Malvern Residents Association
Green City Landscapes Ltd	Haringey Breastfeeding Centre	Dowset Road Residents Association.	HART Architecture	Parkside Malvern Residents Association
Greig City Academy	Haringey Community Volunteer	Haselmere Residents Association	Hartleys Projects Ltd	Rookfield Estate Residents Association
Gridline Architecture	Haringey Deaf Group	Haselmere Residents Association	Health and Safety Executive	Sandlings Residents Association
Grosvenor Road Residents Association	Haringey Faith Forum	Haringey Federation of Residents Associations	High Cross Church	The Alexandra Residents Association
Groundwork London	Haringey Ghanaian Community	Palace Gates Residents' Association	High Cross United Reformed Church	Warner Estate Residents Association
Gus Alexander Architects	Haringey Group London Wildlife Trust	Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth	Highgate Group Practice	West Green Residents' Association
Highgate Library Action Group	Crouch End Forum	Alexandra Palace Charitable Trust	Home Craft Consultant	HTBG Residents Association
Highgate Newton	Fountayne Residents	Al-Hijra Somali Community	Homebase Ltd	IBI Design Associates

Community Centre	Association	Association		
Highgate Primary School	Office of Government Commerce	Alliance Planning	Homebound Social & Luncheon Group	Industrial Dwellings Society
Highgate United Synagogue	Cornerstone Trading	Angolan Community Association	Homes & Community Agency	Innisfree Housing Association
Highgate Wood School	Barratt Development PLC	Arriva London	Hornsey Dental Practice	Irish Community Centre
Highpoint Dental Surgery	Inland Waterways Association	Asian Action Group	Hornsey Housing Trust	Irish in Britain Representation Group
Highway Youth Club	LB Greenwich	Asian Women's Association	Hornsey Housing Trust	Islamic Community Centre
Hill Homes	Metropolitan Development Service	Avenue Gardens Residents Association	Hornsey Lane & Colwick Close RA	Islamic Community Centre Women's Group
Hillcrest Tenants & Residents Association	London TravelWatch	Avenue Gardens Residents Association	Hornsey Lane Association	JA Architecture
Hillside Road Residents Group	St. Peter in Chains RC Infant School	Barnard Hill Association	Hornsey Lane/Colwick Close Residents Association	Jack Cruickshank Architects
Hilltop House Residents Association	Aarogya Medical Centre	Barton Willmore	Hornsey Moravian Church	Jacksons Lane Community Centre
Hollickwood Park Campaign	London Ambulance Service	Barton Willmore	Hornsey Mosque	Jackson's Lane Residents Association
Holly Park Clinic	3 Valleys	Bellway Homes	Hornsey Police Station	James Place/Church Road Residents Association
Holmes Design Ltd	African Caribbean Leadership Council	Beresford Road Residents Association	Hornsey School for Girls	Jason Read Pugh
Holmesdale Road & Orchard Road Neighbourhood Watch	Alexandra Palace & Park CAAC	Black & Ethnic Minority Carers Support Service	Hornsey YMCA	Jesus for the Word Community Project
Holy Innocents	Christian Action (Enfield) Housing Association	BME Community Services - Selby Centre	Housing 21	Jewish Orthodox Association
Holy Trinity Church	City Planning Group	BPTW	HPN Ltd	John Grooms Housing Association
British Waterways	Civil Engineers Ltd	John L Sims Surveyor	The Old Surgery	LB Harrow
Canal River Trust Head Office	Cluttons LLP	John Perrin & Co	Ethiopian Community Centre	LB Havering
Bruce Grove Primary School	College of Haringey, Enfield	JS Surveying And Design	Euroart Studios	LB Kensington & Chelsea

	and North East London			
Burghley Road Residents Association	Colney Hatch Management Company Ltd.	Julian Cowie Architects	Family Mosaic	LB Lambeth
Buying Solutions	Connexions	Kings Avenue Dental Practice	Fields in Trust	LB Merton
CARA Irish Housing Association	Council of Asian People (Haringey)	Kingsley Place Residents Association	First Plus Planning	LB Newham
CB RE	Crossover Group	Kurdish Advice Centre	FirstPlan	LB Richmond Upon Thames
CGMS Consulting	Cypriot Elderly & Disabled Group	Kurdish Community Centre	Friends of Priory Park	LB Sutton
CGMS Consulting	Department for Business, Innovation and Skills	Kurdish Housing Association	Friends of Priory Park	LB Tower Hamlets
CGMS Consulting	Alexandra Park School	Kush Housing Association	Muswell Hill and Hornsey Friends of the Earth	LB Wandsworth
CgMS Ltd	Department of Environment Food and Rural Affairs	L & P Consultants	Friends of the Earth Tottenham & Wood Green	Lea Valley Primary School
CGMS Ltd	Derek Horne & Associates	Ladybur Housing Co-operativr	Friends, Families and Travellers and Traveller Law Reform Project	League of Jewish Women
Chestnuts Northsid Residents Assn	Dialogue Communicating Planning	Lancaster Road Residents Association	Fusion Online Limited	LETEC
Chettle Court Ranger Youth (FC)	DP9 Planning Consultants	LB Barking & Dagenham	Genesis Housing Group	Level Ltd
Cheverim Youth Organisation	Drivers Jonas Deloitte	LB Brent	Glasslyn, Montenotte Tivoli Road Residents Assoc.	Liberty Church
Chitts Hill Residents Association	LB Hammersmith & Fulham	LB Croydon	GLC-RAG	Lidl UK
Alderton Associates	Greek Cypriot Women's Organisation	LB Ealing	Grace Organisations - Elderly Care Centre	Lipton Plant Architects
GreenN8 Community Group	Livingstone Youth & Parent Support Centre	Hornsey Historical Society	Lord Morrison Community Centre	Living World Temple
Gt. Lakes Initiative & Support Project	Lomond Close & Brunswick Road RA	Hornsey Vale Community Association	Lordship Lane Infant School	Metropolitan Housing Trust

Haringey Chinese Centre	Lomond Close Residents Association	London First	Lordship Lane Junior School	Metropolitan Police
Haringey Cycling Campaign	London Ambulance Service	Jala - Johnanthan A Law and Associates	Loren Design Ltd	Metropolitan Police
Haringey Fire Service	London Basement Company Ltd	Jamait-Al-Nissa	Love Lane Residents Association	Methodist Church
Haringey Peace Alliance	London Bat Group	Joint CAAC	M C Dentistry	Ministry of Justice
Haringey Play Association	London City Airport	Jones Lang LaSalle Planning	Manor House Dental Practice	Morrish Residents Association
Haringey Racial Equality Council	London Forum of Amenity & Civic Societies	King Sturge Llp	Marianne Davys Architects Ltd	Mount Anvil plc
Haringey Somali Community & Cultural Association	London Historic Parks & Gardens Trust	Knight Frank	Mario Pilla Architects	Mulalley and Company Ltd
Haringey Womens Forum	London Housing Federation	Ladder Community Safety Partnership	Markfield Project	Nathaniel Lichfields and Partners
HAVCO	London Islamic Cultural Society	Lambert Smith Hampton	MD Designs	National Federation of Gypsy Liaison Groups
Her Majesty's Court Service	London Islamic Cultural Society	LB Bexley	Metropolitan Development Consultancy	AMEC for National Grid
HFRA (Haringey Federation of Residents Association)	London Port Health Authority	LB Redbridge	Metropolitan Home Ownership	National Market Traders' Federation
Home Builders Federation - London	London Walking Forum	Lee Valley Estates	Metropolitan Police	New Testament Church of God
Home Office	London Waste Ltd	Lee valley Park Authority	Metropolitan Police Service	NHS London Healthy Urban Development Unit
Home-Start Haringey	London Wildlife Trust	London Continental Railway	Middle Lane Methodist Church	Noel Park CAAC
Hornsey CAAC	London Windows Direct Ltd	Dron & Wright	Middlesex Area Probation Service	Tottenham CAAC
Millicent Fawcett Tenants Association	North London Business	Noel Park North Area Residents Association/Noel Park Conservation Area	Millennium Neighbourhood Watch & Residents Association	Rapleys

		Advisory Committee/Friends of Noel Park		
Millyard 7th day Baptist Church	North London Chamber of Commerce	Muswell Hill & Highgate Pensioners Action Group	New Stroud Green Health Centre	Redrow Homes (Eastern) Ltd
Ministry of Praise	North London Partnership Consortium	Muswell Hill Police Station	Newton Architecture	Restoration Community Project
Missionaries of Africa	North London Waste Authority	Muswell Hill Synagogue	NHS London	Rookfield Estate Residents Association
MJW	North London Waste Authority	Muswell Hill Youth Project	Nightingale Primary School	RPS Planning
Moravian Church	North Middlesex Hospital	N London Cultural Diversity Group	Noel Park Infant & Junior School	Sandlings Residents Association
More Space	Caldotec Ltd	N.A.G.	Noel Park North Area Residents Association	Savills
Morris House Dental Surgery	Campsbourne School	National Romany Rights Association	Noel Park Over 55's Club	Savills Planning
Morris House Surgery	Parkside & Malvern Residents Association	Neelkamal Asian Cultural Centre	North Grove Residents Association	St. James Church
Moselle Close Residents Association	Parkside Malvern Residents Association	Neil Wilson Architects	North Harringay Infant & Junior School	Selby Trust
Mountview Arts Centre	Peacock & Smith for WM Morrison Supermarkets plc	Nelson Mandela Residents Association	North London West Indian Association	Shian Housing Association Ltd
Mt. Olivet Baptist Church	Peacock and Smith	New Deal for Communities	Northumberland Park Community School	Haringey Trades Council
Murray Graham Architecture Ltd	PEEC Family Centre	New Image Design	Northumberland Park Tenants & Community Association	Woodstock Road Residents Association
Murray Mackeson Associates	Planning Perspectives	New River Action Group	Northumberland Park Women's & Childrens Centre	Workspace Group
Muswell Colney Residents Association	Pollard Thomas & Edwards Architects	New River Sports Centre	npower	YMCA
Muswell Hill & Fortis Green	PTEA	New Space	Oakdale Resident	Cabinda Community

Association			Association / South Tottenham RA	Association
Muswell Hill & Highgate Handicapped Pensioners Club	Okpanam Women's Association	Patrick Hickey Design	Tottenham CAAC	Veolia Water Partnership
St. Mary's Church	Oromo Community in Haringey	Paul Archer Design	Tottenham Civic Society + Tottenham CAAC	London Parks and Gardens Trust
Stapleton Hall Ltd	Osel Architecture	Paul Buxton Associates	Transport For London	Pinkham Way Alliance
Stewart Ross Association/Dev Plan	Outline Building Limited	Peabody Design Group	Tree Trust for Haringey	Thames Water
Stock Woolstencroft	P R P Architects	Peabody Trust	Triangle Community Centre	Freehold Community Association
Stonewall	P. E. Ottery	Peabody Trust	Turley Associates	Natural England Consultation Service
Sustrans	P.D. Associates	People's Christian Fellowship	Campaign to Protect Rural England (CPRE)	Office of the Green MEPs,
Tan Dental Practice	Palace Gardens Association	Perfect Fit Kitchen & Interiors Ltd	Turnaround Publisher Services	Member of Parliament for Chipping Barnet
Tetlow King Planning	Palace Gates Residents Association	Peter Brades Architects	Pathmeads	One Housing Group
Thames Water Utilities Ltd	Palace View Residents Association	Phoenix Group	Unite Group PLC	Hyde Housing
Thames Water Wastewater Services	Park Lane Close Residents Association	Plevna Crescent Residents Association	Veolia Environmental Services (UK) Plc	Protect Bruce Castle Area (PBCA)
The Alexandra Residents Association	Park Road Dental Practice	Police & Community Working Group	Wards Corner Community Coalition	Pyramid Counselling Services
Haringey Council	Park Road Pool	Port of London Authority	Wards Corner Community Development Group	Quorum Associates
The Mulberry Primary School	Park View Academy	Post Office	Warner Estate Residents Association	Randall Shaw Billingham
The Planning Inspectorate	My Dental Care	Post Office Counters Ltd	Haringey Citizen's Advice Bureau	Redemption Church of God

The Ramblers	Park Vue Dental Practice	Powergen plc	West Green Residents' Association	Remington Road Residents Association
The Theatres Trust	Parsons Brinckerhoff Ltd	Pride of Ferry Lane	Woodlands Park Residents Association	Rennie & Partners
<u>Sustrans</u>	Partridge Way Residents Association	Propel Projects	Sierra Leone Family Welfare Association	Rhodes Avenue Primary School
Tiverton Primary School	Mobile Operators Association	Planning Potential	Sigma Design Build UK	Richard S McCarthy Architect
Viridian Housing	Milmead Industrial Management Ltd.	Shire Consulting	Simon Bocking Building Services	Rie Nijo Architecture
Tamil Community Housing Association Ltd	Martineau	Sunlight Lofts Ltd	Simon Levy Associates	Risley Avenue Infant & Junior School
London & Quadrant	Royal Society for the Protection of Birds	Haringey Allotments Forum	Society for the Protection of Ancient Buildings (SPAB)	Robert Burns Residents Association
Muswell Hill CAAC	Rutland House Surgery	Montagu Evans	Solon Housing Co-operative Housing Services	Robert Harrison Property
Lee Valley Regional Park Authority	Saheli Asian Girls & Young Womens Group	Newlon Housing Trust	Somali Community Group	Rolfe Judd Planning Ltd
LB Southwark	Sakumoh Dance Group	Karin Housing Association	Somali Welfare Association	Royal Mail Property Holdings
British Waterways Board (London Office)	Sanctuary Housing Association	CG Architects	Somerset Gardens Family Health Care	Springfield Avenue Residents Association
Friends of Parkland Walk	Sanctuary Youth Club	Tottenham Police Station	Sophia House Residents Association	St, Paul's and All Hallows CE Junior School
Friends of Woodside Park	Save Britain's Heritage	Methodist Homes	South Haringay Infant School	St. Andrews Vicarage
The Highgate Society	Save the Environment of Park & Palace (STEPP)	Network Housing	South Haringay Junior School	St. Ann's Primary School
Circle Houing Group	Savills Plc	Innisfree HA	South Hornsey Residents Association	St. Anns Church
Highgate CAAC	Scenario Architecture	Arhag HA	Southwood Lane Residents Association	St. Benet Fink
Lien Viet Housing	Schamroth + Harriss	Lee Valley Estates	Spenser Associates	St. Cuthbert's Church

Association	Architects			
Islington and Shoreditch HA	Servite Houses	Logic Homes Ltd	Sport England London Region	St. Francis de Sales RC Infant & Junior School
Apna Ghar Housing Association	Seven Sisters Infant & Junior School	North London Business	Sporting & Education Solution	St. Gildas' RC Junior School
Carr-Gomm	Seventh Day Adventist Church	North London Sub-Region	St. Paul's Church	St. Ignatius RC Primary School
Circle 33 Housing Trust	Seymour Road Residents Association	Notting Hill Housing Association	St. Peter Le Poer	St. James CE Primary School
Community HT (One HG)	SGI Sokagakkia	Nottinghill Housing Group	St. Thomas More School	St. James Dental Surgery
Grainger PLC	Sierra Leone Community Empowerment Project	Origin Housing	St. Vincent Social & Economic Association	St. John the Baptist Greek Church
Guinness Trust	Space Design Consultants Ltd	Origin Housing	Stagecoach - SELKENT	St. John Vianney Church
Habinteg Housing Association Ltd	Stokley Court Residents Association	Origin Housing Group	Stamford Hill Primary School	St. John's
Hornsey Housing Trust	Stroud Green Baptist Church	Pocket	Stationers Community Centre	St. Marks Methodist Church
Housing 21	Stroud Green Housing Co-operative	Pocket	Staunton Group Practice	St. Mary Community Centre
Teachers Housing Association	Stroud Green Residents Association	Pocket Living	Stephen Donald Architects	St. Mary's CE Infant School
The Abbeyfield Society	STS Structural Engineering	Sahil HA	LB Bromley	St. Mary's CE Junior School
Pinkham Way Alliance	Stuart Crescent Health Centre	Sahil Housing	St. Martin of Porres RC Primary School	St. Mary's Greek Orthodox Cathedral
Muswell Hill Sustainability Group	Stuart Henley & Partners	Sanctuary Group	Turkish Cypriot Community Association	St. Mary's RC Infant & Junior School
S. Mary's Vicarage	Studio 11 Design Ltd	Sanctuary Housing	Iceni Projects Limited	St. Michael's CE Primary School
Networked Neighbourhoods	Studio 136 Architects	Shian Housing Association	Mind In Haringey	St. Paul the Apostle
Cranley Gardens Residents' Association	Suffolk Road Residents' Association	Southgate Churches & Wood Green	Pellings Llp	St. Paul's
The Hawthorns RA and	Summersby Road Residents	St Mungo	Oliver Burston Architects	St. Paul's and All Hallows CE

Neighbourhood Watch	Association			Infant School
Haringey Forum for Older People	Sunshine Garden Centre	Tetherdown Primary School	Highgate URC Church	The Clock Tower Practice
Woodside High School	Sure Youth Foundation Project	Thames Gateway London Partnership	Earlham Primary School	The Gainsborough Clinic
LB Lewisham	Symon Smith & Partners	The Alexandra Surgery	John Rowe-Parr Architects	The Georgian Group
Barker Parry Town Planning Ltd	T.B.F.H.A	The Bowes Road Dental Practice	The Garden History Society	The Green CE Primary School
Lancasterian Primary School	Tasou Associates	The Chine & Cascade Residents Association	Westminster City Council	The Gypsy Council
Exposure Organisation	Temple of Refuge	The Christchurch Hall Surgery	Wood Lane Residents Association	8 Stuart Crescent Health Centre,
Open Door	Templeton Associates	Spur Road Surgery	Gardens Residents Association (GRA)	The John Loughborough School
Muswell Hill Primary School	The Willow Primary School	The Tree Council	Royal Borough of Kingston upon Thames	The North London Gay & Lesbian Association
Family Mediation Service	Millennium Dental Practice	The Tree Trust for Haringey	St. John the Baptist Greek Church	The Surgery
Sovereign Group Ltd	St. Paul's Catholic Primary School	The United Reformed Church	Grovelands, Lemsford & Leabank Residents Assoc.	Myddleton Road Surgery
St. Francis de Sales	Rokesly Junior School	The Victorian Society	Tottenham Traders Association	St John's Road Surgery
Leads Design Partnership	Tynemouth Area Residents' Association	The Weymarks Residents Association	Tottenham Trust	Dowset Road Residents Association.
St. Aidan's VC Primary School	Papa Architects Ltd	Affinity Water Limited	Tottenham Women's Aid	Bridge Renewal Trust
Keeping it Simple Training (KIS) Ltd	Friern Village Residents' Association	Tibbalds TM2	Tower Gardens CAAC	Winbourne Martin French (chartered surveyors).
Home Group	Enfield, Haringey and Barnet Samaritans	Tiverton Tewkesbury Residents Association	Tower Gardens Residents Network	Muswell Hill & Fortis Green CAAC
The Parish of Wood Green	Dixon Searle LLP	Tomlinson Tree Surgeons	Town & Country Planning Limited	Transition Crouch End
Ferry Lane Primary School	Mario Pilla Architects Ltd	Tottenham & Wood Green	Trafalgar Christian Centre	Hornsey Historical Society

		Pensioners Group		member.
St. John Vianney School	LB Merton	Tottenham Baptist Church	Transco	MHFGA
Action for Kids Charitable Trust	LB Merton	Tottenham Community Sports Centre	Trinity at Bowes Methodist Church	CgMs Consulting
Muswell Hill Centre	The Bounds Green and District Residents Association	Tottenham Green Sports Centre	Turkish Cypriot Counselling Group	London borough of Enfield
Coleridge Primary School	Rapleys LLP	Tottenham Green Taskforce	Turkish Cypriot Elderly Group	London Borough of Enfield
Stroud Green Primary School	Savills,	Tottenham Irish Women's Group	Turkish Cypriot Forum	Collins & Coward
Barnet, Enfield and Haringey Mental Health Trust	Mario Pilla Architects Ltd	Tottenham Peoples Initiative	Turkish Cypriot Peace Movement in Britain	Hornsey Historical Society member
Our Lady of Muswell Hill Primary School	Planning Bureau - McCarthy and Stone	Tottenham Police Station	Turkish Cypriot Women's Project	A2 Dominion Group
Torrington Park Residents Association	Turnpike Lane Citizens Advice Bureau	Warham Road Neighbourhood Watch	Turkish Parents Association	The Highgate Society
Mayor's Office for Policing and Crime	Twentieth Century Society	Charalambous Architectural Consultant	Turkish Youth Association	Urban Vision Partnership Limited Regulatory Services
Haringey Young Carers Project	TWG FoE/FoE London	Welbourne Primary School	Turner Avenue Residents Association	Planware Ltd
We Love Myddleton Road	Tynemouth Medical Practice	West Green Neighbourhood Watch	TfL London Rail	Wood Green Central Area Tenants & Community Assoc.
Architectural Heritage Fund	Uganda Welfare Association	West Green Primary School	LOROL	Wood Green Community Link
Smith Jenkins Town Planning Consultants	Umfreville Road Neighbourhood Watch	West Green Regeneration Group	Metroline	Wood Green Dental Practice
Levvel Ltd	Unit One Architects	Westbury Dental Practice	Abellio	Wood Green Police Station
SSA Planning Ltd	United Apostolic Faith Church	Westbury Medical Centre	Go Ahead	Wood Green Regeneration
London Gypsy and Traveller	Universal Church of the	Weston Park Primary School	Greater Anglia	The Archdeacon of

Unit	Kingdom of God			Hampstead
Met Police – Safer Transport Team - Haringey	Urban Futures London Ltd	White Young Green Planning	Haselmere Residents Association	Wood Green Youth Club
First Capital Connect	Urban Homes Ltd	Whitehall Community Centre	Haringey Disability First Consortium	Woodberry Down Baptist Church
DSO Edmonton London Ambulance Service	Van Rooyen Design	Willoughby Road Methodist Church	London Travel Watch - Chair of Consumer Affairs	Woodlands Park Infant & Junior School
London Ambulance Service	Veryan Court Residents Association	Wilson & Bell	London Travel Watch	Woodridings Court Residents Association
Arriva	Victim Support Haringey	Winkfield Road Community Centre	Haringey Cycling Campaign	Woodside Residents Association
Metroline	Visit London	Wise thoughts - gaywise	Age UK	Xeva Design Concepts
Transport for London	Vivendi Architects LLP	Women & Medical Practice	Mobility Forum/ Age Concern Haringey	Yabsley Stevens Architects
W. A. Shersby	Voluntary Action Haringey	Wood Green Area Youth Project	Haringey Disability First Consortium (Access & Transport sub-group)	Young Lesbian Group
Haringey Federation of Residents Associations	Amec Foster Wheeler on behalf of National Grid	Wood Green Black Tenants Group	Fairview	Youth One Stop Shop
Palace Gates Residents' Association	Berkeley Homes (North East London) Ltd	The Queens Mansions Residents Association	Fountayne Residents Association	Youth Theatre Project
Highgate Neighbourhood Forum	Boyer Planning London	Ladder Community Safety Partnership	DP9 Planning Consultants	Zatkhon Construction Co. Ltd.
Sustainable Haringey/ Muswell Hill and Fortis Green Association	Living Under One Sun	Department for Education	Chartered Landscape Architect	NHS Property Services Ltd
Sustainable Haringey Transport Group	Hackney Community Transport Group	Chris Thomas Ltd	Fairview New Homes	HAVCO
Barking-Gospel Oak line users group	London at BT Group and Chair, Haringey Business Board	Haringey NHS	Crouch End Forum	Whittington Hospital Trust
Haringey Living Streets/	Haringey Teaching Primary			

Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth	Care Trust			
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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

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	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
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4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
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4.(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>
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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	29	Milena Buyum	No
2	Bibsi Haywill	Yes	30	Broadwater Farm Residents' Association	Yes
3	Fiona English and Mark Ellerby	Not stated	31	Sainsbury's Supermarkets Ltd	Yes
4	Zena Brabazon	yes	32	Michael Hodges	Yes
5	Gary Phoenix	Not stated	33	Ann McTaggart	Not stated
6	Our Tottenham	Yes	34	Walter Lee	Yes
7	Bob Lindsay-Smith	Yes	35	Suat Asan	Yes
8	Noah Tucker	Not stated	36	Habieziun Hagos	No
9	Canal and River Trust	Not stated	37	Haringey Defend Council Housing	Yes
10	Melissa Friedberg	Not stated	38	House Builders Federation	Yes
11	James Carey	No	39	Deloitte on behalf of National Grid	Not stated
12	Keith Flett	No	40	Lynne Zilkha	Not stated
13	Ruth Gordon	No	41	Stroud Green CAAC	Not stated
14	Marcin Korowiecki	Not stated	42	Highgate Society	Not stated
15	Lilian Kaluma	Not stated	43	Iceni Projects on behalf of Berkeley Homes (North East London Limited)	Yes
16	Jon Hughes	Not stated	44	Mrs Deman Abdulla	Yes
17	Marco Consolaro	Yes	45	Ms Ozgul Aslan	No
18	Lena Elliott	Not stated	46	Mario Petrou	Not stated
19	Nicholas Fenton	Not stated	47	Constantine J. Smith	No
20	Luci Davin	Not stated	48	Chris Roche	No
21	Luan Hoxha	No	49	Martin Hyacinth	Not stated
22	Patrick Watson	Not stated	50	Jane Wilkin of the Environment Agency	No
23	Shirlie Ritchie	No	51	Bruce Roberts	Yes
24	Martin Ball	Yes	52	Malgorzata Urbanska	Not stated
25	Kelly Arnstein	Yes	53	Alan Stanton	Not Stated
26	David Stoker	Yes	54	Stewart Murray, Assistant Director, Planning, GLA	Not Stated

27	Pavlos Mastiki	No	55	Graham Saunders of Historic England	Not Stated
28	Seema Chandwani	No			

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>

					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>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 particular sites, it will be impossible to say whether meeting targets for total units or</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%

				<p>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>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 social housing lets over the last two</p>
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							<p>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</p>
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							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, but 48% of local people surveyed</p>	The Council should drop the Local Plan, and instead work with residents to improve existing homes and invest in local communities.	Noted but this is not an option the Council is considering.

					<p>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 runs for several weeks. The Council's borough-wide magazine <i>Haringey</i></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>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p><i>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 any hard copies of the documents. They claimed that a set of the</p>		<p>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 Centre will be</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>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 (see</p>		<p>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>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	<p>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.</p> <p>I welcome some aspects of the Local</p>		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>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>The embodied carbon of new build is</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> <ol style="list-style-type: none"> 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. 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>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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					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</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</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, 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</p>

					sector homes which will be unaffordable to the vast majority of Tottenham residents, particularly those who are in most need in terms of housing.	of wider social housing. Maintaining communities and their cohesion. Ensuring positive benefit, or at least no detriment, in terms of equalities.	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. 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.
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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	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. The Trust has a range of charitable objectives	Not stated	Noted.

					<p>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 (including leisure, commercial and residential), walking, jogging, cycling, and angling, amongst others. There is significant potential to increase its use for these and other activities within the area.</p>		
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Respondent 10: Melissa Friedberg

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	NPS20	Not stated	No response given	No response given	I object to the Local Plan, which is inconsistent with its declared objective of providing decent and inclusive housing for all. Instead, the demolition of really-affordable council and housing association homes clears the way for new private housing,	The Council should drop the Local Plan, and instead work with residents to improve	The Local Plan seeks to increase the stock of both overall, and affordable housing within the borough.

					with the risk of higher rents and sky-high service charges. This plan to increase house prices and rents would mean social cleansing for many local people. House ownership requires deposit payments and adequate incomes, but 48% of local people surveyed have no savings or are in debt, and many have low and uncertain incomes.	existing homes and invest in local communities. We need more and better council housing.	
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Respondent 11: James Carey

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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</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</p>

				<p>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</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 the borough. It does not state that in each case demolition will be required, and on some parts of some sites, and on many</p>
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				<p>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 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</p>	<p>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>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 falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion.</p>		
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					<p>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 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	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.	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>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 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</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 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</p>
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				<p>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</p>	<p>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>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 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</p>	
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					<p>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 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	I am writing as a local resident to make a	Not stated	The council has a

			<p>response given</p> <p>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 clear agenda which favours working with</p>	<p>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>
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				<p>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 gridlocked, even after £37m investment. What health provision will there be</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</p>
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				<p>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 falls. The assumption in this plan is that property endlessly rises. But this is not a forgone conclusion. There appears to be</p>		<p>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>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</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</p>

				<p>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 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</p>	<p>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 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>
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				<p>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 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</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>
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				<p>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 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</p>		
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					<p>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 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,</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</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>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 clear agenda which favours working with private developers who will</p>		<p>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</p>

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<p>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</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 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>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>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					<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</p>		

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
					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.		

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	<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</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</p>

				<p>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 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</p>	<p>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 Council's Statement of Community Involvement.</p> <p>The Local Plan proposes that</p>
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				<p>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 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</p>	<p>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>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 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</p>		
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					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 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</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</p>

				<p>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 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</p>	<p>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> <p>The introduction of improved</p>
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				<p>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 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</p>	<p>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>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 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</p>		
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					<p>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 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 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>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</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 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</p>	<p>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>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 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</p>		
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					<p>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 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	<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</i>		<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</p>

				<p>where I live.</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 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</i></p>	<p>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 the Local Plan's housing trajectory.</p>
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				<p><i>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 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</i></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><i>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 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</i></p>		
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					<i>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>		
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Respondent 20: Luci Davin

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's 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</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</p>

				<p>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 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 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 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</p>
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				<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 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</p>	<p>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-</p>
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				<p>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 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</p>	<p>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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					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.		
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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		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

					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		homes for everybody.
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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: - '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. 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. I also believe that this site is inappropriate for such high buildings. 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>		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.

					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 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	NPS 34	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</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</p>

					<p>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>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>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>
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</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

				<p>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 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</p>		<p>everybody can use. The most 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>
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				<p>was discovered they were the correct documents. So, ten days after the start of the consultation the correct documents were not on display in Coombes Croft Library.</p> <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>5. The majority of consultation 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</p>
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				<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 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-criticised-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,</p>	<p>which would be the most efficient manner of getting representations to the Inspector to be viewed. Money 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>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 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>	
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					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 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</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</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 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 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</p>	<p>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</p>
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				<p>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. 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</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> <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</p>
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				<p>“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 with residents; the same is true of the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we</p>	<p>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 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</p>
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					<p>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>residents who are affected tenancies will be managed.</p>
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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</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</p>

				<p>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 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>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</p>
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				<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 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</p>	<p>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>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. 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,</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 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</p>
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				<p>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. 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>	<p>affected tenancies will be managed.</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	<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 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/news-and-</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>

				<p>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 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 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</p>	<p>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</p>
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				<p>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 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,</p>	<p>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 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</p>
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				<p>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 council “aim to ensure an adequate</p>	<p>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 tenancies will be managed.</p>
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					<p>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 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</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>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 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</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>
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				<p>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 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</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</p>
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				<p>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 council "aim to ensure an adequate mix of dwellings is provided". Three 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</p>	<p>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 transport nodes and town centres, and when well designed, contribute to the attractiveness of an area.</p> <p>The Council's Housing Strategy is</p>
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					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.		the key document regarding how residents who are affected tenancies will be managed.
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Respondent 29: Milena Buyum

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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 • 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 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</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</p>

				<p>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 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.</p>	<p>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</p>
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				<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 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</p>	<p>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</p>
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				<p>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 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</p>	<p>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 Housing Strategy is the key document regarding how residents who are</p>
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					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.		affected tenancies will be managed.
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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	<p>Haringey Council's Unwillingness to Re-provide Genuinely Affordable Housing on Regeneration Estates</p> <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</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 its 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</p>

				<p>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 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</p>	<p>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 Hosing Strategy is the key document regarding how residents who are affected tenancies will be managed.</p> <p>The Council does not agree that the local plan’s housing plan will</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.

³Ibid., page 58.

⁴Ibid., note 5, page 53.

				<p>current supply of truly affordable housing in 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 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</p>	<p>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 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</p>
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⁵Ibid., page 12

				<p>Council's Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18 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 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</p>	<p>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</p>
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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

⁷ *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C*, page 5.

				<p>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 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 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</p>	<p>subject to its own EQiA as part of the Sustainability Appraisal.</p>
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				<p>at 65% 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 newsletter⁸. 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 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</p>	
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⁸http://www.haringey.gov.uk/sites/haringeygovuk/files/northumberland_park_newsletter_january_-_lores.pdf

					<p>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	<p>we are extremely concerned that the Council has not 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</p>		See response to Sainsbury's in the Consultation Statement to the Site Allocations DPD

					to be justified or consistent with national policy. As such, the aforementioned policies cannot be considered as sound.		
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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	<p>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 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</p>		<p>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 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>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 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</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 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>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 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</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 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</p>
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				<p>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>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</p>	<p>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>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 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</p>		
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				<p>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 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</p>	
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				<p>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 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</p>		
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				<p>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 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</p>		
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					<p>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 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	Allocation /	Sound	Legally	Reason	Change	Council's
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	ID	Policy / Figure / Para		Compliant		Sought	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 invest in local communities. We need more and better council housing. It is your duty.</p>		It is considered that the Local Plan meets objectively identified housing needs.

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	<p>It is in compliance with the SCI.</p> <p>It is deliverable and based on robust and credible evidence</p> <p>It is in line with the objective set out in Haringey's sttainable community</p>		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	Not stated	No issues have been identified, so no response is provided.

Respondent 36: Habieziun Hagos

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
36	NPS46	Not stated	Not stated	Not stated	None given	None	No issues have been identified, so no response is provided.

Respondent 37: Haringey Defend Council Housing

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
37	NPS47	Not stated	Not stated	Not stated	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: The council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a	Not stated	The Plan is required to be in conformity with the London

				<p style="text-align: center;">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 style="text-align: center;">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 <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</p>	<p>Plan and existing Strategic Policies DPD, which set the pattern of growth within the borough. This identifies Tottenham and Wood Green as the principal growth areas in Haringey.</p> <p>The council has a requirement to meet the borough’s objectively identified housing and</p>
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				<p>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>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%</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</p>
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				<p>(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 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,</p>		<p>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. The Local Plan proposes that on some existing publically-owned housing sites, it is possible to</p>
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				<p>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>2. <u>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="padding-left: 40px;">The ability of local people to afford the new homes being built, 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 style="padding-left: 40px;">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 style="padding-left: 40px;">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</p>	<p>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 . The</p>
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				<p>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>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</p>	<p>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>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, 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>		
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				<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 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 		
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				<p>restrictions on child density are also racist in practice, because they discriminate against those cultural groups which tend to prefer larger family sizes.</p> <ul style="list-style-type: none"> • 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> <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,</p>	
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				<p>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 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>	
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				<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 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 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</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>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 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</p>		
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				<p>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 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>		
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				<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 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</p>		
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					<p>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 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.</p>		
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</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>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 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</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>
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				<p>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 alleviate some of the effects of the affordability crisis in London and to provide a 'significant boost' to supply 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 dwelling 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</p>		
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				<p>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 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</p>		
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					<p>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>		
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>		It is not considered that a specific policy is required to bring forward self/ custom build products.
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</p>		It is not considered that there is a specific housing target for student accommodation in Haringey. It is agreed that this is

				<p>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 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</p>		<p>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>
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					<p>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>		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 monitoring completions of this type and will compare over the plan period.

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	National Grid are owners of the decommissioned gas holders site at Haringey Heartlands, land bounded by Hornsey Park Road, Mayes Road, Clarendon Road and		Noted.

					<p>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. 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 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 /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments /
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		Figure / Para					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 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.</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>

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	Unsound because not adopted and not evidence-based. There are many typographical errors throughout the documents and road names are wrong. We	Not stated	The UCS is an evidence document which informs the Local Plan, and as

					<p>suggest these documents are not fit for purpose. 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> <p>How does it relate to DM1 and DM9?</p> <p>SGCAAC considers this document should be withdrawn</p>		such is not the subject of the consultation.
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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	<p>The Highgate Society Sustainable Homes Group commends the policy put forward to Highgate Neighbourhood Forum:</p> <p>"The Forum encourages alterations to existing buildings</p>		Noted.

					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/ "		
42	NPS57	Urban Characterisation Study	No	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. Suggestions such as those for Highgate Golf Club and Hornsey Lane Reservoir could be presumed to indicate a presumption in favour of development.</p> <p>How do they relate to DM9?</p> <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 		The UCS is an evidence document which informs the Local Plan, and as such is not the subject of the consultation.

					<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 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 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 /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure / Para					
43	NPS58	Not stated	Not stated	Not Stated	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. 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 in this respect.	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 ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / 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	<p>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.</p> <p>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 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</p>		Objection is noted. The Council has a requirement to plan for growth to meet housing and employment needs.

					exploitation of our area.		
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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 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.	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 with the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.

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 consulation because		Noted.

					is not easy to understand your wording. I do not know whether the legally complaints or not- so on.		
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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</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>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			We are pleased to see that the sequential test has now been made available on your website		This will be updated.

					<p>along the other evidence documents. 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

					<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>employment needs. With 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 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</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 the Infrastructure Delivery</p>
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				<p>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 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</p>	<p>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</p>
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				<p>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 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</p>	<p>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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					on the website and were at very difficult times for most people.		
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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			<p>Flawed Consultation - I also consider that it is legally flawed in failing to meet the requirements on 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</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>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>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</p>	
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					neighbourhoods are likely to suffer planning blight and social dislocation, community disruption, and displacement or the next twenty years.		
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>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>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 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>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 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,</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>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 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</p>		
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				<p>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> <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</i></p>	
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				<p><i>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 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>	
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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 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</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>
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				<p>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><i>“... the people Had forfeited the confidence of the government And could win it back only By redoubled efforts. Would it not be easier In that case for the government To dissolve the people And elect another?”</i></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 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</p>	
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				<p>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 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>	
53	NPS74	General		<p><i>Is it based on robust and credible evidence?</i> 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. Please see the Our Tottenham submission for a</p>	<p>The council has a requirement to meet the borough’s objectively identified housing and employment needs. While the Council is</p>

				<p>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>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>
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</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>

					and/or living in poor private sector or temporary accommodation, the Local Plan would include these other options and ideas.		<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>
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</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</p>

				<p>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.</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</p>	<p>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>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 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>	
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					<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 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</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 council has a requirement to meet the borough's objectively identified housing and employment needs.</p>

				<p>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 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</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 that the Council works with the private sector to ensure that the new homes and jobs that 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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				<p>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 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>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</p>	
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					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.		
53	NPS78	General			<p><i>Is it flexible?</i></p> <p>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.</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.
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</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

					<p>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>		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’ the Council and its planners roll over.</p> <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>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</p>

						<p>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</p>
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							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.
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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 Stated	Not Stated	<p>Re: Consultation on Alterations to the Strategic 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</p>		Noted.

					<p>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 accompanying appendices) to emphasise the Mayor's position, and/or to help clarify or improve policy.</p>	
54	NPS82	General	Not Stated	Not Stated	<p>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</p>	Noted.

					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.		
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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 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 27 th 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		Noted.

					of the changes in the capacity figures.		
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> <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>		Noted.

				<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-books/publications/tall-buildings-advice-note-4/</p>		
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