

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

Stephen Kelly

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Our ref: LDF14/LDD15/LDD09/
10/14/15/EK01

Date: 27 March 2015

For the attention of Matthew Paterson (Local Plan consultation response)

Dear Mr Kelly,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007; Town and Country Planning
(Local Development) (England) Regulations 2012**

**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.**

Thank you for consulting the Mayor of London on the Regulation 18 stage of Haringey Council's Alterations to Strategic Policies and the preferred options draft Development Management Policies DPD, Tottenham AAP and Site Allocations DPD. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London are attached in Appendix 1.

The draft Development Plan Documents are generally welcomed, however, there are some matters that require further work to ensure the documents are sound and in general conformity with the London Plan. The representations below (and in the accompanying appendices) address matters of general conformity, and also provide comments which are intended to help clarify or improve policy.

Alterations to the Strategic Policies DPD

Housing: Alt 55, table 3.1, and Appendices 9.2 housing trajectory

To ensure general conformity with London Plan Policy 3.3, boroughs need to show in their Local Plans, housing trajectories and/or supporting evidence base that they have sought to identify and bring forward extra housing capacity, to augment minimum targets for housing provision set out on Table 3.1 of the London Plan. Therefore, the council's commitment in alteration reference 55 to exceed the borough's London Plan housing monitoring target and it's objectively assessed need for the plan period is welcomed. However, the council should demonstrate that it has explored all opportunities to bring forward development and identify additional housing capacity, drawing on the particular locations highlighted in Policy 3.3 as having the potential to support higher density development in order to supplement targets. This should involve a rigorous re-appraisal of its SHLAA findings.

Employment designations: Alt 71 and Alt 72

Alteration 72 proposes the de-designation of three Locally Significant Industrial Sites (LSIS) to reflect changes being consulted on through the council's Site Allocations and Tottenham Area Action Plan documents. The council has recently published the Haringey Employment Land Study (February 2015) which provides recommendations on the future of each of these three sites. In accordance with London Plan Policy 4.4 the de-designation of LSIS should be justified by the council's evidence base. It is noted that the council has confirmed that de-designation of White Hart Lane LSIS is an error in the consultation document. Please see the Site Specific Allocations and Tottenham Area Action Plan sections below and Appendix 2 for detailed comments on these proposals.

To set the changes in LSIS designations in a strategic context it would be helpful if the council listed in the Strategic Policies all the employment related site allocations, including those allocated as Employment Land and Regeneration Areas, as well as LSIS and Strategic Industrial Locations.

In addition the council should detail what the total quantum of industrial land release will be and how this will bear upon the borough's indicative industrial land release benchmark in the Mayor's Land for Industry and Transport SPG, having regard to other planned and actual release over the period 2011-2031.

Draft Development Management Policies DPD**Siting and design of tall buildings**

It suggested that part B of Policy DM5 includes a more comprehensive list of criteria for assessing tall building proposal that accords with London Plan Policy 7.7 C.

The reference to the 'Further Alterations adopted November 2014' in paragraph 2.31 should be corrected to London Plan 2015.

Special needs housing

It is noted that the council will have regard to the London Plan's monitoring benchmarks for the provision of specialist housing for older people, this is welcomed. However, the 2015 London Plan is clear that boroughs should identify and address the need for specialist older person's accommodation, including through targets and performance indicators. In addition, para 3.50C states that Boroughs should work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites. It is suggested that Policy DM21 and supporting text should be updated to address this.

Student accommodation

Paragraph 3.25 states, 'whilst the Council supports the need to provide a choice of housing, student accommodation does not currently form part of Haringey housing needs.' This statement is surprising given that Haringey's Strategic Housing Market Assessment (SHMA) 2014 states in paragraph 4.29 that 'the 2011 Census recorded 551 student households within Haringey'. It is noted that Haringey's SHMA contains no further assessment of student housing in the borough. The London SHMA 2013 recognises that 'it is neither appropriate nor feasible to identify the housing requirements of students with the same methodology as employed for the population as a whole'. It therefore uses the projections of the growth in full-time students in London developed by Mayor's Academic Forum to assess student housing requirements. Based on the Mayor's Academic Forum's projections the London Plan 2015 sets a strategic requirement for London of 20,000 – 31,000 student accommodation places over the 10 years to 2025.

London Plan Policy 3.8 B(h) requires boroughs to meet strategic and local requirements for student housing, and this should be reflected in the borough's Local Plan policy. Therefore, it is suggested that the council add the following underlined text to Policy DM21 part C: 'Where further student accommodation is required to meet local and strategic need, it will be supported as...'.

Allowable solutions

It is suggested that the council consider alternative wording for the title of Policy DM28 (Allowable Solutions), for example 'Carbon offset fund', to avoid confusion with the government's national policy on allowable solutions. Under the currently proposed allowable solutions framework, developers will have free choice as to how they fulfil their allowable solutions requirements. Hence, the borough could encourage them to invest in local allowable solutions measures, but could not set policies requiring this.

Decentralised energy

It is suggested that paragraph 4.39 be amended to include the following underlined text: '...Feasibility assessments should be prepared on a whole life cost basis, in line with the Mayor's relevant guidance...'. It should be noted that the 2014 Energy Planning Guidance is due to be updated shortly.

It is also suggested that paragraph 4.40 be amended to include the following underlined text: '...For planned future networks, a short term 'grace period' of five years may be permitted in which the development would be exempt from providing on-site renewable energy or CHP, along with a potential relaxation of relevant requirements...'.

And that the final sentence is replaced with the following underlined text:

Should the planned future DE network not come forward, applicants will be expected to implement an alternative energy strategy to meet the target in place at the time of planning approval.

Overheating and cooling

Although it is recognised that Policy DM31 is focused on local application of the London Plan Policy 5.9, consideration should be given to broadening the policy to apply to major development as well as minor development in terms of the council's requirements. The council should also note that the Chartered Institution of Building Services Engineers guidance referred to in paragraph 4.52 (TM49 Design Summer Years for London) is now available and it is recommended that developers use this London specific weather data when modelling overheating risk.

The council may also wish to change the reference to the Code for Sustainable Homes in 4.53 as this is due to be wound down, for example it may wish applicants to provide the relevant Building Regulations Part L data to demonstrate the overheating risk for a development.

Draft Tottenham Area Action Plan

GLA officers strongly support the thrust of the draft Area Action Plan (AAP) in terms of its vision and strategic objectives for Tottenham, and welcome the progression of this plan since March 2014. The target to deliver 10,000 new homes across the AAP area over the plan period represents 67% of Haringey's London Plan housing target up to 2025. This level of ambition reflects Tottenham's status as one of the Mayor's Housing Zones, and is supported in line with London Plan Policy 3.3 and the objectives of the Upper Lee Valley Opportunity Area Planning Framework (OAPF).

Further to comments made previously by the GLA, the recently completed Employment Land Review makes an important contribution to the evidence base for Tottenham. Notwithstanding the overarching comments with respect to employment designations discussed above, it is evident that the emerging approach to managing employment land within the AAP area has been carefully considered, having regard to both employment land characteristics and regenerative potential.

In this regard the draft AAP appropriately safeguards Strategic Industrial Land, whilst proposing a number of changes to locally designated employment areas - with the intention of nurturing and retaining a diverse local employment base in Tottenham for the long-term, as well as supporting strategic objectives for regeneration through pragmatic revisions to the allocation of selected employment sites - where these are well placed to contribute towards urban renewal in accordance with the London Plan and Upper Lee Valley OAPF.

Further detailed comments on specific policies and site allocations within the draft Tottenham AAP are set out within Appendix 2.

Draft Site Allocations DPD

The proposed refinements to designation boundaries and opportunity site allocations are largely supported in strategic planning terms. Nevertheless, specific comments with respect to various allocations are provided within Appendix 3. The Council is encouraged to respond to the points raised within this appendix to ensure the general conformity of this document with the London Plan.

The Mayor will issue his formal opinion on general conformity when requested at the proposed submission stage. However, I hope that the matters raised within this consultation response will be resolved before then, through further joint discussions with Council officers. If you would like to discuss any of my representations in more detail, please contact Elliot Kemp (020 7983 4908 / Elliot.Kemp@london.gov.uk) who will be happy to discuss and arrange a meeting.

Yours sincerely,



Stewart Murray
Assistant Director – Planning

cc Joanne McCartney, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL



Our ref: 15/0610

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27th March 2015

Dear Stephen,

London Borough of Haringey Draft Local Plan consultation Strategic Policies, Development Management DPD, Site Allocation and Tottenham Area Action Plan TfL response

Please note that these comments represent the views of Transport for London (TfL) Borough Planning officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision and they do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.

Thank you for consulting TfL Borough Planning on these draft policy documents.

Firstly I would like to reiterate that TfL is very keen to work with the Council to deliver aspirations for sustainable growth in the borough and AAP area, and this aspiration is very much shared by the Mayor.

We have identified comments below on particular policies and text in relation to transport schemes. We would recommend that the documents are thoroughly proof read, and there may be particular references which will need to be corrected referring to current and future London Underground, London Overground, Crossrail 2 and National Rail stations and lines and road name references which should be made consistent throughout the documents. The preparation of the next documents for submission should also take into account the introduction of London Overground services from 31 May 2015 and also any further emerging work on Crossrail 2 in coming months. Crossrail 2 is currently expected to complete in around 2030, and it is recommended that any references to 2026 are revised to 2030.

Alterations to the Strategic Policies (DPD) (adopted 2013)

Alt20 The proposed station at Alexandra Palace is expected to open in 2030.

Alt 53 (Policy SP2) – This alteration identifies a number of priority housing estates for renewal. A number of these (such as Northumberland Park, Culvert Road, Durnford Street and Turner Avenue) are all located within the area of greatest anticipated benefit as a result of Crossrail 2 and in line with LB Haringey’s policy aspirations set out elsewhere, it should be ensured that any redevelopment is sufficiently futureproofed so that the full benefits of Crossrail 2 or West Anglia Main Line (WAML) four tracking are captured. Such an approach may also have additional benefits in terms of addressing potential viability issues in ALT64.

Alt 70 (Policy SP8) – Noting the reduction in floorspace protected through Alt 71, and mindful of the opportunities presented by Crossrail 2 and other projects to deliver growth, TfL would support a continuing review of employment land need in the area.

3.1.19 The gyratory work and new bus station have now been completed; this paragraph should therefore be amended to reflect this progress. Further to this, the station upgrade is now committed (at a cost of £32m) as is the West Anglia Main Lane upgrade from Angel Road to Stratford.

3.1.33 For the enhancement of Northumberland Park, the plan could reference the work between TfL, Haringey and the GLA to develop proposals for the White Hart Lane station.

Draft Development Management Policies (DPD): Preferred Option

DM5 Siting of Tall Buildings (Map 2.8) – The identified locations for tall buildings around future Crossrail 2 stations is welcomed.

DM8 Advertisements – Welcome the reference in paragraph 2.55 – although the text should be corrected to “Transport for London Road Network”. TfL has a set criteria of requirements that it imposes on advertisement boards on the Transport for London Road Network (TLRN), particularly illuminated/electronic signs. This requires a number of conditions to be imposed in order to mitigate any impact on safety/driver distraction, details of these can be provided if required.

DM43 Parking – the principle of this policy to help to restrain car use is welcomed.

DM 44 Crossovers and Vehicular Accesses – TfL would suggest including new wording “Any proposals for crossovers on the Transport for London Road Network will require approval TfL as well as by the borough. Any proposals here should be in line with TfL’s Crossover Guidance.” This guidance is available here <http://www.tfl.gov.uk/cdn/static/cms/documents/vehicle->

[crossovers-guidance-for-applicants.pdf](#) which, as well as other requirements and regulations, does not allow any entering or exiting of the TLRN other than in forward gear.

DM50 Facilitating Site Regeneration and Renewal – the principle of Policy DM50 is welcomed. Within the context of Crossrail 2 it will be important to provide the necessary flexibility so that currently safeguarded land can, where appropriate change as a result of changing economic circumstances. Notwithstanding this, further flexibility may be required if full benefits from Crossrail 2 are to be realised. For example, the re-provision of existing employment facilities allowing for alternative development which capitalises on Crossrail 2 benefits and supports wider regeneration objectives to take place.

Draft Site Allocations (DPD): Preferred Option

Draft SA1 (Indicative Crossrail 2 Areas) the approach to safeguarding here is strongly welcomed however, it is requested that the wider impact area (currently 800m) is extended to 1km from Crossrail 2 stations. This would reflect the expected zone of influence from Crossrail 2 around the stations as evidenced by impacts associated with Crossrail 1 which has been evidenced by GVA.

Development Sites – the same issues apply for the allocated sites and also the Key Development Sites set out in the Tottenham AAP. Consequently, the indicative development capacities could be higher for certain sites as a result of Crossrail 2 coming forward – especially those where delivery is expected from 2020 onwards. It should also be noted that a number of sites may fall within the Crossrail 2 safeguarding areas following the issue of a safeguarding directive (which were recently issued by DfT on 24 March 2015). This will require the Crossrail 2 project team to be consulted on any development proposals within the safeguarding limits to ensure that they would not adversely affect the delivery of Crossrail 2.

Please note TfL would require early notification and consultation where any sites that currently accommodate or are closely located to TfL infrastructure or assets which would result in either permanent or temporary relocation as a result of development. It should also be noted that were relocation made necessary, the new location should be maintained to at least the same capacity/standard, if not improved.

SA9 Highgate Magistrates Court - This site is located on Archway Road which forms part of the Transport for London Road Network (TLRN). Therefore, TfL would expect to see vehicle and servicing access located off the TLRN, and to be car-free or have low levels of parking provided, given the high PTAL rating of 4. This should be incorporated into the development guidelines.

SA10 LBH Civic Centre- This site accommodates a bus stop outside the entrance; the accessibility of this bus stop would be expected to be maintained if not improved.

SA12 Wood Green Bus Garage and SA 13: Station Rd Offices- It can be seen that inclusion of the Arriva bus garage in the wider area for regeneration would be attractive in any masterplan proposals. There is no evidence that Haringey or other stakeholders have started any master planning process for the site.

London Plan policy is that bus garage capacity for bus routes in London should be retained, and planning applications involving bus garages are referable to the Mayor. Retaining bus use seems to be inherent in the text, and we welcome the bullet that development cannot commence until adequate temporary re-provision of the bus stabling and maintenance has been secured, however TfL would request that an additional bullet point is included stating “Any redevelopment of the Bus Garage site must retain or enhance the capacity for buses and associated facilities on site, or alternatively identify a similar well located site in the vicinity of this site.”

SA13 Station Road Offices- TfL would request that an additional bullet point is included stating: “Any development on this site should be aware of the provision of a bus facility on the adjacent site.”

SA21 Turnpike Lane Triangle- The site is located at a busy interchange and potential future Crossrail 2 station, therefore TfL would support a scheme which seeks improvements to the public realm and improves accessibility to transport facilities. TfL would also expect a car-free development here due the very high PTAL and therefore recommends changing “parking should be minimised” to “A car-free development would be expected on this site”.

SA33 Arena Retail Park- The site requirements should also refer to improving facilities for buses. Service W5 currently runs into the site to serve the food store, and revising the access within this site and on Green Lanes should allow enhancements to the bus network and stops.

SA40 Finsbury Park Bowling Alley- It should be noted that any demolition or re-provision associated with this site should seek to increase the width of the footway here.

SA52 Pinkham Way- The Mayor of London has revealed further details to redesign a number of key road networks in the capital in order to unlock growth and make the capital a more attractive place to live and work in line with the Mayor’s 2050 Infrastructure Plan and the recommendations of the Roads Task Force. One of these locations is the A406 in New Southgate, where decking or a mini-tunnel over this junction on the North Circular would unlock land for new homes and connect the area around the proposed Crossrail 2 station. TfL will wish to discuss this further with Haringey (and Barnet and Enfield) councils. As such we would suggest including a new bullet in the development guidelines of “TfL is investigating options for decking or a mini tunnel over this part of the North Circular as part of the Mayor’s 2050 Infrastructure Plan, which if progressed could change the development context for this site.”

Draft Tottenham Area Action Plan: Preferred Option

General comments

Crossrail 2 is not expected to be completed until around 2030. There are numerous instances in the plan where this date is stated as 2026 (such as 2.30) so that it falls within the timeframe of this plan. If Crossrail 2 is to be included in this AAP, it needs to be made explicit that this will bring benefits in the longer term, not during this plan period.

A number of the sites identified within the AAP are likely to be within the zone of influence of Crossrail 2. Whilst it is acknowledged that Crossrail 2 is not yet a committed scheme, should it become so, it is likely to result in a number of changes to certain site characteristics which could impact upon its development potential. For example, Crossrail 2 could have a positive impact on the PTAL level or site viability which could increase development potential of certain sites. Further consideration of how the AAP could take account of these changes could be beneficial – particularly for those sites where delivery is expected from 2020 onwards. It should also be noted that a number of sites may fall within the Crossrail 2 safeguarding areas following the issue of a safeguarding directive (which were recently issued by DfT on 24 March 2015). This will require the Crossrail 2 project team to be consulted on any development proposals within the safeguarding limits to ensure that they would not adversely affect the delivery of Crossrail 2.

The advice set out in Guidance Note 1 is strongly welcomed and is an exemplary, proactive and pragmatic approach to ensuring opportunities from Crossrail 2 can be maximised, and one which all local authorities who will be impacted by Crossrail 2 should seek to follow (subject to suggested changes suggested for Draft Policy SA1). However, it is not clear what material weight could be afforded to the approach in its current form as a Guidance Note within the AAP. Whilst the same approach is intended as Policy SA1 in the Site Allocations DPD, we would like to work with LB Haringey to identify what opportunities may exist to strengthen these requirements as part of the AAP.

The allowance made in the AAP for reorientation, renewal and mixed use of industrial areas within the South Tottenham and Tottenham Hale areas is welcomed. Further consideration could be given to expanding such support to other industrial areas which are situated within the area of influence of Crossrail 2.

A coordinated approach to the provision of infrastructure to support each of the opportunity sites identified in the AAP will be necessary. Whilst infrastructure

requirements are listed under each specific site, reference should be made to the Upper Lee Valley Development Infrastructure Funding Study (DIFS), which is currently being undertaken jointly by the GLA, TfL and the four Upper Lee Valley boroughs. The purpose of the DIFS is to identify and cost the strategic infrastructure required to deliver anticipated levels of growth, to identify the phasing of this in line with development and highlight the timing and scale of funding gaps and possible ways of addressing these. The associated financial model will be flexible and available for use by Haringey Council in the future.

Detailed comments

4.20 Please note that the Department for Transport, not TfL, have issued the safeguarding directions. These have been provided separately to Haringey Council.

5.10 For new wayfinding and signage, TfL would support the use of Legible London signage, which is already being provided in Wood Green.

5.12.1 References a Northumberland Park bus station however this should be revised to read “...Northumberland Park station and bus garage...”.

5.28 The traffic gyratory has now been removed.

5.38 The document should refer to the Tottenham Hale station upgrade and West Anglia Main Line improvements.

SS3 Apex House & Seacole Court - It should be added into the development guidelines that servicing arrangements for this site would be expected to take place away from Seven Sisters Road and Tottenham High Road which form part of the TLRN, utilising Stonebridge Road, and avoid impact on existing bus stops.

TG2 Tottenham Chances - Due to the location of this site on the TLRN and high PTAL of 6a, there are both opportunities to create a car free development and remove servicing from the High Road, these should be incorporated into the development guidelines.

TG3 Tottenham Police Station and Reynardson Court - Due to the location of this site on the TLRN and high PTAL of 6a, there are both opportunities to create a car free development and remove servicing from the High Road; these should be incorporated into the development guidelines.

NT2 Northumberland Park – The third bullet point of site requirements should be revised to read “Work in conjunction with TfL to investigate improving bus routes through the area and links with Northumberland Park Station.”

BG1 Bruce Grove Snooker Hall and Banqueting Suite- A further bullet point "servicing and refuse storage to be resolved" should be included within the Development Guidelines. A car free development would also be expected.

TH4: Station Interchange – TfL welcome the reference to "*new residential and/or commercial development above the station*". However, TfL believes the following statement: "*The new public square will become the heart of the new station*" should seek to better promote Tottenham as a whole, rather than just the station, the words "new station" could be better replaced with '*...the heart of the new district centre*' or '*... the heart of the new, fully integrated transport interchange*'. Further to this, TfL considers the statement: "*This site will form the new Tottenham Hale District Centre*" should be revised as TfL considers that a number of the sites (all of the ones mentioned in this section) will form the district centre, rather than just this one.

"Development of this site could be up to 11 storeys" – It should be noted that this should be taken as being two storeys of station building with nine storeys above it, making a total of 11 storeys.

"potential to introduce a new pedestrian link beneath the road to the retail park with the introduction of Crossrail". Further clarification is required on this on both the location of the link, and which road is being referred to. The current station scheme proposes closing off the Ferry Lane underpass. It will need to be assessed against any other Haringey Council guidance on creating new underpasses.

"Creation of a physical link between the Station and the Green Link". What is meant by a physical link - does this mean a new station entrance? Clarification is required here.

We would suggest adding two more bullets: "*This site should seek an active ground floor frontage to enliven the area around the station entrance*" and "*A retail use at ground floor level with residential above will represent an appropriate mix of uses.*"

TH5: Tottenham Hale Retail Park – We would suggest adding an additional bullet point to the Development Guidelines: "*Potential to explore pedestrian connections across the railway to improve access from the east (Ferry Lane estate).*"

TH6: Hale Village Tower – We would suggest adding an additional bullet point to the Development Guidelines: "*Potential to explore pedestrian connection under Ferry Lane and is a condition of the original Hale Village planning consent to investigate.*"

Chapter 6 Implementation, Delivery and Monitoring, AAP Objectives- TfL welcomes the indicator of better transport links, however the reference to Edmonton Green should be deleted.

Other comments

Crossrail 2 is expected to present significant development benefits within key impact areas around the stations it serves. Therefore, recognition with the various consultation documents of the significant potential for Crossrail 2 to act as a catalyst for further intensification of land uses within Haringey and its potential to support additional growth and regeneration priorities within the borough is welcome.

As recognised throughout, Crossrail 2 or the delivery of four-tracking along the WAML would further contribute to Haringey's future housing and economic growth offer. It should be noted that evidence from Crossrail 1 demonstrates that development and regeneration benefits associated with the delivery of transformational rail schemes such as Crossrail 2 are likely to be realised once a scheme becomes committed and well before such infrastructure upgrades become operational. Consequently, early intervention will be required if the opportunities and scale of benefits associated with such infrastructure upgrades are to be realised. Whilst the precise benefits that could be realised by Crossrail 2 or four tracking of the WAML are not yet known, it would be pertinent to incorporate a review mechanism within relevant policy documents, which would allow for the assessment of development potential within the AAP to be revisited and updated if necessary. The inclusion of effective mechanism will ensure that once a scheme becomes committed, any review can take place in a timely manner.

Following the Health & Social Care Act 2012 Local authorities have taken on new public health responsibilities in 2014 and TfL, along with other agencies, have a role in supporting them to deliver improvements in the health of Londoners. TfL has prepared the document via the link, which might be useful to help link to transport and health and could perhaps become part of any evidence base for further work. <http://www.tfl.gov.uk/info-for/media/press-releases/2014/february/tfl-publishes-worlds-first-transport-health-action-plan>

I hope you find these comments useful and take them into consideration. If you have any queries, have further questions or seek clarification please don't hesitate to contact me.

Yours sincerely,

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TfL Borough Planning
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Direct line: 020 3054 7038

Cc: Elliot Kemp, Graham Clements (GLA)

London Borough of Haringey – Tottenham AAP (preferred option consultation)

Appendix 2

Representations from the Greater London Authority

Consultation period: 9 February to 27 March 2015

GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
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Tottenham AAP – preferred option consultation

Chapter 2. Issues challenges and opportunities

1.	Realising the investment in public transport, para 2.30	General	The draft AAP references various planned and forthcoming connectivity improvements (including the introduction of Crossrail 2 and the delivery of three-tracking along the West Anglia Main Line), and recognises that these improvements would further contribute to the potential for future housing and economic growth in Tottenham. This is supported, however, it is also recommended that the potential four-tracking of the West Anglia line is also referenced within the draft plan.
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Chapter 4. Promoting positive regeneration in Tottenham - Policies

2.	AAP1 Regeneration	Various, especially Policy 2.6	The Council's stated intention to take a proactive approach to working with relevant stakeholders in order to ensure that redevelopment proposals would positively contribute towards comprehensive regeneration in Tottenham is supported in principle.
3.	AAP2 Housing	Policy 3.3	The target to deliver 10,000 new homes across the AAP area over the plan period represents 67% of Haringey's London Plan housing target up to 2025. This level of provision reflects Tottenham's status as one of the Mayor's Housing Zones, and is supported in line with London Plan Policy 3.3 and in broad accordance with the objectives of the Upper Lee Valley Opportunity Area Planning Framework (OAPF).
4.	AAP2 Housing	Policies 3.11 and 3.12	It is noted that whilst the Council's proposed alterations to strategic policies seek to revise Haringey's affordable housing target from 50% to 40% for the majority of the borough (in response to up to date market data), it is proposed to retain a 50% target for the Tottenham AAP area. Mindful of the Housing Zone package for Tottenham, and the proposed locally specific variation to Haringey's strategic residential tenure split target (discussed in comment 5 below), GLA officers support the higher affordable housing target for Tottenham.
5.	AAP2 Housing	Policies 3.9 and 3.11	The Council proposes a strategic tenure split target for Tottenham of 40% affordable rent and 60% intermediate. This represents a notable localised departure from the pan-London tenure split within London Plan Policy 3.11. The Council's reasoned justification makes clear that this is intended to rebalance existing high levels of social rented accommodation in Tottenham (which currently accommodates more than 60% of Haringey's total social rented stock). London Plan Policy 3.9 makes clear that a more balanced mix of tenures should be sought in all parts of London, particularly in neighbourhoods where social renting predominates. Accordingly, having regard to the existing balance of residential tenures in Tottenham, GLA officers are satisfied that the tenure split within draft Policy AAP2 is in general conformity with the London Plan. It is also acknowledged that, in practice, discussions around the balance of tenure at any given site will be negotiated and considered on a case by case basis.

London Borough of Haringey – Tottenham AAP (preferred option consultation)

Appendix 2

Representations from the Greater London Authority

Consultation period: 9 February to 27 March 2015

GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
6.	AAP2 Housing	Policies 3.3, 3.9, 3.11 and 3.14	The principle of promoting higher density housing redevelopment (including the introduction of private and intermediate tenures) to assist with financially enabling estate renewal is strongly supported. Related to this matter it is noted that the Council's proposed alterations to strategic policies introduce the principle of re-provision of housing on a habitable room (rather than unit) basis. This approach is in broad accordance with London Plan Policy 3.14 (which effectively seeks to allow a degree of flexibility with respect to the assessment of re-provision, in order to facilitate the delivery of units which meet current needs). The Council is, nevertheless, invited to consider whether a specific reference to the approach to re-provision in Tottenham (either in the policy or supporting text) may assist with the reading and implementation of this policy in practice.
7.	AAP3 Tottenham Hale District Centre	Policies 2.15, 4.7 and 4.8	The proposed policy approach at Tottenham Hale is supported, and accords with the principles of the Upper Lee Valley Opportunity Area Planning Framework in terms of promoting the creation of a new mixed use district town centre.
8.	AAP4 Green Link	Policy 2.18 and 5.10	The principle of the proposed east-west 'green link' – envisaged to comprise a high quality landscaped connection between Tottenham High Road and the Lee Valley Regional Park (via Tottenham Hale District Centre) is strongly supported.
9.	AAP5 Changes to Designated Employment Areas	Policy 4.4	<p>The Council proposes revisions to a number of areas of employment land in Tottenham. The revisions strengthen protection at Constable Road (proposed to be recognised as 'Local Employment Area: Regeneration Area') and Willoughby Lane (proposed to be promoted to 'Locally Significant Industrial Site' status); maintain the existing level of protection at High Road East; provide greater flexibility for employment-led mixed use regeneration at High Road West and (part of) South Tottenham; and, de-designate two local employment sites (southern part of Tottenham Hale 'Regeneration Area' and 784 to 788 High Road) so that these may contribute towards urban renewal at Tottenham Hale and Tottenham High Road respectively.</p> <p>The 2015 Haringey Employment Land Review acknowledges the intention to nurture and protect a diverse local employment base in Tottenham for the long-term, as well as strategic objectives for the promotion of regeneration through revisions to the designation of selected employment sites - where these are well placed to contribute towards urban renewal in accordance with the London Plan and Upper Lee Valley OAPF. These principles feed through accordingly into the strategic approach of the draft Tottenham AAP.</p> <p>Having regard to the conclusions of the employment land review, and the proposed allocations within the draft AAP, the proposed approach to managing employment land within the Tottenham AAP area is supported in principle. Nevertheless, in line with overarching comments made in respect to the Council's</p>

London Borough of Haringey – Tottenham AAP (preferred option consultation)

Appendix 2

Representations from the Greater London Authority

Consultation period: 9 February to 27 March 2015

GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
			alterations to the Strategic Policies DPD, GLA officers would welcome further discussion on how, at a borough-wide level, the proposals for employment land management relate to the strategic benchmarks for industrial land release within the Mayor's Land for Industry and Transport SPG.
Chapter 5. Neighbourhood areas and opportunity sites			
10.	General		<p>The proposed neighbourhood area objectives and opportunity site allocations are broadly supported in strategic planning terms. Nevertheless, specific comments with respect to various allocations are provided for the Council to consider below.</p> <p>In addition, the Council is encouraged to provide indicative figures for residential capacity and/or employment generating potential (as relevant) as part of the various site allocation profiles. Whilst it is acknowledged that this information currently resides in Appendix A of the draft plan, the aforementioned approach is likely to assist with the practical implementation of the plan.</p>
11.	SS3: Apex House and Seacole Court	Various, especially Policy 7.7	This site allocation is broadly supported. It is noted that the allocation identifies the opportunity for a high quality tall building marking the location of the Severn Sisters public transport interchange. GLA officers are satisfied that this is a suitable location for a tall building in principle, subject to the requirements of London Plan Policy 7.7.
12.	SS4: Helston Court	Various, especially policies 3.9 and 3.14	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this site as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.
13.	SS5: Wards Corner and Suffield Road	Various	This site allocation is broadly supported. It is noted that the allocation recognises existing planning permissions HGY/2008/0303 and HGY/2011/1275.
14.	SS6: Brunel Walk and Turner Avenue	Various, especially policies 3.9 and 3.14	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this site as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.
15.	NT1: Northumberland Park North	Various, especially policies 3.9	This site allocation accords with the strategic aspirations for Northumberland Park within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies the opportunity for major estate renewal. GLA officers acknowledge the opportunity to deliver a step change in residential quality and

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GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
		and 3.14	neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.
16.	NT2: Northumberland Park	Various, especially policies 3.8, 3.9, 3.14 and 7.7	This site allocation accords with the strategic aspirations for Northumberland Park within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies the opportunity for major estate renewal. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14. It is further noted that the allocation identifies the opportunity for taller buildings at the south east corner of the site – contributing towards a wider collection of tall buildings proposed in this part of Northumberland Park. GLA officers are satisfied that this is a suitable location for tall buildings in principle, subject to the requirements of London Plan Policy 7.7. With respect to the envisaged education infrastructure, the Council is encouraged to consider including development guidelines promoting the co-location of school and housing - in order to maximise land use and reduce costs in accordance with London Plan Policy 3.8.
17.	NT3: High Road West	Various, especially policies 5.17 and 7.7	This site allocation accords with the strategic aspirations for High Road West within the Upper Lee Valley OAPF and is broadly supported. It is noted that part of the allocation includes a licensed waste site. Accordingly, requirement for equivalent waste capacity to be re-provided is supported in accordance with London Plan Policy 5.17. It is further noted that the allocation identifies opportunities for tall buildings along the railway corridor. GLA officers are satisfied that this would be a suitable location for a tall buildings in principle, subject to the requirements of London Plan Policy 7.7.
18.	NT5: Tottenham Hotspur Stadium	Various	This site allocation accords with the strategic aspirations for High Road West within the Upper Lee Valley OAPF and is broadly supported.
19.	TH1: Station Square West	Various, especially Policy 7.7	This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies various opportunities for taller point block buildings of 11+ storeys at prominent locations. GLA officers are satisfied that this is a suitable location for taller buildings in principle, subject to the requirements of London Plan Policy 7.7.
20.	TH3: Ashley Road North	Various, especially Policy 5.17	This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that part of the allocation includes a licensed waste site. Accordingly, requirement for equivalent waste capacity to be re-provided is supported in accordance with London Plan Policy 5.17.

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Representations from the Greater London Authority

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GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
21.	TH5: Tottenham Hale Retail Park	Various, especially Policy 7.7	This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies opportunities for taller point block buildings of 11+ storeys to promote legibility. GLA officers are satisfied that this is a suitable location for taller buildings in principle, subject to the requirements of London Plan Policy 7.7.
22.	TH6: Hale Village Tower	Various	This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation recognises existing planning permission HGY/2006/1177.
23.	TH8: Welbourne Centre	Various, especially Policy 7.7	This site allocation accords with the strategic aspirations for Tottenham Hale within the Upper Lee Valley OAPF and is broadly supported. It is noted that the allocation identifies an opportunity for a taller building marking the edge of the proposed 'green link', and the gateway to the new district centre at Tottenham Hale. GLA officers are satisfied that this is a suitable location for a tall building in principle, subject to the requirements of London Plan Policy 7.7.
Chapter 6. Implementation, delivery and monitoring			
24.	Infrastructure delivery, page 120	General	The Council is encouraged to include a reference to the Development Infrastructure Funding Study (DIFS) for the Upper Lee Valley - which has been jointly commissioned by the GLA, Transport for London and the London Boroughs of Enfield, Hackney, Haringey and Waltham Forest, and is currently underway. The DIFS is due to be completed in spring 2015, and will identify the strategic infrastructure required to deliver the growth outlined in the Upper Lee Valley OAPF (including transport, utilities, social/community facilities). The DIFS will set out how infrastructure delivery may be phased and prioritised in line with forecast development, identifying existing funding streams and quantifying funding gaps, as well as suggesting how such gaps may be bridged through a variety of funding mechanisms.
25.	Monitoring, page 120	General	Evidence demonstrates that development and regeneration benefits associated with the delivery of transformational rail schemes (such as those discussed in comment 1 above) are likely to start being realised well in advance of such infrastructure becoming operational. In addition, the Tottenham Housing Zone is also expected to catalyse housing delivery within the AAP area. As a result of these factors it is possible that the minimum housing and employment outcomes for Tottenham may be considerably exceeded over the plan period. Accordingly, the Council is encouraged to ensure that the monitoring and plan review process would be sufficiently dynamic to ensure that the full range of opportunities and benefits associated with any latent growth potential could be capitalised on.

London Borough of Haringey – Site Allocations DPD (preferred option consultation)

Appendix 3

Representations from the Greater London Authority

Consultation period: 9 February to 27 March 2015

GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
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Haringey Site Allocations DPD – preferred option consultation

Site allocations

1.	General		<p>The proposed refinements to designation boundaries and opportunity site allocations are largely supported in strategic planning terms. Nevertheless, specific comments with respect to various allocations are provided below.</p> <p>In addition, the Council is encouraged to provide indicative figures for residential capacity and/or employment generating potential (as relevant) as part of the various site allocation profiles. Whilst it is acknowledged that this information currently resides in Appendix B of the draft plan, the aforementioned approach is likely to assist with the practical implementation of the plan.</p>
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Crossrail 2

2.	SA1: Indicative Crossrail 2 Areas	Policy 6.2	<p>The proposed approach to Crossrail 2 safeguarding and impact assessment in draft SA1 is strongly supported in principle. However, TfL recommends that the 'wider impact area' (currently an 800 metre radius) is extended to a 1km radius from Crossrail 2 stations. This would reflect the expected zone of influence of Crossrail 2, based on experience with impacts associated with Crossrail 1.</p>
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Employment

3.	SA2: Changes to designated employment areas	Policy 4.4	<p>The Council proposes revisions to a number of areas of employment land in the borough (outside the Tottenham AAP area). The overarching approach is set out within the Council's alterations to the Strategic Policies DPD and draft policies DM48-52 of the draft Development Policies DPD, with the strategy feeding through into the site allocations within this draft plan. Broadly the revisions seek to: identify new employment-led 'Regeneration Areas' to create new jobs as part of mixed use development; pragmatically respond to instances of 'warehouse living' by rationalising/intensifying employment areas whilst jointly supporting creative live/work communities; and, encourage existing industrial sites to modernise for greater efficiencies and economic output.</p> <p>Having regard to the conclusions of the 2015 Haringey employment land review, the proposed allocations are supported in principle. Nevertheless, in line with overarching comments made in respect to the Council's alterations to the Strategic Policies DPD, GLA officers would welcome further discussion on how, at a borough-wide level, the proposals for employment land management relate to the strategic benchmarks for industrial land release within the Mayor's Land for Industry and Transport SPG.</p>
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London Borough of Haringey – Site Allocations DPD (preferred option consultation)

Appendix 3

Representations from the Greater London Authority

Consultation period: 9 February to 27 March 2015

GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
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Changes to town centre boundaries

4.	SA3: Changes to town centre boundaries	Policy 2.15	The Council's proposed changes to town centre boundaries are pragmatic and supported.
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Safeguarded waste sites

5.	SA4: Safeguarded waste sites	Policy 5.17	The safeguarding of Western Road Depot, 81 Garman Road, 100a Markfield Road, 44 White Hart Lane, 175 Willoughby Lane, 82 Markfield Road and Civic Amenity Site (Park View Road) is supported in line with London Plan Policy 5.17.
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Strategic sites with planning permission

6.	SA5 to SA9	Various	The recognition of existing planning permissions at: Clarendon Square, Hornsey Depot, St. Luke's Hospital site, Hornsey Town Hall and Highgate Magistrates Court is supported. It is noted that the Council seeks to establish principles for future consideration in the event that financial viability improves, and revisions to these approvals are sought by a developer. The site specific guidance proposed is supported in principle.
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Wood Green, including Turnpike Lane and its western heartland

7.	Tall buildings	Policy 7.7	It is noted that the allocations for Turnpike Lane, Wood Green Underground station, Wood Green Library and the entrance to Penstock foot tunnel identify the opportunity for high quality tall buildings. GLA officers are satisfied that these are suitable locations for tall buildings in principle, subject to the requirements of London Plan Policy 7.7.
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Highgate

8.	SA47: Hillcrest	Various, especially policies 3.9 and 3.14	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this area as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.
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Sites in the west of the borough

9.	SA48: Hornsey Water Treatment Works	Policy 7.17	This site is an area of Metropolitan Open Land that is afforded strategic protection through London Plan Policy 7.17. Accordingly, the proposed redevelopment of this site for housing does not comply with this policy. GLA officers take the view that as a first principle this site should be retained as part of a wider expanse of open space at Hornsey Water Works/Wood Green Reservoirs. In broad terms, GLA officers are only in a position to consider a review of MOL boundaries where there are significant qualitative and/or quantitative benefits in terms of MOL quality and the appreciation of openness. It is, nevertheless, understood that the Council is currently considering developing a masterplan/planning guidance for this area, and that
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Appendix 3

Representations from the Greater London Authority

Consultation period: 9 February to 27 March 2015

GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
			part of this process may seek to review the Metropolitan Open Land boundary. GLA officers seek further discussion with the Council with respect to any review of Metropolitan Open Land - which will need to inform the future assessment of general conformity in so far as this proposed allocation is concerned.
10.	SA52: Pinkham Way	Various, especially policies 4.4 and 7.19	The intention to retain the existing joint designation of this site as a Local Site of Importance for Nature Conservation (Grade 1) and Local Employment Land is noted and supported.
11.	SA53: Cranwood and St. James School	Various, especially policies 3.9, 3.14	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this area as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.
12.	SA54: Tunnel Gardens	Various, especially policies 3.9, 3.14	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this area as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.
Sites in the east of the borough			
13.	SA57: Park Grove and Durnsford Road	Various, especially policies 3.9, 3.14	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this area as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.
14.	SA63: Broadwater Farm area	Various, especially policies 3.9, 3.14 and 7.17	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this area as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14. It is noted that the red line boundary also includes part (approximately 6.6 hectares) of the Lordship Lane recreation ground – an area of Metropolitan Open Land (MOL) that is afforded strategic protection through London Plan Policy 7.17. The Council's stated intention to explore opportunities to enhance linkages between this open space and others in the area is supported in principle. However, in accordance with Policy 7.17, GLA officers take the view that as a first principle Lordship

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Representations from the Greater London Authority

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GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
			Lane recreation ground should be retained as a coherent and contiguous expanse of open space. In broad terms, GLA officers are only in a position to consider a review of MOL boundaries where there are significant qualitative and/or quantitative benefits in terms of MOL quality and the appreciation of openness. Accordingly, GLA officers do not anticipate that the allocated area of Lordship Lane recreation ground would be subject to residential development, and recommend that the red line boundary of the site allocation is revised to remove Lordship Lane recreation ground. Notwithstanding this, GLA officers would welcome further discussion with the Council with respect to how the desired networking of green spaces through the area might be achieved in the context of the broader regenerative proposals for this site.
15.	SA66: Leabank and Lemsford Close	Various, especially policies 3.9, 3.14	It is noted that, as part of a borough-wide review of Haringey's housing estates, the Council has identified this area as potentially suitable for regeneration. GLA officers acknowledge the opportunity to deliver a step change in residential quality and neighbourhood permeability/legibility at this site, and support the allocation in principle, subject to a collaborative engagement with residents and an appropriate response to the requirements of London Plan policies 3.9 and 3.14.