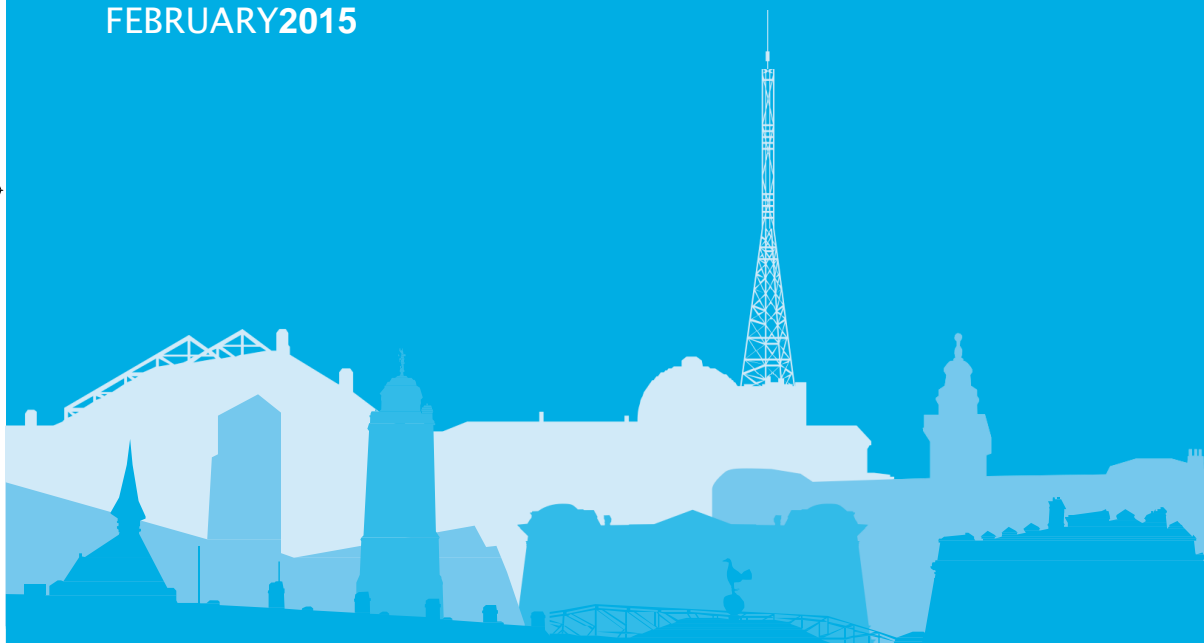


Tottenham

TOTTENHAM AREA ACTION PLAN PREFERRED OPTION CONSULTATION FEBRUARY 2015



www.haringey.gov.uk



Haringey Council

Statutory Information

Planning and Compulsory Purchase Act 2004

**Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012-
consultation pursuant to Regulation 18**

London Borough of Haringey

Tottenham Area Action Plan Development Plan Document

Preferred Option Draft for Consultation on the subject matter of

the Development Plan February 2015

Foreword

The Tottenham Area Action Plan will be a blueprint for the comprehensive and coordinated regeneration of Tottenham and the local neighbourhoods within it.

Currently we are still in the early stages of preparing this Plan, so there is still significant scope and opportunity for local people and stakeholders to get involved and influence the final document.

Since we last consulted the community on the broad options for change, we have been working with our delivery partners and the community to better understand the strengths of the area that need to be built upon, the opportunities that exist that need to be realised, and the existing issues that need to be addressed.

Taking account of the comments received to consultation in January 2014, this document sets out the Council's Preferred Option for how we believe the Tottenham area should be developed. In particular, this document establishes a shared future vision for the area – building on the responses received to the 'Tottenham's Future' consultation and outlined in the Strategic Regeneration Framework (March 2014) – and details how that vision will be delivered through policies aimed at managing specific issues and through proposals for development on specific sites.

To progress the document to its next stage, we now want your views on whether you think the vision for the area is the right one, and whether the suggested policies and site proposals are sufficient and adequate guidance to development to achieve that vision.

We want the Area Action Plan to be more than just a policy document. It is important to us and our delivery partners that the local community and key stakeholders can give their support to the final Plan and can work with us to deliver it over both the short and long-term. Therefore, if you are a local resident, business owner, or just have an interest in how this area should be developed in the future, we strongly urge you to get involved and have your say in shaping the content of this important Plan for Tottenham and the Borough.



Cllr Ali Demirci
Cabinet Member for Planning

Comment [A1]: See our overall comment about the flaws of the public consultation process of February-March 2015.

Comment [A2]: Absolutely no indication or evidence of how, whether and to what extent any of the comments, feedback and objections received by the Council during that previous consultation was posted on the official web page of the consultation <http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/tottenham-area-action-plans-aaps>. It is impossible to know whether any comment made by any resident or community group in Tottenham were taken on board. As far as the response submitted by the OT Planning Policy Working Group in March 2014 is concerned, most comments, suggestions, objections and requests were ignored.

Comment [A3]: The conclusions of the Soundings report were watered down and partially selected. The SRF does not represent a fair picture of the results of the consultation – for example the strong support for Council housing and for more genuinely affordable housing. This was demonstrated in a FOI request / answer about email exchanges between the consultants and Council, which revealed that Haringey Council attempted to have the findings of the consultation watered-down.

Comment [A4]: These 'delivery partners' are by and large not known to the public, although in many cases prospective developers have already been in contact with the Council for proposals regarding specific sites.

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Comment [A5]: Site SS6 is missing from the table of content

1 Introduction

1.1 Tottenham is a key regeneration area within London. It is home to many distinct, diverse and strong communities where over 200 different languages are spoken. It has a rich history, a huge talent pool and, despite the recent recession, the highest startup of new businesses in London. It also has relatively low land values and densities, sites available for development, and some of the best transport links in north London, making it an attractive proposition for new investment. At the same time, parts of the area also experience high levels of unemployment, benefit dependency, overcrowding and crime, and low levels of educational attainment, household income and health. It also suffers from a poor public realm in some areas and a lack of accessibility to quality open spaces and there are deficiencies in community & recreation facilities.

1.2 The desire to build upon its strengths, respond to the community's aspirations and concerns for change, to realise the opportunities for growth, and the need to help address the challenges of deprivation, have led Tottenham to be identified as a priority area for regeneration.

1.3 The Tottenham Area Action Plan (AAP) is a significant and important component of the regeneration strategy for Tottenham which establishes the local spatial planning framework for the area, giving detailed expression to the overall growth objectives for Tottenham as contained in the Haringey Strategic Policies Local Plan (2013). In particular, the AAP seeks to realise the significant potential for urban renewal and intensification, particularly within Seven Sisters, Tottenham Green, Tottenham Hale and Northumberland Park. The AAP builds on the conclusions and recommendations of the following documents:

- The Physical Development Framework for Tottenham (2012); and
- The Tottenham Strategic Regeneration Framework (2014);

1.4 The AAP provides for major new housing development aimed at delivering a further 10,000 new homes and significantly improving the quality of existing social housing stock, through estate renewal such as that proposed for North Tottenham, providing for a more balanced mix of housing tenure and greater housing choice. It also makes provision to deliver substantial employment growth, creating 5,000 new jobs through new retail development at Tottenham Hale, the intensification and diversification of existing industrial estates, and mixed leisure development, as part of a hub incorporating the new Tottenham Hotspur FC stadium, enhancing North Tottenham's distinct offer as a leisure destination and providing a catalyst for wider High Street and estate renewal.

1.5 The AAP proposes measures to ensure new development and growth is complemented by further improvements to public transport and interchange facilities, better pedestrian links with the surrounding area, including to the Lee Valley, and provision of community infrastructure – specifically new schools and healthcare.

Comment [A6]: See our concerns and objection to these objectives in the response to the Core Strategy alterations.

Comment [A7]: Demolition is not 'renewal'. A policy of applying 'balance' only to social housing estates is discrimination, possibly unlawful discrimination. We strongly contest the type of 'estate renewal' proposed here. Behind the word 'a more balanced mix of housing tenure and greater housing choice' is in effect a strategy of demolition of existing social housing units and blocks, with a net loss of the total Council and social housing stock, and without input for the affected residents. We want the following principle to be included in the Tottenham AAP: No urban renewal or regeneration scheme should entail ANY demolition of structurally sound homes, or any net loss of Council or socially rented housing units.

Comment [A8]: How and where these will be provided to accompany the planned 10,000 new homes is NOT demonstrated in this AAP. There is a chronic lack of community infrastructure already (see our cover letter).

1.6 Lastly, a major focus of the Plan is on recognising and reinforcing the distinctive characteristics of Tottenham's neighbourhoods, highlighting its important historic assets, delivering environment improvements and helping to address the inequalities present across Tottenham.

Purpose of the Tottenham Area Action Plan (AAP)

1.7 The Area Action Plan (AAP) is being prepared in order to ensure that the scale of development and change proposed for Tottenham to 2026 and beyond is positively managed and guided by a planning framework and investment decisions that meet the aspirations that the local community and the Council have for the area as a whole, as well as the places within it.

1.8 It is particularly important that local residents and businesses can understand and appreciate how the changes proposed will affect them and their community. The AAP therefore seeks to provide clarity and increased certainty about how the opportunities for improving Tottenham's places will be realised and its challenges addressed. Specifically, it prescribes a vision for how neighbourhoods are to develop, allocates strategic sites for particular uses and types of development, and sets out Tottenham specific policies aimed at ensuring new development is ambitious, appropriate and sustainable in a Tottenham context (i.e. balances development and population growth with increased and improved infrastructure, access to training and employment, and delivers a wide range of housing choice).

1.9 The AAP has a strong focus on delivery and implementation. It is intended to alert infrastructure providers and public sector agencies to the growth targets and existing deficiencies present, so that they may schedule service and capacity upgrades accordingly. Effective cross-service working, securing the coordinated and timely delivery of social and physical infrastructure improvements, will be essential to support new development and ensure that continued growth across Tottenham is sustainable. Equally, the AAP provides further guidance on the appropriate phasing of new development, taking into account the need to ensure positive regeneration occurs which benefits the whole of Tottenham, including on allocated sites with greater constraints than others so that

1.10 The boundary of the AAP (see Figure 1.0) has been drawn to capture the key strategic sites, whilst recognising that they sit naturally within and alongside other sites and neighbourhoods that are not intended to be subject to the same level of change but that will benefit from the targeted regeneration and proposals to improve physical connections, transport accessibility, employment creation and enhanced social infrastructure. Conversely, the drawing of an AAP boundary does not preclude opportunities to realise better connections and other improvements outside of the AAP area including access to green spaces, heritage and leisure facilities, and links to other employment hubs.

Comment [A9]: We welcome all these objectives. However, at present the AAP proposal will not only NOT address the inequalities present across Tottenham but will reinforce and make them worse, through processes of displacement of homes and businesses at particular sites.

Comment [A10]: See our general comment about the consultation process and its flaws.

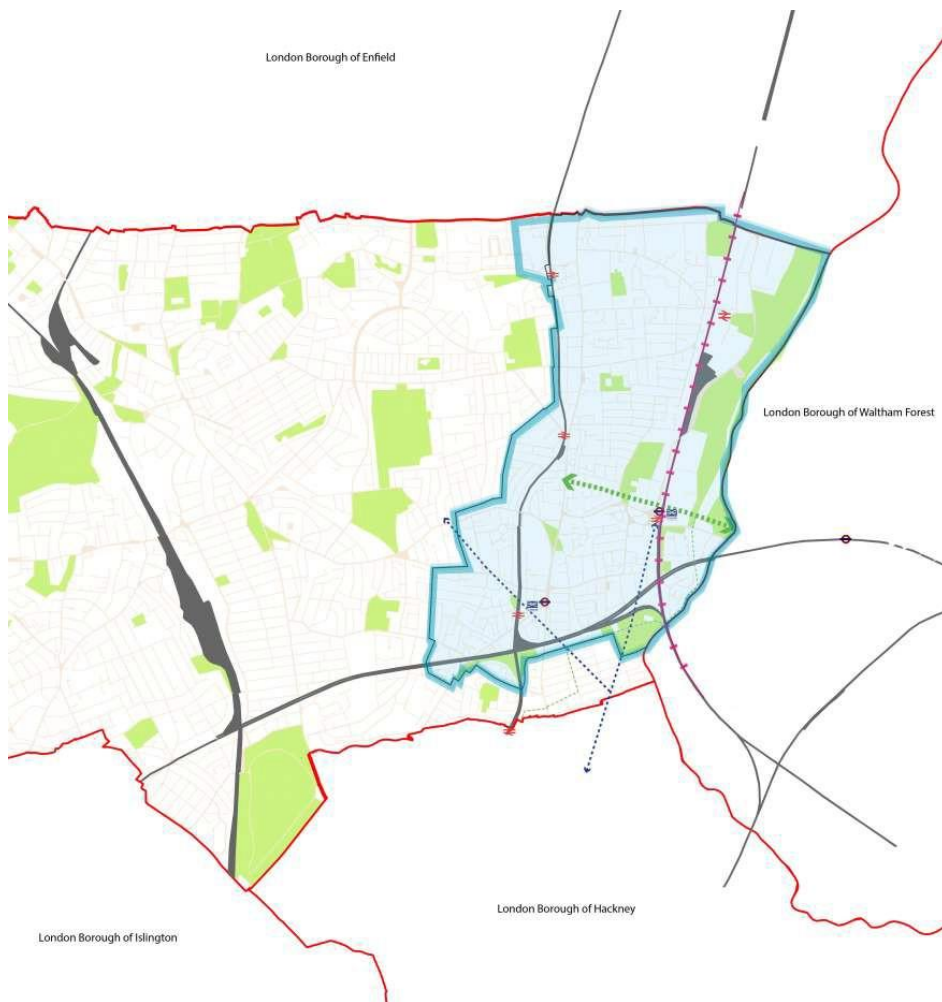
Comment [A11]: This cannot be the case if the broad public does not know about the interests, preliminary proposals and stakeholders who have already held discussions with the Council about potential development at particular sites.

Comment [A12]: How this balance will be achieved is not demonstrated and highly questionable. See our overall comment about social and community infrastructure.

Comment [A13]: This is not the function of an AAP. These things should have been thought through before the final draft of the AAP.

Comment [A14]: Incomplete sentence...

Figure 1.0:TottenhamAAPArea



Comment [A15]: A much more detailed map, with the name of the streets marking the exact boundaries, need to be included.

Preparation of the Preferred Option AAP

1.11 Figure 1.2 illustrates where we have reached in the statutory process of preparing the Tottenham AAP. This draft of the AAP sets out the Council's preferred strategy for how we believe Tottenham should be developed. It gives effect to the Haringey Strategic Policies Local Plan and adopts the shared vision and strategic objectives for Tottenham that the community and the Council agreed as an outcome of the 'Tottenham Futures' consultation undertaken over a five-month period from October 2013 to February 2014.

1.12 To bring about the vision and the achievement of the strategic objectives, the draft AAP sets out the sites the Council proposes to formally allocate for specific types of use and development, including an indication of the quantum of housing and/or employment floorspace to be delivered on each. It sets out the existing designations the Council intend to retain or alter to facilitate the regeneration needed, and the draft policies specific to Tottenham that new development is expected to accord to.

1.13 The proposed site allocations and policies have been prepared having regard to the following:

- consultation to date with the local community, including consultation on an early 'draft' version of the AAP (March 2014), 'Tottenham Futures', the Strategic Regeneration Framework and more recently, consultation on High Road West (September 2014) and Northumberland Park (October 2014) – see 'Previous consultation outcomes' below;
- the findings of the Physical Development Framework for Tottenham (2012);
- engagement with landowners and developers through the pre-application process and other avenues to gain an understanding of the aspirations they hold for their sites;
- engagement with key stakeholders, such as Transport for London & the NHS, who need to support the proposals and commit to their delivery;

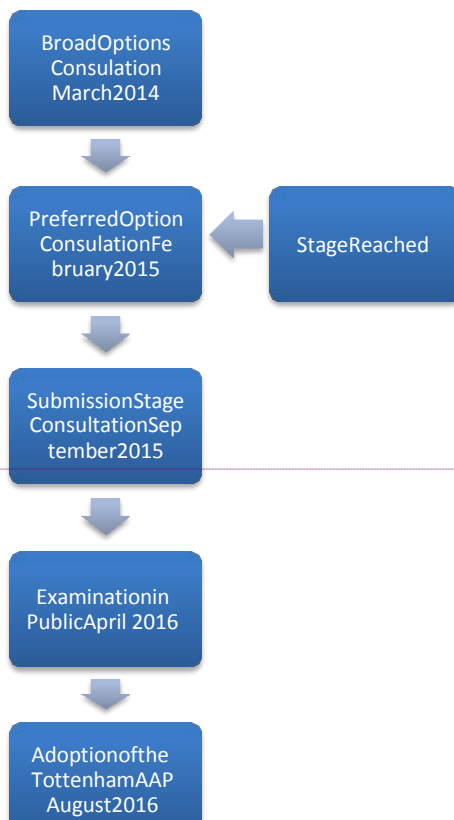


Figure 1.2: Stages in AAP Preparation

Comment [A16]: Who is 'the community' here? That there is such an agreement is the Council's view, but has been seriously contested and challenged by many community groups in Tottenham. See comment made on p. 3 about that.

Comment [A17]: No evidence that comments, feedback, demands, objections made by many community groups have been taken into account. See comment made on p. 3. For High Road West, see Appendix A2: *Local traders condemn 'sham' Council consultation for North Tottenham High Road West. Backed by 4,000-strong local petition against demolitions, they call for a new scenario for the area.*

Comment [A18]: What exact avenues needs to be specified.

- the findings of evidence base studies¹, including emerging master plan work, Tottenham specific studies on Transport, as well as borough-wide studies on housing need, flooding, employment, open space and urban character; and
- other policy developments related to Tottenham, including the potential designation of Tottenham as a Housing Zone and the scope for Crossrail 2 to serve Tottenham, providing significantly greater access to locations within the borough, to London and the wider Southeast.

Comment [A19]: Several of these studies were released to the public on the same day as the public consultation for the 4 Local Plan documents opened. This is unacceptable as it does not give any member of the public or community group the time to read and process some key studies which underpin the policy choices proposed by the Council.

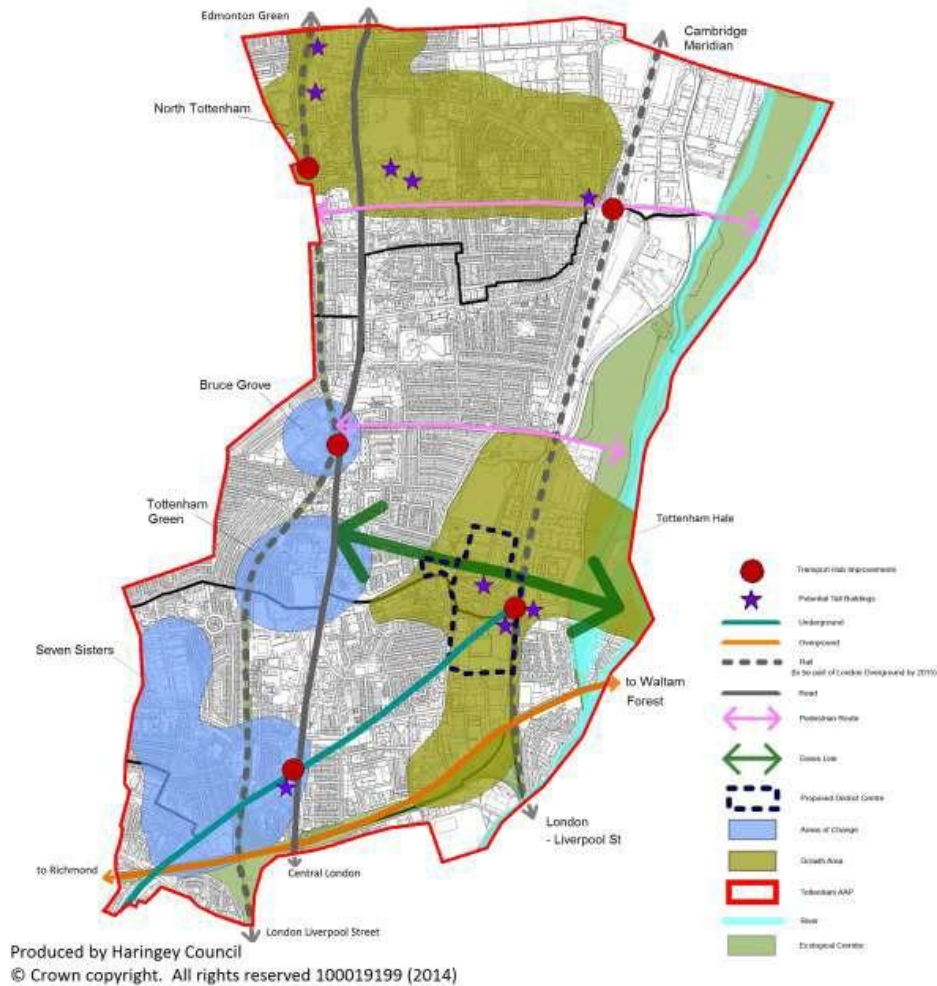
1.14 With regard to sites, it is important to note that delivery of key developments within the Plan's timeframe is critical to the success of the AAP, and sites that can feasibly be developed within this timeframe have been prioritised. However, it is acknowledged that other sites, currently unidentified, may become available during this fifteen year period. Therefore guidance is proposed for each neighbourhood and across the entire area to ensure all development is managed, and not just that planned for on currently identified sites.

1.15 Lastly, the AAP also sets out the approach the Council, along with its delivery partners, will take to deliver and implement the AAP. Many parties will have a role to play in Tottenham's regeneration. The AAP will provide a solid foundation for physical change but much broader coordination between agencies, the private sector and local communities is still required if the broader social and economic objectives, and the vision for Tottenham, are to be achieved.

1.16 The key proposals being advocated for Tottenham through the AAP Preferred Option stage are summarised in Figure 1.3.

¹A list of the evidence base used to inform the preparation of the AAP is set out in Appendix B. As each evidence base study is completed, these will be made available on the Council's website.

Figure 1.3:TottenhamAAPKeyDiagram



Previous consultation outcomes

1.17 Initial consultation on the broad proposals for Tottenham was undertaken in January 2014. A number of public consultation events were also held that attracted over 80 residents and stakeholders. The full report is available on the Council's website www.haringey.gov.uk/localplan/tottenham-aap but in summary the comments received highlighted a number of common themes:

- The need for the AAP to be clear about what is being proposed, where, why, and the implications for local neighbourhoods, local residents and businesses;

Comment [A20]: That link is invalid. Where is the report referred to? It is not here either:
<http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/tottenham-area-action-plans-aaps>

- That the area is already densely populated and therefore there is concern whether the number of new residential development proposed for Tottenham is appropriate and equitable in a borough-wide sense;
- The existing deficiencies in healthcare facilities, primary school places, and local open spaces serving the area that will be further exacerbated if additional housing is added - new infrastructure provision must be secured and not just promised;
- Concern that regeneration will lead to the gentrification of Tottenham, with existing residents and businesses forced out;
- A desire to see the distinctive existing character of neighbourhoods retained and preserved, including local heritage;
- The need for further detail on the types of jobs proposed to be delivered, how they will be secured for local benefit, and what the proposals are for existing local employment sites, including proposals to support, retain (including relocation), and grow local businesses and secure affordable workspace;
- That regeneration in Tottenham should not be solely for, or in the hands of, major developers and landowners but should be in collaboration with the existing community.

Comment [A21]: These summarizing themes actually describe quite well what the core concerns expressed in our previous responses to the January 2014 consultation were. However, there is no evidence in the current draft AAP document that they have been seriously taken into account in the actual proposals made for various key sites.

1.18 In addition to consultations specifically on the draft AAP, the Council has been seeking the views and priorities that Tottenham residents have to a wider range of social and economic issues. This included commissioning, in 2013, an independent organisation called Soundingsto undertake a five-month consultation exercise called 'Tottenham's Future'. More than 3,700 responses were received and analysed, a significant number of which focused on matters that the AAP should address. A full summary of all responses received to 'Tottenham's Future' is available on the Council's website², whilst the key messages relevant to strategic planning and the AAP are summarised below:

Comment [A22]: See our concern about the flaws of that process in the comment made on p. 3

- The need to create more job opportunities for local people and support local people to get into work;
- The need to provide properly funded facilities, activities and spaces for young people;
- Support local independent traders, attract higher end national retail to the High Street and restrict betting shops and fast-food takeaways;
- Address overcrowding and provide for a mix of decent, secure social housing and well designed homes that are affordable to rent and own;
- Improve the physical environment, safety and the provision of local amenities; and
- Support local communities and ensure they benefit from regeneration.

Comment [A23]: Many proposal (e.g. NT3) contradict this directly.

Comment [A24]: Explicit reference should be made to the principle of NO NET LOSS of Council or social housing units anywhere in the Borough.

1.19 The most recent consultation by the Council was on the proposed master plan for High Road West, which ran from 13th September to 25th October 2014, generating 292 responses including the following of relevance to the AAP:

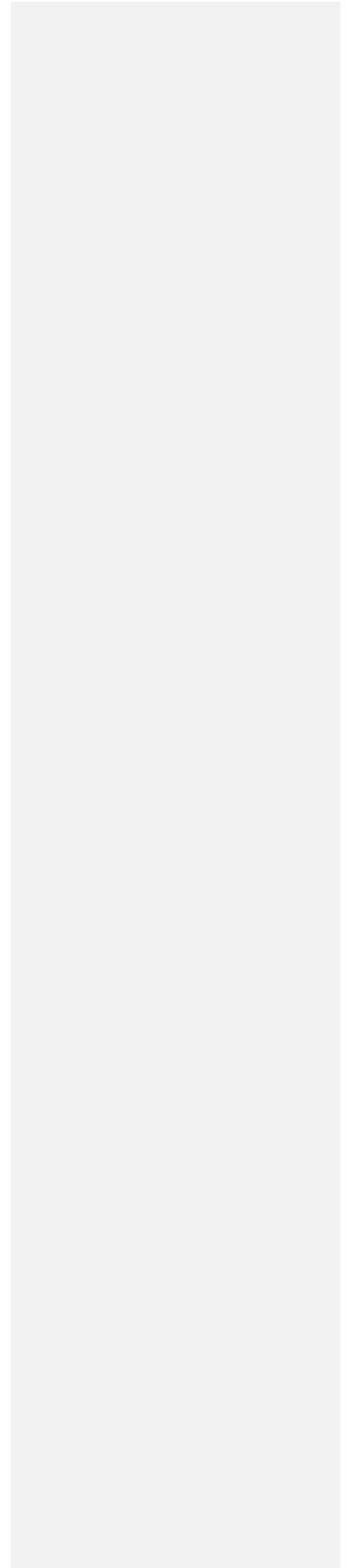
Comment [A25]: The previous High Road West consultation was highly criticised and contested by key local stakeholders. See Appendix A2.

- Broad agreement to the comprehensive estate renewal of the Love Lane Estate;
- Support for the provision of an additional 1,200 new homes where this increases housing choice and provides for a better mix of housing in the area;

Following the highly biased and flawed consultation any objections were ignored, and the Council's spinning of the results would have sent a clear message that it was futile to object in any future 'consultation'..

Comment [A26]: This is not true.

² http://www.haringey.gov.uk/index/housing_and_planning/tottenham/tottenham-consultations/previous-consultation-work.htm



- Residents wished to see the High Road remain as the main shopping area, with improved public spaces, new retail and community hub provision;
- Improvements to local transport facilities, including the station and bus stops, are required to support new development;
- Protection of the local quality heritage buildings also came through strongly;
- Many local businesses raised concerns to the regeneration proposals for the area and, in particular, proposals for relocation of existing businesses.

1.20 In drafting the Preferred Option AAP, the Council has had regard to all the comments received to date to consultation in Tottenham and, where possible, has taken these on board.

Sustainability Appraisal, Habitats Assessment and Equalities Impact Assessments

1.21 In addition to the evidence base studies, the AAP is also supported by a Sustainability Appraisal, Habitats Assessment and an Equalities Impact Assessment. The Sustainability Appraisal tests the policies and proposals to identify the likely social, environmental and economic impacts that may arise, and evaluates options for mitigating negative impacts and enhancing positive impacts. The Habitats Assessment determines whether the proposals in the AAP might have a significant effect on a European designated natural habitat. The Equalities Impact Assessment examines how the AAP meets the needs of the whole community and makes sure that the proposals and policies being advocated through the Plan do not result in any disproportionately disadvantaged group in the community. The three assessments are an iterative process, providing further appraisal at each stage of the Plan's preparation and are published alongside the AAP for public consideration and comment.

Status of the Preferred Option APP and relationship to other Plans

1.22 The AAP is being produced to give effect to the Local Plan Strategic Policies (March 2013) and the London Plan (2011 including the Further Alterations). Figure 1.4 shows where the Tottenham AAP fits within the policy hierarchy for Haringey. As a statutory Development Plan Document, the AAP will form part of the Borough's Local Plan and will be used to appraise planning application proposals located within the Tottenham AAP boundary area. At this stage – the Preferred Option stage – the AAP will be a material consideration in the determination of planning applications.

Comment [A27]: There needs to be clearer evidence that the broad concerns outlined in para. 1.17 and 1.18 have been addressed and if so through which amended, removed or added concrete proposals, principles or policies. It is not enough to list those concerns. We believe that these concerns have in fact largely been ignored. Vague references to these consultations 'shaping' future iterations, or creating 'shared objectives' compound the misuse of these consultations.

Comment [A28]: Again, the short time window for consultation leaves no time for residents and community groups to engage with the vast quantity and size of all those supporting documents.

Comment [A29]: How can a document which is in draft form, has not been through Examination in Public, has not been approved, be a material consideration in the determination of planning applications? This should be clarified.

Figure 1.4: The Planning Policy Hierarchy in Haringey



Structure of the AAP

1.23 The subsequent chapters in this Plan are structured as follows:

- Chapter 2 provides a brief summary of the existing characteristics of Tottenham and sets out the key issues, challenges and opportunities facing the area, which the AAP seeks to address.
- Chapter 3 sets out the Spatial Vision and Objectives for the future of Tottenham.
- Chapter 4 sets out the detailed Tottenham specific policies that supplement or supplant the borough-wide planning policies, to guide and manage new development.
- Chapter 5 sets out the approach to Tottenham’s neighbourhoods and identifies the strategic opportunities sites that the Council wishes to see come forward for redevelopment, including guidance on acceptable uses and design considerations.
- Chapter 6: Provides detail on how the AAP will be implemented and its delivery monitored.

How to comment on this AAP

1.24 The Council places great importance on the ability of the local community and other stakeholders to support the proposals of the AAP and to work with us over the next fifteen years and beyond to deliver them. Therefore, if you agree, disagree or consider there are

Comment [A30]: See our overall concerns with the public consultation process.

better alternatives to those being proposed through the Preferred Option, then please tell us and we will take these into account when we prepare the final draft of the AAP. In particular, we want your views on the suggested policies and site proposals, and whether you consider these to be sufficient and robust enough to guide new development and deliver sustainable outcomes.

1.25 The AAP and all supporting documentation can be found on the Council's website at www.haringey.gov.uk/localplan. Hard copies of the Preferred Option consultation documents are also available for inspection and short term loan from the Council's offices at the Civic Centre and at all public libraries in the Borough.

1.26 Consultation will commence on 5 February 2015 for an eight week period. Over the consultation period the Council will hold a series of drop in events within Tottenham and across the Borough. The times and locations for these events are set out in the public notice in the local paper, on the Council's website, and in the covering letter sent out to residents and stakeholders on our consultation database. These events will be informal and offer the opportunity for the public to come in and discuss the Preferred Option AAP, and any other issues of relevance to the Plan, with officers.

How to comment

1.27 Comments on the document can be made in the following ways:

- By email to ldf@haringey.gov.uk;
- By attending one of the consultation drop in events advertised in the covering letter, the public notices and on the Council's website; or
- In writing to: Strategic Planning, 6th Floor, River Park House, Wood Green N22 8HQ

1.28 The closing date for receipt of comments is the **23rd March 2015**. All comments received will be published on the Council's website and will be taken into account in deciding the way forward for Tottenham in the final AAP.

What happens next?

1.29 We will use the comments received from this consultation, along with those received to the other draft Local Plan documents, to prepare the final draft of the Plan – the Submission draft (Regulation 19) document. A consultation report will be prepared that responds to the comments received, highlighting the changes made to the AAP as a result. The aim is to submit the final AAP to the Secretary of State in November 2015 following pre-submission publication in summer 2015. From that point the Planning Inspectorate will appoint an Inspector who will hold an 'Examination in Public' into the Plan and determine whether the AAP is sound and appropriate. We hope the final plan will be adopted by the Council in early 2016.

2 Issues, Challenges and Opportunities

Tottenham

Today Urban character

2.1 The Tottenham AAP covers an area of approximately 560ha, comprising the wards of Northumberland Park, Tottenham Hale and Tottenham Green, and parts of Bruce Grove, St Ann's and Seven Sisters .

2.2 It includes large areas of employment land, particularly along the West Anglia railway line, and a predominantly suburban hinterland, which exhibits a range of different characteristics including a mix of late Victorian and Edwardian housing, with later in-fill development of high rise tower blocks and low rise housing estates. The area experiences high concentrations of social housing and poor quality privately rented accommodation. More than 60% of the Borough's social housing is in and around Tottenham, approximately 40% of that being located in the Northumberland Park ward alone. The borough has around 30,000 social homes of which 16,000 are owned by the Council.

2.3 The Lee Valley Regional Park forms both the Borough and AAP boundary to the east, much of which is designated Green Belt land and is accessible but for which access from most parts of Tottenham is poor due to severance caused by both the over ground railway line and the A1055. Across the rest of the AAP area there are a limited number of open spaces, particularly pocket parks and play space.

2.4 Tottenham High Road is the main transport corridor, connecting Tottenham to Enfield and the M25 in the north and Hackney and central London to the South. The High Road is also an important historic corridor, comprising six separate but adjoining conservation areas along its length. Recent investment by the Council using Lottery Heritage funding, has specifically targeted the refurbishment and enhancement of the Nineteenth Century shop fronts and their facades along the High Road, but there remain a large number of heritage assets, across the AAP area, on the English Heritage at risk register.

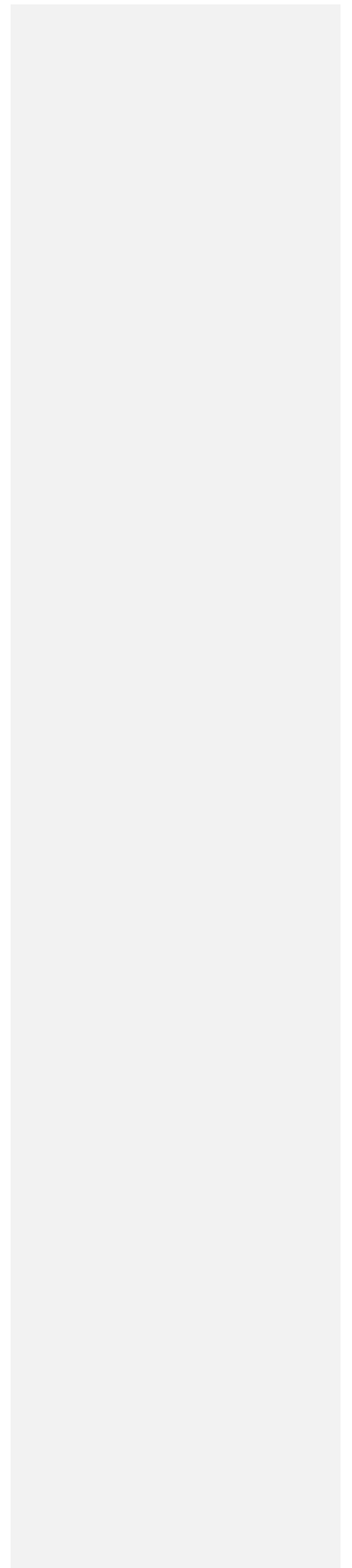
2.5 The area is well served by rail and tube lines, including the Victoria line, which serves both Seven Sisters and Tottenham Hale, and an overground connection to Stansted airport, as well as links to Cambridge and Liverpool Street. There is also an extensive bus network running through the area and excellent connections to the regional and national road network.

2.6 Two of the borough's five district centres are located in Tottenham, along with a number of smaller local centres and shopping parades, and a retail park at Tottenham Hale. The area houses the main campus for the College of Haringey, Enfield and North East London (CHENEL), the historic Tottenham Town Hall, the Bernie Grant

Comment [A31]: See comments under the proposals for NT1 and NT2. We strongly challenge the negative depiction made of social housing concentrations in Tottenham. Indeed the level of social housing in Haringey is low (less than 30%) when it is the only genuinely affordable and secure housing available and there is a recognised London-wide affordable housing crisis. The same applies to Tottenham, where many people are being priced out by housing costs – the Council's current strategy if not amended will accelerate this. There is a massive imbalance in the housing market and the chronic deficiency of genuinely affordable housing must be addressed urgently. Up until 1988 rent controls on private landlords ensured much private accommodation was affordable. This should be brought back. Until then, the protecting and expanding social housing is the only way of addressing this scandalous failure of market housing.

The Council's uniquely targeted approach to social housing estates as needing the insertion of private housing to create a 'mixed and balanced community' is blatant discrimination against local people on the basis of their economic status. This approach is quite rightly not being used to criticise streets of predominantly owner occupiers by claiming they are in need of social housing to make a 'mixed and balanced community'. All such references and bias against social and council housing should be removed from all Council documents as insulting, untrue, discriminatory and potentially unlawful breaches of Equalities Legislation. This approach is clearly a cover to try to justify the sell-off or use of some Council land cheaply to property developers, and to justify the increasing abandonment of the need to address the needs of local people for more (not less) social housing as the only genuinely affordable and secure housing for thousands of residents.

ArtsCentre,the



Marcus Garvey Library, and Tottenham Green Leisure Centre. It is also home to the Tottenham Hotspur Football Club at White Hart Lane, which is a major landmark and crowd draw within the Borough. The Club recently received planning permission for a new £430m stadium development on its existing site which will provide a catalyst for wider regeneration of the surrounding area. The redevelopment of the stadium is an important part of the regeneration of Tottenham.

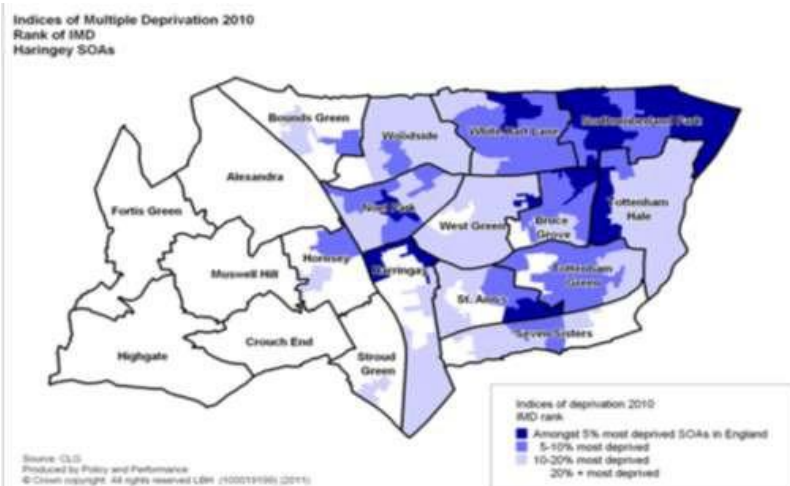
Social demographics

Comment [A32]: Please state very clear what are the precise source(s) and year of the various pieces of statistics mentioned in this section.

2.7 The existing population of the Tottenham AAP area is just over 78,000³, making up around 30% of the total population of Haringey. The demographic profile of the area has changed considerably over the last two decades. It has a much younger population than the rest of the borough and the capital: - 28.1% aged 0-19 compared to 25.6% for Haringey and 24.5% in London (NB: White Hart Lane has the highest proportion of 0-19 year olds (32.5%)). It is also one of the most ethnically diverse areas in the country, with over three quarters (78.9%) of residents from minority groups, compared to 55.1% for London. Both its ethnic diversity and younger population are factors driving housing need within the area.

2.8 As well as being one of the most diverse areas in the UK, it is also one of the most deprived. As Figure 2.1 shows, the entire Tottenham AAP area falls within the top 20% most deprived areas in England, and more than half within the top 10%. It is one of the poorest performing areas in the country for income, education, skills and health. 41% of local children live in poverty, compared to a UK average of 20.9%, and around 40% are in workless households, compared with the London average of 21%. 25% of households are experiencing overcrowding. Much of this deprivation stems from labour market disadvantage, with unemployment and low skills base being the two biggest issues facing Tottenham today.

Figure 2.1: Indices of Multiple Deprivation in Haringey



³ <http://data.london.gov.uk/dataset/gla-2012rnd-trend-ward-proj/resource/bdc2c3d8-3feb-44ba-a5dd-13ad9e54ea7b>

2.9 Although unemployment is reducing, the area still experiences some of the highest levels of unemployment in London and the UK. Some 17,430 residents are claiming an out-of-work benefit – equivalent to 22.3% of the population – and markedly higher than rates across the rest of London (12.4%). This rate is amongst the highest 5% in the country, and one ward in particular – Northumberland Park – has the highest rate of out-of-work benefit claimants in the whole of London, at 31.5%. Youth unemployment is also particularly acute, with 5.4% of 18-24 year olds in the area claiming Job Seekers Allowance, increasing to nearly 10% in Northumberland Park.

2.10 Those residents in employment tend to be in lower paid jobs. In 2012/13 the median household income in Tottenham was £21,834, substantially below both Haringey (£33,140) and London (£35,740). This is likely to be a reflection of educational attainment, which in Tottenham is improving but remains below London levels. In 2013, only 69% of the pupils who lived and studied in the area achieved level 4+ at Key Stage 2, and 57% of pupils 5 or more A*-C at GCSE level, compared to 79% and 64.5% for London respectively. Of those aged 16 and over, only 37% have a qualification at level 3 or above. This is lower than Haringey (50.4%) and London (48.8%), and a quarter of all adults in Tottenham have no qualifications at all.

2.11 The high level of deprivation is also having a negative impact on people's health and wellbeing. In 2012/13, 44.9% of all 10 and 11 year olds living in Tottenham were either overweight or obese, compared with 37.4% for London. 15.6% of residents suffer from a long term limiting illness and 6.8% described their health as either bad or very bad. This compares to 14.2% and 5% for London respectively.

2.12 Poor health and wellbeing is also affecting life expectancy in the area. In Northumberland Park, life expectancy for males is 7.7 years shorter than for males living in the more affluent part of the Borough. For women the gap is less but is still significant at 3.5 years.

2.13 Tottenham also has the highest levels in the UK of people living in temporary accommodation. Currently, 35 in every 1,000 households in Tottenham is temporary accommodation compared to a London average of 12 and a UK-wide average of 2. Many migrants to London come to the area partly as a consequence of the relatively cheap cost of living compared to other parts of London. These migrants then leave the area once they have established themselves economically.

Economy

2.14 Tottenham was once a thriving and prosperous area. As recently as the 1960s and 70s local employers included many household names, such as duplicator manufacturer Gestetner (3,000 employees); the makers of Basildon Bond, (900 employees); and Harris Lebus – an internationally known maker of furniture (6,000 employees). Other sizable firms included bottlers, bakers and a division of what later became Trebor Bassett, the confectioners (700 employees). Today all of these names are gone.

Comment [A33]: All developments to address deficiencies of genuinely affordable housing and social infrastructure, and conform to and enhance the principles of Lifetime Neighbourhoods.

Comment [A34]: 1. We strongly dispute the picture painted of the Tottenham economy paras 2.14-2.16. This is entirely inadequate in both length and understanding. Para 2.14 suggests that there are no major manufacturers in Tottenham any more – this is not the case – as work from CASS Cities from Mark Brearley and Jane Clossick and students, as well as the From Around Here survey of industrial estates in Tottenham shows <http://www.gortscott.com/media/uploads/639-final-3.pdf> (see separate submission by Mark Brearley and Jane Clossick for this consultation). The description of the existing economy as 'fragmented' is not based in evidence. The one sentence mention of a recent increase in SME activity warrants much more detailed study and consideration. More generally, small businesses make up the majority of the Tottenham economy and are a major focus of regeneration and economic development policy, yet are given very little attention. Overall, these paras present an inadequate evidence base for the AAP, rendering it unsound.

We consider that in this regard the AAP fails to meet the NPPF requirement for local plans to support existing business sectors (para 21) and work closely with the business community and develop a clear understanding of business needs (para 160). For instance, no mention is made of the many strengths and assets in the local economy; how Haringey Council has working with local business groups to ensure a good understanding of the local economy; nor of the various initiatives underway in Tottenham in relation to local economy.

2.15 Many of Tottenham's problems are a direct consequence of the demise of its manufacturing base. Despite strong transport links and the availability of good employment sites, those jobs have not been replaced and have contributed to the high levels of unemployment experienced in the area.

2.16 Tottenham's economic geography is based upon various fragmented centres of economic activity, including pockets of Strategic Industrial Land in both the north and south of the AAP area, the Tottenham Hotspur stadium in Northumberland Park, and a fairly disorganized retail offer split between Bruce Grove on the High Road, West Green at Seven Sisters and the retail park at Tottenham Hale. In recent years however, the area has experienced an increase in SME activity, mostly associated with creative industries, but this sector is still in its infancy.

Key drivers for change and regeneration

2.17 The key drivers for change are the forces that will influence and shape Tottenham over the coming years and have influenced the Council's decision to prepare this Area Action Plan. These key drivers are outlined below and either result in opportunities to be fully exploited or require positive intervention to counteract or address:

Deprivation, inequalities and healthcare

2.18 A key challenge and driver for the AAP is to help address some of the underlying factors contributing to the levels of deprivation experienced in Tottenham. Without positive intervention, the causes of deprivation will continue to persist, undermining efforts to positively affect regeneration of the area. In particular, the AAP needs to ensure new development into the area secures opportunities for skill training, apprenticeships and local employment, prioritises low cost home ownership, especially family housing, and contributes to the provision of quality education, healthcare and recreation facilities. Significantly, it needs to create more balanced and mixed communities to address the imbalance of housing tenures within specific neighbourhoods, namely those with disproportionately high levels of social housing. Working positively and collaboratively with both NHS England and the Haringey Clinical Commissioning Group will be the key to ensuring the need for improved primary healthcare provision in Tottenham is delivered.

Unemployment

2.19 There is a need to create new jobs, both to replace the businesses that left in the 1960s and 1970s but also as a component of managed growth, providing a balance of homes and jobs to achieve more sustainable communities. As such, Tottenham is expected to meet provision for the bulk of the London Plan's forecast growth of 12,000 jobs in the Borough by 2026. With a change in reputation, its excellent transport connections, low business costs and affordable/low cost housing offer, there is real potential to attract new businesses to the area. Local evidence suggests Tottenham is experiencing high demand for small-scale, cheap and

Comment [A35]: Low cost home ownership is only one way of addressing inequality. Given the cost of housing in London, only genuinely socially rented housing units can cater for lower income groups.

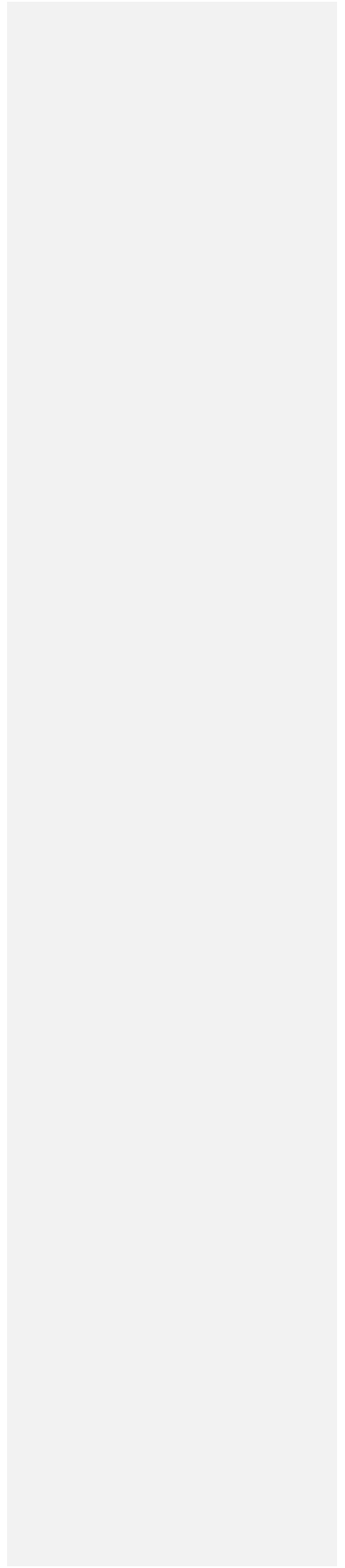
Comment [A36]: See comments made for NT1 and NT2 and in the overall response letter to this AAP. We strongly question the strategy behind the vocabulary of 'balanced and mixed communities', which is effectively about social housing estate demolitions. High levels of social housing is NOT the problem per se.

Comment [A37]: The level of need (both current backlog and future need) and where the provision for it will be achieved is not demonstrated in this AAP.

Comment [A38]: Paras 2.19 and 2.20 explore the potential for Tottenham to provide space for start-ups in new industries that could employ local people. Where will this be delivered? No acknowledgement is made of the importance of low cost and industrial typologies in achieving this. No mention is made of the existing businesses that employ and train local people. None of these ambitions are realised in the AAP.

Make references to Craving Coffee, which is often cited example of a successful new business in Tottenham, having their premises in Gaunson House on Markfield Road. Loss of employment land to housing will reduce the supply of the units that have enabled Craving Coffee to start-up in the area.

flexible space for small businesses. Provision needs to be made to renew and diversify Tottenham's poorer performing industrial estate to realise the prospect of accommodating more intensive employment uses as well as the burgeoning



creative industries sector and 'maker' economy. Given the need for start-up businesses to exist cheaply, with the right support there is potential to make the area a hub of early-stage entrepreneurship with provision for appropriately sized move-on space, to enable new and existing businesses to grow.

2.20 New ways to

deliver new employment floorspace and the potential for all new major development to provide construction apprenticeships and training targeted at local young people also need to be fully exploited as should commitment to using local supply chains and opportunities to assist new businesses with their local recruitment needs, especially within the services sectors, through local job fairs.

Overcrowding

2.21 A quarter of homes within Tottenham are overcrowded. Cramped living conditions can harm family relationships, negatively affect children's education, affect sleep, and cause depression, stress and anxiety. It can also detrimentally affect a person's perception of options and future prospects. Redevelopment of poor quality housing, prioritising family sized housing, strict application of the Mayor's internal space standards, and adherence to good design and layout can all help to significantly alleviate the overcrowding being experienced within parts of Tottenham. The emerging Local Plan will be seeking to prioritise family housing across the east of Haringey, including Tottenham through a restriction on converting family homes to small units. This should ensure sufficient stock of family sized properties in Haringey to meet the needs of Haringey's existing and future residents.

Population and housing growth

2.22 As London's population continues to grow, so does pressure on all boroughs to accommodate such growth. The latest projections suggest that London's population could increase from 8.4m in 2011 to 9.54m by 2026. Over the same period, Haringey's population is also projected to grow by an additional 37,300 people.

2.23 To meet the housing needs of the growing population, Haringey must provide a minimum of 19,800 new homes across the Borough between 2011 and 2026. Tottenham is expected to contribute half of this - 10,000 new homes. This is on the basis of the availability of developable strategic brownfield sites, its excellent transport connections, and the need for investment and change to bring about the regeneration needed within Tottenham. It is considered that sustainable residential development in Tottenham, in the form of higher densities and well designed taller buildings in accessible locations, can meet this target. However, it is crucial for the AAP to ensure that the delivery of the growth agenda runs hand-in-hand with delivery of the regeneration agenda, particularly as a proportion of the new homes provided will come from the renewal of the Council's housing estates.

2.24 Addressing the high levels of population churn is therefore a priority, and will be achieved partly by a cross-the-board increase in the quality of education, the protection and provision of more family housing and home ownership, improvements to the local environment and the creation of local job opportunities.

Comment [A39]: See our comment about this target in the response to the **Alterations to the Strategic Policies**.

Comment [A40]: We disagree with the fact that Tottenham should host half of this targeted growth. The target of 10,000 new homes in Tottenham is totally over-estimated. Several wards of Tottenham already have the highest densities in the Borough (see table and map in the overall response to this APP). Bruce Grove, Saint Ann's Seven Sisters and Tottenham Green have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate), White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land - which means that the population density in the residential areas of those North Tottenham wards is high, too. Tottenham has the highest level of social deprivation and shortages in social infrastructure.

Tottenham cannot cater for 10,000 extra residents without grave problems for its social infrastructure and existing population. Unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough.

Comment [A41]: Council housing estates should NOT be considered brownfield sites. Many of the sites listed here are not brownfield in the sense that they are being used by viable economic activities or homes.

Comment [A42]: We contest this model of renewal. See points below made about NT1 and NT2.

The quality of existing housing stock and estate renewal

2.25 Part of the challenge in regenerating Tottenham is to improve the quality of the existing housing stock which often has poor layouts, lacks any permeability and legibility in street networks and is generally overconcentrated with small homes (1 and 2 bed). While efforts have been taken, through the Decent Homes Programme, to retrofit properties to bring them up to standard, this is not possible for all homes, especially those within estates that are poorly laid out and constrained in terms of the ability to make further modifications. In such cases, estate renewal is a much more cost effective means by which to bring these homes up to modern living standards.

Comment [A43]: We contest this model of renewal. See points below made about NT1 and NT2.

2.26 The redevelopment of low density estates provides the opportunity to tailor new housing to better meet existing residents' housing needs, to increase overall housing numbers, and to provide a better mix of housing choice, including social, privately rented and privately owned housing.

Comment [A44]: No structurally sound estate should be demolished. No net loss of Council or social housing units through urban renewal.

Meeting social needs

2.27 New development and growth must be supported by adequate social infrastructure. Community centres, health centres, schools, libraries should all become part of an integrated social fabric, with a series of 'village green' spaces with mixed social activities. At night schools or other facilities could become places for recreation—for sports, music or similar events.

2.28 New public spaces need to be added and existing spaces significantly improved so that each part of Tottenham has a quality network of green and accessible space.

2.29 New commercial operators must be encouraged, so that once again Tottenham will see its own cinema and theatres, and charities that provide activities must be engaged. The provision of new local centres (e.g. such as community halls and medical centres) should include provision to share facilities with local charities to facilitate their engagement.

Comment [A45]: The AAP needs to make it explicit that the Council will retain and protect existing community centres, some of which are currently under threat of eviction or seeking extended leases.

Realising the investment in public transport

2.30 Over the Plan period, Tottenham is expected to see significant investment in public transport accessibility, including a new intermodal station at Tottenham Hale, a new entrance to White Hart Lane station, the three tracking of the West Anglia Main Line, the incorporation of the Southbury Loopline (through Seven Sister, Bruce Grove and White Hart Lane Stations) into the London Overground network by 2015, the electrification and longer trains on the Barking-Gospel Oak line, and improvements in frequency on the Tottenham Hale to Stratford line. This sits alongside improvements in road, bus, cycle and pedestrian networks, and by 2026, the introduction of Crossrail 2 stations at Seven Sisters, Tottenham Hale and Northumberland Park, significantly increasing the accessibility of Tottenham to wider London.

2.31 The scale of development planned for Tottenham is therefore commensurate with the level of investment being made to improve the transport connectivity of the area. Such investment is crucial in supporting sustainable growth; for promoting and securing further inward investment; and in delivering the wider regeneration objectives for the area.

Town centres

2.32 There is a need to improve the retail offer across the whole of the Tottenham area, ensuring the offer in each location complements and does not compete with each other. Shopping streets could be reduced in size and replaced with stronger centres to help attract visitors, and concentrate activity to areas that make provision for people to congregate. This would allow well-known multiples who provide good value and employment to be located in Tottenham, together with a mix of smaller units allowing family businesses to continue.

2.33 There is a need to realise the investment being made by Tottenham Hotspur FC on their stadium site, ensuring this becomes a hub of activity throughout the week and not just on match days. The transport enhancements to Tottenham Hale support the development of a district centre in this location, with potential to realise and develop an office market.

Comment [A46]: The Council should revisit the £17m s106 planning obligation and the affordable housing commitment the club were allowed to abandon. See comments under NTS.

2.34 Improving the retail offer will require positive interventions in the form of public realm enhancements, reduced congestion, and encouraging a better variety of local amenities such as recreation, leisure, community spaces and cultural facilities.

Heritage and cultural assets

2.35 The AAP needs to ensure that the regeneration of the area acknowledges the importance that local cultural and heritage assets make to the character and vitality of the area, such as the many Listed and Locally Listed buildings on the High Road and around Tottenham Green, Tottenham Hotspur FC Stadium, Bernie Grants Arts Centre, Bruce Grove Youth Centre, and CHENEL, ensure these are integrated into new developments to ensure their continued use and protection. Engaging with English Heritage at the earliest opportunity will be a key to delivering the aims of this AAP and the Council will continue to engage positively on the preparation of this AAP with the London Advisory Committee of English Heritage in a proactive and collaborative manner.

Comment [A47]: All listed and locally listed buildings should be protected and valued. But heritage is not just about a few key buildings but also about the historic fabric and character of an area. This policy fails to demonstrate the Council's commitment to protect Tottenham's heritage and character at a time when massive profit-led development is being proposed throughout the area.

Education

2.36 The work of some excellent schools and colleges will be built upon, and Tottenham's increasing educational standards should continue to push upwards. Further school provision needs to be made within the area to serve both the existing and new communities. Where new schools are proposed, opportunities for the use of shared facilities should be fully explored.

The need for a Strategic Plan

2.37 As a once-prosperous area that fell into decline, Tottenham now needs the ability to be managed as a coherent whole once more. To make this happen Tottenham needs bold action. The AAP is required to ensure development and change does not take place piecemeal and takes account of the area as a whole, rather than focusing on sites or estates in isolation. The need for comprehensive redevelopment is a key message of this AAP. It also ensures the community understands what is being proposed so that when applications are made these can be determined in accordance with this AAP.

Comment [A48]: This document does not do that. It does not communicate well what is being proposed in many sites (see overall response to the AAP) and does not reflect well the input by community groups in previous consultations.

3 The Vision & Strategic Objectives for Tottenham

A Future Vision for Tottenham

Tottenham will be the next great area of London. It will build on its geographical, natural and cultural strengths and capitalise on the dynamics of neighbourhood improvement, the significant infrastructure investments being delivered in the area and the availability of large development sites. The combination of transformative actions and continuous incremental improvement will unlock Tottenham's potential as an increasingly attractive place to live, work, study and visit, a neighbourhood fully benefitting from London's growth and its position in a world city.

Tottenham's transformation will benefit existing as well as future residents of Tottenham. It will build on the strength and resilience of the existing community to help deliver a positive future for Tottenham.

To set a simple goal: 'By age twenty, children born in Tottenham today will enjoy a higher quality of life and a wider range of opportunities comparable with the best in London. Their ambitions will also be greater, nurtured by the social and physical investments made today. Their opportunities will match those ambitions. Their Tottenham will:

- be a desirable neighbourhood, where existing and new residents will find quality housing at all stages in their lives;
- build on existing resilient and self-sustaining communities and foster a sense of wellbeing, optimism and willingness to engage with one another;
- have a thriving local economy, anchored by strong local entrepreneurialism and a mix of successful businesses;
- draw employers and employees from across London and provide its residents with a broad range of work opportunities at all skill levels, especially in the increasingly important creative and green economic sectors;
- attract new transformative educational, institutional and business enterprises that help re-brand Tottenham as a location for major investment;
- have great schools that support their children and young people to achieve academic, social and economic success;
- enable high achieving students who will match those from across London and the UK. They will have real choices about their further education, employment and training and pursue higher learning or exciting careers within Tottenham and further afield;
- be a community that enjoys physical and social wellbeing, has abundant opportunities to have fun and is supported by access to open spaces and recreation facilities, including opportunities for cycling and walking, progressive health initiatives and engaging young people in active citizenship;
- contribute to Haringey's role as a leading low-carbon borough by adopting sustainable development and design standards at the community and building scales, providing low carbon energy sources to new developments and by enhancing the presence of the green employment sector through skills training and improved employment space offer;
- be known as a place for recreation and leisure activities, that attracts

Comment [A49]: Many proposals (see detailed comments below for individual sites) threaten the survival of existing businesses and residents.

- more visitorsto a range of destinations;
be a unique place of beauty and interest as its historic character and natural environment is enhanced through investment and high quality and low-carbon building and public space design'

3.1 The above future vision for Tottenham was developed in consultation with the local community and is contained within the 'Tottenham Strategic Regeneration Framework' which was formally adopted by the Council in March 2014. The vision for Tottenham is further supported by seven key strategic objectives, set out below. The community have told us these objectives need to happen to realise real and positive change:

Comment [A50]: See comment on p. 3 about the flaws in that process.

Strategic Objectives for the AAP

Objective 1: World class education and training

Tottenham already has outstanding rated schools, but we want all our provision to be the best up to the age of 18 and beyond. This must include improved access and higher participation rates in apprenticeships and university. We will work with existing schools and providers to improve or maintain their already great provision and will also attract new schools and new providers – including a major educational institution, to ensure Tottenham residents can compete with the best.

3.2 For the AAP, this means:

- Making provision within the site allocations for new schools and high education institutions;
- Providing high quality student accommodation in accessible locations; and
- Securing opportunities through the planning process for local training and apprenticeships in the construction sector and its supply chain.

Comment [A51]: A listing of the exact sites where this is planned for needs to be included, otherwise this remains a rhetorical statement.

Comment [A52]: i.e.? Specify.

Objective 2: Improved access to jobs and business opportunities

Tottenham is part of the world's most exciting city and an existing and competitive global jobs market. We want better access to these opportunities for Tottenham's communities but we also want more of those opportunities to be in Tottenham itself. We will work to attract major investment and deliver local business growth in successful business sectors to provide new jobs in, and for, Tottenham.

3.3 For the AAP this means:

- Securing provision for at least 5,000 new jobs alongside housing growth;
- Ensuring regeneration delivers economic growth, through provision to enable the rationalisation, renewal, and intensification of existing employment floorspace, securing flexible managed workspace for SMEs, move on space, and new sites for major employers;
- Revitalising high streets, improving the retail and leisure offer, traffic calming and improving the quality of the urban environment;
- Making provision for fast broadband and digital infrastructure

Comment [A53]: Objective 2 and para 3.3 is a formulaic approach to urban economic development that is totally ungrounded in an understanding of the existing economy and its strengths. No mention of how existing businesses will be involved in and benefit from changes rather than be displaced by them. No mention of how the plan will ensure new jobs are quality jobs and can be accessed by local people. The Our Tottenham Local Economy section of the Charter (Appendix A1) should be considered and incorporated.

This should be re-written to ensure small businesses, markets, affordable workspace, the contribution of ethnic retailers, local business and community development groups are included and supported within the objective and the policies of the AAP

Objective 3: A different kind of housing market

Tottenham has a great mix of housing, it was the last great Victorian suburb, but it is part of a city where housing demand is outstripping supply and in some areas the housing quality is not what it should be. We want Tottenham to be known for having a different London housing market and will work with local residents to begin an ambitious programme of estate renewal where necessary. We will secure investors to provide a whole range of housing at a range of prices and tenures to ensure more people get access to the quality homes they need.

Comment [A54]: ? What does this mean? Unclear.

Comment [A55]: See comment about estate renewal in the overall response to the AAP, and in relation to Sites NT1 and NT2.

3.4 For the AAP this means:

- Allocating sufficient sites to deliver 10,000 new homes;
- Securing comprehensive development that creates new residential neighbourhoods providing for a range of housing types, including high quality institutional private rented sector housing, family housing and low cost home ownership options;
- Working with landowners, developers and local communities to proactively manage housing delivery;
- Unlocking the potential of sites through investment in infrastructure;
- Ensuring the type and size of homes delivered contribute to the creation of more mixed and balanced communities;
- Managing the loss of family housing and tackling poorly managed Houses in Multiple Occupation; and
- Promoting estate renewal that delivers higher quality, energy efficient homes in integrated and safe neighbourhoods.

Comment [A56]: No mention is made of low cost rental options. This is a clear weakness in the plan. The word "tenants" does not appear in this APP, but "owners" appear 46 times.

Comment [A57]: This should not hide net losses of Council or social housing units. In any event this is a discriminatory and arguably unlawful policy if only applied to social housing residents.

Objective 4: A fully connected community with even better transport links

Tottenham is only 12 minutes to the centre of London on the tube or train, but it can be even better. Improvements are already being made and we will work to improve the connections within Tottenham for all types of transport – including walking and cycling. In the longer term we will consistently make the case for the delivery of Crossrail 2 and further rail improvements to provide high frequency rail services connecting Tottenham with central and other parts of London.

3.5 For the AAP this means:

- Securing more frequent rail services to Stratford and the transformational benefits that Crossrail 2 will provide;
- Safeguarding land for Crossrail 2 consistent with the Government's future Safeguarding Direction;
- Upgrading stations, particularly Tottenham Hale, White Hart Lane and Northumberland Park;
- Including provision for new bus services connecting residential communities with the High Road and key stations;

- Securing the provision of high quality public realm improvements around key transport interchanges, ensuring these are inclusive and accessible;
- Maximising development capacity around key interchanges to espouse the investment being made and to attract further inward investment; and
- Securing provision for strategic walking and cycling routes and infrastructure throughout Tottenham, improving east– west linkages and easier access to the Lee Valley Regional Park.

Objective 5: A strong and healthy community

Tottenham is a network of strong, cohesive and diverse neighbourhoods. Many people love living here and feel they belong, but an improved Tottenham will need improved health care provision, a continued joint effort to further reduce crime and support to foster strong and new social networks – particularly for young people. We will work with the community to build a stronger sense of pride and provide better and more connected public, health, voluntary and youth services.

3.6 For the AAP this means:

- Ensuring new development results in high quality residential environments, that are inclusive, safe and functional;
- Establishing the creation of an interconnected Green Grid, including new pocket parks, play space, and landscaped green areas, as well as enhanced connections to the Lee Valley Regional Park;
- Establishing a district heating network serving existing and new developments;
- Increasing public transport accessibility, walking and cycling, promoting car free developments and reducing the dominance of car-led environmental, improving and enhancing street scenes, reducing congestion and improving air quality;
- Increasing the supply of energy-efficient homes in new developments and through retrofitting; and
- Making provision for further and improved health centres, schools, and community facilities, including accommodation for the voluntary sector.

Comment [A58]: A precise list of sites where such infrastructure can be provided needs to be included, otherwise this remains a rhetorical statement.

Objective 6: Great places

Strong communities need great places to meet and spend time in. Tottenham has great character areas and gems like the Bruce Castle Museum, the Bernie Grant Arts Centre, the Markfield Beam Engine Pumping House, Spurs and the Lee Valley Park on its doorstep. We need to retain but build on this character and will use investment and bold planning measures to create great town centres, public spaces and streets – giving Tottenham places to meet, shop and play.

3.7 For the AAP this means:

- Securing the significant transport investments proposed for Tottenham;

Comment [A59]: Objective 6 (great places) and para 3.7 should mention Seven Sisters market and the Wards building. WCC's response to the Tottenham Futures consultation and the community plan for Wards Corner (attached to this submission) have already set out how retaining, refurbishing and bringing back into use Wards building can provide a great town centre at Seven Sisters and West Green Road

- Seeking opportunities to recognise and enhancing the historic environment and other places of interest that make the area an attractive place and attract people to Tottenham;
- The creation of a clear, consistent street network and better pedestrian and cycle links into the Lee Valley Regional Park;
- Securing the provision of high-quality public spaces, especially on the High Road and through the gyratory projects; and
- More places to shop and play, strengthening the role of the town centres, enhancing their offer both for retail and leisure but also for wider community use as places to meet and interact.

Objective 7: Aright investment and high quality development

Regenerating Tottenham can't be done alone – it will require partnerships and money. Tottenham is seeing the benefit at Tottenham Hale now, with a new development that has already seen more than 700 new homes and 1,200 student flats delivered. We will work in the interests of the local community to attract further high quality investment to Tottenham ensuring it is of the highest quality and the best design.

3.8 For the AAP this means:

- Ensuring investment in public transport and development, such as the Spur's Stadium, provide the catalyst for targeted regeneration;
- Prioritising the delivery of allocated sites;
- Securing provision of high quality affordable work space through cross-subsidy if necessary;
- Identifying the infrastructure requirements needed to support new development and create sustainable communities;
- Ensuring development and infrastructure delivery take place in tandem; and
- Putting in place appropriate mechanisms to secure/ accelerated delivery of the AAP, including the provision of Council owned sites for redevelopment in the early phases.

3.9 Building upon

the overarching vision and strategic objectives above, the following establishes the AAP's spatial strategy for how Tottenham and the places within will develop by 2026 through implementation and delivery of this Area Action Plan:

The 'Spatial Strategy' for Tottenham

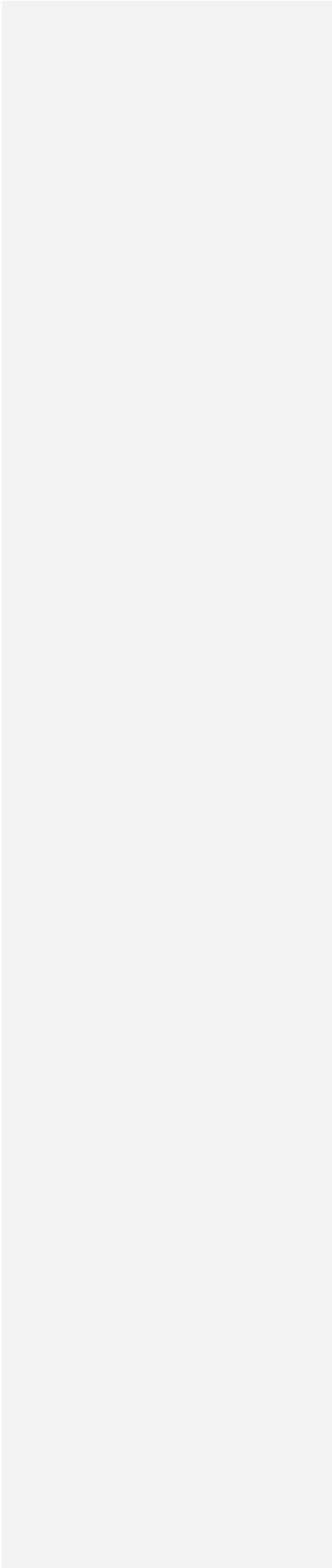
3.10 Development and regeneration within Tottenham will be targeted at four specific neighbourhood areas. The four neighbourhood areas are identified in Map 5.1 and comprise:

- Tottenham Hale;
- Seven Sisters/West Green Road and Tottenham Green;
- Bruce Grove; and
- North Tottenham (which includes Northumberland Park,

Comment [A60]: The Tottenham AAP DPD does not consider research on stadium led development and regeneration, which finds very little contribution to the local economy – jobs provided are generally small scale and part time and arguments about local multiplier effects do not take place in practice. Therefore, the new Spurs stadium should not be presented as a driver of economic development in Tottenham. See separate submission from Mark Panton, Birkbeck University, on this point for more information, and the recent London Assembly Regeneration Committee report on this topic.

Comment [A61]: Dividing the Tottenham in 4 areas does not make a spatial strategy.

theTottenhamHotspurStadium&HighRoadWest).



3.11 These neighbourhoods are targeted for new development and regeneration because they have or are planned to benefit from significant public and private investment. Areas outside these neighbourhoods are not directly targeted for new development in this AAP but will evolve organically, which may involve limited or no change or redevelopment, and benefit from the wider regeneration of Tottenham. This AAP will ensure development proposals adjacent to these neighbourhoods are determined in accordance with the principles of this AAP and the vision to deliver positive regeneration in Tottenham.

3.12 For the Tottenham Hale neighbourhood, the focus will be on comprehensive regeneration. The neighbourhood will accommodate a significant portion of the housing and jobs proposed within the Tottenham AAP area (5,000 new homes and 4,000 jobs of the 10,000 homes and 5,000 jobs planned for all of Tottenham). Development will make the most of Tottenham Hale's location beside the open spaces and waterways of the Lee Valley Park, and the provision of a new transport hub, including a new bus interchange facility, a new station, improved train frequencies, and Crossrail 2, as well as a new all-through school in the current Lee Valley Technopark building. A new road layout and significant public realm improvements are also planned, creating a more traditional street network and making pedestrian movement through the area easier. This includes the proposal for a new Green Link (recommended in the Physical Regeneration Framework for Tottenham 2012), extending from the High Road, through Down Lane Park, to Hale Village and Hale Wharf, through to The Paddock – although the final route through Down Lane Park is as yet to be confirmed.

3.13 This infrastructure will help facilitate the creation of a new District Town Centre through the redevelopment of the existing Retail Park and Ashley Road area, within which the Council expects to see provision made for a range of town centre uses, including retail, office, hotel, community, leisure and higher education facilities. Within the South Tottenham and Tottenham Hale industrial areas, the Council will encourage renewal and reorientation to more intensive industrial and employment uses, and within select parts, will promote warehouse living where this supports existing creative communities and secures the employment use of these sites. On other industrial estates within the Tottenham Hale neighbourhood, such as the Millmead estate, the Council will seek to retain these in their current use and will strongly resist proposals to introduce non-industrial uses.

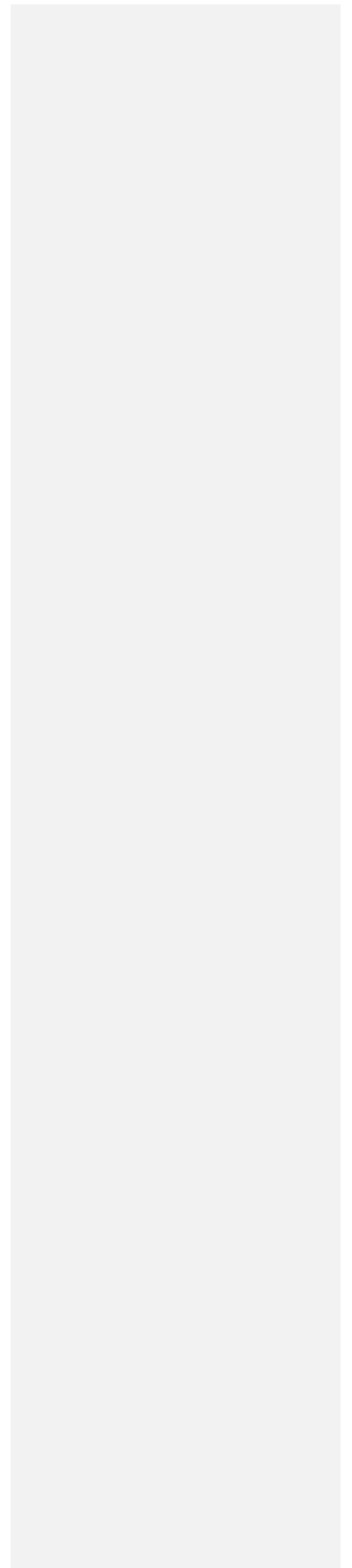
3.14 In the North Tottenham neighbourhood, the new Tottenham Hotspur FC stadium development will provide the catalyst for comprehensive regeneration of both High Road West and Northumberland Park. The priority is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further cement the area's reputation as a premier leisure destination within North London.

Comment [A62]: See comments made below about the Tottenham Hale sites and proposed developments.

Comment [A63]: See comments on the Green Link made below in the section about the Tottenham Hale sites and proposed developments. The planned crossing of Down Lane Park is strongly opposed.

Comment [A64]: The Tottenham AAP DPD does not consider research on stadium led development and regeneration, which finds very little contribution to the local economy – jobs provided are generally small scale and part time and arguments about local multiplier effects do not take place in practice. Therefore, the new Spurs stadium should not be presented as a driver of economic development in Tottenham. See separate submission from Mark Panton, Birkbeck University, on this point for more information, and the recent London Assembly Regeneration Committee report on this topic.

3.15 Comprehensive estate renewal is proposed for both Northumberland Park and Love Lane which includes a programme to deliver better mix of social housing, tailored to meet residents housing needs, particularly for affordable family housing, alongside a mix of



market, private rented and intermediate housing, providing for a substantial increase of 3,850 net new homes within this neighbourhood.

Comment [A65]: This estate renewal programme is strongly contested (see comments about NT1 and NT2).

3.16 Both existing and new residents within the North Tottenham Neighbourhood will benefit from enhanced provision of new schools, health care facilities, community uses, increased train frequencies, Crossrail 2 at Northumberland Park station (in the long term), and the creation of new local parks and open spaces, forming a network of green spaces and play spaces, linking through to the Lee Valley Regional Park.

Comment [A66]: Where? There needs to be a clause ensuring that existing open and green space be protected from development.

3.17 The proposal for Bruce Grove is to consolidate and strengthen its role as the retail heart of the High Road, with underutilised or poorer quality sites around the station proposed for redevelopment, providing new housing, retail and community uses. The level of development proposed for the area is a modest comparison with the other three neighbourhood areas, but will require careful consideration to ensure they integrate with and enhance the distinctive heritage character of the area, and contribute to the area's vibrancy.

3.18 Further down the High Road, proposals at Tottenham Green are aimed at enhancing the cultural offer of the area, reinforcing the area's role as a focal point for cultural and civic activity within Tottenham, including making the most of the Green itself as a significant community asset on the High Road. Provision is therefore to be made for new cafes and restaurants to enhance and support the existing cultural offer in the area. The recent public realm improvements to Tottenham Green will be further extended along the High Road to the north of the Green where the new development will be required to reflect and enhance the heritage and conservation status of the area.

3.19 At Seven Sisters and West Green Road, new landmark buildings around the station will help communicate the area's significance as a vibrant district centre, a gateway into Tottenham, and a major transport hub—the latter to be further enhanced through investment as part of London's Overground network and, in the longer term, Crossrail 2. Further public realm improvements are proposed to help address the current dominance of the heavily trafficked road network.

Comment [A67]: 2. See comments about Wards Corner and Apex House made under SS3 and SS5.

This does not convey that there are two planning permissions in place for Wards Corner, which both have been determined to meet planning policy. Yet para 3.19 is written on the basis of the Grainger plan going ahead. Para 3.19 should be amended to provide a more balanced position in line with the Council's role as local planning authority, communicating the vision of the community plan for Wards building as well as that of the Grainger plan for the site. We propose a new sentence is added to this para as follows:

The community plan for Wards Corner, which also has planning permission, would restore the existing heritage buildings at the heart of the town centre, providing affordable workspace and community space and enhancing the existing market to provide a unique destination and gateway to Tottenham. to confirm the Council's willingness to work with the community on the future development of the West Green Road / Seven Sisters Town Centre.

3.20 Beyond the District Centre boundary, development is focused mostly on estate renewal programmes aimed at enhancing the existing housing stock and providing existing and new residents with greater housing choice within a higher quality residential setting. Whilst proposals for Gourley Place and Lawrence Road offer the opportunity for mixed use development which should secure the replacement of the existing employment floorspace and where possible, deliver light industrial uses and affordable workspace for small to medium enterprises.

Comment [A68]: We disagree with the estate renewal approach taken. See overall response to the AAP.

3.21 Outside of the targeted regeneration areas, it is expected that residents will benefit significantly from the improvements to public transport, better east-west connections, the provision of new and expanded schools and health care facilities, new parks and new employment opportunities. Further, these areas will benefit from planning policies that seek to

protect existing family sized housing by restricting the conversion of houses to flats and Houses in Multiple Occupation. As well as maintaining a supply of family housing, in Tottenham, such restrictions will help stem the tide of poor quality private rented

accommodation and assist in retaining the residential amenity within these predominantly suburban areas.

4 Promoting Positive Regeneration in Tottenham – Policies

Introduction

4.1 This and the following chapter of this AAP provide the Area Wide and Site Specific Policies. The Development Policies build on and supplement existing Local Plan policies and have been nuanced to reflect the regeneration vision for Tottenham. They do not repeat the Council's wider Local Plan policies or the 2011 London Plan and should be read in conjunction with the London Plan and Haringey's Local Plan which includes:

- Strategic Policies Local Plan (2013)
- Unitary Development Plan Saved Policies (2013)

4.2 In addition, there are emerging regional and local policy documents to which, once adopted, will form part of Haringey's Development Plan. These include the Further Alterations to the London Plan (FALP) and three additional Local Plan Documents which the Council is currently consulting on:

- Alterations to the Strategic Policies Local Plan;
- Development Management Policies; and
- Site Allocations.

4.3 The development policies are:

- AAP 1 Regeneration
- AAP 2 Housing
- AAP 3 Tottenham Hale District Centre
- AAP 4 Green Link
- AAP 5 Changes to Designated Employment Areas

4.4 Two guidance notes are provided in this section, giving guidance on how future sites for Crossrail will be safeguarded and the Council's approach to meeting the need for Gypsy and Traveller pitches in Haringey.

Policy AAP1 Regeneration

- A. The Council will support planning applications for development within the Tottenham AAP area which promote the positive regeneration of Tottenham.
- B. The Council will take a proactive approach to working with landowners, the Mayor of London, the local community and other interested parties to help deliver the changes needed in Tottenham to meet the vision and objectives for the regeneration of Tottenham.
- C. Development Proposals should demonstrate how they have capitalised on opportunities to reduce social inequalities in Tottenham, improve the quality and supply of housing to meet housing needs, improve health and wellbeing, contribute to a diverse and sustainable economy and help deliver the necessary infrastructure to support change in Tottenham.
- D. Development proposals will be expected to maximise the use of public and private sector investment to provide a range of types and sizes of homes, create mixed and balanced communities, create economic opportunities for local residents and businesses, improve and enhance the local environment, reduce carbon emissions and adapt to climate change, in accordance with the other policies of this AAP and Haringey's Local Plan.
- E. The Council expects all development proposals in the AAP area to come forward as part of wider comprehensive redevelopment proposals, taking account of adjacent uses (existing or proposed), neighbouring landowner expectations, the Council's expectations for the delivery of infrastructure on sites identified in this AAP, the shared vision for Tottenham and the policies of this AAP and Haringey's Local Plan. Developers should consult with the Council at the earliest opportunity on such proposals and where appropriate, a master planning exercise should be prepared in consultation with the Council.
- F. Development proposals on sites adjacent to the AAP site allocations will be expected to demonstrate how the proposal has had regard to the development principles of the AAP including the proposals for change arising from the site allocation.

Supporting Site Assembly

- G. The Council will use compulsory purchase powers to assemble land for development within the Tottenham AAP area where landowners and developers can demonstrate that:
- they have a viable, deliverable and Local Plan compliant scheme; and
 - they have made all reasonable attempts to acquire,

Comment [A69]: 3. A new paragraph should be added to Policy AAP1 (Regeneration) to require that regeneration schemes benefit and involve existing communities, and a commitment to working in partnership with the community to plan, deliver and manage projects, with reference to the Localism Act and London Plan requirements in relation to the management of town centres.

Comment [A70]: What does 'positive' mean? Against which criteria will the positive nature of a proposal be assessed? This is vague and therefore not a sound basis for a policy. It is not clear how 'positive' will reflect the needs and aspiration of local communities.

Comment [A71]: Will this actually be explicitly required in planning applications? Can these considerations count as 'material considerations'?

Comment [A72]: Policy AAP1.E and para 4.8 proposes a 'comprehensive' approach to development. We disagree that a 'comprehensive' approach necessarily discounts 'incremental' development, nor that the latter is inappropriate for Tottenham. Incremental development can be comprehensive by considering a particular development in its wider context. A step by step approach is better able to include and incorporate existing residents, businesses and community uses than large scale major redevelopment schemes. An incremental approach can build on and support existing strengths and diversity, while large scale major development is more likely to wipe them out.

or secure an option over the land/building(s) needed, through negotiation.

- c. **Comprehensive redevelopment of the assembled site is either required to deliver the site's allocation as prescribed in Section 5.0 of this AAP or is in the public interest; and**
- d. **The development proposed for the assembled site would contribute to the delivery of the Tottenham AAP objectives.**

H. Where compulsory purchase is necessary, applicants will be required to demonstrate how the associated costs impact upon development viability

4.5 To ensure the vision of this Area Action Plan is achieved, Policy AAP1 seeks to ensure all development proposals submitted to the Council proactively respond to the vision and ensure the regeneration objectives for the Tottenham AAP area are achieved. At the same time, the Council also has a responsibility to proactively work with landowners and other parties to help deliver the aims of the AAP. The programme for growth is ambitious but with the support from the Mayor of London, both financially and politically, support from the community and the development industry the vision for Tottenham will be realised. AAP1 (B) provides the Council's commitment to helping facilitate and deliver the necessary change.

Comment [A73]: Many proposals in this AAP are highly controversial and opposed by the residents and businesses of the affected areas.

4.6 Private and public investment will be key to delivering the ambitious regeneration vision for Tottenham. The Housing Zone is one example of investment which will directly and indirectly contribute significantly to delivering the aims of this AAP. The Housing Zone monies will direct important investment to the AAP areas supporting transport and public realm improvements which will benefit existing and future residents of Tottenham. Development will be expected to harness the benefits of such investment and maximise the opportunities this presents which could lead to more sustainable development outcomes. Another such example will be Crossrail which will redefine the accessibility levels of parts of the AAP area. Developers and the Council should utilise this to optimise housing delivery and more effectively meet the objectives of the Haringey Local Plan.

Comment [A74]: There is uncertainty that the democratic safeguard of local authority planning application procedures will be maintained and not made 'lite' to speed up the delivery of the Housing Zone agenda.

Comment [A75]: Vague/imprecise

4.7 Ensuring development proposals are redesigned and submitted to Haringey as part of wider comprehensive developments avoids concerns associated with piecemeal development. The aim is to ensure landowners are talking to each other and are aware of the shared vision for the AAP area, including the sites allocated for important infrastructure projects. Haringey wants to ensure development proposals do not prejudice wider development aspirations for the Tottenham AAP area. Comprehensive redevelopment which is designed in consultation with the Council is likely to result in a faster planning consent being granted and will avoid any undue delays in the planning process, to the benefit of everyone involved.

4.8 A comprehensive approach to development will often be in the public interest within the Tottenham AAP area. Whilst incremental schemes might be more easily delivered, the constraints posed by site boundaries, neighbouring development or uses, and below-ground services all have potentially limiting consequences for scale, layout and viability. Across the Tottenham area as a whole, such consequences could depress the optimum use of land, the proper planning of development (in terms of layout, design, use etc)

and the ability of development to support the achievement of wider regeneration initiatives or objectives.

Comment [A76]: Policy AAP1.E and para 4.8 proposes a 'comprehensive' approach to development. We disagree that a 'comprehensive' approach necessarily discounts 'incremental' development, nor that the latter is inappropriate for Tottenham. Incremental development can be comprehensive by considering a particular development in its wider context. A step by step approach is better able to include and incorporate existing residents, businesses and community uses than large scale major redevelopment schemes. An incremental approach can build on and support existing strengths and diversity, while large scale major development is more likely to wipe them out.

Policy AAP2 Housing

- A. To improve the diversity and choice of homes and encourage long term communities to develop in Tottenham, the Council will seek the delivery of 10,000 homes across the Tottenham AAP in order to meet housing needs, contribute to mixed and balanced communities and to improve the quality of homes;
- B. The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Strategic Policies Local Plan and DM17 of the Development Management DPD, with the exception of:
- Allocated sites within the Tottenham Hale AAP Neighbourhood area (the Housing Zone) will be expected to deliver 50% market housing and 50% affordable housing; and
 - the affordable tenures split (DM17A(c)) which in the case of development in the Tottenham AAP area will result in an overall tenure mix of 60% intermediate accommodation and 40% affordable rented accommodation.
- C. Development proposals incorporating residential will be expected to provide the housing in accordance with the minimum capacities, densities, sizes and tenure mixes of individual sites set out in the relevant sub-area policies and site allocations in this AAP. Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised;
- D. To improve the quality of homes in Tottenham, new housing should be high quality and delivered in accordance with Policy DM16 of the Development Management DPD;
- E. To better address the concerns of viability in delivering renewal on Haringey's housing estates in Tottenham (as listed in Alt53 of the Alterations to the Strategic Policies Local Plan), the Council will support higher density mixed tenure development in accordance with C above, as a mechanism to
- improve the quality and range of affordable housing options,
 - better address housing needs in Haringey;
 - secure a more balanced community; and
 - increase housing delivery in Tottenham.

Comment [A77]: See overall comment about the scale of housing growth.

Comment [A78]: See comments about that in our responses to these 2 documents.

Comment [A79]: 'Affordable' should mean genuinely affordable – and this % should be optimised to the maximum. Within any 'affordable' target a clear figure for SOCIALLY RENTED housing needs to be included.

Comment [A80]: Affordable rented accommodation is NOT socially rented accommodation. Does this mean that NO socially rented accommodation at all is to be foreseen in the Tottenham AAP? We strongly contest that and demand the inclusion of a clear target to optimise the % of desperately needed NEW socially rented housing in all new developments.

Comment [A81]: See comment in the overall response to the AAP.

4.9 Tottenham is expected to experience unprecedented growth over the next decade and a sustainable approach to delivering homes to meet this growth is provided in AAP2. Parts of Tottenham experience overcrowding and deprivation compounded by poor quality

social housing, significant churn in population, polarised communities and limited housing options that might better respond to the aspirations of communities through available market and intermediate homes. Policy AAP2 above seeks to deliver 10,000 new homes across the Tottenham AAP area as a mechanism for stimulating regeneration and economic growth. The capacity to deliver 10,000 new homes has been identified in the allocated housing sites outlined in the allocations section of this report. Additional sources of capacity may come forward as a result of the investment going into the area and as these developments come forward, they will contribute to meeting housing needs in Tottenham.

4.10 To rebalance the high levels of social rented accommodation in Tottenham, which equates to more than 60% of the boroughs' total social rented stock and to most effectively use the funding received to help meet housing needs in Tottenham, Policy AAP2 seeks an unced approach to affordable housing delivery. Creating mixed and balanced communities in accordance with DM17 of the Development Management DPD, the Council would like to introduce alternative tenures into areas currently dominated by a single tenure type.

4.11 Tottenham also has an ageing stock of Council housing and rather than re-providing low quality existing stock which is not a sustainable solution and is not viable, the Council will support proposals for more widespread renewal of Tottenham's housing estates in accordance with policy AAP2(E). This support will lead to significant improvements in the size and quality of affordable housing; better address housing needs; secure a balanced community; and will increase housing delivery.

4.12 Improving the quality of housing in Tottenham is a key priority and policy AAP2(D) is written to be consistent with the Council's wider aims for improving development design in Haringey, as set out in the Haringey Development Management DPD.

Comment [A82]: This policy is discriminatory if only applied to social housing residents. Where are the clauses elsewhere in the document which similarly call for optimising social housing % in all proposed developments in areas where market housing is in the majority? It also must not lead to any net loss of social housing units.

Comment [A83]: What is the evidence for this claim? The expert evidence is that the opposite is generally the case.

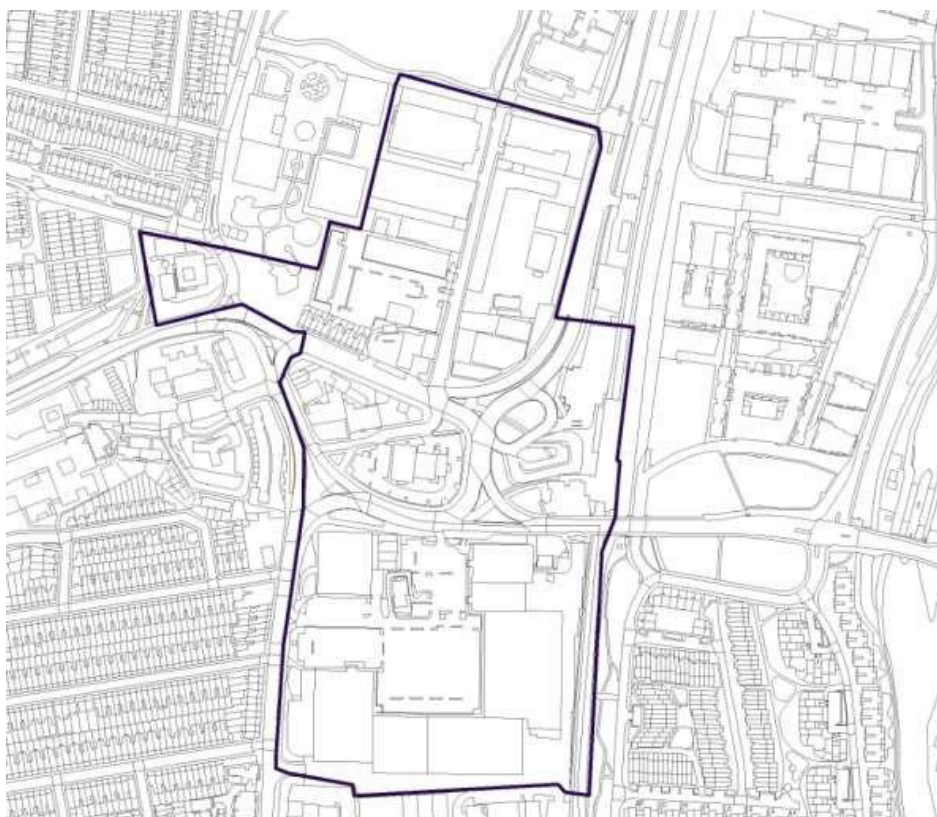
Policy AAP3 Tottenham Hale District Centre

- A. The Council will support planning applications for development within the Tottenham Hale District Centre as indicated in Map 4.1 to promote the positive regeneration of Tottenham Hale.**
- B. Development proposals should provide:**
 - a. A substantially improved public realm that unifies the streets and spaces around the gyratory, improves access to the station and prioritises pedestrian and cyclist circulation and safety;**
 - b. A new urban form – consistent with the areas status and accessibility including greater permeability and legibility of streets;**
 - c. Attractive and functional public spaces located around the gyratory; and**
 - d. Incorporate permeable surfaces, green space and trees.**
- C. Arrange**

of retail, leisure, healthcare facilities or community facilities with active ground floor frontages;

- D. Small-scale units and kiosks near the underground station, to create activity and vibrancy and security;
- E. Uses which are considered appropriate for Tottenham Hale are consistent with National Planning Policy Framework town centre uses.

Map 4.1 Indicative boundary of Tottenham Hale District Town Centre



4.13 A new district centre will be created at Tottenham Hale. The area will become a distinctive, high quality, diverse and vibrant commercial destination. The environmental quality of the area will be transformed through coordinated public and private investment, with complementary improvements to neighbouring residential areas, including significant investment in the open space and transport infrastructure around the Station and the main roads to support the proposed level of development, improve access to the station, create good quality public open space, reduce traffic impacts and improve interchange between bus, train and tube. Development proposals will incorporate the creation of a legible Green Link bisecting Ashley Road and leading to the Lee Valley Regional Park to encourage walking and improve sightlines to the park.

Policy AAP4 Green Link

- A. **A new axial 'Green Link' will provide a high quality landscaped pedestrian and cyclist route between Tottenham High Road and the Lee Valley Regional Park through the Tottenham Hale area. The Green Link will pass across the northern section of the new Tottenham Hale district centre on a straight path which extends east the axis of Chesnut Road.**
- B. **Development proposals for sites traversed by this Green Link will need to take account of the route and ensure that opportunities are taken to provide new mixed-use developments which address and generate activities along its built edges.**
- C. **The Council will use its statutory powers, including compulsory purchase, to ensure delivery and secure perpetuity through a right of way**

4.14 A Green Link (shown on Map 4.2 below) between Tottenham High Road and the Lee Valley Regional Park was first proposed as part of the Tottenham Hale Urban Centre Masterplan SPD of 2006. The SPD highlighted the need to improve east-west permeability in order to lessen the impact of the substantial barriers to movement created by the railway lines and Watermead Way. A new east-west link along the axis of Chesnut Road, would deliver radically improved access to the Lee Valley Regional Park. To improve east-west pedestrian permeability and to bring the park into the heart of the new community, a significant intervention is proposed. The Green Link will extend from Chesnut Road for pedestrian eastward to the waterfront, connecting to the proposed footbridge across the river to Hale Wharf. The SPD described the link as a wide, pedestrian and cycle-only link. At that time, it was envisaged that the link might need to ramp up to a high level to cross Watermead Way. In view of the scale of this public realm and green infrastructure investment, involved the creation of three new bridges, the new link was envisaged as being seen as an important feature in the new landscape of Tottenham Hale and an instantly recognisable landmark.

4.15 The concept of this new green link was carried forward into the Upper Lee Valley Opportunity Area Planning Framework of 2013. This section crosses the Ashley Road area, crosses Watermead Way and the railway and continues east across the Hale Wharf site connecting with The Paddock.

Comment [A84]: See comment made about TH2: This plan proposes agreed link which cuts directly across Down Lane Park, and specifically through the children's play area. We object to this proposal. Down Lane Park is one of the very few amenities for people living in Tottenham Hale's residential roads and estates. This is treasured and valued, and its development has been fought for by the local community and we now have a thriving green flag park with new tennis courts, a recently installed outdoor gym and children's playground, and other facilities.

The proposed green link is very expensive and could be seen as an unnecessary project since there are many ways people living in Hale Village and Ferry Lane can reach Tottenham High Road should they wish to do so. There are existing and used routes to Lea Valley and Marshes from the residential area north of Down Lane Park.

Map4.2: The Green Link



4.16 The proposed Green Link is a bold green infrastructure investment in the Tottenham Hale area. When delivered, the Green Link will represent a landmark green infrastructure intervention which delivers radically improved public accessibility to the open landscapes of the Lee Valley Regional Park. Chesnut Road already provides the area with a pedestrian route towards Tottenham High Road. The proposed Green Link extends the axis of this existing route directly east into the Regional Park. In order to ensure the new link has the most transformative effect on the local environment, its axis should be as straight and legible as possible, affording long sightlines between the Regional Park and the High Road.

4.17 Sites where the proposed alignment crosses over privately owned land area are included in this AAP as site allocations. Development proposals that come forward on these sites must facilitate the delivery of the Green Link. Any development proposals which would hinder the delivery of the Green Link, or require land which is necessary to deliver the Green Link proposal will be resisted.

Policy AAP5 Changes to Designated Employment Areas

- A. The changes in the hierarchy of Designated Employment Areas for the Tottenham AAP area are as follows:
- a. RA9 (High Road West): Designated as a Local Employment Area: Regeneration Area (NT3);
 - b. LSIS18 (Willoughby Lane): Designated as a Locally Significant Industrial Site;

Comment [A85]: Policy AAP5 should list all designated employment areas, not just the designations which are being proposed to change, for ease of reference and clarity. It should also be affirmed within the AAP that the Council is seeking to protect all non-designated employment land also, as per its Development Management DPD and Strategic Policies amendments. See also previous comments on the proposed changes to the designations.

Policy AAP5 warrants much more detailed consideration of how the Council's policies as regards employment land are to be given effect in Tottenham. Just listing changes to employment land designations does not amount to a strategic policy for Tottenham. We also need to know how the site allocations as a whole add up to the vision for Tottenham's economy.

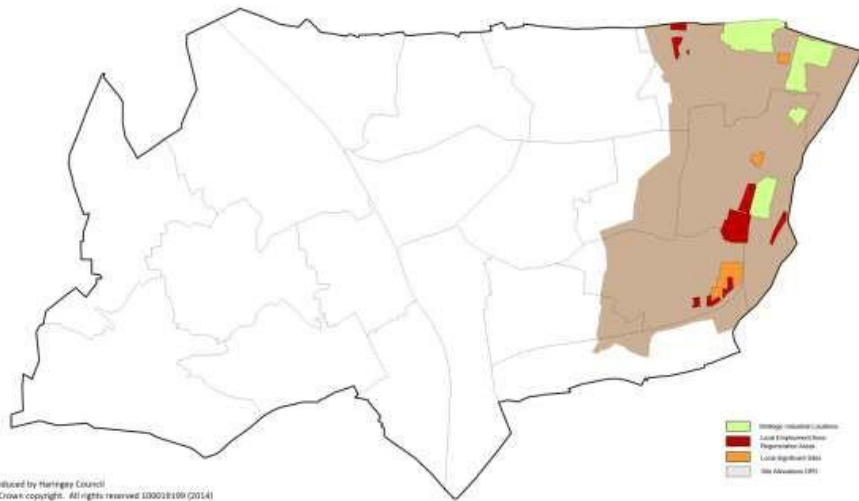
All employment areas that are active and viable should be protected and supported.

- c. **RA14a(ConstableRoad):Designated as aLocalEmploymentArea:RegenerationArea(TH10);**
- d. **RA14b(FountayneandMarkfieldRoad):DesignatedasaLocalEmploymentArea:RegenerationArea(TH9);**
- e. **RA20(HighRoadEast):DesignatedasaLocalEmploymentArea:RegenerationArea(NT1)**
- f. **De-allocationoftheSouthernPart ofRA15Tottenham Hale (TH1–StationSquareWestsitesB,C)**
- g. **De-allocationof N17Studios784-788HighRoad(part of NT2)**

4.18 Securing a strong economy in Tottenham to deliver business growth is a key objective of the AAP and will be paramount to help deliver new jobs in, and for Tottenham. To ensure this, the Council has carried out a review of the designated employment areas in Tottenham which has identified opportunities to strengthen the protection of key employment sites, at the same time providing a more flexible approach in some employment areas which will secure the long term future of a local employment base and help deliver regeneration in Tottenham. The review has also identified employment sites which are no longer suitable for industry or other employment generating uses and should be de-allocated. The two sites proposed for de-allocation are TH1 (sites B/C) and 784-788 High Road (NT2).

4.19 Policy AAP5 lists the proposed changes to the Designated Employment Areas in Tottenham. Policy SP8 of the Local Plan Strategic Policies continues to provide the full list of employment area designations. For the Employment Areas in Tottenham which have not listed for change these retain their listed designation in Policy SP8. Map 4.3 below shows the Designated Employment Areas in Tottenham, incorporating the changes proposed by Policy AAP5.

Map 4.3: Designated Employment Areas in Tottenham



Comment [A86]: Map key unreadable.

Guidance Note 1- Indicative Crossrail 2 Areas

4.20 In 2015 it is anticipated that Transport for London will announce a set of safeguarded sites for the delivery of Crossrail 2. Crossrail 2 is supported by the Council, and the challenges and opportunities for spatial planning will be addressed as more information becomes available. These sites will be subject to national legislation safeguarding them, and any requirements will be added to the Plan as applicable. The safeguarding process is the subject of current consultation. If construction/work sites and/or timescales are known before publication of the Plan, they will be included for consultation in the Proposed Submission consultation.

4.21 The approach to safeguarded sites will be:

- Sites required for the construction of Crossrail 2 safeguarding will be protected as necessary.
- Sites within 400m (a 5 minute walk) of a proposed Crossrail 2 station will be closely scrutinised to ensure the proposed development optimizes the future accessibility provided by the introduction of Crossrail 2. This may include ensuring that a mix of uses and potentially enhanced infrastructure may be required from proposals in this area.
- Sites within 800m (10 minute walk) of Crossrail will be scrutinised for how they can complement the introduction of Crossrail 2. This may include design issues such as provision of routes to and from the station, and consideration of density to include future PTAL increase.

Comment [A87]: If Crossrail 2 is to be supported the chosen sites should not threaten existing housing, communities or neighbourhoods.

Guidance Note 2- Gypsy & Traveller Pitches

4.22 The Examination in Public of the Local Plan: Strategic Policies identified that the Site Allocations document would allocate land suitable for meeting Haringey's Gypsy and Traveller accommodation needs. SP3 of the Local Plan sets a list of criteria which new pitches should meet.

4.23 It is considered that sites which are being transferred from B2/B8 employment to a mix of uses provide the best opportunities for accommodating the Council's existing, and emerging need. This is due to the change of value between the existing and future land value is generally higher on these sites than on residential intensification schemes. This will allow for greater flexibility in terms of site design, which will better enable an appropriate site being created for pitch provision.

Comment [A88]: List those sites.

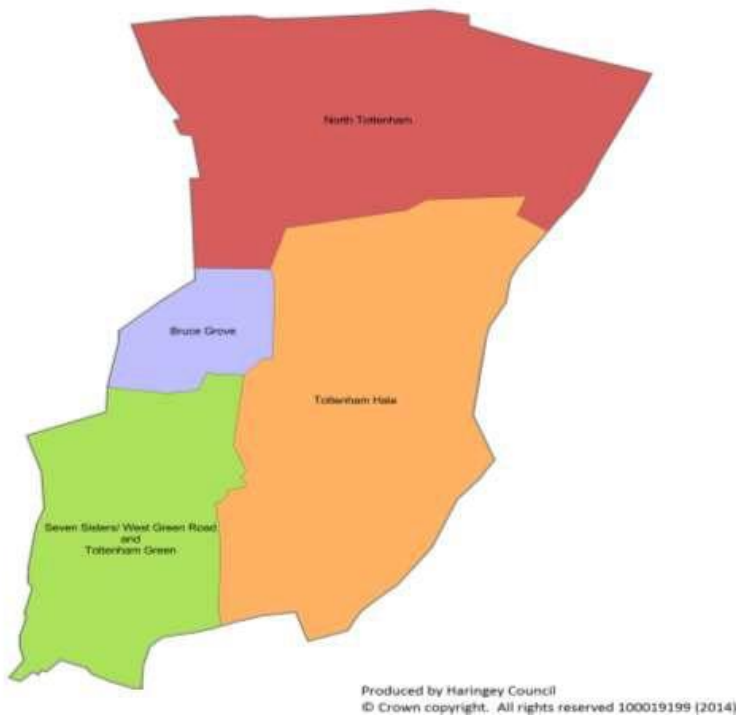
4.24 An ongoing study into the needs of the gypsy & traveller communities will identify future need over the plan period. Existing pitches will be included in this study to understand what contribution to meeting need they can make.

5 Neighbourhood Areas and Opportunity Sites

5.1 The following section is set out based on the four neighbourhood areas: North Tottenham, Bruce Grove, Seven Sisters/West Green Road and Tottenham Hale and Tottenham Green. It provides a narrative setting out the existing urban character and context of each area; the contribution each neighbourhood is to make towards delivering the wider AAP vision and strategic objectives, including target outputs for both housing and jobs; the key neighbourhood objectives; and the public realm improvements and infrastructure to be provided.

5.2 Within each neighbourhood area (shown on map 5.1 which indicatively illustrates the areas and does not seek to define the neighbourhood boundaries), sites with significant opportunities for development and change are proposed for allocation. Each site represents land that is suitable for development over the plan period, including sites key to achieving wider regeneration objectives or necessary to deliver infrastructure improvements. For each site, expectations are set out relating to land use, design, infrastructure and delivery. Where appropriate indicative target capacity estimates for residential unit numbers are provided in the housing trajectory later in the AAP.

Map 5.1: Tottenham Areas



Neighbourhood Area- Seven Sisters/West Green Road and Tottenham Green

Key Sites

5.3 The neighbourhood area comprises two distinct areas: Seven Sisters/West Green Road and Tottenham Green

5.4 The key sites

in this neighbourhood area are: Seven Sisters/West

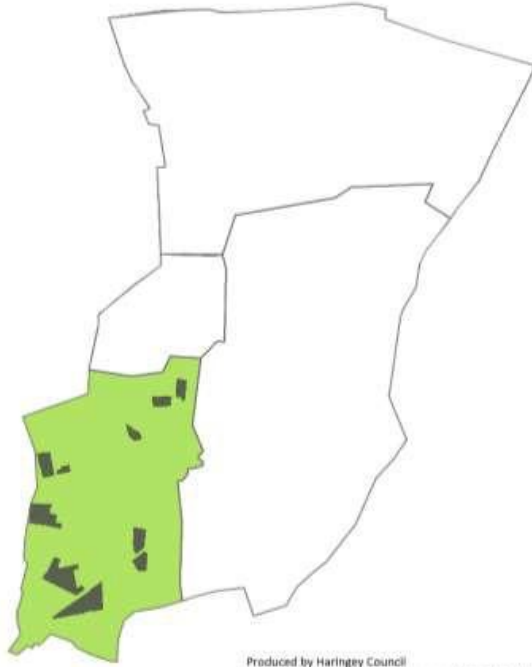
Green Road:

- SS1 Lawrence Road
- SS2 Gourley Place
- SS3 Apex House and Seacole Court
- SS4 Helston Court and Russel Road
- SS5 Wards Corner and Suffield Road
- SS6 Brunel Walk and Turner Avenue

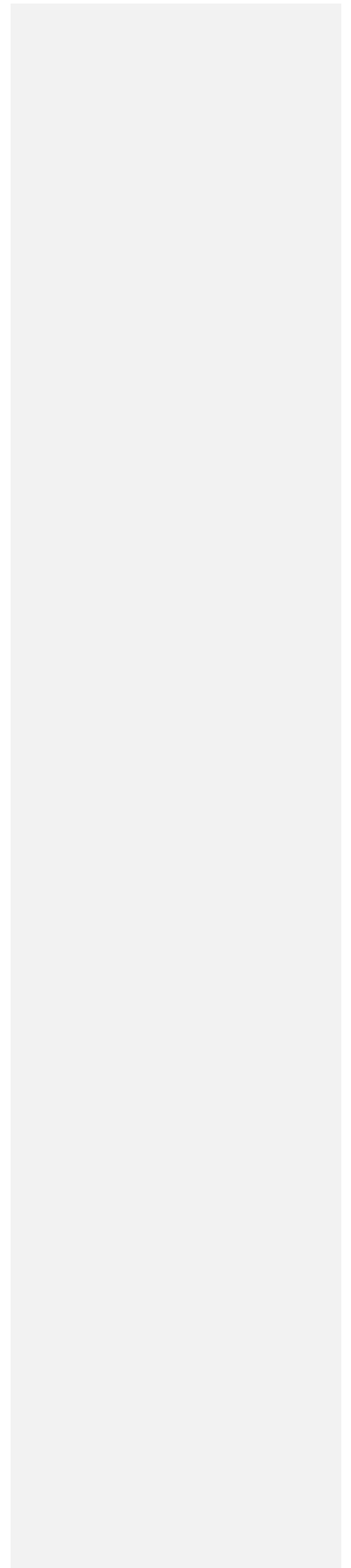
Tottenham Green:

- TG1 Tottenham Green Leisure Centre Car Park
- TG2 Tottenham Chances
- TG3 Tottenham Police Station and Reynardson Court

Map 5.2: Seven Sisters/West Green Road and Tottenham Green



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The character of the neighbourhood area

5.5 Seven Sisters is a key gateway into Tottenham and, along with West Green Road, constitutes the Seven Sisters District Town Centre. It is also a significant transport hub – and is set to have an even greater role as a part of Crossrail 2 (in the longer term) whilst benefiting in the short term from investment as part of London's Overground network in the short term. There are benefits from good to excellent public transport accessibility with three stations forming an important and busy public transport node. These stations connect well with local buses on Seven Sisters Road and the High Road whilst the area is also a busy area for cyclists.

5.6 Given their proximity to major roads and public transport stations, Tottenham High Road, Seven Sisters Road and West Green Road are the focus for development activity in the area on key sites. However, these roads are heavily trafficked and as a consequence the public realm and pedestrian environment suffer and should be improved via strategic regeneration projects and sites.

5.7 Tottenham Green provides a rich mix of civic and cultural uses, many of which are listed buildings, including a theatre, college campus, leisure centre and church hall centred around the historical Tottenham Green. Currently the area is not fulfilling its full potential as Tottenham's cultural and civic hub and there is an aspiration to enhance activity in the area at all times of the day, and throughout the week. To achieve this Tottenham Green will be the focus for new cafes and restaurants to enhance and support the existing cultural offer in the area. Public realm enhancements will build upon the recent improvements in Tottenham Green and focus on the shared spaces and routes between the existing buildings. Any new development must enhance the historical status of the area and its existing buildings.

5.8 The character of the area is equally mixed, from industrial/employment uses within post-war buildings in the south to the more established educational, cultural and leisure buildings and land uses clustered around the recently enhanced open space at Tottenham Green. The area also contains two housing estates earmarked for renewal which are Helston Court and Russel Road and Brunel Walk and Turner Avenue. Town centre retail use is clustered to the south of the area. The area is significantly enriched by a number of prominent heritage buildings whilst the High Road corridor is a conservation area.

Key neighbourhood area objectives

5.9 The key objectives for the neighbourhood area are:

- Increased retail floorspace at Seven Sisters District Centre to enhance its retail characteristics
- Redevelopment of key sites including Wards Corner, Apex House, Lawrence Road and Gourley Triangle
- Targeted streetscape and environmental improvements along West Green Road, Tottenham High Road and Seven Sisters Road including paving, signage, landscaping and street furniture
- New affordable employment/workspaces suitable for new enterprises

Comment [A89]: The text should be re-drafted to acknowledge the importance and community value of Seven Sisters market, ethnic retailers, small independent shops and local community and business groups to the town centre, as well as the vision of the community plan for the town centre.

In addition, the heritage assets at the Seven Sisters / West Green Road town centre should be acknowledged as they are for Tottenham Green (e.g. the Wards building and 1A West Green Road).

Comment [A90]: We disagree with bullet 1 under para 5.9, which suggests a key objective is to increase retail floorspace at Seven Sisters town centre. The Further Alterations to the London Plan adopted in March 2015 make clear that as changes to retailing impact, it will become increasingly important for town centres to develop distinctive roles. Delivering more retail floorspace without consideration for the likely use of that floorspace goes counter to the policy direction introduced by the Further Alterations to the London Plan (in particular, Policies 2.10, 4.7 and 4.8). Instead, the aim should be to support the development of a distinctive, specialist retail offer, such as that provided by Seven Sisters market, as has been the case in Camden and Brixton, for example.

Comment [A91]: See comment under SS5

Comment [A92]: should be amended to reflect the fact that refurbishment is also an option for Wards Corner, as well as redevelopment (as evidenced by the two planning permissions in place for the site).

and medium sized businesses as part of mixed use redevelopment at Gourley Place and Lawrence Road.

Comment [A93]: 4. should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.

- A landmark building at Apex House providing significant new mixed tenure homes and ground floor space for employment/commercial space to complement development on the Wards Corner site.
- Targeted building and shopfront/signage improvements consistent with the enhancement of the character, heritage and townscape attributes of the area alongside new development.
- Developments should support Tottenham Green as the civic and cultural heart of Tottenham, with an enhanced restaurant, cafe and cultural offer that complements public realm improvements to the Green.
- Redevelopment of underused sites that detract from the historical status of the area and conservation area.
- Public realm enhancements between the buildings on the Green to create a more attractive and coherent area.
- Promotion of the provision of workspace to support the successful and emerging SME community around Tottenham Green.

Comment [A94]: See comment below under site SS3. Should be clear that this is in relation to the two plans with planning permission.

Urban realm improvements:

5.10 The urban realm improvements for the neighbourhood area are:

- The redevelopment of key sites on the High Road should lead to improvements to footway and public realm/station entrances in the vicinity of Seven Sisters road and High Road junction.
- New wayfinding/signage as part of wider Tottenham branding and route finding.
- Opportunities for education and cultural events on Tottenham Green.
- Improvements to the south side of Seven Sister road/High Road associated with the development of Apex House.
- Improvements to the public realm around Gourley Place associated with new land use and development to address existing antisocial behaviour.
- Important buildings and spaces should be conserved and enhanced and their settings and viewing corridors improved, notably St Ignatius Church, St Ann's Church and wider setting and Page Green.

Comment [A95]: Add additional bullet: All residential development should address the low % of social housing in Tottenham relative to the desperate need for genuinely affordable housing and overwhelming public support identified in Council consultations. If many people can't afford to live in Tottenham this will undermine efforts to protect existing communities and ensure they remain mixed and balanced into the future.

Comment [A96]:

Comment [A97]: All developments of the kind identified in this document should have at least one community partner involved in its design, implementation and long-term management.

Comment [A98]: Add additional point: Protection and enhancement of each area's character, heritage, communities, small business opportunities, open spaces, play spaces, culture and diversity, and range of necessary local accessible social infrastructure serving all ages and interests to ensure compliance with Lifetime Neighbourhoods policies. In fact such policies are increasingly embedded in the London Plan and there should be a specific section reflecting the importance of this.

Address all deficiencies relating to open space, play facilities and other social infrastructure in accordance with London Plan guidance. Address deficiencies of genuinely affordable and family-sized housing in the area.

Infrastructure

5.11 The infrastructure projects for the neighbourhood area are:

- The site is expected to be served by new Crossrail 2 station infrastructure at Seven Sisters.
- Transfer of the main line to London Overground will lead to improvements at Seven Sisters overground station.

Allocated Sites in Seven Sisters/West Green Road and Tottenham Green

SS1: Lawrence Road			
Address	Zenith House, 69 Lawrence Road; Sterling House 67 Lawrence Road; Mono House, 50-56 Lawrence Road and 45-49 Lawrence Road		
Site Size (Ha)	1.0		
Timeframe for delivery	PTAL Rating		3
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Offices (B1)		
Ownership	Mix of private and public freeholds and leaseholds		
How site was identified	Strategic Housing Land Availability Site		

Proposed Site Allocation:
Mixed use development



Site Requirements

- Re-provision of employment in accordance with the DMDPD at ground and first floor along Lawrence Rd with residential development above.
- The development typology of 7-8 storey mansion blocks facing onto Lawrence Rd with active non-residential uses at ground floor level, and flats above, with mews-type streets behind containing family housing responding to the scale of the terraced housing prevailing in the Clyde Circus Conservation Area to the east and west will be supported.
- The junction linking the existing linear park to the north of the site should be reconfigured to establish Clyde Rd as part of the Mayor of London's Quietway cycle network.

Development Guidelines

- Development at the northern edge of the site should face the existing linear park as well as Lawrence Rd, and should step down in height to respect the existing terraced housing to the west.
- The existing trees are a strong asset to the streetscape and should be preserved.
- The residential site to the immediate east and west of the site lie within the Clyde Circus Conservation Area and development should preserve or enhance its appearance as per the statutory requirements.

Comment [A99]: Extra pt: Expand the green space to the north into a substantial public park.

Comment [A100]:

Comment [A101]: See Comment 98

SS2:GourleyTriangle

Address	Land South of Seven Sisters Road extending west of the Mainline Railway and East to the junction of Seven Sisters Road and St Anns Road		
Site Size (Ha)	2.0	PTAL Rating	5
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Mix of B1/B3/B8 and Residential		
Ownership	Public and Private		
How site was identified	Strategic Land Availability Assessment (SHLAA)		

Comment [A102]: No loss of existing businesses.

Proposed Site Allocation

Mixed use redevelopment providing new employment space (B2/8) and residential use.



Site Requirements

- Active frontage onto Seven Sisters Rd with employment uses located here.
- The employment uses should be of a typology that is compatible with residential use
- To preserve and enhance the SINC and ecological corridor to the south and east of the site.
- There is potential for some 6-11 storey development along Seven Sisters Rd, but these should be point blocks rather than continuous slabs.

Development Guidelines

- Where necessary, the layout of the new development should provide for adequate separation between industrial and residential uses on the site.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Capped commercial rents will be expected in this area in line with draft Development Management policies.
- The potential for a pedestrian crossing of the rail line to the south of the site should be considered.
- The servicing of buildings fronting Seven Sisters Road should be provided from the rear.
- Parking should be minimised on this site due to the excellent local public transport connections.

Comment [A103]: See Comment 98

SS3: Apex House & Seacole Court

Address	Apex House, 820 Seven Sisters Rd, and Seacole Court, Tottenham High Road		
Site Size (Ha)	0.5	PTAL Rating	6
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Offices & residential		
Ownership	Mix of public and private freeholds and leaseholds		
How the site was identified	Strategic Housing Land Availability Assessment (SHLAA)		

Proposed Site Allocation

Residential mixed use development



Comment [A104]: We support the response by Wards Corner Coalition with respect to this site. We consider this site allocation does not provide a strong enough vision for such a key strategic site, either in terms of meeting needs of Tottenham's diverse communities; ensuring a high-quality sustainable building; or ensuring a vital and viable town centre as required by the London Plan. This is especially important in relation to the value of the site and its potential to yield benefits for Tottenham.

We propose the following aspects should be mentioned and the relevant policies cross-referred to:

- a. Need for the highest environmental standards to be achieved
- b. Need to ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable)
- c. Need to reflect and support the culture and diversity of the area
- d. Need to deliver affordable workspace, space for small shops, space for cultural and creative uses
- e. Need to enhance the public realm
- f. Need to ensure safety

A tower block, let alone a 22-storey building, is inappropriate at this site. Further cross referencing is needed to key council policies relating to tall buildings, given this is the first time such a building has been proposed in this area and given the height Grainger are currently considering. If this goes ahead, this will likely be the first time these new policies allowing taller buildings are tested. There is therefore a need for caution to ensure that a precedent is not set that damages Tottenham's character and strengths. In particular the following policies should be explicitly referred to: Privacy, Light, Need to relate to surrounding buildings and heritage – it should be clarified that the building must not be so tall that it cannot relate to the surrounding area. The density and height allowable on this site should be clarified with reference to an evidence base, policy and other relevant factors (e.g. flood study).

Site Requirements

- This is a suitable location for a high quality tall building marking the location of the public transport interchange of train, tube, bus and Overground rail, and the junction of Seven Sisters Rd and Tottenham High Rd. Careful consideration of the long views of this building along, including the linear view along the High Rd and Seven Sisters Rd, as well as the effect on the microclimate should be considered in line with the DMDPD.
- The tallest element will need to have regard to properties to the rear of the site, as well as to its relationship to other buildings along Seven Sisters and Tottenham High Rd. This could be a slender point block tower.
- Where necessary, the developments should step down towards the lower density building to the south and south-west of the site.
- Part of the site is located in the Seven Sisters Conservation Area and developments should preserve or enhance its appearance as per the statutory requirements.
- Any development will be required to consider the proposal's relationship to the proposal at Wards Corner and the provision of public space and public realm improvements to support the arrival to Seven Sisters Station and for moving between this site and Wards Corner.

Comment [A105]: any proposal should consider its relationship to the proposal (not proposal) at Wards Corner, given there are two plans with planning permission.

The Wards Corner Community Plan should be preferred.

Development Guidelines

- The Council will consider a range of town centre uses along the High Road Frontage which could include small scale A1 retail located close to the apex with Seven Sisters Road. However along Seven Sisters Road, the Council will only permit secondary retail uses such as use classes A2, A3, A4, A5, or B1.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Car free development is suitable for this site.
- This site is in a Critical Drainage Area - proposals should refer to the Local Flood Risk Management Strategy.
- The existing mature trees along Tottenham High Rd will be retained.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.

SS4: Helston Court

Address	Landbound by Seven Sisters Road to the Southeast, Culvert Road to the South, Braemar Road to the West and Southery Road to the north.		
Site Size (Ha)	2.0		
Timeframe for delivery	PTAL Rating		4
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Residential (C3) with ancillary retail/commercial		
Ownership	Public		
How the site was identified	Housing Renewal Site		

Comment [A106]: We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.

Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.

Proposed Site Allocation
Potential Estate renewal opportunity



Site Requirements

- A master plan approach in collaboration with local residents will be taken to this area seeking to improve permeability, and the coherence of the street network, and improve the residential building stock.
- No buildings need to be retained.
- A new frontage onto Seven Sisters Rd will be created in which buildings of up to 6 storeys will be permitted. Heights will need to be restricted to the north, east and west to respect the amenity of residents of properties on Elizabeth Rd, Culvert Rd, and Braemar Rd.
- Southey Rd will be extended through to Braemar Rd.

Comment [A107]: This needs to be a REAL process of participation in which residents' expressed preferences during genuine consultation are respected,

Comment [A108]: What does this mean? Clarify the principles of the renewal process. No net loss of social housing units.

Comment [A109]: ??? On what basis is this judgement made? Demolition of buildings in use should be avoided.

Development Guidelines

- Improved permeability through the site will be supported to tie the area into the local road network. A through route will be supported, but traffic calmed to stop through traffic.
- This site is made up of several post-war housing developments, and a master plan that ties the area together will be supported.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

Comment [A110]: spelling

SS5: Wards Corner and Suffield Road

Address	Wards Corner Site, High Road London N15		
Site Size (Ha)	0.7	PTAL Rating	6a
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Private and public		
Ownership	Commercial and residential		
How the site was identified	Strategic Housing Land Availability Assessment and existing planning permissions (See below)		

Proposed Site Allocation

Existing Permission 1 - HGY/2008/0303 - Demolition of existing buildings and erection of mixed use development comprising Class C3 residential and Class A1/A2/A3/A4 with access parking and associated landscaping and public realm improvements.

Existing Permission 2 - HGY/2011/1275 - External alteration to front and rear elevation including new shop fronts, angled bay

Comment [A111]: We support the response by Wards Corner Coalition with respect to this site.

Earlier comments relating to the lack of vision for the town centre. This is a key site for the expression of Tottenham's diversity, its cultural and heritage offer and its strength in small businesses and community activities. The potential arrival of Crossrail 2 to Seven Sisters and the Further Alterations to the London Plan relating to retail and town centres and diversity discussed above make this essential. An additional bullet point should be added to confirm that future development proposals will be required to contribute positively to this vision.

Comment [A112]: This section should provide details as to actual usage i.e. indoor market; retail and workspace; community uses; housing.

Comment [A113]: Wrong data. Ownership should be specified and include Transport for London



Future Planning Requirements

- Ensure a comprehensive approach to this site is secured
- To help facilitate a coordinated approach towards development along the High Road and in particular Apex House
- Re-provision of the existing markets should be provided on site and arrangements should be made for the temporary housing of the market whilst the proposal is being developed.
- Secure retail and other town centre uses at ground floor level onto the West Green Road, High Road and Seven Sisters Road frontages.
- This site lies within the Seven Sisters Conservation Area and development should preserve or enhance its appearance as per the statutory requirements
- Ensure a high quality public realm is secured
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- xxxxx

Comment [A114]: It should be acknowledged that incremental development would be consistent with an integrated approach to the development of this site, as long as the whole site and broader area is taken into account.

Comment [A115]: This is inappropriate given two plans already have permission for Wards Corner. The site allocation for Apex House requires any plans for Apex House to consider these existing plans for Wards Corner, so the issue of coordination is dealt with through SS3.

Comment [A116]: It should be clarified that this re-provision will proceed with the agreement and partnership of existing traders, with particular care to ensure long-term affordability, space to grow and provide community services, units suitable for existing uses, and compensation for moving, fit-out costs and legal fees etc. Such commitments are necessary in light of the Mayor of London's commitments in relation to retaining the existing market.

Comment [A117]: This should explicitly mention locally listed buildings and refer to the Council's broader policies and approach to securing the refurbishment of heritage assets along the High Road and more generally

Comment [A118]: There is potential for refurbishment, restoration and infill in and around existing housing .

SS6: Brunel Walk and Turner Avenue

Address	Landbound by West Green Road to the north, Elma Road to the west and Braemar Road to the South.		
Site Size (Ha)	1.4		
Timeframe for delivery	PTAL Rating		3
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Housing Estate		
Ownership	Public		
How the site was identified	Housing Renewal site		

Comment [A119]: We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.

Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.

Proposed Site Allocation

Potential Estate renewal opportunity



Site Requirements

- A masterplan approach should be undertaken.
- Existing buildings do not need to be retained, although refurbishment of the existing blocks with limited infill of the Turner Avenue part of the site should be considered.
- Design should take into account and positively respond to the Clyde Circus Conservation Area adjacent to the site.

Development Guidelines

- Development along West Green Road will set a datum of building heights of 4 storeys for this site. Heights could increase towards the centre of the site, but would need to be reduced to the south, east and west to respect the amenity of neighboring residential buildings.
- Improved site permeability to enhance connection to the local road network. A through route may be acceptable if sensitively integrated and designed to restrict through traffic, including traffic calming measures.

Comment [A120]: What does it mean? This needs to be a REAL process of participation in which residents' expressed preferences are respected. Clarify the principles of the renewal process. No net loss of social housing units.

Comment [A121]: ??? On what basis is this judgement made? Demolition of buildings in use should be avoided.

TG1: Tottenham Leisure Centre Car Park			
Address	Land used for the Tottenham Leisure Centre Car Park		
Site Size (Ha)	0.3		
Timeframe for delivery	PTAL Rating		5
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Carpark for the leisure centre (D2)		
Ownership	Public		
How site was identified	Strategic Housing Land Availability Assessment (SHLAA)		

Comment [A122]:
 We object to the TG1 proposal, which identifies the Leisure Centre car park as a site for built development. We support the objection presented by Judith Hanna, co-chair of Clyde Area Residents Association and a committee member of Friends of Tottenham Green, and of the Sustainable Haringey network. This site should not be built on, but designated to be retained as open space -- particularly to provide facilities for outdoor physical activity, which are almost completely lacking in the already densely built up central Tottenham area. There is a lack of other open space large enough to provide this. The site's location -- adjacent to both the Sports Centre and Tottenham Green -- make it a strategic location for this. It is usual for sports centres to be located adjacent to playing fields and outdoor courts, which extend and supplement their important public health role.

The case for not building on the Leisure Centre car park -- but returning it to public open space, as an extension of the Green -- to make good the existing green space deficiency, even more essential as other new housing developments increase population density in what is already one of the most densely built up areas of London. The target of 10,000 new homes in the borough, most of which will be in Tottenham, means **more public green and open space is needed for residents to enjoy decent quality of life** -- especially as most of the new homes will have little or no home garden space. **Tottenham Green area is identified in Haringey's Local Spatial Framework as an area of green space deficiency:** Bruce Grove South Residents Association area has no public green space at all; Clyde Area RA area has just the Elizabeth Place pocket park and Maysie Memorial Garden micro-patch. Tynemouth Area RA has just Hanover Rd community garden and a grass patch back of the old Prince of Wales hospital. **The London Plan sets a 'no net loss of green space' policy.** Tottenham Green area has suffered massive loss of green space over recent years. Dedicating the open space now used as for car parking as a formal part of the adjacent Tottenham Green, the old village common, last year regenerated as a major community focus, would help re-balance these and other past greenspace losses. For ideas about what form should such a Green extension best take see the representation made to the LDF team by email on 24th March 2015.

Proposed Site Allocation

Mixed use development containing community, commercial and residential uses.



Site Requirements

- This is an extremely prominent and sensitive site, and an exceptional design will be required.
- The site lies within the Tottenham Green Conservation Area and development should preserve or enhance its appearance as per the statutory requirements. Development will be limited to 5 storeys to help achieve this.
- Tottenham Green provides the civic heart of this part of the High Road, and forms the focus of an emerging cultural quarter. Development on this site will help to achieve this aim by providing an additional civic use, and by creating an improved sense of enclosure to the Green and Phillip Lane.
- The education and arts centre to the south, and church within the green are all statutorily listed buildings, and the vicarage directly opposite the site is locally listed. Development on this site will be required to respond to and enhance the setting of these assets.
- Evidence will need to be provided to the Council to demonstrate the loss of the car park will not demonstrably affect the vitality and viability of the leisure centre and library and opportunities have been explored to work with the leisure centre operator to enhance the remaining car parking provision and re-provide an appropriate number of spaces on site where possible.

Development Guidelines

- The new building needs to address Phillip Lane, Tottenham Green, and provide an attractive and easily accessible route to the existing library and leisure centre from Tottenham Green, and provide an acceptable frontage facing the Leisure Centre.
- The new building should act as a 'wayfinder' to this important community asset and should not act as an obstacle to viewing the centre from Phillip Lane and the Green.
- The site is in an identified area of archaeological importance.
- The Green itself has a Significant Local Open Land and Historic Park designation.
- Vehicle access should be from Phillip Lane. Pedestrian access will predominantly be from Town Hall Approach Road, and the primary entrance to the site should be from here.
- A Cycle Superhighway is proposed in close proximity to the site, and local Quietway cycle routes operate in the area. Cycle parking should be provided as part of any development.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

TG2: Tottenham Chances

Comment [A123]:

Address	399 High Road, N17		
Site Size (Ha)	0.5		
Timeframe for delivery	PTAL Rating		6a
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Community Venue		
Ownership	Community Trust		
How site was identified	Strategic Housing Land Availability Assessment (SHLAA)		

Proposed Site Allocation

Mixed use development for community and residential use



Site Requirements

- The development may include one of the following:
 - a sensitively designed limited extension with the retention of the listed building;
or
 - Comprehensive redevelopment justifying the loss of the listed building.
- Proposal for comprehensive redevelopment involving the loss of the listed building will need to be rigorously justified.
- If demolition of the listed building is justified, new developments should continue the building line established in 391 and 413 High Rd.
- Developments should respect the setting of neighbouring locally listed buildings.
- There is potential for backland development behind the High Rd frontage.
- Views to the former High Cross School from the High Rd should be maintained and enhanced where possible.
- The site lies within the Tottenham Green Conservation Area and development should preserve or enhance its appearance as per the statutory requirements. Development will be limited to 5 storeys to help achieve this.

Comment [A124]: For what use?

Comment [A125]: We strongly oppose this. T-Chances, is a very important community centre providing key services and facilities for Tottenham's youth. The protection of T-Chances needs to be explicitly included in the site requirements.

Development Guidelines

- Particular care for the amenity of 413 High Rd should be taken through any potential redevelopment.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

Comment [A126]: State what it is

TG3: Tottenham Police Station and Reynardson Court

Address	398 High Road and Reynardson Court, N17		
Site Size (Ha)	0.5		
Timeframe for delivery	PTAL Rating		6a
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Police Station and Residential		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Strategic Housing Land Availability Assessment (SHLAA)		

Comment [A127]: We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.

Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.

Proposed Site Allocation

Mixed use residential and commercial redevelopment, including the conversion of the existing police station to include commercial space for SME and start up businesses with residential to the rear and estate renewal of Reynardson Court.



Site Requirements

- A GreenLink is proposed at the northern edge of the site, and proposals should facilitate development of an enhanced access to this new route.
- The existing Police station and the façade of 2 Chestnut Rd should be retained as per planning consent (HGY/2011/1604:
Demolition of existing building and erection of new students' accommodation building comprising 6 storeys to provide 94 students units with gym, common room, shop, laundry room, store room cycle store, refuse store and lift)
- There is a presumption for retention of the existing building, but schemes that include 372-376 may be considered where it can be demonstrated that the benefit to the Conservation Area can be enhanced through the extension and/or change of use of these buildings. The rear of these buildings is suitable for redevelopment.
- Building heights will be limited to respect the scale of existing buildings to be retained on this site.
- The site lies within the Tottenham Green Conservation Area and development should preserve or enhance the character of the historic environment, in line with the relevant statutory requirements.
- Demolition and redevelopment of the 1980s extension to the police station, along with space for related ancillary uses, will be acceptable.

Development Guidelines

- The High Road building lines should be continued, with design taking account of the line of the existing police station and 372-376 Tottenham High Rd.
- Development at the northern and southern edges of the site should positively respond to the existing heritage assets and wider historic environment.
- The existing trees to the front and rear of Reynardson Court may be removed, however with an equivalent number of trees, at a minimum, replaced as part of public realm enhancements in proximity to the site. This will be secured via planning obligation.

North Tottenham Neighbourhood Area

Key Sites

5.1 The key sites in the North Tottenham Neighbourhood Area are:

- NT1 Northumberland Park North
- NT2 Northumberland Park
- NT3 High Road West
- NT4 North of White Hart Lane
- NT5 Tottenham Hotspur Stadium

Map 5.3: North Tottenham



Character of the neighbourhood area

Northumberland Park Regeneration Area

5.12.1 The Northumberland Park area includes the Northumberland Park Estate and surrounding areas situated within the Northumberland Park ward. The north of the area is bound by the Brantwood Road and Tariff Road industrial estates and immediately to the north of the industrial estates is the borough boundary with Enfield and the Central Leaside/Meridian Water regeneration area in Enfield. To the east is the Tottenham Hale branch of the West Anglia Main Line, Northumberland Park bus and rail stations and the Victoria Line Depot. The southern boundary is formed by Park Lane and traditional street networks consisting predominantly of two storey semi-detached houses built from the late 1980s to the 1910s with some later additions. To the west of the neighbourhood area is the Tottenham Hotspur Stadium (which is currently undergoing major redevelopment) and the Love Lane Housing Estate (which is part of the High Road West area).

5.12.2 The area is directly adjacent to the Lee Valley Regional Park which provides opportunities for new access points and landscaping strategies that encourage access to the park and waterways.

5.12.3 The neighbourhood area consists of several places and smaller neighbourhoods that have been developed over time. There are a large number of terraced houses in private ownership in the centre of the area, as well as larger Council owned estates. There are a large number of cul-de-sacs in the area and the network of streets is unclear. Generally the east-west roads are well defined but there is a lack of north-south links, contributing to the area being fragmented.

5.12.4 The area suffers from undefined public and private spaces that are not always well looked after. Entrances don't address the street and many frontages are inactive, leaving streets ill-defined and not well overlooked. There is an amount of decent housing stock that could be retained and improved. However, the majority of the post-war buildings are creating poorly structured urban conditions with unclear network of streets and undefined spaces. There is a predominance of social housing and smaller homes.

High Road West Regeneration Area

Comment [A128]: If public spaces are not well-looked after, then the Council should improve its custodianship of these areas. The scenarios set out in the Northumberland Park Masterplan for the demolition of over a thousand council properties (tenanted and leasehold) is a grossly disproportionate response to this problem. The demolition is also a grossly disproportionate response to the issue of North-South road links.

Comment [A129]: Mass demolition is a totally disproportionate response to a problem that is not described with any specificity here. High density developments produce much worse spatial problems with narrow pedestrianized areas without sunlight between very closely built blocks as in Hale Village.

Comment [A130]: In the context of the Northumberland Park Master Plan's scenarios for mass demolitions of council housing it is obvious that the 'predominance of social housing' is seen as a problem by the Council. The Council's uniquely targeted approach to social housing estates as needing the insertion of private housing to create a 'mixed and balanced community' is blatant discrimination against local people on the basis of their economic status. This approach is quite rightly not being used to criticise streets of predominantly owner occupiers by claiming they are in need of social housing to make a 'mixed and balanced community'. All such references and bias against social and council housing should be removed from all Council documents as insulting, untrue, discriminatory and potentially unlawful breaches of Equalities Legislation. This approach is clearly a cover to try to justify the sell-off or use of some Council land cheaply to property developers, and to justify the increasing abandonment of the need to address the needs of local people for more (not less) social housing as the only genuinely affordable and secure housing for thousands of residents.

5.12.5 The area is located in North Tottenham between the Greater Anglia railway line to the west and the High Road to the east. It extends from the new Brook House development in the north to Brereton Road in the south. The area is cut off from surrounding terraced street patterns by the elevated railway which limits connectivity with the High Road and the Tottenham Hotspur Football Club Stadium to the east and neighbourhoods to the north and south. The area is a level site falling gently toward the River Lee to the east. A major tributary of the Lee, the River Moselle and the culverted section runs along White Hart Lane.

5.12.6 The area is characterised by a fragmented urban form which is dominated by three building types: point block 1960s housing set in large areas of open space, industrial sheds, and three storey terraced buildings fronting the High Road and White Hart Lane.

5.12.7 The southern part of the area is predominantly characterised by local authority housing estates which were built in the 1960s and have very poor street and block layouts with a lack of connections and fragmented networks. The northern part of the area is predominantly characterised by large industrial employment units occupied by a number of local businesses such as timber merchants, car mechanics and metalwork fabrication which also includes a safeguarded waste facility. The northern end of the area is characterised by a now vacant superstore and the new 22 storey Brook House development scheme.

5.12.8 Smaller properties typically front the High Road and White Hart Lane and provide a local parade of shops that are in need of investment. This could provide the potential opportunity for minimal expansion of the existing Local shopping parade. The local parade is predominantly characterised by narrow plot widths which extend deeply behind the High Road. The retail units are typically occupied by independent operators and there is a high proportion of hot food take away and convenience stores. This area is also significantly influenced by the scale and form of the football stadium.

Key objectives Northum

berland Park

The key objectives for Northumberland Park are:

- Comprehensive economic, social and physical regeneration focused around a transformative estate renewal programme.
- A substantially improved urban form and character which creates safe, modern and high quality places.
- A range of housing types to meet the needs of the community and create a high quality residential neighbourhood with a distinct and coherent identity, providing at least 2200 new additional homes of a different type, tenure and size and the creation of more family housing in the heart of the neighbourhood.
- Taller or higher density development near to the redeveloped Tottenham Hotspur FC stadium and transport links such as Northumberland Park Station or where there are existing taller buildings.
- New homes along traditional street patterns and sit within an attractive public realm network.
- Preservation and enhancement of existing good quality homes.

Comment [A131]: This repeats the above general allegation about the street layout in Northumberland Park and we have the same response as above.

Comment [A132]:

Comment [A133]: Given low property values on Tottenham High Road, traders are very concerned that the money they receive for their shops will not pay for the cost of starting up another business in London. Haringey Council must make a commitment to paying compensation to any displaced shop-owners that will enable them to do this. Our Tottenham has worked extensively with the affected traders who have demonstrated and petitioned against the proposals to demolish their businesses.

Comment [A134]: *The Alterations to Strategic Policies (2011-2026)* document (dated February 2015) states clearly that estate regeneration will not lead to the re-provision of social housing in the same quantities. Alteration 64 on page 27 states of estate regeneration: '...re-provision of low quality existing council housing with an equal quantum (on a habitable rooms basis) of higher quality modern social housing is not a financially viable option. The building of higher density mixed tenure developments, which increase the quality and range of the affordable housing options for local people is likely to be the only realistic options [sic], and even then, will require significant public subsidy may require flexible application of normal planning policy expectations for affordable housing provision.'

Comment [A135]: The Northumberland Park Masterplan - the *Northumberland Park Strategic Framework Report* states (page 97) that new homes in the area will be between 3-10 stories. Our Tottenham believes that Tottenham's existing pattern of low-rise housing (2-3 stories) in residential suburban development should be respected. The high-dens...

Comment [A136]: It is very misleading to refer to the plans in this way. It is clear that the whole process of developing the plan for Northumberland Park has used very misleading language. The *Northumberland Park Strategic Framework Consultation Report* suggests that respondents wanted homes with gardens to be built (page...

Comment [A137]: The *Northumberland Park Strategic Framework Report* only provides for the preservation of a very small percentage of the existing council homes in any of the scenarios. Even in the 'Minimal Intervention' scenario (page 104) only 183 council homes are preserved with 1154 council homes (909 tenanted and 245 ...

- Improved open space in Northumberland Park as well as improved access to surrounding open spaces.
- Ensures social infrastructure meets existing and future community needs in high quality buildings that promote an integrated community and opportunities for all.

Urban realm improvements

5.13 The urban realm improvements for the neighbourhood area are:

- New and enhanced public open spaces alongside a defined hierarchy of interconnected pedestrian routes.
- A new enhanced public realm and high quality, safer routes that better connect the neighbourhood with Tottenham High Road, the Lee Valley Regional Park and the opportunities delivered by the Tottenham Hotspur FC stadium, transport and infrastructure improvements.
- A mix of commercial uses, including new and affordable workspaces, leisure, and retail that revitalises and activates local streets.
- An improved Northumberland Park Station that reflects the transport improvement on the West Anglia Main Line and potential designation as a Crossrail 2 station. These improvements should also improve security, safety and the experience of arriving by rail along with a new bridge at Northumberland Park Station that forms a key part of new public realm and a landscaped route between the High Road and the Lee Valley Park

Infrastructure

5.14 The infrastructure projects in the neighbourhood area are:

- New pedestrian and cycling bridge at Northumberland Station and new and enhanced routes into the Lee Valley Regional Park
- Improvements to community infrastructure provision including new primary health facilities.
- New and enhanced education facilities commensurate with the growth in forecast population.
- New rail and station facilities at Northumberland Park associated with the delivery of Crossrail 2.
- New and enhanced bus routes reflecting the area's role as a key regional growth hub.

High

Road West Key Objectives

Objectives

5.15 The key objectives for High Road West are to:

- Create a vibrant, attractive and sustainable neighbourhood and a new sports and leisure destination for North London.
- Create a well connected neighbourhood which is accessible by all forms of transport and has attractive walkable streets including new north-south and east-west links

- Provide a safe and welcoming neighbourhood, which is a balanced place to live and work with active street frontages and attractive open space.
- Provide a minimum of 1,400 new homes which are a mixture of different tenures and type, maximising housing choice for residents and creating a thriving area for small business and enterprise.
- Expand the local shopping centre along the High Road fronting the new football stadium, including the new public square.
- Promote social interaction with new public open spaces for the community to foster community cohesion and social inclusion.
- Incorporate a range of residential typologies including courtyard blocks of varying heights and terraced housing.

Urban realm improvements

5.16 The urban realm improvements for High Road West will:

- Create a legible network of east-west streets and north-south links that connect to the surrounding areas, existing lanes off the High Road and open spaces and connect public spaces, key buildings and the station;
- Provide a new public square which will –
 - serve as the heart of the High Road West area and a welcoming gateway into North Tottenham;
 - include a new library, community learning centre and education hub at the centre of the square and space for public activities including screenings, sport events and shows;
 - become a destination for shops, restaurants and cafes with development focused around the new entrance to White Hart Lane Station;
 - support attractive residential typologies; and
 - provide a clear route for visitors to match and event days at Tottenham Hotspur Football Club arriving at a new White Hart Lane station entrance.
- Enhance Tottenham High Road by –
 - creating an attractive shopping destination for local people and visitors; and
 - a programme of improvements to refurbish the existing Victorian building stock and improvements to paving, lighting and street furniture to enhance the attractiveness and safety of the High Road.

Infrastructure

5.17 The infrastructure projects in High Road West are:

- Improvements to community infrastructure provision, including a crèche, a new library and education hub, a new healthcare centre including a pharmacy and new leisure facilities associated with the redevelopment of Tottenham Hotspur Stadium.
- Improvements to White Hart Lane Station and a new entrance to the station to align with the new public square and the new clear route provided by the

squarefromthestationtothenewfootballstadium

- The new Brook House Primary School will open on the former Cannon Rubber Factory in September 2015 (it is currently operating in temporary premises at Tottenham Green)

Allocated Sites in North Tottenham Neighbourhood

NT1: Northumberland Park North			
Address	1-71 Northumberland Park, Roebuck, Altair, Bennetts, and Cooperage Closes, the Lindales, 7-27 Brantwood Rd, Tottenham N17		
Site Size (Ha)	4.9	PTAL Rating	4
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Mix of housing and local shopping centres		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham Physical Development Framework; housing investment and estate renewal strategy		

Comment [A138]: See above comments on the massive problems with the proposed 'estate regeneration' in Northumberland Park as a whole.

Proposed Site Allocation

Masterplanned improvement of the area to improve existing, and create new, residential neighbourhood through the delivery of a major estate regeneration programme that will include the provision of additional high quality housing with an increased range of types, sizes, and tenures, improvements to existing housing stock, new public spaces and new community infrastructure.



Site Requirements

- Development will be in conformity with any future adopted master plan for the area.
- Redevelopment will create more, new, and better housing with greater diversity of scale and tenure and type
- New east-west and north-south routes will be created, and existing routes enhanced. This includes enhancing Northumberland Park as a key bus route through the area, linking with Northumberland Park Station.
- Retention of good housing stock where appropriate
- The High Road frontages should be enhanced including retention of listed and locally listed buildings where appropriate.

Development Guidelines

- High quality new public spaces within the site should be created, with an increase in the amount of publicly accessible urban realm.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Developments should complement and make use of the amenity provided by Florence Hayes Rec (In LB Enfield).
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

Comment [A139]: Extra point: We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.

Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.

NT2:NorthumberlandPark			
Address	NorthumberlandParkEstateArea,Tottenham,N17		
Site Size (Ha)	27.6	PTAL Rating	
			3
Timeframe for delivery	2011-2015	2015-2020	2020onwards
Current/Previous use	Predominantlyhousingwith ancillarycommercial andcommunityuses.		
Ownership	Mixof publicandprivate freeholdsandleaseholds		
Howsitewas identified	TottenhamPhysicalDevelopmentFramework;housinginvestmentsandestaterenewalstrategy		

Comment [A140]: See above comments on the massive problems with the proposed 'estate regeneration' in Northumberland Park as a whole.

Proposed SiteAllocation

Masterplannedimprovement oftheareato improveexisting,andcreate new,residentialneighbourhoods throughthe delivery ofamajor estateregenerationprogrammethatwillinclude the provision ofadditional highqualityhousingwith an increasedrange oftypes,sizes,andtenures,improvementssto existinghousingstock,newpublicspacesand newcommunityinfrastructure.



Site Requirements

- Development will be in conformity with any future adopted master plan for the area.
- Redevelopment will create more, new, and better housing with greater diversity of scale and tenure and type, and will contribute to the creation of a Family Housing Area.
- Existing east-west routes will be enhanced, including Park Lane as a pedestrian and cycling friendly route and Local Centre, connecting Tottenham High Rd and the Lee Valley Regional Park. Bus routes will be improved through the area and link with Northumberland Park Station.
- A fine graining of the road network in the area will be created with the aim of increasing permeability. There will be a strong focus on creating new north-south streets and new streets must connect to existing streets to the north and south of the area, and to new spaces proposed around the new stadium development to the west.
- Retention of good housing stock where appropriate
- Taller buildings will be located at the southeast corner of the site as part of the proposed Northumberland Park tall buildings cluster, and in the west and southwest of the site adjacent to the stadium development.
- Small scale commercial development along Park Lane and at Northumberland Park Station . Any commercial should not detract from the main aim of concentrating town centre uses on the High Road
- New health infrastructure will be provided within the area
- Education infrastructure will be enhanced including the provision of a new through-school within the [master plan area](#).

Development Guidelines

- High quality, new public spaces within the site should be created, with an increase in the amount of publically accessible urban realm.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- The potential for new employment opportunities to be developed along Park Lane should be explored in line with our ambition to revitalise this key local street.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

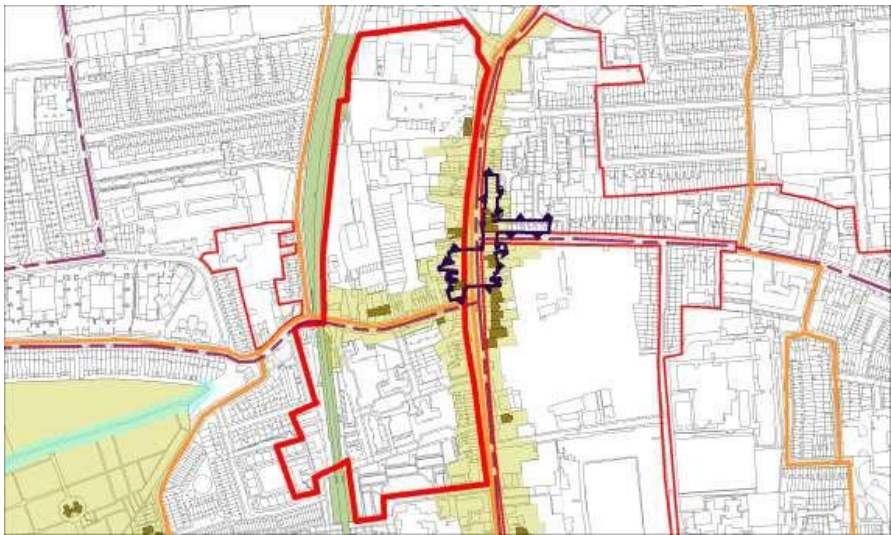
Comment [A141]: Extra point: We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.

Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.

NT3: High Road West			
Address	High Road West regeneration area, High Rd, Tottenham N17		
Site Size (Ha)	11.8	PTAL Rating	4
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Mix of housing estates, industrial estate, high street buildings, and other uses.		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	High Rd West Masterplan		

Proposed Site Allocation

Masterplanned comprehensive development creating residential led mixed use neighbourhood including a new public realm linking White Hart Lane Station and a redeveloped football stadium and an expanded local shopping centre on the High Road opposite the football stadium including the new public square.



Comment [A142]: We support the position expressed by the Tottenham Business Group in the submission they sent to the Council as part of the public consultation for the present AAP. The NT3 proposal does not consider the merits of alternative schemes and is based solely on the scheme being promoted by THFC. It fails to protect and support the interests of not only our local businesses but the present and future residents of the borough. We have strenuously objected to the demolition of the High Road shops and the Peacock Estate Industrial Estate.

NT3 is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. Despite local proposals involving modest changes to allow local business to remain no alternatives have been considered as alternatives to extensive demolition. This is a profoundly flawed methodology and an unsound basis for land use allocations.

No consideration has been given to small businesses. Existing small businesses do not have a role. This conflicts with recommendations in the evidence base (Retail and Town Centres study): "Local shopping Centres will continue to be supported in providing core local shopping facilities and services, for their prospective local communities". Current proposals for High Road West will constrict rather than strengthen the High Road. Retail offer will be limited to a visitor economy rather than a residential community. Core local shopping for the existing community (particularly specialist ethnic) will be virtually eliminated

Comment [A143]: Extra point: We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.

Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.

Comment [A144]: Whilst being opposed to the demolition of Love Lane Estate, should such go ahead we support the report of the LLE Residents Association calling, amongst other things, for all residents to be able to be rehoused back onto the redeveloped estate.

Site Requirements

- Development will need to conform to the Masterplan Framework agreed by the Council's Cabinet in December 2014
- Creation of a new residential neighbourhood through increased housing choice and supply with minimum 1,400 new homes of a mix of tenure, type and unit size – including the provision of existing social rented council homes.
- A new connection between an enhanced White Hart Lane Station, the High Road and the redeveloped football stadium will be created.
- Creation of a new public square and a community park
- New retail provision to enlarge the existing shopping parade, creating a new local centre opposite the new stadium, including the new public square. This should complement not compete with Bruce Grove District Centre.
- Enhance the area as a destination through the creation of new leisure, sports and cultural uses and provide seven day a week activity.
- Increase the quality and quantity of community facilities and social infrastructure – such as a new library, learning and education hub.
- Improve east/west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Park.
- The site lies within the North Tottenham Conservation Area, and includes listed and locally listed buildings. Developments should preserve or enhance their appearance in line with statutory requirements.
- The regeneration of heritage assets should be considered where the benefits of change and sympathetic development can enhance the overall viability and attractiveness of future investment into the future of heritage buildings in the area.
- Tall buildings should be placed along the railway corridor to create a legible tall buildings spine. The buildings should use Brook House as a reference point and descend in height as they approach the North Tottenham Conservation Area.
- Increase and enhance the quality and quantity of community facilities and social infrastructure, including:
 - New Learning Centre including library and community centre
 - New Health facility incorporating a Pharmacist.
 - Provision of new Crèche.
 - Provision of a range of leisure uses, e.g. cinema, bowling alley.
 - Provision of new community sports provision
 - Provision of a new and enhanced public open space including a large new community park and high quality public square and a defined hierarchy of interconnected pedestrian routes.
 - Improved and enhanced entrance to White Hart Lane Station with step free access

Comment [A145]: The plans for the new housing completely contradict the results of the Council's own survey and, we believe they are therefore unlawful. The *High Road West Consultation Feedback Report* of August 2013 clearly states that respondents on the Love Lane estate want 'traditional homes with gardens, built to low density' (page 32 also see page 33 and 37). Love Lane residents are clear they do not want high rise blocks being built (see page 37). The *Consultation Feedback Report* is quite clear that residents in the wider High Road West area did not want high-rise residential blocks, preferring low rise blocks of 3-5 stories. The *Tottenham High Road West Masterplan Framework* indicates clearly, however, that there is an intention to build a large number of urban blocks at 5-6 levels and towers at 12-14 levels (see page 148 and 152 for example). 12-14 levels is higher than any of the council blocks currently in the High Road West area (the highest currently being 3 towers which are ten levels.) It is quite clear that the High Road West plans completely contradict the wishes of the residents as expressed in the consultation documents.

The *High Road West Consultation Feedback* states clearly that Love Lane residents wanted to remain as Council tenants (page 33). Yet as noted in our response to the 'Key Objectives for Northumberland Park section (above) the Council are clear that re-providing social housing in its existing quantity as part of estate regeneration schemes is not financially viable. The Council should never have let the residents of Love Lane believe that new council homes would be built on the Love Lane site if they went along with the demolition of existing homes. Consulting on something that the Council was never going to let happen without making this clear to residents was dishonest and invalidates the results of the consultation. We believe this was unlawful.

Development Guidelines

- Produce a net increase in the amount and the quality of both public open space and private amenity space within the area

- To deliver transport improvements including a new, safe and attractive entrance to White Hart Lane Station and improved rail connectivity.
- Part of the site has a licensed waste capacity, and this will need to be re-provided before development can commence in line with Draft Policy SA4.
- Re-provision of employment floorspace lost as a result of the redevelopment as new leisure, sports and cultural floorspace and as modern, flexible workspaces. This could be achieved by workspaces with potential to connect to High Road retail properties, and/or through the creation of workspace behind the High Road and the railway arches.
- The site is within a Critical Drainage Area and any proposals should refer to the Local Flood Risk Management Strategy
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, and open spaces.
- Establish clear building frontages along the High Road and White Hart Lane to complement the existing character of the Local Centre.
- Incorporate a range of residential typologies which could include courtyard blocks of varying heights and terraced housing.
- In the part of the site facing the new stadium, development should respond to both the existing High Road character, and the greater heights and density of the new stadium. This needs to be carefully considered given the height differential between the existing historic High Road uses and future stadium development.
- Larger commercial and leisure buildings should be located within close proximity to the new public square linking the station to the stadium.
- Due to the size of the site and scale of development envisaged, particular consideration of the effect of the works on the nearby communities, including how phasing will be delivered. This is referenced in the High Road West Masterplan Framework.
- The Moselle runs in a culvert underneath the site and will require consultation with the Environmental Agency.

NT4:NorthofWhiteHartLane

Address	Haringey Irish Cultural & Community Centre, Pretoria Road, Tottenham, London N17 8DX		
Site Size (Ha)	1.0	PTAL Rating	4
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Community facility, employment land		
Ownership	Mix of public and private freeholds		
How site was identified	SHLAA2013		

Comment [A146]: We strongly oppose the loss or displacement of a community facility and employment land. The continuous existence of the Irish Centre needs to be guaranteed in the site requirements, not 'the potential to accommodate community uses'.

Proposed Site Allocation

Residential mixed use development with the potential to accommodate community uses, provide employment, improve accessibility, and enhance the White Hart Lane frontage.



Site Requirements

- New east-west route across the northern part of the site, linking White Hart Lane and Pretoria Rd and enhancement to north/south access to improve permeability.
- White Hart Lane retail premises should be enhanced through any development.
- There should be no net loss in employment floorspace.
- The existing community use should be re-provided before any redevelopment occurs.

Comment [A147]: What does this mean? On site? Off site?

Development Guidelines

- The potential for a new north-south route linking the new east-west route to White Hart Lane at the south of the site should be considered.
- Consideration of height of neighbouring buildings particularly adjacent to the properties on Pretoria Rd. This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Developments should seek to complement future development at High Road West.
- Consideration of sensitive neighbouring uses such as the school.

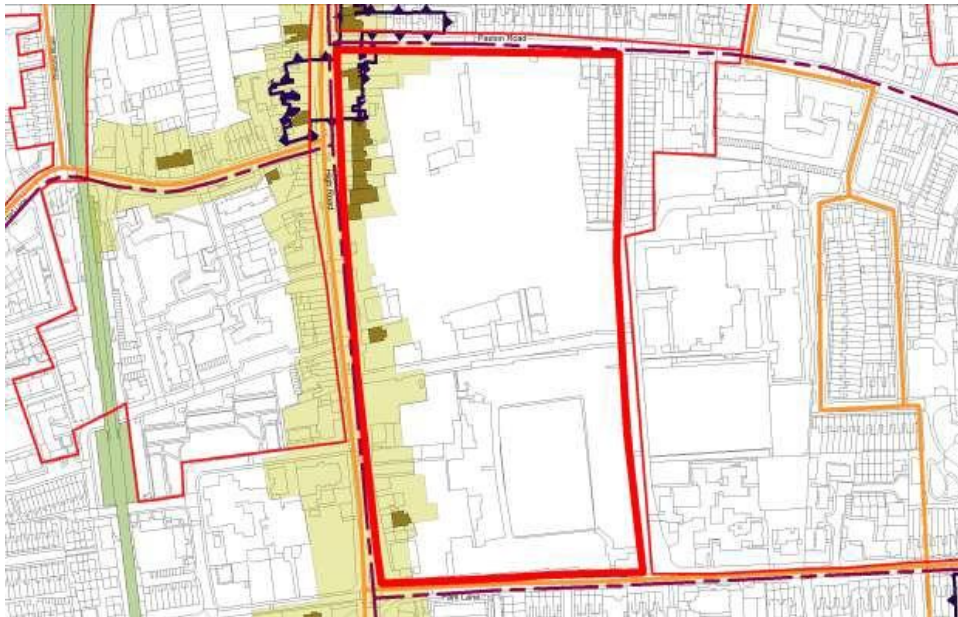
NT5: Tottenham Hotspur Stadium

Address	748 High Road, Tottenham, London N17 0AP		
Site Size (Ha)	9.2	PTAL Rating	3
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Football Stadium (Leisure), Technical College and Sainsbury's (as a result of the extent of planning permission)		
Ownership	Multiple private freeholders and leaseholders		
How site was identified	Existing planning permission		

Comment [A148]: -The Tottenham AAP DPD does not consider research on stadium led development and regeneration, which finds very little contribution to the local economy – jobs provided are generally small scale and part time and arguments about local multiplier effects do not take place in practice. Therefore, the new Spurs stadium should not be presented as a driver of economic development in Tottenham. See separate submission from Mark Panton, Birkbeck University, on this point for more information, and the recent London Assembly Regeneration Committee report on this topic.

Proposed Site Allocation

Redevelopment of existing football stadium to increase match day capacity, with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site.



Future Planning Requirements

Should any new planning applications come forward in the future the Council will seek:

- Comprehensive development across the site;
- High quality design, that responds positively to the Conservation Area and provides an active frontage to the High Road and Park Lane, including considering connectivity and scale of development;
- Improved interface with sites to the east of the stadium to support regeneration objectives for this area;
- High quality publicly accessible spaces within the site on non-match days that complement other public realm/spaces in the area and link with key existing and future walking and cycling routes in the locality;
- The leisure/ commercial uses should be complementary and not competing with the uses proposed on the expanded Local Centre on the western side of the High Road within the High Road West area.
- To address the statutory presumption in favour of retaining heritage assets unless justifiable;
- An increase in residential on the site; and
- Improved connectivity east-west across the site.

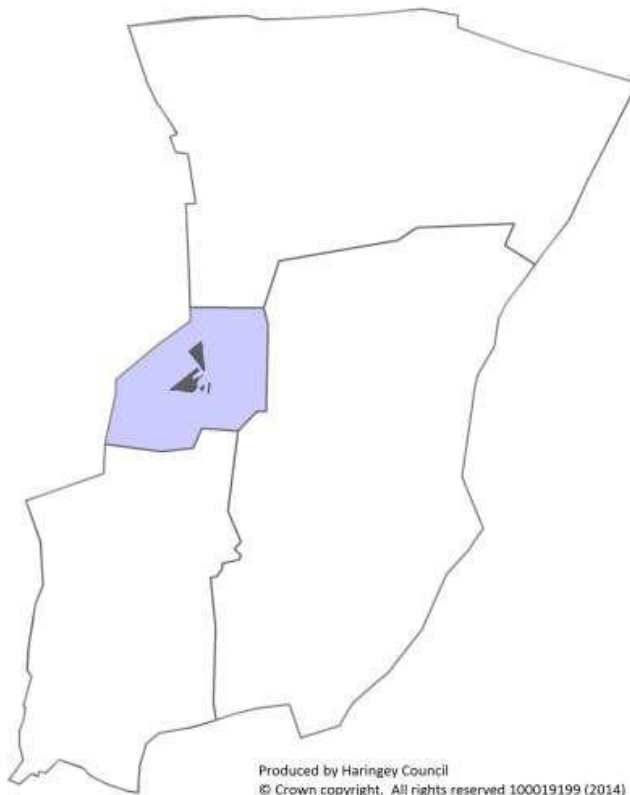
BruceGroveNeighbourhoodArea

KeySites

5.13 Thekeysites inthisneighbourhoodareaare:

- BG1BruceGroveSnookerHallandBanquetingSuite
- BG2TottenhamDeliveryOffice
- BG3BruceGroveStation
- BG4MoorefieldRoad

Map5.4:BruceGrove



The character of the neighbourhood area

5.14 In contrast to the other neighbourhood areas in Tottenham, Bruce Grove will experience more moderate change based on enhancing its existing and distinctive retail, heritage and residential assets.

5.15 The role of Bruce Grove as the retail heart of the High Road will be reinforced through the enhancement of its conservation area characteristics and associated heritage assets while the shrinkage of the town centre boundary along Bruce Grove will help to intensify and focus retail provision along the High Road.

5.16 Bruce Grove's primary retail frontage and core shopping area is along the High Road while the town centre boundary (along with a significant secondary portion of retail frontage) continues along the A10 (Bruce Grove). In general the commercial units in this part of the town centre are of poor quality and dilute the commercial offer along the High Road which should be the functional and physical axis to which the adjoining areas respond.

5.17 In general the quality of the streetscape within Bruce Grove is varied with some Victorian period properties interspersed with more modern development. However, the quality of the built environment is often detracted from by poor quality shop fronts and street clutter from signage and street furniture. This situation is worsened by the high volumes of traffic and the car-dominated movement corridor of the High Road which does not promote pedestrian movement. In general there are a number of transport infrastructure issues that need to be addressed through proactive planning if the Council's aim of facilitating a modal shift from the car in this area is to be achieved. These issues include the quality of Bruce Grove station which serves this area but is poorly located and inaccessible to people with limited mobility, parking standards, poor east-west movement to the Lee Valley Park and the lack of safer routes for cycling.

Comment [A149]: What does this mean? Quality in terms of the physical state of the frontage? Or is this a judgement about the nature of the shops, the goods and target groups they serve? If the latter, this is not an appropriate statement to make.

Key neighbourhood area objectives

5.18 The key objectives for the neighbourhood area are:

- Limited growth through complementary mixed use development on allocated sites consistent with the existing scale and character of the Conservation Area and Town Centre.
- Consolidation and targeted reduction of primary retail frontages within the town centre boundary along Bruce Grove to consolidate and intensify commercial provision along the High Road, improvements to shop fronts and signage and managing potential for "negative clusters" of betting shops and takeaways.
- Improvement of Bruce Grove Station and forecourt through redevelopment and re-branding to London Overground network.
- The promotion of high quality new restaurant/residential character area along Bruce Grove which reflects the potential aspirations and clustering of two major residential-led development sites and capitalises

Comment [A150]: Whose aspirations?

on opportunities from the improvement of Bruce Grove Station.

- The enhancement and legibility of Bruce Grove's heritage assets which complement the town centre's character and as a place for smaller floorplate commercial units.

- Public realm improvements and transport projects which facilitate improved pedestrian circulation and movement including improvements to permeability.
- The enhancement and improvement of way finding and legibility of the area's heritage assets such as Bruce Castle.

Urban realm improvements:

5.19 The urban realm improvements for the neighbourhood area are:

- Improved/widened footways along Bruce Grove to improvement and bus passenger waiting facilities
- Redevelopment and environmental improvements to Bruce Grove Station Forecourt
- Targeted streetscape and environmental improvements including an enhanced urban realm between Seven Sisters and Tottenham Green and recognition/redesign of the street to encourage use of the proposed "GreenLink" to Tottenham Hale and the Lee Valley Regional Park.

Infrastructure

5.20 The infrastructure projects for the neighbourhood area are:

- Investment in Bruce Grove Station will take place as part of the transfer of the station asset to TfL and introduction of London Overground services in 2015.

Allocated Sites in Bruce Grove Neighbourhood

BG1: Bruce Grove Snooker Hall and Banqueting Suite			
Address	110-119 Bruce Grove and Public Convenience building, Bruce Grove N17		
Site Size (Ha)	0.4		
Timeframe for delivery	PTAL Rating		5
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Partially vacant, retail and community uses.		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Strategic Housing Land Availability Assessment (SHLAA)		

Comment [A151]: The site consists of viable buildings and usage and therefore should not be subject to a site allocation. Any future development should conform to the Guiding Principles set out in our overall response to the AAP.

Proposed Site Allocation

Retention of existing Banqueting Suite building, entrance to the former cinema building, and former public toilets building, with redevelopment of the remainder of the former cinema, and land behind, as well as improvement of the Bruce Grove frontage for town centre secondary frontage uses.



Site Requirements

- The public toilets, entrance to the former cinema, and the Banqueting Suite frontage will be retained and brought back into active use.
- An alternative use for the former public toilets building will be found, with improvements to the surrounding public realm.
- Retention of the secondary town centre frontage on this site, and creation of new frontage on the former cinema site.
- The site lies within the Bruce Grove Conservation Area and developments should preserve or enhance its appearance as per the statutory requirements.

Development Guidelines

- A small new urban square could be considered on the former cinema site.
- A sensitive additional storey extension to the Banqueting Suite will be acceptable where it can be demonstrated that it enhances the setting and character of the building, and the wider Conservation Area.

BG2: Tottenham Delivery Office

Address	53 Moorefield Road, 1 and 5 Bruce Grove, N17		
Site Size (Ha)	0.6		
Timeframe for delivery		PTAL Rating	5
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Employment and Community Uses		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Existing Planning Permissions and Strategic Housing Land Availability Assessment (SHLAA)		

Comment [A152]:
 NO NET LOSS OF EMPLOYMENT LAND AND FACILITIES: The site is occupied by the Tottenham Delivery Office which provides a vital public service including retrieval of parcels and special delivery items and therefore should not be subject to a site allocation. Howarth, a timber and building merchant, occupies part of the proposed site allocation. It is a thriving local business which should not be displaced.

In the back of this site is the only open space in Bruce Grove. The impact of any development on BG2 on this adjacent green space needs to be very carefully considered and in Site Requirements the council should aim to ensure the protection of the Ecological Valuable Site.

Proposed Site Allocation

Residential development of the existing post office sorting office, builder's merchant and rear of no 5 Bruce Grove, along with creation of a new public route from Moorefield Road through the site to the

5 Bruce Grove (HGY/2014/1041): Demolition of side and rear extensions. Conversion of part ground, first and second floors into four flats (3 x 1 bed and 1 x 2 bed). Erection of 10 Houses (8 x 3 bed and 2 x 4 bed) at the rear of the site with associated access road, parking spaces and landscaping.

7 Bruce Grove (HGY/2012/0563): Conversion of Grade II listed building to provide 9 residential units and erection of a new building to the rear to accommodate 4 self-contained flats.



Site Requirements

- Developments should seek to enhance the setting of all heritage assets along Bruce Grove, especially those fronting the site.
- Development proposals for the site should include a new vehicular access road from Moorefield Road (on the eastern edge of the site). This should also provide an access to the permitted residential development to the rear of No 5, currently proposed to be accessed by a narrow route off Bruce Grove. This could then be converted to a pedestrian and cycling route only, protecting the listed buildings and enhancing their setting.
- The new route through the site should allow the possibility of a connection to the southern end of Champa Close to the west of the site.
- The site lies within the Bruce Grove Conservation Area and developments should preserve or enhance its character of the historic environment, in line with relevant statutory requirements.
- Contribution towards improvement of public realm along Bruce Grove, especially No. 1-5 should be sought.

Comment [A153]: need to address security concerns of residents affected by the route

Development Guidelines

- Developments should positively respond to the adjacent heritage assets in terms of scale, form and massing
- A maximum of four storeys in height would be considered with three storeys or lower closest to the listed buildings and the terrace to the south.

BG3: Bruce Grove Station			
Address	509-513A High Road, N17		
Site Size (Ha)	0.1		
Timeframe for delivery		PTAL Rating	6
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Rail station		
Ownership	Public		
How site was identified	Identified through master planning process		

Proposed Site Allocation

Improvements to Bruce Grove Station and forecourt including high quality retail or restaurant use (Use Class A3/A4) facing the High Road



Site Requirements

- Improvements to the locally listed station building and public realm outside of the station.
- An innovative single storey extension on the existing forecourt, linked to the arched openings within the station, for retail or restaurant use.
- Space for a landscaped court at the northern end of the existing forecourt, with a potential that it could in future be connected to the station and used as an outdoor area to a restaurant unit.
- Widening the pavement to the High Road.
- An active, lively frontage onto the High Road that complements the existing station.
- Between 1 and 3 retail/restaurant units
- The site lies within the Bruce Grove Conservation Area and developments should preserve or enhance its appearance as per the statutory requirements.

Development Guidelines

- Should respond to both the existing High Road shop frontage as well as complement the existing locally listed Bruce Grove Station.
- Form & massing of the design should enhance the character & appearance of the Bruce Grove Conservation Area and surrounding heritage assets.
- Should respond to the TfL proposals for the public realm in the High Road and Bruce Grove, which form the A10 and are part of the Strategic Route Network.
- Servicing and refuse storage to the new retail/restaurant unit(s) to be resolved.

BG4:MoorefieldRoad			
Address	24 MoorefieldRoad		
Site Size (Ha)	0.1		
Timeframe for delivery	PTAL Rating		6a
	2011-2015	2015-2020	2020onwards
Current/Previous use	StorageDepotandrailwayarch		
Ownership	Public		
Howsitewas identified	Identifiedthroughmasterplanningprocess		

Comment [A154]: NO NET LOSS OF EMPLOYMENT LAND AND FACILITIES. This site is occupied by MEMS, building merchants, a successful local business and therefore should not be subject to site allocation.

Comment [A155]: Wrongly identified. The site is occupied by Mems, building merchants.

Proposed SiteAllocation
Residentialdevelopment



Site Requirements

- The site lies within the Bruce Grove Conservation Area and is also adjacent to listed and locally listed buildings. Development should preserve or enhance heritage assets and the wider historic environment.
- Developments should include rationalisation and improvement of the public realm along Moorefield Road, especially the pavement beside the stairs to the station platform.

Development Guidelines

- Developments should positively respond to adjacent heritage assets in terms of scale, form and massing
- Considerations should be given to the site's proximity to the railway line, especially with regard to residential use, and due consultations should be carried out with Network Rail.
- The developments should not be visible from the High Road over and above the station. A maximum of four storeys is envisaged.

Tottenham Hale Neighbourhood Area

Keysites

The key sites for the neighbourhood area are:

- TH1 Station Square West
- TH2 Ashley Road South
- TH3 Ashley Road North
- TH4 Station Interchange
- TH5 Tottenham Hale Retail Park
- TH6 Hale Village
- TH7 Hale Wharf
- TH8 Welbourne Centre
- TH9 Fountayne Road & Markfield Road
- TH10 Herbert Road and Constable Crescent

Map 5.5: Tottenham Hale



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The Character of the Neighbourhood Area

5.21 Located to the far east of the borough, Tottenham Hale's eastern boundary edges the River Lee. The area can be classified as a diverse, inner London urban area located within a rich natural physical landscape with large areas such as the Lee Valley Park and the Walthamstow Wetland towards the east dedicated to open space, marshes and allotments. At present accessibility to these significant assets is poor and the area feels cut off from this neighbourhood area.

5.22 While transport links and infrastructure are a major advantage of the area with excellent public transport and a high PTAL rating around Tottenham Hale Station accessibility to the station is poor with a fragmented street pattern and a number of housing estates limiting through movement. At present Tottenham Hale Station acts as an anchor point for the area and has some of the highest levels of public transport accessibility in the Upper Lee Valley with a significant interchange between local buses, the Victoria Line and National Rail trains into London Liverpool Street and Stratford and north to Stansted, Cheshunt and Cambridge.

5.23 The area's lack of permeability and severance is exacerbated by the car dominated main roads, the railway line, Ferry Lane and a traffic gyratory. As a result, Tottenham Hale lacks a cohesive sense of place and has a fragmented urban structure without a discernible focal point for community activity.

5.24 While Tottenham Hale lacks a town centre designation, a major commercial focal point in the area is the Tottenham Hale Retail Park which is a purpose built complex providing large format floor space typically for the sale of large goods.

5.25 Haringey's emerging 2015 Open Space and Biodiversity Study indicates that there is an existing open space deficiency in the area when measured against the eight typologies. Whilst the Lee Valley Regional Park (LVRP) is classed as strategic open space and in this typology provision is adequate, access to smaller open spaces such as pocket parks within the Tottenham Hale area is deficient.

5.26 Tottenham Hale's employment areas including Millmead and Lockwood Industrial Estates to the north of Hale Village and the South Tottenham Employment Area (Fountain Road and Markfield Industrial Estates) to the south of the Retail Park are a microcosm of Tottenham's diversity, with a rich mix of business types, building stock and demographics contained within a relatively small geographic area. These areas are currently performing well with low vacancy rates. In some areas around the Rangemoor Road Employment Area and the South Tottenham Employment Area there is an nascent creative sector but with a number of unauthorised live/work issues.

5.27 The neighbourhood area is one where targeted investment can best accelerate the delivery of substantial volumes of new homes and jobs. Investment in transport infrastructure is already happening, however to create a community with 5,000 homes and 4,000 jobs, there is a need for early infrastructure planning (working with the utility providers) and significant place-shaping investment to ensure that we are creating a place that can serve as a home, a place of work and a destination in its own right.

5.28 Through these interventions including the construction of a Green Link, Tottenham Hale will be a destination where people can

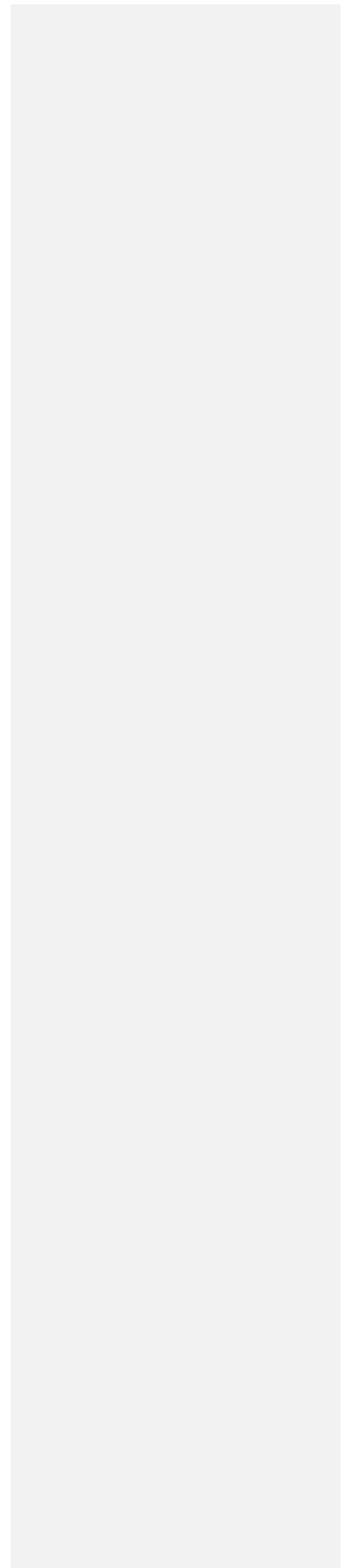
Comment [A156]: The infrastructure needed to cater for such a growth is more than utilities. Scant and superficial mention is made of the need for health infrastructure for example, which even now, before 5,000 people move in, is entirely inadequate for the local population. People moving into Hale Village find it difficult to register with a GP for example.

Comment [A157]: The Green Link construction referred to here does not mention its proposed route through Down Lane Park. The green link will have a detrimental impact on Down Lane Park, and this poses a threat to peaceful safe use of the park as well as loss of park amenities.

The Park is a vital local amenity fought for by local people when there were previous proposals to build houses on it. This was opposed by the community, who then worked to secure funding for the new children's playground. This is a lifeline for families living locally, especially those in temporary housing or in flats. The green link will cut through this and it is entirely unacceptable that this should go ahead at vast public cost, and at great social cost to the community living in the areas to the north west of Tottenham Hale Station.

The proposal has been strongly objected by the Friends of Down Lane Park and their response provided as an appendix A3 provides further detail of their position. There is no evidence that it is what local people want or any indication that people will use. For much of the route there are existing well-used roads and pavements, and for other parts of the proposed link there is no demand for extra routes. The proposed route also depends on the removal of significant barriers, such as Murphy Ltd builders yard on Ashley Road.

easily access the open spaces and waterways of the Lee Valley Park. Removing the barriers to the Lee Valley Park and creating a



sustainable network of cycle and pedestrian routes was a key objective of the Upper Lee Valley Opportunity Area Planning Framework and is now reflected in the aims of the Area Action Plan.

5.29 Tottenham Hale will provide a range of housing with the emphasis being on the more affordable end of the spectrum. The delivery of 1 and 2 bed units will be prioritised in keeping with Tottenham Hale's urban character. High quality family housing will be concentrated on sites that best accommodate this use through access to open space or relate to increased social infrastructure provision. The housing approach in this area also recognises the opportunity to introduce a quality, managed institutional private rented sector at scale in the heart of the new district centre.

5.30 Employment land in this area will be retained and intensified in order to create a greater job density, whilst recognising that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives. The successful employment elements of the different areas will be promoted while in the South Tottenham employment area, there is the opportunity to introduce limited warehouse living to those working in the area's nascent creative sector. Millmead and Lockwood industrial estates will continue to be protected. The 4,000 jobs delivered in Tottenham Hale will be from the core of the district centre, intensifying existing retail offer, some office and higher education institutions and small scale creative employment in Warehouse Living accommodation in the relevant designated areas.

Key Neighbourhood Area Objectives

5.31 The key objectives for this neighbourhood area are:

- A distinctive new mixed use district centre incorporating higher density development will be created at Tottenham Hale in accordance with the Tottenham Hale District Centre Framework
- The delivery of 5,000 new homes through a portfolio approach to housing that offers a wide range of choices across the housing spectrum.
- The creation of 4,000 new jobs in a wider range of sectors including retail office, leisure and enterprise and craft related employment spaces, including new and improved/enhanced industrial workspace in the established industrial areas and the intensification and protection of B class use on employment land
- The Council will take a portfolio approach to housing, using the delivery tools at its disposal to make flexible arrangements for certain uses in key areas of Tottenham Hale.
- An enhanced public realm that prioritises pedestrian circulation and linkages to the Lee Valley Regional Park, including through a new Green Link.
- The designation of sites for significantly improved community facilities including a new health care facility, and a new all-ages primary school (Harris Academy) and a education hub which may include a multi-institution higher education campus
- Development within the wider Tottenham Hale area will be required to respond to the aspiration for a distinctive new walkable "place/destination."
- Given the fragmented site ownership, and the aspirations for a new, coherent centre with distinct but harmonious urban form, development on allocated sites shall be in accordance with coordinated master plans.

Comment [A158]: The housing proposed is largely high rise tower blocks 'with the emphasis being on the more affordable end of the spectrum'. It goes on to say 'the delivery of 1 and 2 bed units will be prioritised in keeping with Tottenham Hale's urban character'. Yet the great need here in Tottenham Hale, as in the rest of Tottenham is for genuinely affordable public housing for families. Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise.

Comment [A159]:

Comment [A160]: What criteria will be used to define what is 'successful employment'? This needs to be made very clear.

Comment [A161]: Tottenham Hale has a high proportion of families living in private rented and temporary accommodation. There is no mention of tenants and their needs in Haringey's "Local Plan Preferred Option Development Management Policies Consultation Document February 2015. The AAP for Tottenham Hale similarly does not mention tenants once, whilst making 46 references to owners. Yet the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments.

Comment [A162]: Very unclear sentence which needs unpicking. What does this really mean, what are the implications for local residents, and what are the Council's intentions?

Comment [A163]: The Green Link construction referred to here does not mention its proposed route through Down Lane Park. The Park is a vital local amenity fought for by local people when there were previous proposals to build houses on it. This was opposed by the community, who then worked to secure funding for the new children's playground. This is a lifeline for families living locally, especially those in temporary housing or in flats. The green link will cut through this and it is entirely unacceptable that this should go ahead at vast public cost, and at great social cost to the community living in the areas to the north west of Tottenham Hale Station.

Comment [A164]: More social infrastructure is needed to cater for the planned growth, and more evidence is needed of where this would go.

- The Council and its partners will support measures to promote comprehensive delivery on key strategic sites, including undertakings site assembly
- Along the River Lee encourage its active usage through the provision of canal boat mooring facilities.
- Relocation of the Ashley Road depot facilities.

Urban realm improvements

5.32 The urban realm improvements for the neighbourhood area are:

- A Tottenham Hale Green Link bisecting Ashley Road and leading to the Lee Valley Regional Park which encourages walking and movement and improves sightlines to the Lee Valley Regional Park
- New north/south route connecting Ashley Road to the Retail Park
- A series of interconnected, permeable, safe courtyard sites on development sites between Fountain Road and Ferry Lane
- At the Retail Park site, the incorporation of a public square which acts as a focal point for the community
- Along Ashley Road, a public realm and road surface that prioritises the pedestrian movement, including the introduction of a shared surface, pavement widening and dropped kerbs,
- Design features to reinforce the River Lee's role for amenity and leisure, including a riverside route at Hale Wharf, paddocks and a canal towpath,
- Improvement with Ferry Lane and Forrest Road - Wetlands Access Centre - Blackhorse Lane - joint investment opportunities

Comment [A165]: The Green Link construction referred to here does not mention its proposed route through Down Lane Park. The Park is a vital local amenity fought for by local people when there were previous proposals to build houses on it. This was opposed by the community, who then worked to secure funding for the new children's playground. This is a lifeline for families living locally, especially those in temporary housing or in flats. The green link will cut through this and it is entirely unacceptable that this should go ahead at vast public cost, and at great social cost to the community living in the areas to the north west of Tottenham Hale Station.

Infrastructure

5.33 The infrastructure projects for the Neighbourhood Area are:

- Healthcare facility of 1500-2000sqm in size to accommodate in the short to medium term, existing and increased demand as the population grows.
- Decentralised energy hub, forming part of a wider decentralised energy network
- All through school - Harris Academy and multi-use sports area
- Measure to protect and enhance the Paddocks
- New bridges crossing the River Lee

Comment [A166]: Demonstrate this is enough for the existing backlog/shortage AND planned population growth

Allocated Sites in the Tottenham Hale Neighbourhood

TH1: Station Square West			
Address	29-51 The Hale, 1-21 Hale Road, 1-25 Ashley Road, Station Road		
Site Size (Ha)	2.7		
Timeframe for delivery	PTAL Rating		5
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Retail, restaurants, employment land and garage		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		

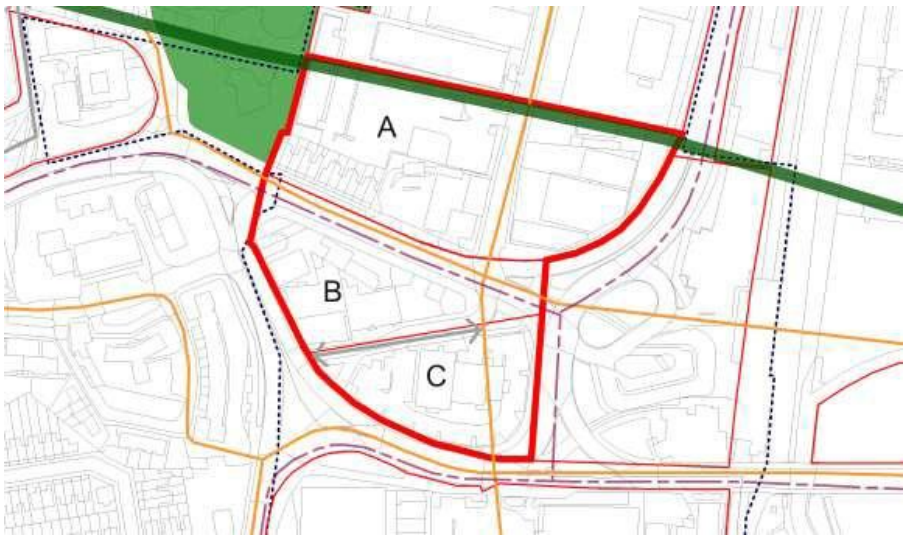
Comment [A167]:
 Comment to edit once Claire has an answer from Zena about the location: The petrol station is a very useful local service which is located at the confluence of many roads. We wish it to be retained. Building a 15 storey tower on the adjacent site at the corner of Ashley Road is entirely unnecessary and out of keeping with this side of Tottenham Hale

Proposed Site Allocation

Area A: Comprehensive redevelopment of the Southern end of Ashley Road forming part of a new District Centre.

Area B: Comprehensive redevelopment incorporating new District Centre uses including a hotel use with residential and enhanced public realm.

Area C: Comprehensive redevelopment creating new District Centre uses with residential and enhanced public realm.



Site Requirements: Area A

- This site (Area A) will be comprehensively redeveloped, and must accord with the emerging master plan for Tottenham Hale District Centre, including areas B & C of this policy.
- This site (Area A) will be given a Designated Employment Area: Regeneration Area status to recognize the contribution to the local economy that this site can make. It is anticipated that the redevelopment of this site will not create a net reduction in employment floor space and will result in a substantial increase in jobs.
- A Green link will be created along the northern edge of the site, running between Tottenham High Road and the Lee Valley.
- Ashley Road will be enhanced, with an enhanced crossing of Hale Road/Watermead Way being created.
- Town Centre uses will be required on all frontages to Ashley Road. Active frontage, potentially employment, should be provided on the Hale Road/Watermead Way frontage.
- There should be a greater proportion of employment use provided to the east of Ashley Road, with a minimum ground floor employment, and more if viable.
- Heights should generally be highest along the Hale Road/Watermead Way frontage.
- Developments should take the form of perimeter blocks with the potential for tall point block buildings of 11+ storeys at strategic points along the southern edge of this site.
- Ashley Road should provide a pedestrian and cycle friendly link through the District Centre including linking the Station Square and the Green Link.
- Proposals should consider the potential opportunities presented by retaining (and refurbishing) or demolishing the existing Victorian terraces on Hale Road.

Comment [A168]:

There are serious concerns about Tottenham Hale being designated a district centre. The proposals for development do not mention the impact of a night time economy which can be detrimental to a community's quality of life and this is largely a residential area. This is a serious omission and needs to be rectified and spelt out so local people can make an informed judgement.

Comment [A169]:

This proposal includes a 'green link' from Hale Village to the Tottenham High Road. This cuts directly across Down Lane Park and specifically across the children's play area. We object to this since the play area is sited near to the families living on Chesnuts Estate, Warren Court and the flats around Monument Way. No account is taken of their needs or wants or of this loss of amenity. At the same time the development guidelines say the 'interface with Down Lane Park should be treated with care'. The development of the green link would not do so.

Comment [A170]:

Tower blocks along Watermead Way will impact on the view people have from the Parkview Road side of Tottenham Hale. No regard is given in these proposals to the impact on existing residents in this part of Tottenham Hale.

Comment [A171]:

The comprehensive redevelopment proposed suggests perimeter blocks of 11+ storeys around the southern edge of the site, and a wider forest of block up to 15 storeys. This would change the character of the area, impact on the open feeling and environment of the park, and could conceal it from view. There is mention of block courtyards which suggests grouping of towers which will impact on the local environment, views and quality of life.

Development Guidelines: Area A

- The interface with Down Lane Park should be treated with care.
- Developments should form a consistent building line, and complement Berol House and the Eagle Pencil Works to the north.
- Ashley Road should be retained as a key movement spine
- The Victoria Line runs in a shallow tunnel beneath part of this site.
- This site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning permission.
- Care will be required on south facing frontages to limit heights to avoid overshadowing of block courtyards.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Parking should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a decentralized energy network. This may be as a decentralised energy hub, as

- a customer, or requiring part of the site to provide an easement for the network.
- Each development will be expected to contribute to a comprehensive public realm strategy, through the use of pooled S106 contributions.

Site Requirements: Area B

- Permission has already been granted for a part of this site, and developments should complement this permission. (HGY/2014/0498: A96 bed hotel (Class C1) including a 146sqm restaurant/bar, 3 disabled car parkings spaces and 6 dedicated cycle spaces)
- This site (Area B) will be comprehensively redeveloped, and must accord with the emerging Tottenham Hale District Centre Framework, including areas A & C of this policy.
- Ashley Road will be extended through this site as the key public and movement spine passing through the Centre.
- Ground floor uses on this site will be town centre uses, playing a key role in establishing Tottenham Hale as a District Centre.
- Existing employment floorspace will be reprovided on this site.
- Development will generally be 3-10 storeys as a perimeter block. Taller elements marking the key corners of the site will be considered, possibly of 11+ storeys. However, the site cannot accommodate tall buildings on all corners and therefore a comprehensive proposal will be necessary for Area B.

Development Guidelines: Area B

- The Victoria Line runs in a shallow tunnel beneath part of this site.
- This site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning permission.
- Developments should strengthen the role of Station Road
- Station Rd, and potentially the extended Ashley Rd will provide service access for the buildings on this site.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Parkings should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a decentralized energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Care will be required on south-facing frontages to limit heights to avoid overshadowing of block courtyards.
- Each development will be expected to contribute to a comprehensive public realm strategy, through the use of pooled S106 contributions.

Site Requirements: Area C

- This site (Area C) will be comprehensively redeveloped, and must accord with the emerging Tottenham Hale District Centre Framework, including areas B & A of this policy.

- Ashley Road will be extended through this site as the key public and movement spine passing through the Centre.
- Development of the part of the site to the west of Ashley Rd will generally be 3-10 storeys as a perimeter block. Taller elements marking the key corners of the site will be considered, possibly of 11+ storeys.
- Development of the part of the site to the east of Ashley Rd will reinforce the Ashley Rd route and provide enclosure for the bus station and the District Centre. This could be 7-10 storeys with the potential for a higher point block building of exceptional quality at the southern end rising up to 15 storeys.

Development Guidelines: Area C

- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Station Rd, and potentially the extended Ashley Rd will provide service access for the buildings on this site.
- Parking should be minimised on this site due to the excellent local public transport connections.
- Each development will be expected to contribute to a comprehensive public realm strategy, through the use of pooled S106 contributions.

Comment [A172]: The comprehensive redevelopment proposed suggests perimeter blocks of 11+ storeys around the southern edge of the site, and a wider forest of block up to 15 storeys. This would change the character of the area, impact on the open feeling and environment of the park, and could conceal it from view. There is mention of block courtyards which suggests grouping of towers which will impact on the local environment, views and quality of life.

TH2: Ashley Road South			
Address	Land at Ashley Road South of Burdock Road		
Site Size (Ha)	2.5		
Timeframe for delivery	PTAL Rating		4
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Former Factory, Employment.		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		

Comment [A173]: This plan proposes agreed link which cuts directly across Down Lane Park, and specifically through the children's play area. We object to this proposal. Down Lane Park is one of the very few amenities for people living in Tottenham Hale's residential roads and estates. This is treasured and valued, and its development has been fought for by the local community and we now have a thriving green flag park with new tennis courts, a fin play area, and other facilities.

The proposed green link is a very expensive and unnecessary project since there are many ways people living in Hale Village and Ferry Lane can reach Tottenham High Road should they wish to do so. The millions proposed for this could be better spent on social housing or local environmental improvements.

Proposed Site Allocation

Creation of an employment led mixed use quarter north of a new District Centre, creation of a new Green Link, and enhanced Ashley Rd.



Site Requirements

- This site will be given a Designated Employment Area: Regeneration Area status to recognize the contribution to the local economy that this site can make. It is anticipated that the redevelopment of this site will not create a net reduction in employment floor space. Residential development will be acceptable for the purpose of cross subsidising the provision of employment floorspace.
- Ashley Road will be retained as the key public and movement spine. Employment uses will be expected on both sides of the Ashley Road frontage at ground floor level, and above where ever viable.
- Good quality buildings, including, but not limited to Berol House and 16 Ashley Rd should be retained and adapted for flexible, and affordable employment use. Further employment will be supported, with cross subsidization from residential.
- A Green link will be created along the southern edge of the site, running between Tottenham High Rd and the Lee Valley.
- Potential for new education hub on the eastern part of the site, fronting Watermead.

Development Guidelines

- The most suitable use on the Watermead Way frontage is considered to be employment which may include an educational use
- Developments should utilise the amenity, and respect the character of Down Lane Park to the west and north-west. This should include limiting blank facades fronting onto the park.
- The existing industrial character on Ashley Rd should be maintained and enhanced, encouraging new businesses to come into the area.
- Ashley Road itself should be pedestrian and cycle friendly, and provide a legible route to the new District Centre to the south. Measures to improve the activity on Ashley Rd will be supported on this site, including the orientation of sites to open onto Ashley Rd with frequent front doors.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Parkings should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a decentralized energy network. This may be as a decentralized energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Additional permeability through the addition of a pedestrian and local access route passing east-west through the site could be considered.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Assess the implication of any potential flood risk

Comment [A174]: This plan proposes agreed link which cuts directly across Down Lane Park, and specifically through the children's play area. We object to this proposal. Down Lane Park is one of the very few amenities for people living in Tottenham Hale's residential roads and estates. This is treasured and valued, and its development has been fought for by the local community and we now have a thriving green flag park with new tennis courts, a fin play area, and other facilities.

The proposed green link is a very expensive and unnecessary project since there are many ways people living in Hale Village and Ferry Lane can reach Tottenham High Road should they wish to do so. The millions proposed for this could be better spent on social housing or local environmental improvements.

TH3: Ashley Road North

Address	100-399 Ashley Road including Council Depot, Land on Watermead Way.		
Site Size (Ha)	5.8		
Timeframe for delivery	PTAL Rating		4
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Lee Valley Technopark, Council Depot, Railway land		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		

Proposed Site Allocation

Site Allocation: Part A: Intensification of current employment uses

Site Allocation: Part B: Improved education facility without doorsport facilities associated with the school, and the extension of Ashley Rd as a pedestrian and cycling connection north through to Park View Rd.

Site Allocation: Part C: New residential development complementing the amenity of Down Lane Park, and the extension of Ashley Rd as a pedestrian and cycling connection north through to Park View Rd.



Site Requirements: Area A

- This site will remain as an employment site. It is anticipated that the redevelopment of this site could result in a more intensified employment use and will not create a net reduction in employment floor space.

Site Requirements: Area B

- A new route extending the line of Ashley Rd north between Areas A and B of this policy will be created, improving access into the Lee Valley Regional Park.
- Vehicular access to the site will be from Ashley Rd/Burdock Rd or Park View Rd, but there will not be a link from one to the other.
- The south-east corner of this site should be the tallest point. Heights should be reduced towards the north, and where the site faces Down Lane Park.

Site Requirements: Area C

- A new route extending the line of Ashley Rd north between Areas A and B of this policy will be created, improving access into the Lee Valley Regional Park.
- Residential will be the primary use on this site.
- Vehicular access to the site will be from Ashley Rd or Park View Rd, but there will not be a link from one to the other.
- The site's existing licensed waste capacity will be replaced prior to any redevelopment taking place.
-

Design Guidelines: Area A

- The southern edge of this site should create a positive interface with the proposed Green Link.

Design Guidelines: Area B

- Any residential development above the school should avoid overlooking of the school.
- Explore the potential for the use of part of the games areas of Down Lane Park during school hours as a way of providing the school with good quality sports facilities should be explored.
- Paths connecting Watermead Way, Ashley Rd and Park View Rd should be rationalised, and made safer and more welcoming to resolve local safety concerns, and make the routes more direct, and thus better used.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
-

Design Guidelines: Area C

- Heights will be restricted to the north and west to respect the amenity of neighbouring terraced housing.

Comment [A175]: There is no mention of how high these buildings might be, although elsewhere Watermead Way is proposed as an area for buildings up to 22 storeys. It is inconceivable that these heights would not impact on the park and also on the residents living along Parkview and other nearby roads. Although not spelled out in the site requirements and design guidelines, it would seem that these vague proposals conceal the possibility of a forest of tower blocks looming over Down Lane Park and on the horizon.

Comment [A176]: The Council confirmed that the games areas of Down Lane Park would not be used to provide the school with sports facilities. It was accepted very early on in the discussions regarding the sale of the Technopark that the park was a community facility and that the resources secured were for local community use. This commitment made to councillors and the Friends of Down Lane Park should be honoured.

- Heights could step up to 6 storeys in the east of the site.
- The mature trees on the site, and in the park should be protected and incorporated into any future design
- The crossroads in the northwest corner of the site where Park View Rd, Dowsett Rd and Havelock Rd converge should be made a focal point as a gateway from the residential hinterland of Tottenham towards the emerging Tottenham Hale District Centre.

TH4: Station Interchange

Address	Station and land on Ferry Lane and Watermead Way		
Site Size (Ha)	1.4		
Timeframe for delivery	PTAL Rating		5
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Tottenham Hale underground and rail.		
Ownership	Public ownership		
How the site was identified	Tottenham District Centre Framework		

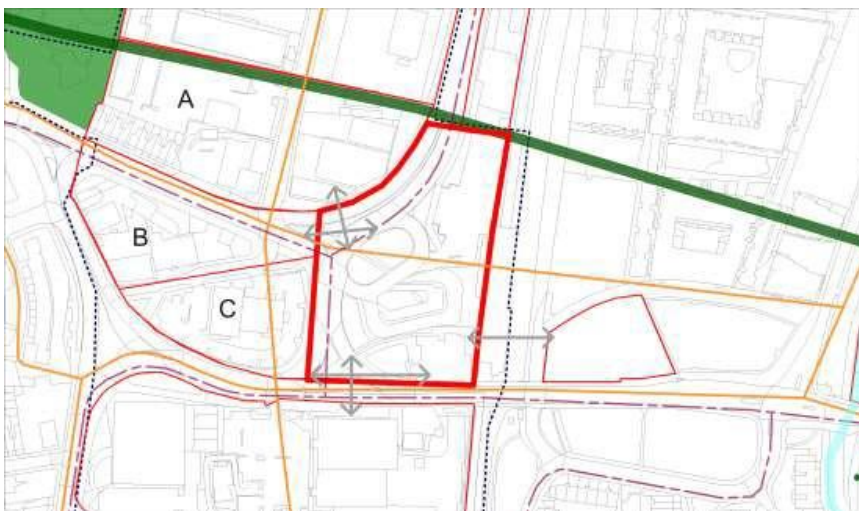
Comment [A177]: Objections to the Green Link crossing Down Lane Park have already been set out above. We consider the proposals to be over development. The plans here propose up to eleven storeys, yet when the last permission was given for Tottenham Hale the number of storeys proposed was nine. There is an emerging pattern here where developers get agreement for a certain height, and then return for a couple of additional storeys which is then granted. This sets a precedent for higher towers elsewhere irrespective as to whether or not they are appropriate. In this instance eleven storeys above the station is in effect 12 or 13 storeys since the station is already there, and this will be in front of a current wall of blocks at Hale Village which now form the eastern aspect of the site. This will only intensify the concentration of tower blocks in the area. We draw your attention to the CABE report on the initial designs for Hale Village which expressed clear criticism of the wall of blocks proposed. In this AAP new buildings on Watermead Way (TH3 area B) extends this 'wall' much further.

Proposed Site Allocation

A new station interchange with new residential land and/or commercial development above the station

The station has just undergone extensive remodelling at significant public cost. Is the intention to build a new square or will the bus station and square remain as they are?

Concerns about developing a new district centre have also been set out above. The document is silent on the matter of the night time economy which is a glaring and unacceptable omission.



Current Planning Permission (HGY/2013/2610)

Work to extend the operational railway station at Tottenham Hale. Creation of a new station entrance, enlarged station concourse, improved access and a new access for all bridge. Extension of the existing footbridge to form a new station entrance from Hale Village, relocation of the station vent shaft and provision of a new station control facility, provision of retail units and associated works. Development involves the closure of the existing Ferry Lane subway.

When a new planning permission comes forward subsequently

- This site will form the new Tottenham Hale District Centre.
- Development of this site could be up to 11 storeys.
- Provision has been made within the approved scheme (HGY/2013/2610) for over-station residential development.
- The Station Interchange will be a new high quality point of arrival, departure and interchange.
- The new public square will become the heart of the new station.
- Potential to introduce a new pedestrian link beneath the road to the retail park with the introduction of Crossrail.
- Creation of a physical link between the Station and the Green Link.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Parking should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.

TH5: Tottenham Hale Retail Park

Address	Corner of Broad Lane and Ferry Lane, N17		
Site Size (Ha)	4.8		
Timeframe for delivery	PTAL Rating		4
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Retail Park		
Ownership	Private		
How site was identified	Tottenham District Centre Framework		

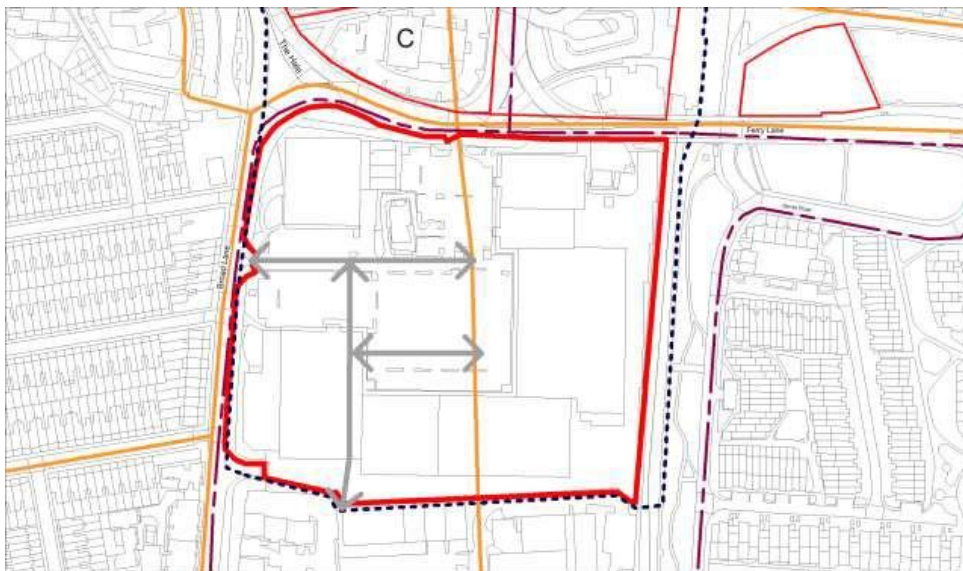
Comment [A178]: Haringey Council has plans to revitalise Tottenham High Road and to make Seven Sisters station an anchor site for the High Road. To develop an enlarged retail centre at Tottenham Hale is more than likely to contradict the Council's first aim. The current retail park is busy and successful, and is a day time centre. These proposals would significantly increase the usage, again over developing which will cause even greater traffic problems, air contamination and noise pollution. These plans are silent on Ferry Lane which is the direct route into Tottenham Hale from Walthamstow. How will developing a new town centre and extending the retail park impact on Ferry Lane and the people who live along it? People drive to retail centres, yet no mention is made in this proposal of traffic issues and management.

No mention is made of potential night time activities which remains a serious omission. This is a residential area and even with the developments you propose will remain so. Anyone living locally will know that despite the improvements from the new gyratory, traffic problems are still very frequent and significant. For people living along Broad Lane, and indeed for children attending Earlsmead School, air pollution is a real day to day issue.

Finally, these proposals seek to create a town centre for an area which is not a town and is essentially a transport interchange. It is not like Stratford which always was a shopping and town centre, nor is it like Walthamstow which has always had a main shopping urban street. This is an artificial development, imposing even more very tall buildings with over intensification, whilst also undermining the development of Tottenham High Road.

Proposed Site Allocation

Part of the new District Centre along adjoining sites. New road layout, creating town centre uses, with residential and commercial uses above.



Site Requirements

- Any Council-approved District Centre Framework will be prepared for this site, and developments should be in accordance with it.
- Ashley Rd will be extended through this site creating a town centre spine linking the station area to the employment district to the south. The alignment of Fountayne Rd to the south should form a parallel north-south street when extended into this site.
- Ground and potentially parts of first floors will be town centre uses. Residential use will be permitted above.
- Development of the eastern side of the site will not proceed until the requirements of Crossrail 2 have been established. Heights will generally increase from south and west to north and east, with the potential for taller point block buildings of 11+ storeys marking key landmark points. The remaining development should be 3-8 storeys, with no higher than 5 storeys along Broad Lane.

Design Guidelines

- New streets created within the site will have a town centre typology with active frontages at ground floor level and provision for servicing from the street.
- New streets should also connect with developments likely to come forward to the south of the site, notably Fountayne Rd. If possible east-west streets should align with roads to the west of Broad Lane, notably Tynemouth Road.
- Developing the site in phases will ensure the site is better integrated to the surrounding area.
- Introducing a new pedestrian link between this site and the station
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Parking should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a decentralized energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.

TH6:Hale Village Tower			
Address	Land on Ferry Lane, East of Tottenham Hale Station, between Dane Lane and Walk and Coppermill		
Site Size (Ha)	0.3		
Timeframe for delivery	PTAL Rating		5
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Vacant		
Ownership	Private		
How site was identified	Outline planning application		

Comment [A179]: Permission for this has already been granted for a hotel. If this is developed as residential flats then this would, in our view, constitute glaring over development in this already congested site full of tower blocks.

Proposed Site Allocation

Existing Planning Permission HGY/2006/1177

Demolition of all structures and remediation for the development of a mixed use scheme comprising up to 1210 residential units (Use Class C3), student accommodation (C2), office (B1), hotel (C1), retail (A1, A2, A3, A4, A5 and B1) uses, a health centre (D1), a health club (D2), crèche (D1) and a primary school, with provision for underground and on-street car parking, to be comprised within separate building blocks ranging in height from 1 to 18 storeys, incorporating public open space, an unculverted watercourse and Combined Heat and Power (CHP) with associated renewable energy systems (outline application)



Site requirements

- The outline planning permission identifies the site as the location for a tall building (18 storeys).
- Ground floor uses should contribute to the vitality of the existing urban streets within the site and engage with the Ferry Lane frontage.
- Development will need to provide for limited car parking to serve accessible residential units, taking account of the usage of existing spaces in Hale village
- Proposals for development that provides additional units beyond outline extent will need to provide details of infrastructure impacts arising from additional units/occupants.

Development Guidelines

- Proposals for a tall building over 18 stories will require justification and will need to be of exceptional architectural quality in accordance with the DMDPD tall building policy.
- Designs should respect and respond to the wider site and should meet the requirements of the relevant DM policy on tall buildings. The approved scheme (OSD @ Tottenham Hale Station) includes a bridge landing in the urban realm outside this site, and any design on this site should respond positively to this.
- Any developments should demonstrate how with an acceptable relationship with neighbouring land uses by virtue of microclimate and daylight/sunlight.

TH7:HaleWharf			
Address	LandnorthofFerryLanefrom Pymme'sBrooktothe RiverLea,includingHaleWharfand "ThePaddock"N17.		
Site Size (Ha)	6.3		
Timeframe for delivery	PTAL Rating		4
	2011-2015	2015-2020	2020onwards
Current/Previous use	Employment, petrolfillingstation, thePaddockCommunityNaturePark		
Ownership	Mix ofprivateandpublicfreeholds andleaseholds		
Howsitewasi identified	TottenhamDistrict CentreFramework		

Proposed SiteAllocation

Comprehensiveredevelopment toprovide amixofuses,withreplacement employment,residential(includingfamilyhousing)andleisurerelateduses



Site Requirements

- This site will be given a Designated Employment Area: Regeneration Area status to recognize the contribution to the local economy that this site can make. It is anticipated that the redevelopment of this site will not create a net reduction in employment floor space.
- Part of the site (Hale Wharf) is in employment use and will need to reflect the Council's aspiration to create a mix of uses on this site through the replacement of existing employment levels with new employment space and complementary leisure uses that provide amenities for the users of the Regional Park
- Improve connections to, and the use and utility of the Paddocks open space and ensure re-development of the former petrol station site to create high quality waterside development.
- The Development will need to respond to the new Green Link which will pass through this site linking Tottenham High Rd to the Walthamstow Wetlands and Lee Valley Regional Park.
- In order to deliver the proposed new homes and jobs, comprehensive re-development of the site is required.
- The redevelopment of the garage site, within the green belt, will need to be included as part of a comprehensive plan for the overall site and demonstrate compliance with green Belt objectives. Consideration will be given to previously developed land on this site within the Green Belt in accordance with the guidance in the National Planning Policy Framework.
- Developments should be delivered in a co-ordinated manner. Comprehensive re-development for the site is required. The garage site across the Leanavigation, and the Lock Keepers Cottage to the east should be developed as part of a comprehensive proposal.
- The design of the new development will need to have regard to environmental, ecological interests in the locality, particularly relating to the water environment and habitat of the Lee Valley Regional Park.

Development Guidelines

- Redevelopment of the Hale Wharf site will need to ensure continued facilities for the houseboat community north of the Hale Wharf site and explore the potential provision of Moorings on the western side of the site to accommodate employment barges/temporary moorings.
- New developments should enable the ongoing operation and maintenance of the lock gates. New developments should not adversely impact on the ecological assets in the area.
- The developments shall include a range of unit sizes and types and take advantage of the site's suitability for family housing
- The Environment Agency will be a key stakeholder in agreeing any new development proposals as the site is just outside of a high flood risk area. The site is in close proximity to the Walthamstow Marshes SSSI, Lee Valley Ramsar Site and Special Protection Areas.

- Building heights will have to respond to the proximity and 'openness' of the Green Belt. Buildings should step down in height from Ferry Lane and create an effective marker point to the river.
- Buildings should be orientated to allow a continuous sight line from the Green Link into the Lee Valley Regional Park. The design and form of the development on the eastern side of the Wharf site (and on the former garage site) should be responsive to the natural environment of the park and river.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- The Lee Valley Regional Park Plan seeks to ensure improvement of the paddocks area and any proposal should have consideration of this plan. [The Paddock must be protected.](#)
- Improvement of the access into the Hale Wharf site is required.
- The development will need to be designed having regard to risks of flooding and in accordance with the Flood Risk Assessment

Comment [A180]: The plans for Hale Wharf are silent as to the height of new buildings. It is entirely inappropriate, in our view, for tall buildings or tower blocks to be located anywhere on Hale Wharf. Tall towers on Hale Wharf will damage the view of the Lea Valley and place a shield around the new Wetlands Trust Centre being established at the Walthamstow Reservoirs.

TH8: Welbourne Centre			
Address	Land North of Monument Way, South Fairbanks Road, South of Chesnut Road		
Site Size (Ha)	1.3		
Timeframe for delivery	PTAL Rating		6a
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Former Welbourne Centre, vacant land.		
Ownership	Mix of private and public freeholds and leaseholds		
How the site was identified	Tottenham District Centre Framework		

Comment [A181]: Given the shortage of public housing, the proximity of this site to Chestnuts estate, and the fact that Haringey owns the land, it would make good sense to build public housing on the east end of this site. Having a health centre underneath, and access to some community meeting space would be welcome given the shortage of primary health and community facilities in the area. We would oppose yet another tower since this is a residential area with low rise blocks. The highest block is Warren Court, which is set back from the road and is eight or nine storeys.

The Welbourne site is surrounded by four and one five storey block and a tower would be entirely out of keeping with the estate and with Parkview Road. The Welbourne centre site is not in the proposed Tottenham Hale District Centre, it is in a quiet residential neighbourhood comprising residential street of terraced housing and a low rise estate. Building a tower block on this site would destroy the character of our neighbourhood and be entirely out of keeping with the rest of the area's layout. We do not support aspects of the Green Link for reasons set out above in this document.

Park View Road is three words.

Proposed Site Allocation

Residential redevelopment with secondary town centre uses (which could include a health centre) at ground floor level on the site of the former Welbourne centre



Site Requirements

- Development at ground floor level should be a use that complements the District Centre. This may take the form of a new health centre.
- Residential development will be permitted above.
- The site of the former Welbourn centre is considered a suitable location for a taller building marking the edge of the new Green Link.
- Infill development to Chesnuts Estates

Design Guidelines

- The tallest element of the site should address the frontage onto Park View Rd, with heights reduced to the west towards the existing housing estate.
- Opportunities to consider introducing activity to Monument way including residential development and the introduction of junctions to help calm traffic
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

Comment [A182]: what does 'introducing activity to Monument Way' mean? Monument Way is a main road which is greened, provides protection for the nearby houses from air and noise pollution through high walls and through an earth bund and high willow fencing. It should remain as it is. Any further housing on this road would destroy a much needed public green space, be overdevelopment and will be putting people in harm's way and this entirely unnecessary.

The green space should be treasured, protected and enhanced.

TH9:FountayneandMarkfieldRoad

Address	LandSouth ofFountayneRoad andtothewestofMarkfieldRoad.		
Site Size (Ha)	2.1		
Timeframe for delivery	PTAL Rating	4	
	2011-2015	2015-2020	2020onwards
Current/Previous use	Employmentland		
Ownership	Mix ofprivateandpublicfreeholds andleaseholds		
Howsitewasidentified	TottenhamDistrict CentreFramework		

Proposed SiteAllocation

Potential redevelopmentofthe siteto:

- increasedcommercialfloorspace,numberof jobs,andjobdensity; and
- Allowfor warehouseliving.



Site Requirements

- The site will be given a Designated Employment Area: Regeneration Area status to reflect the Council's aspiration to create a mix of uses on this site through the introduction of creative employment uses.
- Reintroducing employment-generating uses is the key aim of this policy. These may be created at ground floor level as part of a mixed use development, or in purpose-built blocks.
- Redevelopments should look at the feasibility of connection up to the quiet ways network between the new Tottenham Hale District Centre and Markfield Park and the River Lea via a combination of Ashley Road, Fountayne Road and Markfield Rd should be enabled through development in this area.
- Capped commercial rents will be expected in this area in line with the Draft Development Management Policies DPD.

Development Guidelines

- There is potential for most of the buildings on this site to be retained due to their industrial heritage value.
- The quantum of dedicated employment floor space on the site should match that originally built on the site.
- The principles of the Warehouse Living Development Management policy apply to this site.
- Provision of suitable accommodation that meets acceptable standards will be required.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

TH10: Herbert Road and Constable Road

Address	5-18 Herbert Road, Iandon Norman Road and Bernard Road to the West of Ashby Road, AND 1-7 Constable Crescent, and 52 to 68 Stamford Road.		
Site Size (Ha)	1.4		
Timeframe for delivery	PTAL Rating		6a
	2011-2015	2015-2020	2020 onwards
Current/Previous use	Residential, employment and vacant land		
Ownership	Mix of private and public freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		

Proposed Site Allocation

Potential redevelopment of the sites for commercial-led mixed use development.



Site Requirements

- The site will be given a Designated Employment Area: Regeneration Area status to reflect the Council's aspiration to create a mix of uses on this site through the introduction of creative employment uses.
- The quantum of dedicated employment floorspace on the site should match that originally built on the site.
- Capped commercial rents may be expected in this area in line with the Draft Development Management Policies DPD.

Development Guidelines

- Removal of the "double road" on Ashby/Bernard/Herbert Rd.
- Reintroducing employment-generating uses is the key aim of this policy.
- Improved interfaces with the surrounding residential area should be created.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

6 Implementation, Delivery and Monitoring

6.1 Each of the opportunity sites identified in this document will play a role in delivering the vision for the area and it is imperative that the Council does as much as possible to aid their delivery.

6.2 The Council will take the lead on project managing the implementation and delivery of the Tottenham AAP. Dedicated resources will be put to managing and coordinating delivery of both sites and supporting infrastructure.

6.3 A key mechanism for delivering the Tottenham AAP will be the Council's decisions on planning applications. The policies in the Strategic Policies Local Plan, along with those in this AAP and the Development Management Policies, once adopted, will provide the framework for such decisions. Planning decisions will be crucial to ensuring that new development appropriately responds to the Plan's objectives and policies. We will also take account of the Council's supplementary planning documents and guidance when determining planning applications.

Working in partnership

6.4 The Council does not have the resources to implement the AAP alone. Implementation and delivery of the AAP will require the Council to work closely with a range of different partners, including landowners and developers, as well as infrastructure providers, the Greater London Authority and Transport for London, to ensure a coordinated framework and approach to delivery. The AAP provides the necessary framework for coordinating a large number of development proposals, along with investment in infrastructure, across the whole of the Tottenham area, over the life of the Plan, and across all partners involved.

Comment [A183]: Add community groups and trusts

Stalled developments or sites

6.5 Where appropriate the Council will prepare, in consultation with landowners, developers and the community, more detailed masterplans where this aids in accelerating delivery.

6.6 Further, as set out in Policy AAP1, the Council will also use its compulsory purchase order power to facilitate site assembly where this is required to enable comprehensive, timely and coordinated development to come forward.

6.7 In certain circumstances, the Council may look to utilise its strategic acquisition fund to acquire sites, but such an approach will require robust assessment in terms of value for money.

Council as a landowner and developer

6.8 The Council has substantial landholdings across the AAP area, much of which has been allocated for redevelopment. The Council is committed to bringing sites forward in a timely manner and will, if appropriate, enter into joint ventures or other such arrangements, to facilitate this.

6.9 Any procurement exercise will be undertaken in an open and transparent manner.

Comment [A184]: Public land belongs to everyone and we are against it being sold off. There may of course be options for leasing which might be considered.

Infrastructure delivery

6.10 An overall commitment to improving the pedestrian realm, delivering a range of new public open spaces and strengthening public transport and movement generally underpins the entire approach to the successful delivery of the AAP. The intention is to provide a strong setting and encouragement for new homes and jobs.

6.11 An Infrastructure Delivery Plan will be prepared for the AAP, setting out key responsibilities and timeframes, recognising the many partners that will assist in implementing the AAP over its lifetime. This Delivery Plan will align with the borough-wide Infrastructure Delivery Plan for the Strategic Policies, which is currently being updated, and provide further information specific to the Tottenham area.

6.12 Given market values there is a demonstrable prospect of raising funding through private developer contributions as indicated by the Borough's existing planning evidence base.

The following funding structure identifies broad potential contributions from a variety of sources.

- well-structured Regeneration Programme prepared by LBH, with staff, plans, studies, and initiatives focusing on delivery against ten strategic themes;
- A prospectus of potential transport investments prepared by Transport for London (TfL) to support growth and regeneration in Tottenham;
- A comprehensive redevelopment proposal for the Tottenham Hotspur Football Club (THFC) Stadium, with its associated news superstore and University Technical College, as well as new leisure, retail, residential and hotel uses;
- A major improvement, master planning and estate renewal package being developed for the 'High Road West' area of north Tottenham;
- A £41 million public sector funding and investment package for Tottenham;
- A new Housing Zoned designation for Tottenham Hale, initially, then rolling out over the rest of the AAP area; and
- A central government-backed £500 million borrowing guarantee for housing and transport improvements

Monitoring

6.13 The Council will regularly review and monitor performance towards delivery of the AAP vision and strategic objectives (set out in Section 3), and the delivery of individual opportunity sites and policy initiatives, using the Strategic Policies indicators, where relevant, as well as through a bespoke set of monitoring indicators for the AAP asset set out below. Progress and performance outcomes will be published annually in the Authority Monitoring Report.

6.14 The Council will also monitor government and London wide policy and changes in legislation to make sure that the AAP continues to be consistent with relevant national, regional and local planning policies, and to identify any the need to review or reassess the approach taken in this Plan.

AAP Objective			
Indicator Ref	Indicator	Target	Action/contingency
AAPobj1	World class education and training	Ensure there are enough school places to meet current and future demand, up to a rolling 10 year horizon. Delivery of at least one major education inst	The Council will use its School Place Planning Reports in preparing and updating Delivery Plans for the AAP. These will inform whether targeted policy responses / site allocations are needed, particularly to
AAPobj2	A prosperous hub for business and local employment	Accommodate 5,000 new jobs No net loss of employment floorspace over the plan period	The Council will monitor proposals involving industrial and commercial development, and town centre uses, through the Authority Monitoring Report process.
AAPobj3	A safe, secure and	As per Strategic Policies Local Plan monitoring framework.	Monitor through the Authority Monitoring Report process.
AAPobj4	A different kind of housing market	Accommodate a minimum of 10,000 net new homes 40% of all new residential development delivering ten or more units as affordable housing For affordable housing requirement, deliver 40% as affordable rented housing (including social rented housing) and	The Council will monitor delivery of housing development through the Authority Monitoring Report process. Future Strategic Housing Market Assessments will be reviewed. Pending outcomes, consideration may be given to amending policy targets.
AAPobj5	A fully connected place with even better transport links	Delivery of strategic transport infrastructure including: new intermodal station at Tottenham Hale, 3 Tracked West Anglia rail, Crossrail 2 at Tottenham Hale / Northumberland Park, London Overground at Edmonton Green.	The Council will prepare and maintain an Infrastructure Delivery Plan for the AAP, and monitor delivery of strategic transport infrastructure through the Authority Monitoring Report process. The Council will engage with key delivery partners to ensure that infrastructure is appropriately
AAPobj6	A high quality public realm network	As per Strategic Policies Local Plan monitoring framework.	Monitor through the Authority Monitoring Report process.
AAPobj7	A strong and healthy community	As per Strategic Policies Local Plan monitoring framework.	Monitor through the Authority Monitoring Report process.

Comment [A185]: Is that enough to match the population growth target?

Comment [A186]: Deficiencies of social infrastructure should be addressed and overcome.

Comment [A187]: As expressed elsewhere Tottenham may not be able to realistically accommodate 10,000 new and well-designed homes and the social and other infrastructure needed to support them.

Comment [A188]: 'Affordable' needs to be defined so that it is genuinely affordable. This is a totally inadequate target, and should be revised upwards to nearer 100%.

Comment [A189]: Spell out an explicit and high target for social rented housing

Comment [A190]: Clarify the definition and threshold

AAP Opportunity Sites			
Indicator Ref	Indicator	Target	Action/contingency
AAPsites1	NumberofAllocated Siteswith PlanningPermi ssion	100%by2026	Wherelessthan30%ofthe allocatedsiteshave planning permission by2018/19 theCouncilwillengage with landownersanddevelopersas to ascertainwhyplanningpermission is notbeing sought.Considerationwillthenbegiven to a reviewof the allocationsorto furthersite
AAPsites2	NumberofAllocated Sitesdeveloped	100%by2026	Wherelessthan20%ofthe allocated siteshave notbeen completedby2018/19,Councilwilldiscuss with owners/developers whysitesarenotbeing developed out,and willconsideramendments to extantplanning permissions orto
AAPsites3	Sites deliveredin accordancewith hparameters ofthe Allocation	100%by2026	Iftwoormore applications, notin accordancewith the OpportunitySite allocations,aregranted atappeal,the Councilwillreviewtheappealdecisions and reviewthe AAP policiesorallocations to strengthen these asappropriate.
AAPsites4	Spatialdistribution ofAllocated Siteswith PlanningPermi ssion	Eventistributionacro ssallsites	Where one ormore AAP neighbourhoodsisshowing Allocated sites with50%ormoreplanning permission above thatexperiencedacrossthe otherAAPNeighbourhoods,theCouncilwilldiscuss withDevelopers/Agents/Viability& Place Making specialists whythis isand considermeans to incentivisedevelopmentin poorerperformingAAPneighbourhoods

Appendix A: Tottenham Housing Trajectory and Job growth estimates

Housing Schedule

A.1 Haringey's Local Plan provides a commitment to deliver at least 19,802 net additional homes in the Borough and 12,000 jobs over the fifteen year period from 2011/12 to 2025/26.

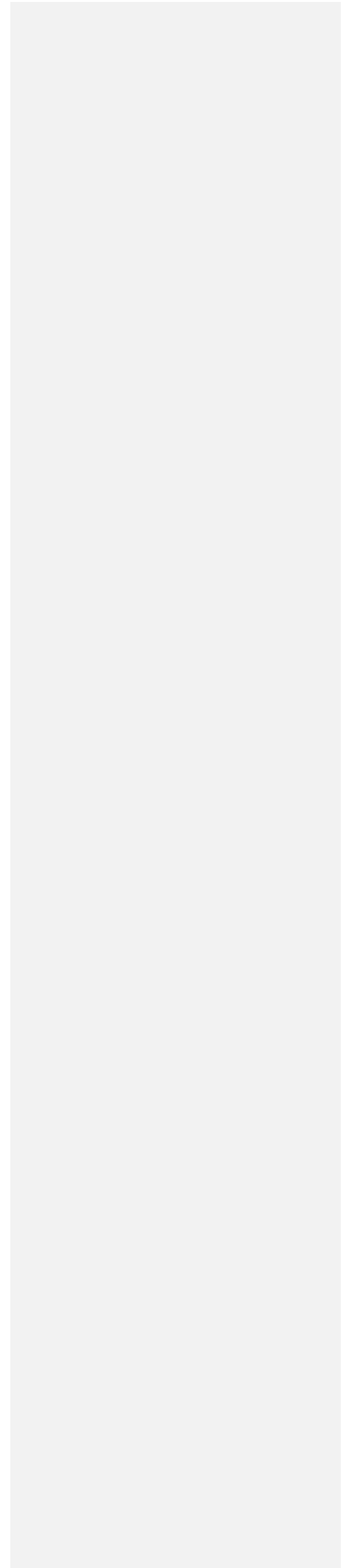
A.2 The Tottenham Area is tasked to deliver at least 10,000 of the 19,802 homes needed⁴ and 5,000 jobs. The following tables summarise the past completions within the Tottenham AAP area for the period 2011/12 to 2013/14, as well as pipeline supply and planned delivery for the remaining Plan period 2014/15 to 2025/26. It indicates where and when development is intended to come forward to meet and, where possible, exceed the 10,000 home target within the Tottenham area, including the broad distribution of growth as benchmarked in accordance with Strategic Policy SP1. A total job growth estimate by neighbourhood area is also provided in the table

Delivery Summary 2011/12 to 2025/26

Neighbourhood Area	Development Site	Site allocation reference number	Net Completions 2011-2014	Sites with Planning Permission	Allocated	Totals	Total Jobs
Tottenham Hale	Hale Village	TH6	1,890	530		2,420	
	Tottenham Hale Retail Park	TH5			770	770	
	Station Interchange	TH4			190	190	
	Station Sq west	TH1			676	676	
	Ashley Road South	TH2			500	500	
	Ashley Road North	TH3			180	180	
	Hale Wharf	TH7			330	330	
	Fountayne Road and Markfield Road	TH9			97	97	

⁴For the avoidance of doubt, the effect of this Tottenham AAP and Local Plan Site Allocations is not to disaggregate the Borough-wide target into separate, minimum targets for the different growth locations. Therefore, it will not be a material consideration if development to achieve 10,000 homes within the Tottenham Area

is not on track when overall delivery against the Borough target of at least 19,802 homes is on track as a result of phased growth across the rest of the borough.



	Welbourne Centre	TH8			180	180	
	Herbert Road and Constable Road	TH10			100	100	
(Totals)			1,890	530	3,023	5,443	4,000
Seven Sisters/West Green Road and Tottenham Green	Ward's Corner (HGY/2012/0915)	SS5		163		163	
	Lawrence Road	SS1		264	100	364	
	Helston Court & Russel Road	SS4			0	0	
	Tottenham Leisure Centre car park	TG1			37	37	
	Gourley Triangle	SS2			213	213	
	Brunel Walk & Turner Avenue	SS6			20	20	
	Tottenham Police Station & Reynardson Court	TG3			30	30	
	Tottenham Cances 399 High Road	TG2			10	10	
	Apex House and Seacole Court	SS3			100	100	
(Totals)			0	427	510	937	250
Bruce Grove	700-702 Tottenham High Rd (HGY/2009/1122)			14		14	
	624 Tottenham High Rd (HGY/2009/1532)			42		42	
	Landrear of 318-320 High Rd (HGY/2013/1985)			18		18	

Comment [A191]: -The community plan for Wards Corner should be included in the monitoring table alongside the Grainger plan.

	638HighRoadN1 70AA(HGY/2012/ 0427)			26		26		
	530- 536HighRoadN1 79SX(HGY/2013/ 0745)			13		13		
	7BruceGroveN17 6RA(HGY/2012/0 563)			13		13		
	BruceGroveSno okerHallandbanq uetingSuite	BG1			55	55		
	TottenhamDeli veryOffice	BG2			160	160		
	BruceGrove Station	BG3			10	10		
	MoorefieldRoad	BG4				0		
					0			
(Totals)				0	126	225	351	50
North Tottenham	TottenhamHotsp urStadium(HGY/2 010/1000)(NT5)	NT5		285		285		
	FormerCannonR ubberFactory,88 1HighRoadN154 RS(HGY/2012/21 28)			222		222		
	NorthofWhiteH artLane(NT4)	NT4			115	115		
	Northumberland Park(NT1andNT 2)	NT1and NT2			2,200	2200		
	HighRoadWest(NT3)	NT3			1400	1400		
(Totals)				0	507	3715	4222	700

Netsmallsites completions2 011-2014			347			347	
TOTAL			2,237	1,590	7,473	11,300	5,000

Appendix B: Evidence Base Studies

B1. Prior to the preparation of any new plan, baseline information must be collected to establish the need for and scope of the document. The evidence base for the AAP draws upon studies undertaken for the Borough as well as specific studies undertaken for Tottenham. These are set out below along with a brief description of their purpose.

B2. All of the evidence based documents are available to view from the Council's website www.haringey.gov.uk/ldf.

Document	Topic	Description	Date
Policies			
National Planning Policy Framework (NPPF)	National Planning Policy on all planning matters	Sets out the Government's overall objectives and approach to the provision of sustainable development to be delivered through the planning system. All local plans and documents need to be in general conformity with the NPPF.	March 2012
National Planning Practice Guidance (NPPG)	National planning guidance on all planning matters	Detailed guidance on the implementation and interpretation of the land use policies in the NPPF. The production of plans and supporting evidence need to be consistent with the approach outlined in the NPPG.	N/A
London Plan	Regional Spatial Strategy	Identifies Tottenham as a growth point within the Upper Lee Valley Opportunity Area. The AAP policies and site allocations need to be in general conformity with the London Plan.	July 2011
Further Alteration to the London Plan	Updated Population and Housing projections	Amends the growth targets for London, increasing Haringey's Housing target from 820 to 1,502 homes per annum, whilst also forecasting growth of 12,000 jobs in the borough by 2026.	January 2014
Haringey's Local Plan: Strategic Policies 2013–2026, including partial review (2015)	Local Spatial Strategy	Establishes the spatial strategy for the borough and identifies Tottenham as having capacity to deliver 10,000 homes and 5,000 jobs. The AAP need to give effect to the strategic objectives and policies through its site allocations and Tottenham specific policies.	March 2013 Subject to partial review 2015
Upper Lee Valley OAPF	Mayor of London Opportunity Area Framework	The AAP needs to have regard to the OAPF and its emphasis on the optimisation of the potential of the Lee Valley for growth and regeneration, including Tottenham Hale, which is identified as a key growth point within the Opportunity Area. The AAP also needs to reflect the investment in strategic infrastructures such as rail, cycle and pedestrian routes and the general development principles set out.	July 2013
Studies			
Tottenham Transport Modelling Assessment	Transport	Transport modelling carried out to assess the transport impacts of the potential changes in population and employment in Haringey with a particular focus on the Tottenham AAP area. The study identifies a range of possible	November 2014

interventionstomitigatetheimpactofthese

		changes.	
Haringey Urban Characterisation Study	Urban Structure Analysis	Study assessing the Borough's urban character, structure and form. Informs Tottenham AAP's agenda of change, and placemaking whilst guiding how it should safeguard its existing assets.	February 2015
Haringey's Open Space and Biodiversity Study	Open Space and Nature	Study assessing the quantity, quality and value of the open spaces across the Borough, setting locally derived standards and identifying areas of deficiency the Local Plans should seek to address, including deficiencies in Tottenham.	January 2015
Haringey's Strategic Housing Market Assessment	Housing	Provides up to date information and understanding of housing growth and needs in Haringey, including affordable housing needs, to be used in developing housing and planning policies for the Borough and the places within it.	May 2014
Employment Land Study	Employment Land	Provides up to date analysis of the Borough's overall employment lands supply as well as an assessment of the likely demand for employment land and premises up to 2031. It also recommends changes to employment designations and general policy considerations based on the study findings.	Updated January 2015
Strategies			
A Plan for Tottenham	Regeneration Plan	Sets out the ambitions and plans for regeneration, development and growth in Tottenham which the AAPs should seek to give effect to through the spatial strategy.	Sept 2012
The Tottenham Strategic Regeneration Framework	Community Consultation document	Sets out vision for the future of Tottenham and sets out how local people's priorities could be achieved through long-term regeneration.	March 2014
The Tottenham Physical Development Framework	Spatial Framework	Sets out a conceptual spatial framework for Tottenham. It shows the opportunities for change in Tottenham's key regeneration areas and makes a number of recommendations for consideration by Haringey Council.	2012
The High Road West Masterplan Framework	Masterplan for site	The Masterplan Framework informs the AAP's vision and objectives for the wider North Tottenham neighbourhood area whilst the detail of the Framework guides the key principle for development for inclusion in the site's allocation.	September 2014
Northumberland Park Estate Masterplan Framework	Masterplan for site	Sets out broad principles for development, including the potential quantum of development, indicative options for massing, heights of buildings, materials and use for the Northumberland Park site. The Masterplan informs the AAP's vision and objectives for the wider North Tottenham whilst the detail of the Framework guides the key principle for the site's allocation.	December 2014
Supplementary Planning Documents			
Transforming Tottenham Hale Urban Centre	Masterplan for area	The Masterplan defines the preferred form of development for Tottenham Hale in order to facilitate a comprehensive development that will provide new jobs and homes.	2006

Comment [A192]: This was published at the same time than the consultation document and there was no time for the public to process all the supporting evidence.

Comment [A193]: This was published at the same time than the consultation document and there was no time for the public to process all the supporting evidence.

Comment [A194]: This was published at the same time than the consultation document and there was no time for the public to process all the supporting evidence.

Appendix C: Proposed deleted policies and proposals sites of the Haringey Unitary Development Plan (2006)

C1. The table below identifies the Part 2 policies and proposals sites of the Haringey Unitary Development Plan (2006) that will be deleted upon adoption of Haringey's Development Management DPD.

C2. A full list of the policies that were deleted by the Secretary of State on 15th July 2009 and those deleted upon the adoption of the Haringey Local Plan: Strategic Policies on 18th March 2013 are contained in Appendix 1 of the Haringey Local Plan: Strategic Policies.

UDPPart2 policies		
UDPPolicy	Title	Date of Deletion
UD1	Planning Statements	2016
UD3	General Principles	2016
UD7	Waste Storage	2016
UD10	Advertisements	2016
UD11	Telecommunications Equipment	2016
ENV5	Works Affecting Water Courses	2016
ENV6	Noise Pollution	2016
ENV7	Air, Water And Light Pollution	2016
ENV11	Contaminated Land	2016
ENV12	Development at or Near Premises Involving Use or Storage of Hazardous Substances	2016
HSG2	Change of Use to Residential	2016
HSG5	Hostel Accommodation	2016
HSG6	Houses in Multiple Occupation (HMO)	2016
HSG7	Housing for Special Needs	2016
HSG11	Restricted Conversion Areas	2016
EMP4	Non-Employment Generating Uses	2016
EMP5	Promoting Employment Uses	2016
EMP6	Car Repairs Workshops, Garages And Car Washes	2016
EMP7	Live/Work Units	2016
TCR2	Out of Town Centre Development	2016
TCR3	Protection of Shops in the Town Centres	2016
TCR4	Protection of Local Shops	2016
TC5	A3 Restaurants And Cafes, A4 Drinking Establishments And A5 Hot Food Takeaways	2016
M8	Access Roads	2016
M9	Car-Free Residential Developments	2016
M10	Parking for Development	2016
M12	Mini Cabs	2016
OS3	Significant Local Open Land (Slol)	2016
OS4	Alexandra Park And Palace	2016
OS5	Development Adjacent to Open Spaces	2016
OS8	Heritage Land	2016
O17	Tree Protection, Tree Masses And Spines	2016
CLT3	Social Clubs	2016
CLT4	Hotels, Boarding Houses And Guest Houses	2016
CSV4	Alterations And Extensions To Listed Buildings	2016

CSV5	AlterationsAndExtensionsInConservationAreas	2016
CSV6	DemolitionOfListedBuildings	2016
CSV7	DemolitionInConservationAreas	2016
CSV8	Archaeology	2016
UDPPProposalSites		
UDP SiterefNo.	Address	Dateofdeletion
13	WhiteHartLaneStadium	2016
18	TottenhamGreenBaths	2016
19	Land adjacent to railwaylineWhiteHartLaneStation	2016
20	TottenhamInternationalincludingTottenhamHaleStation,the retailpark,HaleWharf and Tottenham Marshes	2016
21	WardsCornerandCouncilOfficesatApexHouse	2016
27	LawrenceRoad	2016
28	SevenSisters,Road /Durnford,Street/GourleyPlace	2016

Appendix D: Superseded Supplementary Planning Documents and Guidance

D1. This AAP proposes a new policy framework for Tottenham. As a result, a number of existing Supplementary Planning Documents (SPDs) and Guidance (SPGs) will be out of step with the new spatial strategy and the Tottenham policies and site allocations which give effect to this. The SPDs and SPGs listed below are therefore proposed for deletion.

- Tottenham Hale Urban Centre Masterplan, 2006
- Lawrence Road Planning Brief SPD, October 2007
- Tottenham High Rd Shopfront Policy (draft 2006);

D2. Upon adoption of the suite of Haringey's Local Plan documents, including the Tottenham AAP, the Council will undertake a full analysis of the requirements for further supplementary guidance and will publish a proposed schedule of new SPDs to be prepared on its website.

Appendix E: Glossary

- **Accessibility:** Ability of people or goods and services to reach places and facilities.
- **Accessible Development:** A building, facility etc. and its wider environment which can be reached and used, in particular by people with disabilities.
- **Accessible Transport:** Transport services and vehicles designed and operated to be usable by people with disabilities and other transport disadvantaged people, with characteristics possibly including affordable fares, wheelchair user accessibility and easy reach of final destination.
- **Active Frontages:** Street frontages where there is an active visual engagement between those in the street and those on the ground floor of buildings. This quality is assisted where the front facade of buildings, including the main entrance, faces and opens towards the street. This is not the same as attractive frontages, such as art walls, green walls or display boxes. Active frontages are often taken to mean continuous rows of highly-glazed shop fronts with frequent entries and cafes.
- **Affordable Rent:** Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime but is subject to the rent controls that require a rent of no more than 80 percent of the local market rent.
- **Affordable Housing:** Affordable housing includes social rented and intermediate housing provided to specific eligible households whose needs are not met by the market (See entry for affordable rent, intermediate and social rented for further details).
- **Amenity:** A positive element or elements which contribute to the overall character of an area, for example open land, trees, historic buildings and the inter-relationship between all elements in the environment.
- **Authority Monitoring Report (AMR):** The AMR reviews progress on the preparation of the Council's Local Plan and monitors the effectiveness of Local Plan policies.
- **Area Action Plan (AAP):** Development Plan Documents used to provide a planning framework for areas of change (e.g. major regeneration) and areas of conservation.
- **Area of Archaeological Importance:** Areas with known archaeological potential where the Council's archaeology policies will normally be strictly applied.
- **Area for Intensification:** These are areas which have significant potential for increases in residential, employment and other uses through development for regeneration of available sites and exploitation of potential for regeneration, through higher densities and more mixed and intensive use. These areas have good existing or planned public transport.
- **Area of Change:** These are areas with considerable potential for growth, though on a lesserscale than growth areas. These areas are appropriately located to support growth and contain identified sites which are available and suitable for development.
- **Area of Opportunity:** London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.
- **Article 4 Direction:** A power available under the 1995 General Development Order allowing the Council, in certain instances, to restrict permitted development rights.
- **Backland Development:** Development of landlocked sites, such as rear gardens, private open space or old lockup garages, usually within predominantly residential areas.
- **Biodiversity:** Biodiversity encompasses the whole variety of life on earth (including on or underwater) including all species of plants and animals and the variety of habitats within which they live. It also includes the genetic variation within each species.
- **Biodiversity Action Plan (BAP) – Haringey:** The Biodiversity Action Plan includes policies and actions that will contribute towards conserving, enriching and celebrating the wildlife in Haringey.
- **Blue Ribbon Network:** Policy covering London's waterways, waterspaces and land alongside them.
- **Building Research Establishment Assessment Method (BREEAM):** Used to assess the environmental performance of new and existing buildings.
- **Brownfield Land:** Previously developed land which is or was occupied by a permanent structure.

Comment [A195]: Amend to reflect the natural meaning of the word 'affordable', ie genuinely affordable.

- **Borough Roads:** Roads for which the Borough is the Highway Authority.
- **Building Line:** The line formed by frontages of buildings along a street.
- **Car Club:** Schemes which facilitate vehicle sharing.
- **Central Activity Zone (CAZ):** The CAZ is the area where replanning policy recognises the importance of strategic finance, specialist retail, tourist and cultural uses and activities, as well as residential and more local functions.
- **Care in the Community:** This enables people in need of care, whether because of old age, disability, illness or other reasons, to continue to live in their own homes or in homely settings within the community.
- **Census:** A ten-yearly comprehensive nation-wide sample survey of population, housing and socio-economic data. The latest one was conducted in March 2011.
- **Cluster:** Geographical concentration of interconnected companies, specialised supplies, service providers in related industries, and associated institutions (for example universities, standard agencies, and trade associations) in particular firms that compete but also co-operate.
- **Code for Sustainable Homes:** The national standard for the sustainable design and construction of new homes.
- **Combined Heat and Power (CHP):** The combined production of heat, usually in the form of steam, and power, usually in the form of electricity.
- **Community Facilities:** Community facilities can be defined as including children's play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, facilities for emergency services, including police facilities, education facilities, libraries, community halls, criminal justice facilities, meeting rooms, places of worship, public toilets, pubs and post offices.
- **Community Infrastructure Levy (CIL):** A per square metre tariff on new developments seeking to raise revenue to fund new infrastructure.
- **Community Transport:** A range of voluntary sector, non-profit-making transport services designed to meet the needs of people who do not have access to private transport and for whom public transport is unsuitable.
- **Comparison Goods:** Goods for which the purchase involves comparison by the customer and which while not being purchased frequently must nevertheless be stocked in a wider range of size, colours and fabrics, jewellery, furniture and goods normally sold at specialist shops and general stores.
- **Compulsory Purchase Order (CPO):** An order which enables a statutory authority to purchase an area of land compulsorily for an approved project.
- **Conservation Area:** Areas designated by the Council under the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 as possessing special architectural or historic interest. The Council will seek to preserve and enhance the character and appearance of these areas.
- **Contaminated Land:** Land which contains potentially harmful substances as a result of human activity or from natural causes may be regarded as contaminated land. Because substances in or on the land may be hazardous and likely to affect its proposed development, a quantitative risk based assessment is required to determine whether the proposed developments should proceed and whether some form of remedial action is required.
- **Context:** In urban design terms the character and setting of the immediate local area within which a building or site is situated or to be sited. The context will take into account any local distinctiveness of an area, i.e. the particular positive features of a locality that contribute to its special character and sense of place and distinguishes one local area from another.
- **Convenience Goods:** Goods purchased on a regular basis which meet the day-to-day needs of local residents. They require minimum effort in selection and buying, e.g. food, newspapers and other goods of a standardised type of which there is a wide sale.
- **Conversions:** The sub-division of residential properties into self-contained flats or maisonettes.
- **Core Strategy:** The Core Strategy was the former title of the Local Plan: Strategic Policies document.
- **Culture:** A way of life including, but not limited to language, arts and science, thought, spiritual activity, social activity and interaction (the Roshan Cultural Heritage Institute).
- **Cultural Quarter:** An area where a critical mass of cultural activities and related uses are emerging, usually in a historic or interesting environment.

- **Decent Homes Standard:** A Government standard for housing which requires both Councils and Registered Social Landlords (RSLs) to bring up their property standards to a defined minimum by 2010.
- **Density:** The number of habitable rooms per hectare.
- **Designated Views-** views which focus on architecturally and culturally important groups of buildings that can be enjoyed from well managed public spaces
- **Development Management Policies (DMP) (DMDPD):** These are the policies which are required to ensure that all development in the borough meets the spatial vision and objectives set out in the Local Plan.
- **Development Plan Documents (DPD):** Statutory planning documents that form part of the Local Development Framework including the Local Plan: Strategic Policies, Development Management Policies and Site Allocations Document.
- **District Centre:** District centres have traditionally provided convenience goods and services for more local communities and accessible by public transport, walking and cycling.
- **Ecological Corridor:** Ecological Corridors are relative areas of green space running through built up areas that allow the movement of plants and animals to other areas and habitats.
- **Emergency Services:** Includes Fire, Police and Ambulance services.
- **Employment Land Review (ELR):** A study providing evidence of the macroeconomic circumstances driving the need for provision of employment land in the borough.
- **Environmental Assessment:** A method or procedure for predicting the effects on the environment of a proposal, either for an individual project or a higher-level 'strategy' (a policy, plan or programme), with the aim of taking account of these effects in decision-making.
- **Fluvial:** Water in the Thames and other rivers.
- **Form:** The layout (structure and urban grain), density, scale (height and massing), appearance (materials and details) and landscaping of development.
- **General Development Order (GDO):** Identifies the certain types of usually minor development for which planning permission is not required and which therefore do not require a planning application to be submitted to the Council.
- **Greater London Authority (GLA):** The GLA is a strategic city-wide government for London. It is made up of a directly elected Mayor and a separately elected Assembly.
- **Green Belt:** Green Belt is an area of land which has been given special status to restrict inappropriate development.
- **Green Chain/Link:** Linked green spaces composed of such elements as open land, footpaths, canals and rivers which provide public access, play, valuable recreational, conservation, ecological and general amenity role. Green chains can also be Ecological Corridors.
- **Green Industries:** This business sector that produces goods or services, which compared to other more commonly used goods and services, are less harmful to the environment.
- **Green Infrastructure:** A network of connected, high quality, multi-functional open spaces, corridors and the links in between that provide multiple benefits for people and wildlife.
- **Green Roofs:** Planting on roof to provide climate change, amenity and recreational benefits.
- **Growth Area:** Specific areas for new residential development to accommodate future population growth. In Haringey, there are two including Tottenham Hale, Opportunity Area, and Haringey Heartlands, Areas of Intensification.
- **Gyrotory:** A road junction at which traffic enters a one-way system around a central island.
- **Health Impact Assessment (HIA):** A process for ensuring that land use and planning decision making at all levels considers the potential impacts of decisions on health and health inequalities. It identifies actions that can enhance positive effects and reduce or eliminate negative effects.
- **Heritage Land:** Heritage Land is open land of strategic importance to London of significance for its landscape, historical and nature conservation interest. The only Heritage Land at the present time is Highgate Golf Course which forms part of the wider area of Hampstead Heath.
- **Highway Authority:** An authority responsible for a highway, whether or not maintainable at public expenses.
- **Historic Parks and Gardens:** Parks and gardens containing historic features dating from 1939 or earlier registered by English Heritage. These parks and gardens are graded I, II or II* in the same way as Listed Buildings. Only Alexandra Park and Finsbury Park are registered in Haringey.
- **Homes and Community Agency (HCA):** HCA is the national housing and regeneration agency for England.

- **House in Multiple Occupation (HMO):** Housing occupied by members of more than one household, such as student accommodation or bedsits.
- **Housing Association:** see Registered Provider.
- **Housing Trajectory:** Graph illustrating the supply of projected completion housing completions up to 2026.
- **Industrial Business Park (IBP):** Strategic industrial locations that are particularly suitable for activities that need better quality surroundings including research and development, light industrial and high value general industrial, some waste management, utility and transport functions, wholesale markets and some small scaled distribution. They can be accommodated next to environmentally sensitive areas.
- **Intermediate Housing:** Housing available at prices and rents above those of social rent but below market prices or rents.
- **Landmarks-** Buildings and structures, other than Strategically Important Landmarks, that are visually or culturally prominent in Designated Views
- **Landscape:** The character and appearance of land, including its shape, form, ecology, natural features, colours and elements and the way these elements combine.
- **Lifetime Home:** Ordinary homes designed to provide accessible and convenient homes for a large segment of the population.
- **Linear View:** A view seen through narrow gaps between buildings or landscaping
- **Listed Building:** Locally listed buildings are those which satisfy one or more of the following criteria: historic interest, architectural interest or environmental significance. Statutory listed buildings are buildings of special architectural or historic interest, they are graded as I, II* or with grade being the highest. English Heritage is responsible for designating buildings for statutory listing in England.
- **Local Development Documents (LDD):** The collective term for Development Plan Documents, Supplementary Planning Documents (does not form part of the statutory development plan) and other documents including the Statement of Community Involvement.
- **Local Development Framework (LDF):** The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current Local Plans or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan.
- **Local Development Scheme (LDS):** The LDS sets out the programme/timetable for preparing the LDD.
- **Local Implementation Plan (LIP):** Statutory transport plans produced by London boroughs bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.
- **Local Nature Reserve (LNR):** Sites which offers special opportunities for people to see and learn about wildlife in natural surroundings. LNRs are a statutory designation made under the National Parks and Access to the Countryside Act 1949.
- **Local Plan: Strategic Policies:** The Local Plan: Strategic Policies is a Development Plan Document setting out the vision and key policies for the future development of the borough up to 2026.
- **Local Shopping Centre:** The level of shopping centre below District Centre level, providing services for local communities.
- **Local Strategic Partnership (LSP):** A partnership of people that bring together organisations from the public, private, community and voluntary sector within a local authority area.
- **London Development Agency (LDA):** Organisation acting on behalf of the Mayor, whose aim is to further the economic development and regeneration of London.
- **London Plan (The Spatial Development Strategy):** The London Plan is the name given to the Mayor's spatial development strategy for London.
- **Market Housing:** Private housing for rent or for sale, where the price is set in the open market.
- **Metropolitan Open Land (MOL):** Strategic open land within the urban area that contributes to the structure of London.
- **Metropolitan Town Centre:** Metropolitan centres serve wide catchment areas and can cover several boroughs. Typically they contain at least 100,000sq.m of retail floor space with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, leisure, service and civic functions.

Comment [A196]: Add: Lifetime Neighbourhoods as per London Plan

- **Mixed tenure:** A mix of affordable and market housing.
- **Mixed Use Development:** Provision of a mix of complementary uses, such as residential, community and leisure uses on a site, within the same building or within a particular area.
- **National Planning Policy Framework (NPPF):** Sets out the Government's planning policies for England and how they are expected to be applied. The NPPF replaces 44 planning documents, primarily Planning Policy Statements (PPS) and Planning Policy Guidance (PPGs), which previously formed Government policy towards planning.
- **Neighbourhood and more local centres:** Typically serve a localised catchment often most accessible by walking and cycling. They include local parades and small clusters of shops, mostly for convenience goods and other services.
- **Open Space:** All land in London that is predominately undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.
- **Panorama:** A broad prospect seen from an elevated public viewing place.
- **Planning Obligations Supplementary Planning Document:** A guidance document offering support in the implementation of planning obligations on planning applications subsequent to the adoption of the Haringey CIL.
- **Primary Care Trust (PCT):** PCTs decide what health services a local community needs, and they are responsible for providing them.
- **Public Realm:** This is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.
- **Public Transport Accessibility Level (PTAL):** Public Transport Accessibility Levels are a measure of the extent and ease of access to the public transport network.
- **Regeneration:** The economic, social and environmental renewal and improvement of a rural or urban area.
- **Registered Provider:** non-profit making organisation that provides low-cost housing for people in need of a home.
- **River Prospect:** Short and longer distance visual experiences of a riverscape (in HG Y case Lee, Moseley or New River)
- **Section 106 Agreements (S106)/Planning Obligations:** These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.
- **Secured by Design:** The planning and design of street layouts, open space, and buildings so as to reduce the likelihood of fear of crime.
- **Site Allocations Development Plan Document:** This will form part of Haringey's LDF and will guide land use and future development in the borough until 2026.
- **Sites of Importance for Nature Conservation (SINC):** SINC areas are protected through the planning process having been designated for their high biodiversity value.
- **Small and Medium Enterprises (SMEs):** Small and Medium Enterprises (SMEs) comprise businesses with more than 11 but less than 250 staff.
- **Social Infrastructure:** Facilities and services including health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.
- **Social Rented Housing:** Rented housing owned and managed by local authorities or registered social landlords, or provided by other bodies under equivalent rental agreements.
- **Spatial Vision:** A statement of long term shared goals for the spatial structure of an area.
- **Statement of Community Involvement (SCI):** The Council's policy for involving the community in the preparation, review and alteration of LDDs and planning applications. It includes who should be involved and the methods to be used.
- **Strategic Environmental Assessment (SEA):** Expression used by the European Union to describe environmental assessment as applied to policies, plans and programmes.
- **Strategic Housing Land Availability Assessment (SHLAA):** An assessment of land availability for housing which informs the London Plan and borough local development documents, as set out in section 48 of the NPPF.
- **Strategic Housing Market Assessment (SHMA):** An assessment of housing need and demand which informs the London Plan and borough local development documents.

- **Strategic Industrial Location (SIL):** These comprise Preferred Industrial Locations (PILs) and Industrial Business Parks and exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including logistics, waste management, utilities, wholesale markets and some transport functions.
- **Supplementary Planning Document (SPD):** Provides supplementary information about the policies in SPDs. They do not form part of the development plan and are not subject to independent examination.
- **Supplementary Planning Guidance (SPG):** Additional advice, provided by the Council on particular topics or policy areas and related to and expanding upon statutory policies.
- **Sustainability Appraisal (SA):** This is a systematic and continuous assessment of the social, environmental and economic effects of strategies and policies contained in the DPDs, which complies with the EU Directive for Strategic Environmental Assessment.
- **Sustainable Urban Drainage Systems (SUDS):** An alternative approach from the traditional ways of managing runoff from buildings and hard standing. They can reduce the total amount, flow and rate of surface water that runs directly to rivers through storm water systems.
- **Tall Buildings:** The Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their neighbours, have a significant impact on the skyline, are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London.
- **Townscape View -** Unfolding close view of built up environment with spaces between and in each case views might or might not contain (but will be more significant if they do)
- **Tree Preservation Order (TPO):** Made under the Town and Country Planning Act 1990 by the local planning authority to protect trees of importance for amenity, landscape and nature conservation.
- **Urban Characterisation Study (UCS):** An appraisal of the character of the borough in terms of built form, topography, conservation and heritage value.
- **Use Classes Order:** The Town and Country Planning (Use Classes) Order 1987, as amended, lists 15 classes of use. A change of use within the same Class does not constitute development and thus does not require planning permission.
- **Unitary Development Plan (UDP):** A UDP is a land use plan that seeks to make the most efficient and effective use of land in the public interest. The LDF will eventually replace Haringey's UDP 2006.
- **View Corridor:** Strategic important views designated in the London Views Management Framework.
- **Warehouse Living:** Purpose built and genuine integrated working and living accommodations specifically targeted at the creative industries sectors.

Appendix F: Key to Maps

KEY:

	Proposed Green Chain
	Existing Green Chain
	Potential Tall Buildings
	Enhanced Cycle/ Pedestrian Route
	Bus Routes
	Rivers
	Indicative New Street Pattern
	Green Link
	Significant Local Open Land
	Site Allocations
	Existing Planning Permission
	Current Planning Application
	Proposed Town Centre
	Town Centres
	Local Shopping Centres
	Proposed Primary Frontages
	Proposed Secondary Frontage
	Primary Frontage
	Secondary Frontage
	Primary Shopping Areas
	Listed Buildings
	Conservation Area
	Ecological Corridor
	Urban Realm
	400m distance from Crossrail 2
	800m distance from Crossrail 2
	Parks

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