

Statement of Representations to the Post-Hearing Modifications covering:

The Alterations to the Strategic Policies DPD

The Development Management DPD

The Site Allocations DPD

The Tottenham Area Action Plan DPD

1. Introduction

- 1.1 As part of the ongoing Examination of the Haringey Local Plan, the Council published the schedules of proposed post-hearing modifications for each of the above listed four DPDs for public consultation. The proposed post-hearing modification arose as a result of both the Council's consideration of comments received to Pre-submission consultation (held in 8th January - 4th March 2016) and from the hearing sessions for the Examination in Public, which were held in August – September 2016. The main modifications have been proposed to ensure the Local Plan documents comply with the soundness tests set out in the National Planning Policy Framework.
- 1.2 The consultation period on the proposed schedule of modifications ran from 18th November 2016 to 13th January 2017. This is two weeks longer than the statutory period of six weeks, reflecting that the consultation period ran over the Christmas holiday period.

2. Summary of consultation undertaken on the Schedules of Proposed Post-Hearing Modifications

- 2.1 Formal notification of the consultation on the proposed post-hearing modifications was given on 18th November 2016, and representations were invited for a eight week period ending 13th January 2017. Representations were also invited on the addendum to the Sustainability Appraisal during this period.
- 2.2 A formal notice setting out the proposals matters and representations procedure was placed in the local newspaper on both the 17th and 24th of November 2016. In addition, on 18th November, a total of over 1,000 notifications were sent by post or email to all contacts on the Local Plan database, including all appropriate general consultation bodies, and to all persons who made representations to the Regulation 19 consultation. Enclosed with the letter was the Statement of the Representations Procedure explaining the purpose of the consultation and how people could access the documents and submit comments. Those emailed were also provided with the web link to the documents on the Council's Local Plan web pages. All specific consultation bodies were also notified on 18th November 2016.
- 2.3 Hard copies of the schedules, the Sustainability Appraisal Report addendum, the Statement of the Representations Procedure, and Regulation 19 version of each DPD, were made available at the Haringey Council offices at River Park House and all public libraries across the Borough. The documents were also made available to view and download from the Local Plan web pages of the Council's website.

3. Who responded and number of representations received

3.1 In total 81 representations were received to the consultation, broken down as follows for each of the DPDs:

12 respondents to the Alterations to the Strategic Policies DPD;
27 to the Development Management DPD;
28 to the Site Allocations DPD; and
10 to the Tottenham Area Action Plan DPD.

3 further representations were received from statutory bodies that did not specify a plan but rather acknowledged the consultation on the modifications and offered no comment.

1 representation was made to the Policies Map.

3.2 A full list of the respondents to each DPD is provided in the tables below along with the Council's response to each of the specific comments made.

4. Summary of the main issues/comments made to the Post Hearing Modifications consultation

4.1 The following section sets out the main issues made in respect of each DPD.

Alterations to the Strategic Policies

4.2 Two general responses were received. Mr Petrou objected to the plan as a whole, particularly citing over-development and unrealistic job outputs. The Council is content that the Plan is the most appropriate, when considered against all reasonable alternatives, and delivers upon identified requirements for housing and employment. The general response was from Sport England, saying their previous comments still apply. However, a check of previous responses to the Alterations to the Strategic Policies shows Sport England did not previously comment on these – Council therefore considers this must relate to one of the other Local Plan documents.

4.3 The Mayor for London responded to confirm that the modifications were in general conformity with his London Plan, which was welcomed. The Mayor also noted that certain references, including to the London Plan and supplementary guidance, had changed and needed updating, which the Council agreed and can be dealt with as minor factual modifications.

4.4 Only one representation was received to AltsMod9, from Tottenham Hotspur FC, supporting the modification.

4.5 Only one representation was received to AltsMod10, from Haringey Defend Council Housing, supporting the modification.

- 4.6 Haringey Defend Council Housing also responded to strongly support AltsMod16.
- 4.7 Historic England responded to AltsMod17 to suggest that the proposed text be amended so not placing an obligation on Historic England to assist. However, the Council note that this was the wording suggested by Historic England and that we do not see it as an obligation but rather sign-posting.
- 4.8 Our Tottenham suggested a further change to AltsMod18, which the Council agrees, which is to clarify the intention to reprovide social rented housing with new social **rented** housing.
- 4.9 Two representations were received to AltsMod19. The Tottenham Hotspur FC supported the modifications while Pinkham Way Alliance sought to make the case that the Pinkham way site did not meet the criteria for inclusion in SP8 as an employment site. The Council maintains that Pinkham Way is correctly designated and is suitable for employment development to contribute towards meeting forecast demand for B-class floorspace.
- 4.10 Two representations were also received to AltsMod22. Rapleys on behalf of LaSalle supported the modifications but sought Appendix 2b to clarify they are indicative employment floorspace capacities for each site. The Council's view is that this is already clarified elsewhere throughout the Plan. Pinkham Way Alliance sought to make a case that the forecast demand was for B1 floorspace and that Pinkham Way is not suitable to B1. The Council disagrees and considers the site as suitable for the range of B class uses, as per the nature of employment use present on the adjacent Bounds Green Industrial Estate. Further, with New Southgate becoming an Opportunity Area in the London Plan, the location will become more attractive to B1 use.
- 4.11 AltsMod23 drew three representations. The North London Waste Authority supported the modification. The Freehold Community Association and Pinkham Way Alliance Maintaining state the employment designation applying to Pinkham Way is not supported by evidence and the designation should be removed. The Council considers the allocation as Pinkham Way as a designated Employment Area is consistent with the latest available evidence, and is not a material change in this Plan.
- 4.12 Collective Planning, on behalf of Provewell Ltd, responded to AltsMod24 requesting the figures in detailed Housing Trajectory (in Appendix 2) be updated to give the warehouse district sites a combined indicative figure for monitoring purposes. The Council acknowledges that this was the approach agreed at the Hearing session and agrees with this change, and reflects the changes made in the Site Allocations DPD.
- 4.13 Only one representation was received to AltsMod30 from Haringey Defend Council Housing who supported the modification.

Development Management Policies

- 4.14 Three representations were received to the entire plan. Historic England confirmed their support for the changes and had no further comments, Highgate School also confirming they had no substantive comments to the modifications and, lastly Sport England confirming there were no modifications relevant to their area of interest.
- 4.15 One representation was received to DMod4 from the Met Police seeking reinstatement of the original wording 'comply with the principles set out in Secured by Design' instead of 'have regard to' as put forward in the modification. Council would support the use of 'comply with' to ensure the full policy intent is met.
- 4.16 Only one representation was received to MMod5, from the Met Police, supporting the modification.
- 4.17 One representation was received to MMod9, from Ursula Riniker, objecting to 'has regard to', which she considers too vague. Council disagreed as the Tall Buildings and Views SPD could only be a material consideration.
- 4.18 Highgate School queried whether DMod10 required further clarity or justification. The Council is content that development proposals should have regard to all key views and vistas identified in the conservation area appraisals regardless of the number of views and vistas that might be identified therein, as it would only be those affected by a proposal that would necessarily need to be considered in any detail.
- 4.19 Rapleys on behalf of La Salle wrote to confirm their support for DMod9.
- 4.20 MMod12 received two representations, one in support (Rapeys) of removing the requirement for community benefit, and one (Ursula Riniker) objecting to the removal. The Council notes that this was debated at length during the hearing and agreed that this was ambiguous and there were more relevant policies within the plan where community benefit could be sought where justified and necessary to make a proposal acceptable in planning terms.
- 4.21 MMod13 received a representation from Rapley's in support and one in objection from Ursula Riniker, with respect to replacing 'be consistent with' with 'have regard to'. The Council is content that an SPD can only be considered a material consideration and therefore 'have regard to' is the correct terminology.
- 4.22 Ursula Riniker also objected to Apex House and Finsbury Park being identified in DMod14 as suitable for tall buildings. The Council is content that the evidence base indicates both locations suitable for tall buildings, and that the plan contains sufficient policies to effectively control the appropriate height of development at these locations.

- 4.23 Only one representation was received to DMMod20, from Haringey Defend Council Housing, supporting the modification.
- 4.24 Only one representation was received to DMMod27, from Ursula Riniker, which sought clarity on the change being made, which the Council considers is self-explanatory (i.e. additional units granted above that already granted for an earlier but unimplemented version of the same scheme/development).
- 4.25 Rapleys were the only respondent to DMMods35, 37 & 38, for which they supported the modifications.
- 4.26 DMMods45 – Dmmods47, which relate to Policy DM20 on Open Space, received two representations. Highgate School supported the modifications but sought a further minor modification providing for the loss of open space where exceptional circumstances can be justified. The Council considers that the modification reflects the NPPF and the limited circumstances where loss would be considered an exception are already included in the policy, which reflect the presumption against the loss of open space in Strategic Policy SP13, Michael Burroughs Associates on behalf of Omved International Ltd considered modification MDMod45 was inconsistent with the London Plan (Policy 7.18) and DMMod48 to be inconsistent with the NPPF. The Council considers both modifications to be in conformity with both the London Plan and NPPF in that they clarify that ‘previously developed land’ does not fall within the definition of open space. However, where PDL exhibits open space qualities, there may be the potential to secure an open space provision as part of any further redevelopment proposal.
- 4.27 Tottenham Hotspur FC made a representation to DMMod48 proposing alternative wording. However, the Council considers the alternative proposed to be an incorrect interpretation of previously developed land within the NPPF and brownfield land in the London Plan.
- 4.28 Two representations were received to DMMod57. These were from the Environment Agency and Ursula Riniker with both representations seeking replacement of the wording ‘proposals should not’ with ‘proposal must not’ adversely affect the natural functioning of main rivers... – the Council considers this would add clarity and are therefore supportive of this further change.
- 4.29 Two representations were received to DMMod60. Ursula Riniker objected to the inclusion of a new Part B to the policy unless sub-section c was deleted and replaced by a criterion that ensured proposals did not harm nearby residential properties rather than safeguarded neighbouring employment uses. The Council considers that the protection of residential amenity is adequately covered by other policies in the Local Plan. Tottenham Hotspurs FC suggested a raft of further amendments aim primarily at removing the requirement for the proposal to relate to and support the continued functioning of the LSIS for industrial and commercial use. Rather their position is that the policy should provide for mixed use development that safeguards employment capacity, and that the expectation of regeneration benefits should be lowered to be local rather than borough-wide. The Council considers the LSIS designation to represent an existing area of industrial or commercial land use of borough importance, and that the potential introduction of non-B Class use can only be considered acceptable where these facilitate the continued functioning of these areas for industrial and commercial use. The safeguarding of employment capacity would only ensure job numbers remain the same i.e. replacing low job

density often highly skill maker industry jobs with say higher job density but low skilled retail jobs - which is at odds with Haringey's Economic Strategy and unacceptable to the Council.

- 4.30 Only one representation was received to DMMod61, from Rapleys, supporting the modification.
- 4.31 Three representations were received to DMMod62. Ursula Riniker sought to have the wording 'will' replaced with 'may' in Part A, but the Council considers this results in the policy becoming unclear and less effective. Savills on behalf of JLL considered the presumption against the redevelopment of SIL to not be in conformity with the NPPF. However, the Council is content that the evidence base identifies the need to safeguard SIL to meet industrial and commercial needs over the plan period, and that any release of such land should be through the plan-making process rather than on a planning application basis. DP9 on behalf of Austringer Estates Ltd should removal of 'employment-led' being applied to their particular LEA site circumstances, however, the Council is content that the site circumstances still lend to themselves to an 'employment-led' approach to redevelopment, consistent with the designation.
- 4.32 Three representations were received to DMMod63. Provewell and Rapleys both support the modification, while DP9 on behalf of Austringer Estates Ltd sought to ensure consistency between Policy DM38 and their Site Allocation SA21. Having reviewed both, the Council is content that there is no inconsistency.
- 4.33 One representation was received to DMMod64 from DP9 on behalf of Austringer Estates Ltd requesting the consideration of development viability be reinstated. The Council is content that viability is inherent in demonstrating compliance with the policy which seeks the maximum employment floorspace.
- 4.34 DP9 on behalf of Austringer Estates Ltd was the only respondent to DMMod65 – DMMod67 and supported the modifications.
- 4.35 DP9 on behalf of Austringer Estates Ltd and Provewell responded to DMMod68. Both of whom confirm their support for the modification.
- 4.36 Two representations were received to DMMod69. DP9 obo Austringer Estates Ltd asked for further clarification on the use of the term 'amenity', which the Council considers is already clearly set out at Policy DM1. Rapleys on behalf of La Salle wrote to support the modification.
- 4.37 Rapleys on behalf of La Salle also wrote to confirm their support for DMMod70, which DP9 obo Austringer Estates Ltd also supports.
- 4.38 Two representations were received to DMMod71. Rapleys on behalf of La Salle support the modification while Ursula Riniker considered the regeneration of Employment Area - Regeneration Areas could be achieved without mixed-use provision. Council is content that the sites identified for designation as EA- Regeneration Areas are those that are appropriate for, and require, mixed use development to deliver an intensification of employment use in modern and fit for purpose premises.

- 4.39 Provewell and LB Hackney both made representations supporting DMMod76.
- 4.40 LB Hackney also confirmed their support for the other modifications to Policy DM39 (DMMod77 – DMMod84). However, Provewell did raise an objection to DMMod82 and the requirement to engage and seek the views of LB Hackney when preparing site masterplans, citing that LB Hackney had very different planning policies. The Council is content that LB Hackney should be consulted on proposals that may impact on their borough, including for infrastructure requirements, and confirmed that LB Haringey remains the Local Planning Authority for determining applications in the borough and in accordance with Haringey’s Local Plan.
- 4.41 Only one representation was received to DMMod86 from Ursula Riniker seeking the wording ‘will’ to be replaced with ‘may’. The Council disagrees and considers this would make the policy unclear and not as effective.
- 4.42 Only one representation was received to DMMod87 from Ursula Riniker seeking the wording ‘will’ to be replaced with ‘may’ and sought to have the wording ‘without success’ reinstated in respect of the marketing requirement. The Council disagrees with the first change, as we consider this would make the policy unclear and not as effective. We also disagree with the second change, as we consider the marketing requirements to be appropriate.
- 4.43 Only one representation was received to DMMod88 from Ursula Riniker seeking the wording ‘will’ to be replaced with ‘may’. The Council disagrees and considers this would make the policy unclear and not as effective.
- 4.44 Only one representation was received to DMMod89 from Ursula Riniker seeking the wording ‘may be sought’ to be replaced with ‘will be sought’. In this instance, the Council disagrees, as the intention of the modification is to provide sufficient flexibility to only require planning obligations that are strictly necessary to make the proposal acceptable in planning terms.
- 4.45 Only one representation was received to DMMod91 from Ursula Riniker which asked that the modification be re-written to ‘make sense’, to that the wording ‘the vibrancy and’ be deleted, and the wording ‘can be demonstrated’ be replaced by ‘has been demonstrated’. The Council considers the wording of DMMod91 to be sufficiently clear and appropriate to evidence the policy requirements. However, the Council would agree that amending the wording ‘can be demonstrated’ to ‘has been demonstrated’ would better reflect the policy requirements.
- 4.46 Sport England made a representation to DMMod92 but the Council considers this was a misreading of the wording of the modification which the respondent thought said ‘Leisure Centre’ rather than ‘Local Centre’.
- 4.47 Planning Potential was the only respondent to make representations to DMMod93 – DMMod97, all of which they supported.
- 4.48 Only one representation was received to DMMod98 from Ursula Riniker which suggested that the first sentence to paragraph 6.56 was absurdly inappropriate with the two commitments have nothing to do with each other. The Council agrees and has no objection to removing the modification as it is not necessary to justify the policy.

- 4.49 There were 11 representations received on the proposed modifications to Policy DM47 including from the Greater London Authority, public health stakeholders such as Public Health England and Haringey CCG, and a number of local schools. All respondents supported the inclusion of a policy to manage hot food takeaways but also expressed concern that the modifications, particularly the removal of the 400m exclusion area around schools (i.e. healthy eating zone), could adversely impact on health outcomes and undermine the 'whole systems approach' promoted by public health bodies. Many respondents presented new technical evidence to support the reinstatement of Policy DM47 as set out in the Pre-Submission publication document. Respondents also noted that other London boroughs have adopted similar policies for managing takeaways around schools. In light of the significant response to the modifications to Policy DM47, and the substantial body of further evidence provided by the respondent (including Haringey specific evidence), the Council would strongly support the Inspector's consideration to reinstating Policy DM47 to that set out in the Pre-Submission publication document.
- 4.50 One representation was received to DMod107 by Rapleys on behalf of La Salle objecting to list of potential planning obligations that the Council may seek, and therein, particularly Public Art. The Council is content that it is appropriate to specify in policy DM48 the types of planning obligations that may be sought depending on the nature of the development proposed and the impacts requiring mitigation to make a scheme acceptable in planning terms. This provides necessary clarity to developer and aids in site specific negotiations. In response, the Council also offers circumstances in which public art may need to be secure through use of a planning obligation.
- 4.51 LB Hackney responded to DMod109 to confirm their support for the modification.
- 4.52 In addition to the comments on the main modifications, one representation was received to DMinor29 from Highgate School querying the relationship between the Locally Significant Views at Appendix A and Policy DM5 on views. In response, the Council noted that paragraph 2.34 of Policy DM5 clearly states that the Schedule at Appendix A sets out the Locally Significant Views that are relevant to Policy DM5 and the Schedule has been updated to include the coordinates indicating the point of origin of each view.
- 4.53 Five further representations were received to parts of the Development Management Plan that were not subject to main or minor modifications. This included a representation by Ursula Riniker to Policy DM30 suggesting the wording 'a significant' should be replaced by the wording 'any'. While outside the scope of the consultation, the Council did not consider the suggested change appropriate as it may not be possible in all instances for a waste facility to have no impacts in terms of noise or odour and therefore the significance of the impact would be a key consideration as to whether a proposal was acceptable. Ursula Riniker also suggested Part A of Policy DM34 be amended by substituting 'should' with 'must'. Again, while outside the scope of the consultation, the Council would support this further amendment as it would add clarity to the Policy. Provewell put in a representation to Policy DM39 which sought additional wording be added to clarify how individual applications for improvements or extensions are to be determined that come forward outside of a masterplan for a Warehouse Living site. Provewell offer up suggested text for inclusion in the Policy which the Council considers

would be acceptable and would provide the clarity sought. While outside the scope of the consultation, interim arrangements, ahead of a site masterplanning exercise, was covered during the hearing sessions in relation to the Tottenham AAP Policy AAP1 and in respect of a number of the Site Allocations. In this context, the proposed amendment would be in keeping with the approach agreed elsewhere throughout the Local Plan. NHS Property Services responded to the consultation to note their support that Policy DM49 or supporting paragraph 7.17 had not been subject to modifications. Lastly, Ursula Riniker requested an additional view be added to the Schedule of Locally Significant Views at Appendix A. The Council responded that the view was not one identified or supported by the evidence base and therefore unlikely to be worthy of protection.

Site Allocations

- 4.54 6 representations were received to the whole plan. These were from the Environment Agency who welcomed earlier modifications relating to deculverting and deliver of the Water Framework Directive. EA wish to also see inclusion, within the relevant site allocations, of reference to ‘River Basin Management Plans’, which the Council considers would be acceptable. Historic England wrote to support the modifications, as did the Mayor for London who confirmed that the modifications were in general conformity to the London Plan. The Mayor also noted that references to a number of GLA documents had changed, which the Council considered could be dealt with as minor factual changes. Sport England confirmed that none of the changes affected their areas of interest, and Highgate School confirmed that they did not have substantive comments to make on the vast majority of the modifications.
- 4.55 Only one representation was received to SAMod1 by Rapleys on behalf of La Salle, seeking the reference to employment-led mixed use development’ to specifically reference ‘including residential development’. The Council considers this proposed modification unnecessary, as it is clear that mixed use can include residential, alongside many other uses, there is no need to spell them all out in Policy.
- 4.56 Two representations were received to SAMod2. Both Savills on behalf of Safestore and Rapleys on behalf of La Salle confirmed support for the modification, with the latter also seeking confirmation that the modification proposed for “capped rents” also applies to “capped commercial rents”, which the Council confirmed it would and references should be updated accordingly.
- 4.57 One representation was received to SAMod5 by Rapleys on behalf of La Salle, confirming their support for the modification.
- 4.58 Two representations were received to SAMod21. Tottenham Hotspurs FC wrote to confirm their support for the modification. GBN’s representation queried the waste safeguarding of their site, which they considered was not in a waste use. The Council reviewed the planning application history of the site, which the Council considers adequately demonstrates that the waste management use applies to the entire area, and the entire area is correctly identified for safeguarding in the Site Allocations DPD.
- 4.59 One representation was received to SAMod22, by Rapleys on behalf of La Salle, supporting the modification.

- 4.60 One representation was received to SAMod29 by Ursula Riniker, objecting to the modification which Ursula did does not consider sufficiently protects the residents located adjacent to the site. The Council disagrees and considers the modification retains criteria to ensure residential amenity is adequately considered.
- 4.61 One representation was received to SAMod33 by Ursula Riniker, asking for the inclusion of a definition of 'landmark building'. The Council agrees this could be useful and would suggest the following addition to the Glossary – 'Landmark Building: A building which serves as a marker of a particular location and/ or a prominent feature in the urban landscape.'
- 4.62 Rapleys on behalf of La Salle were the only respondent to SAMod36, SAMod38, SAMod41, SAMod42, & SAMod43. With respect to SAMod36 and SAMod41 they wrote to support the modifications. They objected to SAMod31 and therein, to the residential use being referred to as enabling use. The Council considers this appropriate given the requirement to maximise the amount of employment floorspace to be delivered. Rapleys also objected to SAMod42, which they consider places a requirement on Site Allocation SA18 but omits the same requirement on the neighbouring sites. The Council would agree that for consistency AAPMod42 should also apply to SA19 and SA20. Lastly, they objected to SAMod43 on the basis that the exact alignment of the new pedestrian/cycle route through the site is known. In respect of the modification they offered up alternative wording, which the Council considers would be acceptable.
- 4.63 One representation was received to SAMod44, by Barton Willmore on behalf of Workspace, querying the reference to 'provision of affordable commercial rents' as applying to their site. The Council clarified that the reference had been updated to read 'affordable rent may be sought having regard to the viability of the scheme as a whole'. The Council considers that SAMod44 is consistent with that of other RA Site Allocations.
- 4.64 Two representations were received to SAMod48. Rapleys on behalf of La Salle and DP9 obo Austringer Estates Ltd both responded to confirm their support for the modification.
- 4.65 Two representations were received to SAMod49. Rapleys on behalf of La Salle request that as a result of the modification, which states that the site (SA22) could support increased scales and densities beyond that already provided, a further site requirement should be added to SA22 to the effect that 'any new planning application should demonstrate that proposals would not compromise the deliverability of development on neighbouring sites'. The Council would support this proposed further modification to improve clarity and effectiveness. St Williams Homes pointed out that the modification did not reflect the SoCG, namely that Downhills Park should read Downhills Park Road. The Council agreed it should make this correction.
- 4.66 Only one representation was received to SAMod58, by Provewell, who confirmed their support for the modification.

- 4.67 One representation was received to SAMod60, by Provewell, supporting the modification but asking that a further modification clarify the circumstances for small scale extensions prior to a site-wide masterplan. The Council notes that this is already proposed to be incorporated in Policy DM39 Warehouse Living and negates the need to include it within each Warehouse Living site.
- 4.68 Provewell was also the only respondent to SAMod61, which they considered the modification should also be applied to site SA34 Eade Road and Overbury Road. The Council would agree that the modification should also apply to SA34 Eade Road and Overbury Road.
- 4.69 Only one representation was received to SAMod62 by Provewell who support the proposed wording but wished to add a reference to 'existing lawful use'. The Council considers the current wording to be accurate and adequate, as this ensures considerations take into account all current uses, lawful or otherwise, noting the enforcement actions still pending on a number of these Warehouse Living sites.
- 4.70 Savills on behalf of Legal and General put in three representations to SAMod63. The thread of their representation is to increase the indicative site capacity for residential development and to reduce the indicative employment floorspace target for site SA31 Crusader Industrial Estate. The Council would disagree to a higher indicative housing target or a lower employment floorspace target being imposed on this site, given it is expected to deliver a component of employment floorspace, of which this should be the leading land use unless determined unfeasible.
- 4.71 Only one representation was received to SAMod67 by Provewell who support the proposed wording but wished to add a reference to 'existing lawful use'. The Council considers the current wording to be accurate and adequate, as this ensures considerations take into account all current uses, lawful or otherwise, noting the enforcement actions still pending on a number of these Warehouse Living sites.
- 4.72 Three representations were received to SAMod68. These were from Ursula Riniker, Susie Barson, and Cllr Cater, all suggesting the modification be further amended by deleting the reference to the site being considered suitable for a tall building. The Council disagrees. The Council's evidence base study- Tall Buildings Validation Study (2015) identifies this site as potentially suitable for a tall building. Therefore, in tandem with other policies within the Plan, notably DM6, the Council believes that a suitably designed tall building could be appropriate on this site whilst respecting and not adversely affecting upon Finsbury Park. Cllr Cater also makes reference to a nascent Finsbury Park Neighbourhood Plan, suggesting the modifications and the site allocations may be premature. However, the Council notes that at this time we have not even yet received an application to establish a Neighbourhood Forum for the area.
- 4.73 One representation was received to SAMod73 by Ursula Riniker seeking the inclusion of the wording 'and height' after 'The design'. The Council would support this addition given the constraints within and around this site, and the potential impact upon MOL.
- 4.74 Tony Rybacki was the only respondent to SAMod77, which proposes changes to SA39 Gonnerman's and Goldsmiths Court. The comments seek further changes to take account of concerns previously outlined by the respondent in respect of the allocation, including the labelling of Coleridge Gardens and the protection of this open space. The Council considers that a flexible approach to

open space provision at this site is necessary to deliver the strategic objectives for the Highgate area and the Borough's spatial strategy. Coleridge Gardens is not designated open space however the modification provides that all proposals give due consideration to its amenity value, recognising the broader strategic aim within this area is to facilitate improvements to the Parkland Walk.

- 4.75 Only one representation was received to SAMod78 from Highgate School who confirmed their support for the modification.
- 4.76 Highgate School were also the only respondent to SAMod79. The School was seeking greater clarity around the potential location and extent of the archaeological remains (medieval settlement). The Council noted that this modification responded to comments by Historic England and reflect the fact that the Greater London Archaeological Advisory Service are currently reviewing the archaeological priority areas for Highgate, and that the School should consult GLAAS early in the planning application process.
- 4.77 SAMod80 – SAMod85 relate to site allocation SA42 Highgate Bowl and received representations from three respondents. The Highgate Bowl Action Group offered up suggested further changes to aid clarity. The vast majority of the further amendments would be supported by the Council with the exception of restricting any development from taking place within the indicative open space area, as the Council notes that there are a number of buildings already within the green line (Whistler's Cottage, and a greenhouse. Where existing development extends into the area identified for potential open space designation, the Council will need to consider the individual site circumstances and determine whether an acceptable outcome can be reached, noting that previous appeals regarding the Conservation Area status applying to the Bowl and the importance of the openness of land within the Bowl to the heritage setting. The representations by both Michael Burroughs Associates obo Omved International Ltd and Savills obo NHS Property Services object to any part of their respective sites being allocated for open space, which they considered is not justified or in keeping with discussions at the Hearing session. They also strongly resist any suggestion of the open space being made publically accessible. The Council considers that the modifications clarify the position with respect to the current status of the bowl land as previously developed land, and the Council's intention to secure the area identified on the site allocation as designated open space upon acceptable development coming forward on the individual land parcels to secure this. The Council is also content that, while public access to any future open space would be desirable, the purpose for securing the land in an open space designation is primarily for conservation purposes.
- 4.78 Three representations were received to SAMod99. The North London Waste Authority (NLWA) supported the removal of the allocation for Pinkham Way from the Plan but wanted assurance that the dual employment and SINC designations still applied. The Council noted that the employment designation applying to the site was confirmed in Alterations to Strategic Policy SP8 and the dual designation would be illustrated on the Proposals Map. The Freehold Community Association wished the land be safeguarded for flood alleviation but the Council noted that flood management would be assessed in line with Policies DM24, DM25, & DM26. The Freehold Community Association also considered that the site should be designated as open space. The Council notes that a previous Village Green application for the site was unsuccessful, that the site is PDL and is required to meet employment needs in accordance with Strategic Policy SP8, and an open space designation is therefore not appropriate given the areas is also not identified as being deficient. The Pinkham Way Alliance welcomed the modification but felt the description in the proposed change was inaccurate. The Council considers the description and the reasoning given for the removal of Site SA52 from the Site Allocations DPD was clear.

- 4.79 Only one representation was received to SAMod101, from the Education Funding Agency, seeking deletion of 'potentially' from the reference to education in the list of uses. The Council recognises that work is being undertaken to secure an education use on this site, but considers it appropriate that flexibility is retained in the policy for other potential uses.
- 4.80 One representation was received to SAMod104 by the Keston Action Group which sought a further addition to the guideline to read 'and should be looked at for educational or community usage'. The Council notes that there is no identified unmet need for an educational use on this site. The term community use by itself is appropriate, and offers flexibility in the type of use to be located on the site.
- 4.81 The Keston Action Groups was also the only respondent to SAMod105 and sought 'and be considered against all relevant MOL policies' be added to the end of the site requirement. The Council considers this is already implicit in the reference to 'consideration against relevant policies', which would include MOL policies.
- 4.82 The Broadwater Farm Resident's Association responded to SAMod108 and sought several changes to the requirements that the masterplan SPD would need to take into account. While the Council was generally supportive of the amendments, it notes that these were already covered in the modification or in other policies of the Plan. Therefore the only addition that actually added to the effectiveness of the site allocation was an amendment to the existing principles to take into account the wider surrounding context, which the Council agreed should be made.
- 4.83 Two representations were received to the minor modifications. These were both from DP9 obo Austringer Estates Ltd. In respect of SAMinor10, the representation sought removal of the cross-reference to policy DM38 in the site requirement for site SA21. The Council disagrees and considers that the cross-reference is particularly important to the future redevelopment of this site being 'employment-led regeneration'. In respect of SAMinor11, DP9 obo Austringer Estates Ltd acknowledged support for the minor modification.
- 4.84 A total of four further representations were received that were outside the scope of the consultation on the modifications. Provell sought changes to the indicative capacities at Table 17 in Appendix 4 in support of their position that their two site interests (SA30 Arena Design Centre and SA34 Eade Road and Overbury Road) should be assigned higher residential capacities than currently shown. In response, the Council considers that the indicative figures to be more accurate, noting that these are minimums and the site must also contribute to meeting employment floorspace needs. Cllr Cater's representations to sites SA36 Finsbury Park Bowling Alley and SA37 Stroud Green reiterated previous comment the respondent made to the sites at the pre-submission stage. The Council is content that these comments have already been the subject of detailed consideration and did not give rise to any necessary modifications. This position remains unchanged. The Highgate Bowl Action Group offered up further suggested changes to aid in the clarity of site SA42 Highgate Bowl. While outside the scope of the consultation, the Council agreed that the suggested changes were helpful and would therefore, support them being made. Lastly, Alexandra Palace wrote to seek a change to one of the development guidelines for site SA53 Alexandra Palace, namely that reference to 'museum' be changes to 'visitor experience' to more accurately reflect the proposed

use of part of the refurbished building. The Council would be supportive of this change which it considers can be dealt with as a minor modification.

Tottenham Area Action Plan

- 4.85 Three representations were received to the entire plan. Sport England confirming there were no modifications relevant to their area of interest and two from Mayor of London, the first confirming the modifications are in general conformity with the London Plan, and the second highlighting updated references to GLA documents, which the Council agrees can be made a minor modifications,
- 4.86 One representation was received to AAPMod12 by Our Tottenham seeking inclusion of 'refurbishment' as an option for consideration for estate renewal proposals. The Council would support a change to 'renewal or strategic improvements' as being more consistent with the changes set out in Alt53.
- 4.87 Historic England proposes a number of changes to Policy AAP5 (AAPMod20 – AAPMod24). The changes seek to aid with the legibility and effectiveness of the Policy and so would be supported by the Council.
- 4.88 One representation was received to AAPMod27, by Ursula Riniker, but to part of Policy AAP6E that was not the subject of further modification. Therefore the deletion of the text sought is not supported by the Council, which considers the policy wording to be appropriate.
- 4.89 Two representations were received to AAPMod41. Haringey Defend Council Housing sought inclusion of a yes/no vote by residents as a precursor to any estate renewal proposal. The Council disagrees with the change as modification AAPMod41 already sets out the requirement upon the Council to engage with residents across the estate prior to the commencement of any proposal. This requirement would afford residents the opportunity to voice their view on the appropriate approach to estate renewal having regard to site and individual circumstances. Our Tottenham suggested including 'the potential for refurbishment' and 'the principle under which demolition would be considered' within the list of matters for considering estate renewal. The Council considers the further modifications reflect the amendments in Alt53 and would therefore be supportive of these.
- 4.90 Only one representation was received to AAPMod59, by Tottenham Hotspur FC, supporting the modification.
- 4.91 Only one representation was received to AAPMod68, by Tottenham Hotspur FC, supporting the modification.
- 4.92 One representation was received to AAPMod76 by the North London Waste Authority seeking a change to Site Allocation TH6 to include a requirement that the existing employment floorspace must be replaced. The Council would not support this further change as the Council wishes to maintain the flexibility provided by the Site Allocation.

- 4.93 The North London Waste Authority responded to support modifications AAPMod79
- 4.94 One representation was received to AAPMod80, by Fiona Carson, who noted the changes to Site Allocation TH7
- 4.95 The North London Waste Authority responded to AAPMod81 to not their support for the modification.
- 4.96 Our Tottenham responded to AAPMinor8 seeking the inclusion of a change that residents will decide whether estate renewal will include renovation or replacement of homes. The Council disagrees and considers that modification AAPMod41 already sets out the requirement upon the Council to engage with residents across the estate prior to the commencement of any proposal. This requirement would afford residents the opportunity to voice their view on the appropriate approach to estate renewal having regard to site and individual circumstances.
- 4.97 There was one representation made outside the scope of consultation on the modifications. Springfields on behalf of Mems DIY Ltd reiterated previous comments made to Site Allocation BG2, which the Council considers have already been adequately considered in confirming the allocation.

No Specified Plan & Proposals Map

- 4.98 Three representations were received to the consultation on the modifications by statutory bodies (Canal & Rivers Trust, Health and Safety Executive, and the Highways Agency) all confirming that they had no further comments to make on the modifications to any of the Plans.
- 4.99 One representation was received to the Proposals Map by Sallyann Bradnam regarding the delineation of Article 4 Directions. The Council agreed to pick this up in finalising the cartography in the final Proposals Map but does not consider this to be a soundness issue.

Sustainability Appraisal

- 4.100 No representations were received to the Sustainability Appraisal of the modifications.

Consequential Changes

- 4.101 It should be noted that the modifications necessitate consequential changes to some parts of the DPDs, such as policy, paragraph or figure numbering.

Respondents to the Modifications to the Alterations to Strategic Policies Consultation

ID	Respondent	ID	Respondent
Res1	Haringey Defend Council Housing	Res7	Rapleys on behalf of LaSalle
Res2	Historic England	Res8	Greater London Authority
Res3	Sport England	Res9	North London Waste Authority (NLWA)
Res4	Our Tottenham	Res10	Freehold Community Association
Res5	Mario Petrou	Res11	Pinkham Way Alliance
Res6	Collective Planning on behalf of Provewell Ltd	Res12	Tottenham Hotspur Football Club

Responses to the Modifications to the Alterations to Strategic Policies Consultation – In Modifications Order

ID	Rep ID	Mod Ref	Policy / Para / Figure	Comment	Council's Comments / Response
Res3	A1	N/A	General	Sport England has reviewed the modifications in light of these planning objectives, national planning policy set out in the National Planning Policy Framework (NPPF) and in the context of Sport England's previous comments on the aforementioned documents and has concluded that there does not appear to have been any modifications that affect sport, sport facilities and playing pitches from the pre-submission documents and therefore Sport England's comments and concerns are still applicable.	The Council notes that Sport England did not comment on the Regulation 19 version of the alterations to the Strategic Policies. No change
Res5	A2	N/A	General	General objection to the plan as a whole, particularly citing over-development and unrealistic job outputs. Objections to the process – see full letter.	The Council's Plan sets out to meet objectively assessed housing and employment need. No change
Res8	A3	All	All	Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England)	The Council notes that the Mayor considers the proposed Modifications to be in general

				<p>Regulations 2012</p> <p>Haringey Local Plan: Post EIP Mods to:</p> <ul style="list-style-type: none"> o Strategic Policies o Development Management DPD o Site Allocations DPD o Tottenham Area Action Plan <p>Thank you for consulting the Mayor of London on the Draft Local Plan. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.</p> <p>The proposed Modifications generally conform with the London Plan and there are no further specific points from Transport for London.</p>	<p>conformity with the London Plan.</p> <p>No change</p>
Res8	A4	All	References throughout	<p>However, I would highlight the following three points for your consideration:</p> <p>1 The London Plan was updated in March 2016, the full Title is The London Plan (Spatial Development Strategy for London Consolidated with Alterations since 2011). It appears that the previous Modifications were made prior to the above London Plan update, therefore the development Plan Documents should reference this version of the London Plan (rather than the 2015 version).</p> <p>2 Similarly the Mayor of London's Housing SPG was updated in March 2016.</p> <p>(Note: Point 3 pertains to DM DPD and comments are set out in corresponding schedule for that document).</p>	<p>Noted.</p> <p>The Council suggests that references to the appropriate adoption dates of the Mayor's Housing SPG and London Plan could be addressed as minor modifications (factual updates) to the Local Plan.</p>
Res12	A5	AltsMod9	3.1.35	<p>THFC support the amendment to paragraph 3.1.35 to incorporate reference to delivering a "premier leisure destination" in London and agree that this will clarify the Council's aspiration</p>	<p>Support is noted.</p> <p>No change</p>

				for the area following the grant of planning permission for the new THFC stadium.	
Res1	A6	AltsMod10	3.2.1	<p>Estate regeneration must not mean demolition, as it does in practice at present, but must in future include proper assessment of improvement, better management, and infill development; taking proper account of the risks and uncertainties of redevelopment, including the possible loss in practice of council and social housing at Target rent, and the negative impact of higher house prices and rents for lower income households and on those with no or limited savings, or who may be in debt. The option of strategic improvement must always be on the table.</p> <p>The deletion of the words social or council to describe the estates selected for densification suggests that council housing should not be unfairly targeted for densification in future. We agree.</p> <p>The revisions to the Plan are strongly supported here.</p>	<p>Support noted.</p> <p>No change</p>
Res1	A7	AltsMod16	3.2.29	<p>We agree that the option of strategic improvement must always be on the table in the consideration of estate issues and problems.</p> <p>This revision to the Plan is strongly supported.</p>	<p>Support noted</p> <p>No change</p>
Res2	A8	AltsMod17	3.2.29 - after	<p>In general we have no further comments to make, except the following:</p> <p>We would suggest that the proposed text be amended so not placing an obligation on Historic England to assist, as the local authority should utilise its own heritage specialists first and seek advice as and when necessary from Historic England.</p>	<p>The Council considers it helpful to include this – it is not an obligation to assist, merely a signpost.</p> <p>No change</p>
Res4	A9	AltsMod18	3.2.29 - after	<p>AltsMod18 (page 5) the inspector suggested the following amended text: 'Where the Council undertakes estate renewal, it will seek to reprovide social rented housing (as defined in the glossary) with</p>	<p>The Council has no objection to this further proposed modification for clarity.</p>

				<p>new social housing on an equivalent floorspace basis.'</p> <p>We suggest changing this to:</p> <p>'Where the Council undertakes estate renewal, it will seek to reprovide social rented housing (as defined in the glossary) with new social rented housing on an equivalent floorspace basis.'</p> <p>Reason: This is to make absolutely clear that the reprovided housing should be at 'guideline target rents are determined through the national rent regime'. The latter is the definition of social rented housing given in the proposed amended glossary (see page 9 of these modifications.)</p>	
Res11	A10	AltsMod19	Alt 71 – SP8	<p>This alteration lists how the forecast demand for 23,800m2 of B-class floor space is to be met.</p> <p>5.28 The Pinkham way site does not meet the criteria for any of the four categories listed and therefore its inclusion in SP8 as an employment site cannot be justified.</p> <p>Reconfiguration and re-use of surplus land in B uses.</p> <p>5.30 Pinkham Way is vacant land, not an existing employment site. There is no existing employment use to be reconfigured or re-used on Pinkham Way, as the site has been vacant since the early 1960s.</p> <p>Intensification of the use of existing employment sites</p> <p>Pinkham Way is vacant land, not an existing employment site.</p> <p>Provision of floorspace as part of a mixed use development on suitable sites including town centre sites</p> <p>5.31 There is no floor space on Pinkham Way – the site is vacant. Atkins has advised that Pinkham Way is not a suitable location for B1</p>	<p>Pinkham Way is a designated an Employment Area through historic use, and therefore, the site, although currently vacant, is previously developed land and is suitable for intensification to contribute towards meeting forecast demand for B-class floorspace.</p> <p>No change</p>
Res12	A11	AltsMod19	Alt71 SP8	<p>THFC also support the amendment made to Strategic Policy SP8, which now recognises that demand for B Class floorspace</p>	<p>Support is noted.</p>

				can be met in part through “intensification of the use of existing employment sites”.	No change
Res7	A12	AltMods22	5.1.21	<p>The proposed amendments to the supporting paragraph 5.1.21 state that much of the predicted increase in demand for B1 space (including light industrial) is to be met through reconfiguration of redundant existing industrial and warehouse floorspace and through mixed use development within LEA – Regeneration Areas and town centre sites. We do not have any objection to the strategic approach to meeting Class B1 floor space. However, it should be noted that the extent of Class B1 floorspace and specific uses should be considered at the time when a planning application is submitted, taking into account market demand and conditions, viability and deliverability. We also do not have object to the following additional sentence: “The trajectory identifying the locations and phasing to deliver the additional employment floorspace needed is set out at Appendix 2b, and will assist in monitoring delivery over the plan period,” on the basis that Appendix 2b makes it clear that the table sets out an indicative employment floorspace capacity for each site and that the actual amount of floorspace will depend on the floorspace to be retained and reconfigured, the achievement of the maximum floorspace on existing employment sites having regard to the proposed overall mix, site layout and constraints and viability.</p>	<p>Support noted – The Council notes that the supporting text to Table 3.2 in Appendix 2 already includes the clarification sought.</p> <p>No change</p>
Res11	A13	AltsMod22	5.1.21	<p>We note that this modification clarifies further that B1 will form ‘the majority of demand’</p> <p>5.34 B1 floorspace is the category for which Atkins describes Pinkham Way as ‘not an attractive location’</p> <p>5.35 The Atkins Study concludes that B2 demand falls away under any scenario. For B8, they conclude that the North East of the Borough ‘provides a good strategic location for accommodating new development ...’. Pinkham Way, in the extreme West of the borough, cannot provide any contribution to</p>	<p>The site in question is considered to be an appropriate location for B2/B8 use in the short – medium term. The Council notes that, adjacent to the Pinkham Way site is the Bounds Green Industrial Estate DEA2, which has the same local Employment Land designation. In respect of this estate, which</p>

			<p>the North East.</p> <p>5.36 In the response to SADPD Matters and Issues Matter 3 – Site Specific Issues – SA52, the Council stated that ‘The Employment Land Review identifies that there is significant unmet need for employment land in the borough, and as such preserving this opportunity [retaining the employment designation] is considered appropriate. The site is proximate to the A406, and therefore a suitable location for new employment floorspace.’</p> <p>Given the above, it is impossible to see the source of demand for any ‘new employment floorspace’ on Pinkham Way.</p> <p>5.38 When considered with the very significant fall in forecast demand and in the light of our analysis above, the previous Inspector’s assessment of the site ‘as offering employment opportunities in the west of the borough’ has now been superseded.</p> <p>5.39 In any event, the Council’s SA52 response above contradicts its own statement in response to LBH/Matter Inspector’s Note 1: Location and Scale of growth. The Council’s Employment/Retail Position Paper submitted to the hearings stated: <i>‘ As shown above, there is a healthy surplus of potential employment floor space that could be delivered in the borough, above and beyond what would be required to meet forecast need.....’</i></p>	<p>shares the same locational characteristics as Pinkham Way, the Atkins Employment Land review states:</p> <p><i>“DEA 2 provides for a variety of B1, B2 and B8 uses, is well located in relation to the highway network, it has good public transport links and parking provision. The site has good occupancy and appears to meet the needs of local businesses. The current EL designation on the site safeguards it as an employment location with a flexibility to accommodate other complementary employment generating sectors beyond traditional B use classes.”</i></p> <p>In the longer term, with the introduction of Crossrail 2 to New Southgate, the property market will likely shift to make both these estates appropriate locations for, amongst other uses, B1.</p> <p>The argument that the Plan creates a “healthy surplus” must be read in the light of that surplus being created through the allocating of sites</p>
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					for mixed use development, principally for B1. No change
Res10	A14	AltsMod23	SP8	Maintaining the 'Employment' designation of the land in the strategic policies is perverse and is not supported by robust evidence and this strategic designation should be removed.	Disagree. This is an established designation based on historical use of the site and supported by the evidence within the updated Haringey Employment Land Review. No change
Res9	A15	AltsMod23 – Alt 110	Section 5.1 Policy 8	NLWA welcome this modification	Noted. No change
Res11	A16	AltsMod23	SP8	The alteration proposed simply amends the title of the site listed as "Friern Barnet Sewage Works" to "Pinkham Way". The site therefore continues to be listed in the Strategic Policy SP8 as a Local Employment Area – Employment Land. Given that the council has agreed to remove it from the SADPD on the grounds that there is no identifiable development over the plan period, this is irrational and contrary to NPPF para 22. 5.2 Flagging the Pinkham Way SINC up in Policy SP8 of the Local Plan as one of two sites suitable for employment use, the other one, a well-established industrial estate, is sending out the wrong message to potential developers and is exposing this SINC to risk rather than protecting it.	The allocation as Pinkham Way as a Designated Employment Area is consistent with the latest available evidence, and is not a material change in this plan. No change
Res6	A17	AltsMod24	Table 3.1	It is proposed to insert Table 3.1 Housing Trajectory Table at Appendix 2. The table includes indicative capacities for Site SA30 Arena Design Centre and Site SA34 Overbury and Eade Roads. For Arena Design Centre (SA30) it includes 40 units and for Overbury and Eade Road (SA34) 141 units. The figures need updating to reflect that the Site Allocations DPD	This was the approach agreed at the Hearing Session and therefore the Council would support amending the Table in Appendix 2 to show a

				<p>will be updated to remove single site capacities and instead give the warehouse district area a combined indicative figure for monitoring purposes.</p> <p>The indicative capacity will need updating reflect the inaccuracies in how the original figure was derived as set out earlier in this letter under SAMod58.</p>	<p>combined indicative housing figure for the Warehouse District sites.</p>
Res1	A18	AltsMod30	Glossary: Social Rented Housing	<p>This revision is to be supported to clarify and focus the plan on meeting the assessed housing need of all income types in the borough, as is required by Housing policy objective 3.2</p> <p>The use of the term ‘social housing’ to include 65% and 80% market rent, even though these are unaffordable for those on average incomes in the borough, let alone those on below average incomes, has created a confused discussion over whether the developments brought forward under the Local Plan actually meet the policy objectives of really-affordable housing for people of all income and savings levels.</p> <p>This modification also eliminates the possibility of social rented housing being provided by actors other than local authorities or private registered providers, and this is most welcome in helping to keep the profit makers out of not-for-profit housing.</p> <p>The revisions to the Plan are strongly supported here.</p>	<p>Support noted.</p> <p>No change</p>

Respondents to the Modifications to the Development Management DPD Consultation

ID	Respondent	ID	Respondent
Res13	Ursula Riniker	Res27	Yael Glanvill obo Rokesly Infant School
Res14	Environment Agency	Res28	Shane Claridge obo Rhodes Avenue Primary School
Res15	Haringey Defend Council Housing	Res29	London Healthier High Street Network
Res16	Historic England	Res30	Public Health England
Res17	LB Hackney	Res31	Haringey Clinical Commissioning Group
Res18	Metropolitan Police	Res32	Greater London Authority
Res19	Sport England	Res33	CBRE obo Highgate School
Res20	Collective Planning on behalf of Provewell Ltd	Res34	Michael Burroughs Associates obo Omved International Ltd
Res21	Rapleys on behalf of La Salle	Res35	NHS Property Services
Res22	Children's Food Campaign	Res36	Planning Potential
Res23	Bridge Renewal Trust	Res37	Savills obo JLL
Res24	Healthy London Partnership	Res38	DP9 obo Austringer Estates Ltd
Res25	N. Tuptuk	Res39	Tottenham Hotspur Football Club
Res26	Chris Lambert obo Park View Secondary School		

Responses to the Modifications to the Development Management Policies DPD Consultation – In Modifications Order

ID	Rep ID	Mod Ref	Policy / Para / Figure	Comment	Council's Comments / Response
Res16	B1	All	All	We support the proposed changes and have no further comment to make	Noted No change
Res33	B2	All	All	HARINGEY LOCAL PLAN CONSULTATION ON THE FOLLOWING DOCUMENTS: - MODIFICATIONS TO THE DEVELOPMENT MANAGEMENT DPD - MODIFICATIONS TO SITE ALLOCATIONS DPD We write on behalf of Highgate School in relation to the above consultation documents.	Noted.

				We have no substantive comments to make on the modifications to the abovementioned documents. However, the subsequent modifications do give rise to a requirement to clarify what the Council's intent is in respect to some of these within the Development Management DPD and the Site Allocations DPD. The details of these suggestions are set out below for your consideration.	
Res19	B3	All	All	Sport England has reviewed the modifications in light of these planning objectives, national planning policy set out in the National Planning Policy Framework (NPPF) and in the context of Sport England's previous comments on the aforementioned documents and has concluded that there does not appear to have been any modifications that affect sport, sport facilities and playing pitches from the pre-submission documents and therefore Sport England's comments and concerns are still applicable.	Noted. No change
Res18	B4	DMMod4	DM2A(d)	I request that the original wording is retained unchanged "Comply with the principles set out in Secured by Design". Comments present evidence of the benefits of complying with this standard, and why it is necessary in Haringey. By changing the wording to 'have regard to' secured by design will weaken the Policy position and allow sub-standard security features to be included in developments, alongside poorer overall design in relation to crime prevention	The Council agrees with the evidence presented in this submission, and support the modification to change the wording to 'comply' to ensure the full Policy intent is met, and to reflect local evidence based justification that proves a need for this additional design standard.
Res18	B5	DMMod5	2.1	I fully support DMMod5 – Proposals will be assessed against the principles of Secured by Design	Support noted. No change
Res13	B6	DMMod9	DM5A (c)	Policy DM 5 Part A (c): "Has had regard to": Objection: this is too vague.	Disagree. The modification recognises that the Tall Buildings

					and Views SPD has not yet been adopted, and could only be a material consideration in the determination of a planning application.
					No change
Res33	B7	DMod10	DM5	The Highgate School understands the need to have regard to views identified within the relevant Conservation Area Appraisals, however clarity and justification on the proposals in DMod10 (Policy DM5) on the specific views that this relates to is required. The current Highgate Conservation Area Appraisal is considered to be outdated (2013) and includes numerous views and vistas which are considered to be of importance. A smaller number of 'Key Views and Vistas' are also mentioned and also require similar clarification.	Haringey's Conservation Area Appraisal and Management Plans include maps identifying Key Views and Vistas, along with further narrative descriptions on these and other important views and vistas. Each CA Appraisal will vary in the amount and number of key view and vistas identified as these will depend on the characteristics of the individual conservation area, including typography. With Highgate being on a hill, it should be expected that there will be a significant number of key views both into and out from the conservation area. The Council considers that

					<p>DMMod10 rightly requires that proposals give appropriate consideration to these views and vistas which have been identified through detailed conservation area specific character appraisal.</p> <p>No change</p>
Res21	B8	DMMod9 & DMMod13	DM5 and 6	We support the proposed amendments which require proposals to “have regard to” non-statutory Supplementary Planning Documents, on the basis that these planning documents should not be given the same status/weight as statutory Development Plan documents.	<p>Support noted</p> <p>No change</p>
Res13	B9	DMMod12	DM6B	<p>Policy DM 6 Part B: deletion of “community benefit as well as”:</p> <p>Objection:</p> <p>“taller buildings that project above the prevailing height of the surrounding area” to be merely “justified in urban design terms” (which are anyone’s guess) is far too vague, open to any interpretation and contrary to the rights and interests of the community.</p>	<p>Disagree. Other policies within the plan seek community benefits where necessary and reasonable to do so - notably on major schemes. It is unnecessary to include this as a requirement specific to all taller building proposals.</p> <p>No change</p>
Res21	B10	DMMod12	DM6	We support the proposed amendment to remove the reference to requiring “community benefits” as justification for taller buildings	<p>Support noted</p> <p>No change</p>
Res13	B11	DMMod13	DM6C (c)	Policy DM 6 Part C (c): replacing “be consistent with” by “Have regard to”: Objection, because this is too vague and ineffective. Anyone can claim to	Council would disagree. The SPD has not yet been adopted, and it

				<p>“have had regard to” something but go on to decide the very opposite.</p>	<p>would only be a material consideration that should be given regard to.</p> <p>No change</p>
Res13	B12	DMod14	Fig 2.2	<p>DMod14, Fig. 2.2: I object to the inclusion of Apex House and Finsbury Park as locations potentially suitable for tall building. These are outer areas of London where, because of the proximity of tube stations, taller buildings (as defined) may be acceptable, but not tall buildings.</p>	<p>Council would disagree. The evidence base indicates that these locations could be appropriate. The plan contains criteria to help effectively control the appropriate height of any building submitted for permission.</p> <p>No change</p>
Res15	B13	DMod20	DM11E	<p>Institutional investors in the private rental sector will make no contribution to the requirements of Housing policy objective 3.2: real housing affordability, and communities we can be proud of.</p> <p>The private rental sector should not be relied upon to deliver new housing in this borough.</p> <p>We support the deletion of this paragraph.</p>	<p>Support noted.</p> <p>No change</p>
Res13	B14	DMod27	DM13B (c)	<p>DM 13 Part B (c) Please clarify the proposed amendment which is unclear.</p>	<p>The Council believes this is clear – i.e. where the prior approval is unimplemented, affordable housing will be required from any further Planning Application for the site.</p>

					No change
Res21	B15	DMod35, DMod37 & DMod38	DM15Df and 3.33	We support the proposed amendments to policies/guidance relative to student accommodation, which reflect the need to take account of viability and the London Plan guidance.	Support noted No change
Res33	B16	DMod45	DM20	The Highgate School welcomes the proposed amendment DMod45 to Policy DM20. The Highgate School benefits from large areas of Metropolitan Open Land. The school seek to utilise, enhance and protect this open space, but may in exceptional circumstances be required to utilise this space to enhance their education and sporting offer.	Noted. Any future proposals for development on this open space will be considered against relevant policies including those in the London Plan. No change
Res34	B17	DMod45	DM20 & SA42	RE: HARINGEY LOCAL PLAN MAIN MODIFICATIONS PUBLIC CONSULTATION OUR CLIENT: Omved International Ltd ("the Objector"). 1. The Objector owns the land at Southwood Nursery as delineated on PLAN 1 attached to this submission. The Objector was represented at the Examination in Public ("EiP") in August 2016 and made representations with regards to SA42- Highgate Bowl and Development Management Policy DM20. 2. The Council has now published its proposed modifications to the Local Plan. This representation relates to modifications that directly affect the Objector's property interests in the Plan area. 3. The relevant documents are: a. The Site Allocations DPD; and b. The Development Management DPD.	Noted.
Res34	B18	DMod45	DM20	Development Management DPD Policy DM20: Open Space and Green Grid: Proposed Modification DMod45	Disagree. DMod45 gives effect to the

				<p><i>A Open Space is protected from inappropriate development by Policy SP13. The Council will not grant planning permission for proposals for development Development that protects and enhances Haringey's open spaces will be supported would result in the loss of open space, unless an assessment has been undertaken which shows that the open space is surplus to requirement for use as an open space.</i></p> <p>18. DMod45 is inconsistent with London Plan Policy 7.18 which resists the loss of protected open space, while Policy DM20 is not resisting the loss of protected open space but loss of any open space. Plainly, this goes far beyond the scope of the London Plan Policy.</p> <p>19. Policy DM20 should include the word “protected” to align with the London Plan policy.</p>	<p>presumption against loss of open space in adopted Policy SP13, which has been assessed as being in general conformity with the London Plan.</p> <p>No change</p>
Res34	B19	DMod46	DM20	<p>Development Management DPD: Proposed modification DMod46 G. Sites over 1Ha in size which are located in identified areas of open space deficiency should seek to create new publicly accessible open space on the site, in accordance with the open space standards set out on the Haringey Open Space and Biodiversity Study (2013) subject to viability.</p> <p>20. The objector has nothing further to add under this point as the Southwood Nursery site does not extend to 1ha.</p>	Noted.
Res33	B20	DMod47	DM20	<p>Following on from this, the Highgate School considers that a further minor modification (DMod47) to Paragraph 4.11 is required that reiterates that the loss of open space would be acceptable in accordance with the NPPF and where exceptional circumstances can be robustly justified.</p>	<p>Disagree. The supporting text now signposts the NPPF for open space considerations. Given the presumption against the loss of open space in Strategic Policy SP13, the Council considers that the policy and supporting text already clarifies the exceptions</p>

					provided, which are rightly limited in their scope. Exceptional circumstances would be scheme and site specific and a material consideration.
					No change
Res34	B21	DMMod47	DM20 Para 4.11	<p><i><u>Para 4.11 Planning policy at all levels recognises the importance of open space to supporting sustainable development. High quality open space can make an important contribution to the health and well-being of communities. The NPPF provides that planning policies must be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The NPPF states that existing open space, sport and recreation facilities should not be built on unless clearly surplus to requirements, or where the loss would be replaced by equivalent or better provision in terms of quantity and quality, or where the need for and benefits of the development clearly outweigh the loss. Haringey's Open Space and Biodiversity Study (2013) shows that there is a significant quantitative shortfall in accessible open space to meet the needs of the Borough's population, and for this reason Strategic Policy SP13 establishes a presumption against any net loss of open space, and with the exception of small scale ancillary facilities, resists development on open spaces.</u></i></p> <p>21. The NPPF states existing open space should not be built on unless clearly surplus to requirements. The Southwood Nursery portion of the allocation is not an existing open space and the site is not identified as being within an area of open space deficiency.</p>	<p>While the representation is not fully reflective of NPPF paragraph 74, the Council acknowledges that the site is not designated open space. However, the representation fails to recognise the context of the site within a conservation area and the explicit intention of the site allocation to secure, upon development, the land identified in an open space designation to protect the conservation area character.</p> <p>No change</p>
Res34	B22	DMMod47	Para 4.15	<p><i><u>22. Para. 4.15 The population in Haringey is projected to increase by approximately 75,000 people between 2015-2035. The</u></i></p>	The definition of open space is taken from the

				<p><u><i>additional population will be accommodated through the promotion of more compact urban development on existing brownfield land. This, however, should not lead to a reduction in amenity and places greater priority on the need to protect and maintain a well-distributed, well-connected and accessible supply of open space. will place pressure on local services, including open spaces. In this context, it is important that the Council prioritises the protection and enhancement of the Borough's open spaces, as well as improving public access to them. For this reason, open space does not fall within the NPPF definition of 'brownfield / previously-developed sites', although brownfield sites that exhibit open space characteristics offer the potential to secure further provision upon redevelopment.</i></u></p> <p>23. The Council defines open space as: <i>"all land in London that is predominantly 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."</i></p> <p>24. Predominantly undeveloped includes previously developed land. Proposed modification DMMod48 is inconsistent with NPPF para 111 which encourages the reuse of land that has been previously developed. This element of the plan is inconsistent with national policy and is consequently unsound.</p>	<p>London Plan. The modification clarifies that 'previously developed land' does not fall within the definition of open space – being brownfield land. However, where PDL exhibits open space qualities, there may be the potential to secure an open space provision as part of any further redevelopment proposal. Given the above, the Council considers that the Local Plan is entirely consistent with the NPPF.</p> <p>No change</p>
Res34	B23	DMMod45 & DMMod47	DM20	<p>25. The Council is asked to modify the final DPDs as set out above. All the objections are consistent with the Inspector's request at the EiP that the Council should consider non-designated open space and previously developed land within the context of the requirements of Policy DM20. This objection shows that inclusion of the identified land within the open space allocation has not been properly considered within the modifications, which, as a result, are fundamentally unsound.</p>	<p>The Council considers that the modifications clarify the position with respect to the current status of the bowl land as previously developed land, and the Council's intention to secure the</p>

					<p>area identified on the site allocation as designated open space upon acceptable development coming forward on the individual land parcels to secure this. The purpose for securing the identified area in designated open space is to preserve and protect the historic character of the bowl and its setting. The open space designation will be secured via a planning obligation upon grant of planning permission for development of the individual parcels. The securing of the open space is likely to be in phases and over a long-term.</p> <p>No change</p>
Res39	B24	DMMod48	DM20 Para 4.15	<p>The modification as currently worded is incorrect and confusing. There is no definition of brownfield sites in the NPPF. That defines PDL only. Brownfield land is defined only in the London Plan, which also defines PDL.</p> <p>3.2 We suggest the following wording is substituted “Brownfield sites or previously developed sites that exhibit open space characteristics are excluded from the definition of Brownfield land in the London Plan</p>	<p>The Council considers the proposed amendment to be incorrect, as even land that exhibits open space characteristics can be PDL. Use of the terms ‘brownfield land’ and</p>

				2015 and from the definition of Previously Developed Land in the NPPF 2012. Such sites offer the potential to secure further provision of open space upon redevelopment.”	‘previously developed land’ in the context of the modification are correct in that, together, they fully capture the definitions within the London Plan, of land that falls outside these definitions, and therefore by default can be considered open space. No change
Res13	B25	DMMod57	DM28D	DM 28 Part D: For this amendment to be acceptable, replace “should not” by “must not”.	For clarity, the Council would accept this proposed change.
Res14	B26	DMMod57	DM28D	We are pleased to see that our comments and suggestions relating to flood risk and development in Source Protection Zones have been considered and taken on board. We note that there are some further alterations to aspects we did not comment on previously (DMMod 55, 56 and 57) and acknowledge the intention to make the policies more positively worded. Policy DM28 part D would be stronger if it stated ‘proposals must not’ rather than should not as in Policy DM27 part D. However we are pleased to see that the Development Management Plan policy 28 places a requirement on developers to demonstrate that the objectives of the Thames RBMP have been taken into account. We hope you will work with us on an individual site basis going forward to ensure that the WFD actions can be implemented and contribute to improving the status of the waterbodies in your borough.	The Council would support the suggested wording change for clarity and effectiveness.
Res13	B27	DMMod60	DM37B	DM 37 amended to include a new Part B: This is unacceptable , unless the new part itself is amended as follows: delete c. (NB This would be no justification of otherwise inappropriate or damaging development.) Replace the deleted sub-para. c. by the following:	Council would disagree. Part B.c is necessary to ensure the introduction of a non-B Class use

				<p>“The proposal would not restrict, harm, impair or in any way prejudice the enjoyment of nearby established residential properties, nor the health and well-being of its occupants.”</p>	<p>does not affect existing established industrial or commercial uses elsewhere within the LSIS. The Council is content that the safeguarding of residential amenity is adequately covered by other policies within the Plan.</p> <p>No change</p>
Res39	B28	DMMod60	DM37	<p>Following discussions at the EiP, THFC produced the following proposed amendments (Attachment 1) to policies DM38 and DM40. THFC note that these amendments have not been incorporated but that Policy DM37 (Maximising the Use of Employment Land and Floorspace) has been extended with additional wording referring to the proposals in Locally Significant Industrial Sites (LSIS) that do not propose B1 to B8 uses. THFC believe that the wording as proposed does not provide the specificity required to ensure it can be interpreted correctly, namely:</p> <p>I. There is no need for circumstances to be ‘exceptional’ in addition to the detailed stipulations outlined in the new Part B sub-sections a) to e), or a definition of what ‘exceptional’ means in this context;</p> <p>II. With reference to sub-section a), this should relate to identified demand for employment space, by type, outlined in amended policy SP8 (i.e. mainly B1 space) and defined by the ELR (which should take into account future demand and wider economic change).</p> <p>III. With reference to sub-section b), this should state explicitly that the proposals will include a mix of uses, inclusive of the uses needed to maintain the role of the LSIS. It should also state that the uses support the safeguarding of employment rather than the specific ‘industrial or</p>	<p>The Council did note THFC proposed wording for the modification but felt this did not reflect the limited exceptional circumstances upon which the Council would consider non B Class use of LSIS. The Council is content that the modification to DM37 is capable of clear interpretation and that compliance with the criteria a- e would represent exceptional circumstances.</p> <p>With regard to a) – it is intended to meet the needs of modern industry and business</p>

			<p>commercial uses’.</p> <p>IV. With reference to sub-section c), this should refer to the enabling of strategic regeneration benefits, rather than just the delivery, reflecting the level of strategic interrelated sites in the area.</p> <p>V. With reference to sub-section d), this should refer to the employment capacity of sites, rather than the land or floorspace, in order to reflect the importance of meeting the [evolving] needs of modern industry and business identified in (a) and the intensification of uses identified in Strategic Policy SP8.</p> <p>As such, THFC’s view is that the wording of Policy DM37 Part B should be amended as follows:</p> <p><i>Within Locally Significant Industrial Sites (LSIS), proposals for uses not within Use Classes B1 to B8 will only be supported in exceptional circumstances where the following can be demonstrated:</i></p> <p><i>a) The proposal is necessary to facilitate will contribute towards meeting the identified demand needs of modern industry and business;</i> or</p> <p><i>b) The proposal relates to includes a mix of uses including a use which supports the continued functioning of the LSIS as a predominantly to safeguarding industrial and commercial area employment;</i> or</p> <p><i>c) The proposal would deliver or enable strategic economic regeneration benefits of a borough or sub-regional scale including supporting the delivery of Growth Areas; and</i></p> <p><i>d) The net loss change in of the employment capacity of the B Use Class land or floorspace would not compromise the strategic employment land requirement; and</i></p> <p><i>e) The proposal would not restrict, prevent or in any way prejudice the continued operation of adjoining or nearby established employment uses.</i></p> <p>In order to reflect this in the supporting text, THFC propose that the supporting paragraphs could be made more explicit with reference to</p>	<p>and so may, and should, include the full range of B class uses, not just B1 as suggested.</p> <p>With regard to b) – the acceptable uses are only those that supporting the continued functioning of the LSIS as a commercial and industrial area. Safeguarding of employment as suggested could be delivered by inappropriate retail or leisure development that would do little to support the long-term function of the LSIS.</p> <p>With respect to c) – LSIS represents an existing significant area of industrial or commercial land use of borough-wide importance. Potential non-B Class use of this land must be considered in the same borough-wide context and should be capable of demonstrating this without reliance upon</p>
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			<p>points (a) and (c) above - primarily within paragraphs 6.3 and 6.7: Paragraph 6.3 – <i>“The following section sets out detailed policies to assist in managing development within Haringey’s employment land hierarchy. The policies are needed to ensure that the use of land is fully optimised to enable the maximum amount of jobs and <u>in employment floorspace that is responsive to the needs of modern industry and business and in context with wider regeneration plans</u> to be provided on sites, as well as to encourage and attract the types of businesses that are supported by the Council’s economic and regeneration strategies.”</i> Paragraph 6.7 – <i>“Technical evidence, including Haringey’s Employment Land Study (2015), indicates that the Borough’s stock of employment land will remain a key source for local business and jobs. Accordingly, Policy SP8 sets out a hierarchy of employment land that will be safeguarded to meet future need. However, beyond such protection a gradual restructuring of the Borough’s employment land portfolio is also required to meet the needs of modern industry and business. This is to enable the modernisation of existing sites and older buildings so as to attract a wider range of businesses to the Borough, <u>deliver jobs and premises that the economy needs, make more efficient use of land, recognise their role in the wider strategic regeneration of the borough</u> and ultimately, to increase the number and quality of businesses and jobs that can be accommodated on sites.”</i> THFC note that the title of Policy DM38 has been amended to remove “employment-led”, but that Part A (and supporting text at paragraph 6.2) has been amended to stipulate that proposals should be both “mixed use” and “employment led”. THFC consider that the definition of “employment-led” is unclear and potentially undermines the definition of “mixed-use”. THFC consider that, applying the proposed stipulations below, the continuing role of the site as an employment generator should be sufficient definition rather than inclusion of “employment-led”. The same point is made in relation to the inclusion of “employment-led” in the proposed new Policy DM40 Part A.</p>	<p>local regeneration initiatives. In this respect, LSIS should be treated like open space, where in regeneration terms the latter is not lost but rather replaced and enhanced as an integral component of the wider regeneration proposal, where non-sports and recreation use of the open space is only considered acceptable in exceptional circumstances and only where this does not compromise but enhances the functioning of the remaining open space provision.</p> <p>With respect to d) – see response above re safeguarding of employment.</p> <p>No change</p>	
Res21	B29	DMod61	DM38	<p>We objected to the term “employment-led” regeneration being sought</p>	Support noted

				for the Local Employment Area – Regeneration area, on the basis that “employment” is generally regarded as B Class Uses and could be interpreted as a wide range of other employment generating uses may not be suitable in the Regeneration Area. The Inspector noted that the strategic policy makes it clear that employment-led regeneration includes a wide range of uses outside B Class Uses, and on that basis, our concerns were already dealt with in the Strategic Policy. On this basis, we do not object to the proposed modification which makes reference to “employment-led regeneration.”	No change
Res13	B30	DMMod62	DM38A	DM 38 Part A: This amendment is only acceptable if “will” is replaced by “may”.	Council would disagree. This would lead to the Policy becoming unclear and not as effective. No change
Res37	B31	DMMod62	DM38	Considers the presumption against redevelopment of Strategic Industrial Land to not be in conformity with the NPPF as it has no flexibility to release redundant employment land.	There is considered to be a suitable set of policies dealing with the release of designated and undesignated employment land. Further, if this land is redundant, the presumption should be, as it is part of SIL, that a new employment use should be found for the site to meet need. No change
Res38	B32	DMMod62	DM38	Whilst it is acknowledged that Site SA21 falls within the ‘Local Employment Area: Wood Green Regeneration Area’ planning designation, the site also falls within the Wood Green Metropolitan Centre, Wood Green Growth Area and Blue ribbon network planning	This site is unique in that it has both a town centre and an employment area designation. While it is in

				<p>designations.</p> <p>We consider that the inclusion of “employment-led” should not be included so as to avoid conflict with the aforementioned planning designations and to allow part of the site to be led by residential development.</p>	<p>a town centre, it does not have a designated frontage, and office is considered to be an appropriate town centre use. As such the two designations are considered to dovetail satisfactorily.</p> <p>No change</p>
Res20	B33	DMMod63	DM38A (a)	Prove well support the removal of this requirement.	Support noted
Res21	B34	DMMod63	DM38	We support the removal of the criterion which seeks justification for mixed-use development in the Regeneration Area, on the basis that the Strategic Policy allows the principle of mixed use development in the Regeneration Area.	<p>Support noted</p> <p>No change</p>
Res38	B35	DMMod63	DM38A (a)	<p>The proposed modification seeks to delete the following text “<i>a. Suitably demonstrate that for reasons of viability a mixed-use scheme is necessary to facilitate the delivery of employment floorspace</i>” from the current wording.</p> <p>Whilst we appreciate that this is a borough wide policy, the deletion of this is at odds with the SADPD Proposed Modification which, relating to Site SA21, proposes to introduce a ‘Site Requirement’ which states that “<i>The development should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability which must be assessed looking at the mix of uses and the scheme as a whole.</i>”</p> <p>We would recommend that this is reviewed to ensure consistency.</p>	<p>We do not agree. The wording of the site allocation is in keeping with DM38. The Council does not consider there to be any inconsistency.</p> <p>No change</p>
Res21	B36	DMMod64	DM38A (b)	We consider that criterion b) should be amended to “Maximise the amount of employment floorspace to be provided within the mixed-use scheme, <u>as far as practically feasible and viable.</u> ” This is on the basis	The Council considers the Policy as written to be effective, as feasibility

				that the amount of employment floorspace that can be provided depends on a number of factors including the type of employment uses, the quality of employment floorspace and the relationship with other uses proposed within a mixed use development. We therefore object to the modification to make the policy effective.	and viability will inherently be considered when judging whether the floorspace has been maximised No change
Res38	B37	DMMod64	DM38A (b)	The proposed modification seeks to amend part (b) as follows: <i>"Maximise the amount of employment floorspace to be provided within the mixed-use scheme, having regard to development viability;</i> For consistency across this document and others, we consider that the proposed deletion should be rejected.	The amendments have been made to avoid repetition in the document. The need to consider viability in determining the need for, and proportion of, mixed uses on these sites is implicit in DM38 (A). No change
Res38	B38	DMMod65	DM38A (c) (ii)	Agree	No change required.
Res38	B39	DMMod66	DM38A (c) (iii)	Agree	No change required.
Res38	B40	DMMod67	DM38A (c) (iv)	Agree	No change required.
Res20	B41	DMMod68	DM38A (d)	Provwewell support the removal of this requirement.	Support noted
Res38	B42	DMMod68	DM38A (d)	Agree	No change required.
Res38	B43	DMMod69	DM38A (e)	It is considered that further clarification is required regarding the use of the word 'amenity'; it is unclear as to whether this relates to overlooking or daylight / sunlight issues or does it relate it to the provision of open space. If it is the latter, then it is considered that the obligation to provide open space for neighbours is too onerous and we would request this element is rejected.	The standards for residential amenity are set out at Policy DM1D, and include daylight, privacy, overlooking, visual amenity, noise,

					vibration, odour, light pollution and microclimate. The Council considers this is adequately covered in the plan. No change
Res21	B44	DMMod69 – DMMod71	DM38	We support the modifications as proposed.	Support noted No change
Res38	B45	DMMod70	DM38A (g)	Agree	No change required.
Res13	B46	DMMod71	6.12	DMMod 71 para. 6.12, 3 rd sentence: I object to this amendment which would facilitate inappropriate mixed use development of designated LSIS land and designated employment land for the developer’s benefit and to the detriment of the community. Site “regeneration” of such sites can be achieved perfectly well without mixed use schemes which may be inappropriate and undesirable. Moreover, the proposed amendment seems to be contradicted by the next amendment at para. 6.13.	Council would disagree – DMMod61 clarifies this Policy and supporting text applies to Local Employment Area – Regeneration Areas. This proposed amendment would contradict the Policy intent. No change
Res20	B47	DMMod76	DM39A	Prove well support the clarification of this definition, and suggest the definition in the glossary is changed to reflect this.	The Council would support updating the Glossary for consistency
Res17	B48	DMMod76 – DMMod84	DM 39	Hackney therefore welcomes the inclusion in the proposed modifications of the jointly agreed changes to policy DM39 (warehouse living) of the Haringey Development Management DPD in regard to proposals for live/work in Haringey and the incorporation of changes to policy DM55 of the same document	Support noted. No change
Res20	B49	DMMod82	6.21	This modification requires in preparing proposals and site masterplans,	LB Hackney made a

				<p>the applicants to have engaged with and sought the views of Hackney Council, particularly on sites which adjoin the Borough boundary. Provevell object to this requirement. This requirement was not discussed at the Examination in Public nor was it consulted on in previous consultations. LB Hackney has considerably different planning policies particularly around live/work uses which the borough does not support. Indeed it does not recognise or plan for warehouse living, and therefore there is no justification for them to be consulted on sites within LB Haringey that relate to warehouse living. This requirement has the potential to delay development coming forward and the potential to negatively impact the delivery of warehouse living. It is therefore considered this is a requirement that is unjustified and should be removed.</p>	<p>representation to this effect at Reg19 stage, which was subsequently included in the SoCG agreed between the councils that was published ahead of the hearing session. The Council considers this supporting text useful in signposting that LB Hackney should be consulted on applications that may impact upon them. LB Hackney will be a consultee but is not the Planning Authority. Further, the consultation with LB Hackney is not a Policy requirement, and should not hinder the delivery of warehouse living.</p> <p>No change</p>
Res13	B50	DMMod86	DM40A	DM 40 amendment by provision of new Part A: Objection , unless “will” is replaced by “may”.	<p>Council would disagree. This would lead to the Policy becoming unclear and not as effective.</p> <p>No change</p>
Res13	B51	DMMod87	DM40B	DM 40 Part A, changed to Part B: The introductory amendment is only acceptable if “will” is replaced by “may”. The amended sub-para. e. is unacceptable and should be changed to read: “Evidence is required of	<p>Council would disagree. This would lead to the Policy becoming unclear</p>

				recent, continuous and suitable marketing of the site, covering a minimum period of 3 years, without success.”	and not as effective. The Council are satisfied that the advertising requirements are proportionate and justified as proposed. No change
Res13	B52	DMMod88	DM40B	DM 40 Part B: The amendment is only acceptable if “will” is replaced by “may”. (NB The Council does not seem to realise that “will” as opposed to “may” has legal implications which may be undesirable.)	Council would disagree. This would lead to the Policy becoming unclear and not as effective. The wording change gives clarity to developers, that where all relevant provisions of the Policy (and all others within the Plan) are met, applications will be supported. This ensures its effectiveness. No change
Res13	B53	DMMod89	DM40C	DM 40 Part C: “may be sought” should be replaced by “will be sought” for the sake of clarity.	Council would disagree. This modification is to give the policy sufficient flexibility to only require obligations that are strictly necessary and proportionate to make the scheme acceptable in planning terms. Other obligations may therefore be sought which would negate the

					need for employment initiative contributions. No change
Res13	B54	DMod91	6.26-6.28	DMod 91, replacing paragraphs 6.26, 6.27 & 6.28. This amendment is a linguistic muddle and needs to be re-written to make sense. Moreover, “the vibrancy and” should be deleted because Haringey Council, from a distance, knows nothing about “vibrancy” and this is not a relevant consideration. Moreover, “can be demonstrated” is to be replaced by “has been demonstrated”.	Council would partially disagree. The wording as proposed by DMod 91 is considered sufficiently clear and appropriate to evidence the Policy requirements. The Council would however support the proposed change of wording from ‘can’ to ‘has been’ to reflect Policy requirements.
Res19	B55	DMod92	DM41	The modification to Policy DM41 in the Development Management DPD now specifically includes leisure centres. Although the provision of new sport facilities are welcomed these should be provided where there is an established need. Sport England is unaware that the Council have a Built Facility Strategy that sets out what built facilities are needed, where and when to meet any existing or future demand and therefore there does not appear to be a robust justification for the provision of such facilities. Sport England therefore recommend that this policy is modified again to require the provision of leisure centres to be supported where there is a need for the facilities which is based on a robust and up-to-date assessment and strategy.	This modification introduces the words ‘Local Centres’ to the Policy. The Council assumes this representation is a misreading of the proposed modification. No change
Res36	B56	DMod93	DM42	This modification is welcome and will ensure that town centre uses are not excluded from the borough’s Primary Shopping Frontages.	Support noted. No change
Res36	B57	DMod94 – DMod96	DM46	We welcome the more objective policy test included within Modification DM Mod96.	Support noted. No change

Res36	B58	DMod97	Para 6.55	We welcome the proposed modification to the supporting text (Paragraph 6.55) which removes the statement that there is link between health outcomes and the proximity to betting shops.	Support noted. No change
Res13	B59	DMod98	6.56	DMod 98 para. 6.56, amendment of 1 st sentence: Objection. This is an absurdly inappropriate amendment. The two alleged “commitments” have nothing to do with each other.	Council has no objection to the removal of this modification as it is not necessary to justify the Policy on Betting Shops.
Res22	B60	DMod100 - DMod106	DM47 Fig 6.1	<i>Summary: we support the reinstatement of the original policy proposal and original wording which was deleted / amended in Policy DM47 after the Examination in Public (DMod100 to DM Mod106).</i>	Noted. The Council would welcome the Planning Inspector’s reconsideration of the acceptability of the original policy wording.
Res22	B61	DMod100 - DMod106	DM47 Fig 6.1	<p>Children’s Food Campaign aims to improve children and young people’s health by campaigning for policy changes in our schools, in our communities and throughout our society that would promote healthy and sustainable food environments. The Children’s Food Campaign is supported by over 100 UK-wide and national organisations, including public health professional bodies, trade unions, school food experts, children’s charities and environmental groups. We are a campaign of the charity Sustain: the alliance for better food and farming.</p> <p>We have not previously responded to the consultation on the Haringey Local Plan because we were satisfied that the draft policy would help use the planning system in an appropriate way to help address health inequalities and tackle rates of diet-related ill health in the Borough. We represent a campaign with limited resources and therefore only respond to consultations where there is a policy deficit.</p> <p>Unfortunately, in this case there is a clear policy deficit which has</p>	Noted.

				<p>emerged. We are concerned that the proposed post-Hearing modification results in a planning policy which abdicates responsibility of Haringey Council to use its planning powers to address serious health issues, contrary to the National Planning Policy Framework on planning healthy communities.</p>	
Res22	B62	DMod100 - DMod106	DM47 Fig 6.1	<p>We believe that the proposed modifications will make the Plan unsound because it disregards the local public health data of 2012 and 2016 which clearly demonstrates health inequalities in the borough. The updated 2016 map should be reinstated.</p> <p>We believe that the proposed modified policy will not address this issue because the wording is vague and incapable of implementation. The 400m distance is a well regarded figure for walking distances to facilities as a proxy for the length of time it takes to walk to reach food outlets. The inspector will be interested in the following research:</p> <p>The London Food Poverty Profile 2016 shows the interventions being made in each borough across London. One of the maps shows what boroughs are doing to improve physical access to good food and this includes Haringey’s action to adopt appropriate Local Plan policies as part of a suite of measures to address health and food poverty. (Beyond the Food Bank, Sustain 2016)</p> <p>The modified Plan no longer meets the best practice – and Inspector-approved – planning policies of other London boroughs with similar levels of deprivation, obesity rates and hot food takeaway provision.</p> <p>The initial proposed policy restrictions on A5s met with the test of soundness and fairness, because hot food takeaways are far more likely than A1 or A3 uses to offer specific promotions to school children. Indeed, we have only ever seen or heard about special offers only available at lunchtime and in the immediate after school period (say 3-5pm) from hot food takeaways - especially the independently run or franchised ‘chicken and chips’ shops. That type of specific targeting of school children to encourage the purchase of high fat (and</p>	<p>In light of the representation, including additional technical evidence provided, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.</p>

				<p>often high salt and high sugar) meals just does not happen in another retail environment, or even in an eat-in only business.</p> <p>For these reasons, we are thus calling for the reinstatement of the original wording and the original policy proposals on restrictions for granting permission for new A5s, including that they should be 400m from a school.</p>	
Res23	B63	DMod100 - DMod106	DM47 Fig 6.1	<p>I write in response to the consultation on the emerging Haringey Local Plan. The Bridge Renewal Trust is disappointed to note that the public examination with the Independent Planning Inspector has led to modifications that compromise on the integrity of the Hot Food Takeaway policy (DM47). Specifically, the removal of the 400m zone controlling the number of fast food takeaways around schools and text changes sited from DMod100 – 106 in the published list of modifications are alarming.</p> <p>The Bridge Renewal Trust is a charity based in Tottenham, an area in the east of the borough where the high number of fast food outlets is evident. Our main purpose is to deliver practical ways that people can live healthier and fulfilling lives – thus playing our part in working towards reducing health inequalities and building stronger communities. As the Council’s Strategic partner for the Community and Voluntary Sector (CVS), our deep understanding of the local community gives us on the ground insight that is not always captured by academic researchers, evidence or in this case, policy. The Bridge Renewal Trust is also a member of the Haringey Obesity Alliance which contributes to the improvement of health and wellbeing of people living and working in the borough through co-ordinated, effective and sustained action to reduce obesity. As a member of the HOA steering group, The Bridge Renewal Trust also provides strategic direction, knowledge and expertise to the partnership.</p>	Noted.
Res23	B64	DMod100 - DMod106	DM47 Fig 6.1	<p>We deliver whole health services that sit alongside the primary care services at Laurel’s Health Centre and are becoming increasingly aware of the life threatening health harms associated with obesity. Two thirds of adults, one fifth of children in reception (4 to 5 years old) and a</p>	Technical evidence noted.

				<p>third in year six (10 to 11 years old) are overweight or obese in Haringey. Approximately 70% of obese children or adolescents will become obese adults, and are at significantly increased risk of developing life changing diseases such as cardiovascular disease and type 2 diabetes. Thus, this is a serious public health problem with negative physical, social and health consequences for our community.</p> <p>Our membership of Haringey's Obesity Alliance (HOA) not only demonstrates our commitment to reducing obesity but has also provided us with the forum to reflect on our collective responsibility to reduce levels of obesity in the borough. Attendance of the HOA conference in July 2015 allowed us to hear from experts in the field, including Professor Harry Rutter. His presentation on the 2007 UK government Foresight report 'Tackling Obesities: Future Choices' was incredibly insightful. One important action which the Foresight report identified was the need to modify the environment so that it supports being active and does not provide easy access to foods high in sugar, fat and salt. We also heard how food purchased from fast food takeaways is more energy dense than the average diet which leads to weight gain when eaten regularly. We are concerned that the modifications disregard this and will make the unhealthy choice, the easier choice.</p>	
Res23	B65	DMMod100 - DMMod106	DM47 Fig 6.1	<p>The 2015 Indices of Multiple Deprivation (IMD) rank Haringey as one of the most deprived in the country; it is the 30th most deprived borough in England and the 6th most deprived in London. In Haringey we know that obesity is closely linked to deprivation with children about to start secondary school being two and a half times more likely to be obese in the deprived areas east of the borough than children in the west. We also know from local research that the number of fast food takeaways influences children's purchasing habits. A study of secondary schools in Haringey found that where schools had a fewer number of takeaways and other shops within a 300m radius of a school, less pupils were observed in nearby takeaways and shops at lunchtime or after school. Given this evidence we now know that improving the food environment around schools does have potential to influence children's</p>	Technical evidence noted.

				food-purchasing habits and therefore diets.	
Res23	B66	DMod100 - DMod106	DM47 Fig 6.1	<p>Successful preventative efforts are urgently need and the removal of the 400m boundary undermines local effort to improve diet and health outcomes among Haringey children.</p> <p>There is a need for local planning authorities to manage the over concentration of fast food takeaways as a means of improving the health of local children in Haringey. In particular, management should be focused around schools. It is our earnest hope that you will reconsider the modifications you have made and will reinstate the original policy proposal for Hot Food Takeaways (DM47). Please feel free to engage with the organisation further should you require additional support on this matter</p>	In light of the representation, including additional technical evidence provided, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.
Res23	B67	DMod100 - DMod106	DM47 Fig 6.1	<p>References</p> <ol style="list-style-type: none"> 1. Reilly J. Childhood Obesity: an overview. <i>Child Soc</i>; 21 (2007) pp. 390-396 2. Richardson, Andrea S., and Penny Gordon-Larsen. "Timing and Duration of Obesity in Relation to Diabetes Findings from an ethnically diverse, nationally representative sample." <i>Diabetes care</i> 36.4 (2013): 865-872. 9 (2) 3. Gattineua M. Obesity and disability: children and young people. Oxford: Public Health England Obesity Knowledge and Intelligence. 2014 4. Prentice, Andrew M., and Susan A. Jebb. "Fast foods, energy density and obesity: a possible mechanistic link." <i>Obesity reviews</i> 4.4 (2003): 187-194. 5. Burgoine, Thomas, et al. "Does neighborhood fast-food outlet exposure amplify inequalities in diet and obesity? A cross-sectional study." <i>The American journal of clinical nutrition</i> 103.6 (2016): 1540-1547. 6. Children's Food Choices on the Streets Around Schools in Haringey 7. Cetateanu, Andreea, and Andy Jones. "Understanding the relationship between food environments, deprivation and childhood overweight and obesity: evidence from a cross sectional England-wide study." <i>Health & place</i> 27 (2014): 68-76. 	Technical evidence noted.

Res24	B68	DMMod100 - DMMod101	DM47	<p>In response to Haringey’s Local Plan alterations pertaining to the policy on hot food takeaways (DM47), I am writing you to express disappointment that ‘<i>The council will resist proposals for hot food takeaway shops located within 400 meters of the boundaries of a primary or secondary school</i>’ (DMM0d101).</p> <p>London has the worst record on childhood obesity than most other peer global cities such as New York, Paris and Madrid. Over a third of London’s children are overweight or obese by the time they leave primary school and childhood obesity is now an epidemic that needs to be tackled. In turn, London CCGs and NHS England are supporting this priority through the Healthy London Partnership prevention programme and the Great Weight Debate.</p> <p>The Great Weight Debate (GWD) is a multi-stage conversation on childhood obesity to fully engage and involve Londoners in the health of their children, and to galvanise social action to tackle one of the most pressing public health challenges facing London in recent years.</p> <p>A recent GWD survey to gauge public opinion and views on childhood obesity in London showed that Haringey residents highlighted fast food outlets and unhealthy food and drink were key concerns:</p> <ul style="list-style-type: none"> • Q3: Haringey residents told us that top 3 things that made it hard for children to lead healthier lives were: <ul style="list-style-type: none"> ○ Too many fast food outlets ○ Too many cheap unhealthy food and drink options ○ Too much advertising of unhealthy food and drink options • Q5: Haringey residents told us that in order for children to be better supported to lead healthier lives, there needed to be: <ul style="list-style-type: none"> ○ Limit on the number of fast food outlets ○ Support or families to cook healthier food ○ Cheaper healthier food and drink options 	<p>In light of the representation, including additional technical evidence provided, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.</p>
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				<p>As most hot food takeaways provide the majority of a child's daily calories (pizza/chicken & chip = c.1500 cal), fast food takeaways near schools are linked to childhood obesity.</p> <p>I hope you will reconsider the hot food takeaway shop restriction located within 400 meters of the boundaries of a primary or secondary school.</p>	
Res25	B69	DMMod100 - DMMod106	DM47	<p>It is a challenge for both adults and children to eat healthily. With children in particular we need to show as well as tell our expectations of things.</p> <p>It makes no sense for a simple 400m exclusion zone around schools to be removed when we know that obesity is not merely a local but a national issue.</p> <p>Far too many young people congregate around fast food shops afterschool as there are way too many tempting offers and unhealthy food available. In my role as Assistant Achievement Coordinator I have had conversations with parents about their child purchasing food before coming home and then not eating the healthy food that they cook.</p> <p>As schools we apply for Healthy School awards and there is only so much we can do if the council is not working with us to do a little more outside of schools regarding exclusion zones. If we are to take the health and well being of our young people seriously we cannot do this merely through rhetoric but must also do so through our actions.</p> <p>Before an exclusion zone is lifted I really hope there will be great consideration given to the message we are given to young people.</p>	<p>In light of the representation, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.</p>
Res26	B70	DMMod100 - DMMod106	DM47	<p>Park View secondary school is located on the junction of Langham Road and West Green Road, N15 3QR. We have 1080 pupils in years 7 -11 with a gender mix of 55% boys and 45% girls and from very diverse ethnic communities.</p> <p>We have external caterers on site who are committed to the principles</p>	<p>Noted.</p>

				of Eatwell and Healthy Living. As such their menus and food offer is designed to attract the widest audience and achieve compliance with all healthy food agenda. The menus aim to eliminate or reduce intake of sugar, saturated fats, salt and other undesirable ingredients from the menu – be it in food or drink. The daily option of meat based or vegetarian main meal reflects the School’s commitment to support the child’s development through a healthy diet.	
Res26	B71	DMMod100 - DMMod106	DM47	<p>Over past few years working closely with our caterers the School has been very successful in increasing the numbers of pupils who take up our on-site catering offer. This is evident through the increasing numbers passing through the tills each day. But we are very disappointed when at day end we still find pupils who have ignored the healthy food offer at lunch time (12:50 – 1:50) in preference for a “chicken n chips” at 15:15 from the “chicken shops et al” all within our immediate boundary fence.</p> <p>We acknowledge that there is a place for such commercial outlets in the community but we strongly dispute the need to place them within 400 metres of school gates.</p> <p>We strongly urge the Council to review its planning policies to such applications close to school premises. Please amend policies that reduce opportunities for children to purchase from such outlets – so that schools including Park View can concentrate on promoting the healthy food agenda to pupils during and after the school day</p>	In light of the representation, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.
Res27	B72	DMMod100 - DMMod106	DM47	<p>I am writing as the Healthy Schools/STEM coordinator for Rokesly Infant school and in response to your proposed changes to the DM47 policy.</p> <p>Our school has worked hard to establish an ethos of healthy eating and well being and we achieved a Healthy Schools London gold award in the summer term.</p> <p>In Crouch End there are several fast food establishments. One of these, Dixy Chicken, is less than 400 metres from our school gates. We</p>	In light of the representation, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.

				believe that while the wider school community is encouraging children to adopt more healthy lifestyles, it would be irresponsible to remove the 400 metre exclusion zone from the local plan.	
Res28	B73	DMMod100 - DMMod106	DM47	<p>It is with dismay that I hear that the removal of the 400m exclusion zone is being debated, truly this is a regressive steps for schools who are battling against the incessant wave of childhood obesity. The close proximity of chip shops and other take away outlets near schools just compounds our difficulties, no one wants to restrict free trade but when it is having a detrimental effect on our children's health then schools and educational commentators have to make a stand.</p> <p>Think of the logic of having fast food establishments selling high calorific food being open on the way and the way back from school. Hungry, tired children on their way home will have to have enormous will power to shun cheap, high carbohydrate ridden food. Once sated on such food how will it affect their evening meal choices? Will they want or be able to eat a balanced food plate later on in the evening? Will they need another meal? I doubt it! Immediate gratification will rule and our pupil's chance of eating five-a-day will diminish greatly.</p> <p>Furthermore, my school borders on Albert Recreation Ground, a green flag park that suffers greatly because of local take away food shops. Discarded foam/plastic containers, chip wrappings, dropped plastic bottles pollute this area of beauty and pose a threat to wildlife and increase the likelihood of pest infestation (e.g. rats).</p> <p>I understand your wish to develop commerce and raise business rates but please think again do not remove the 400m exclusion zone.</p>	<p>In light of the representation, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.</p> <p>With regard to litter/pollution, the Local Plan will seek to manage impacts of this type of development on local amenity where there is scope to do so, as provided by DMMod106.</p>
Res29	B74	DMMod100 - DMMod104	DM47	<p>Re: Consultation on the Inspector's Main Modifications to the emerging Haringey Local Plan</p> <p>The London Healthier High Streets Network considered the above consultation at its meeting 12th December 2016. This letter is a summary of the discussion.</p>	Noted.

				<p>We are disappointed with the proposed changes relating to the policies for hot food takeaways (DM47). Specifically, our concerns regard DMod100-104 and the amendment to the first sentence of paragraph 6.60 which removes the management of hot food takeaways around primary and secondary schools.</p>	
Res29	B75	DMod100 - DMod104	DM47	<p><u>Local data evidence:</u></p> <ul style="list-style-type: none"> - The latest National Child Measurement Programme (NCMP) found that nationally, regionally and locally overweight and obesity among children is rising. In Haringey, overweight and obesity rates have risen by 1.2% among Reception year children and 0.8% among Year 6 children between 2014/15 and 2015/16. - A mapping of fast food outlets in Haringey shows an over concentration of fast food outlets almost exclusively in the deprived east of the borough. The borough was also identified by the National Obesity Observatory to be in the top quintile of local fast food outlet concentrations. This inequality was further highlighted in a recent report by the Royal Society of Public Health which showed that Haringey was the only borough in London to be placed in both the top ten healthiest high streets and the top ten unhealthiest high streets. In addition, the RSPH recommended a threshold of 5% to manage clustering. Ref: Royal Society of Public Health, <i>Health on the High Street</i>, 2015 <p><u>NPP consistency</u> - The 400m zone to restrict further fast food outlets around schools is consistent with National Planning Policy which recognises that health considerations are an important part of planning policy. In particular, the Local Plan should promote health and wellbeing and support the reduction of health inequalities; take into consideration the local health and wellbeing strategy and other relevant health improvement strategies; and support healthy lifestyles. Ref: https://www.gov.uk/guidance/health-and-wellbeing</p> <ul style="list-style-type: none"> - Removing the management of hot food takeaways around schools will undermine key Haringey health strategies and approaches to healthy weight including their healthy schools work 	Technical evidence noted.

				<p><i>Evidential studies</i> - Increasing access to healthy foods while also limiting access to unhealthy foods are ways that local authorities can influence environmental factors that affect health and wellbeing, including weight gain and obesity.</p> <p>- Haringey Council's approach to regulating planning permission for takeaways and other food retail outlets in specific areas including within walking distance of schools, is in line with recommendations from NICE (National Institute for Health and Care Excellence) and PHE.</p> <p>- The latest evidence published in the British Medical Journal shows that those exposed to takeaway food outlets in home, work and commuting environments is associated with higher consumption of takeaway food, greater body mass index, and greater odds of obesity .</p> <p>Ref: Burgoine T, et al. <i>Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight in Cambridgeshire, UK: population based, cross sectional study.</i> BMJ 2014;348:g1464)</p>	
Res29	B76	DMMod100 - DMMod104	DM47	<p>Having considered the proposed changes, the Healthier High Streets Network strongly believes that the following should be re-instated in the Haringey Local Plan:</p> <ul style="list-style-type: none"> • Healthy Eating Zones - (DMMod100) • The council will resist proposals for hot food takeaway shops located within 400 meters of the boundaries of a primary or secondary school - (DMMod101) • The percentage of hot food takeaway shops will not exceed 5% of designated shopping frontage in the Metropolitan and District Town Centres and local centres - (DMMod102) • Within neighbourhood parades, other non-designated frontages and elsewhere in the borough – (DMMod 102) • Particularly around primary and secondary schools where they pose a significant health risk to children (DMMod104) <p>We look forward to our response being positively considered. The Network and members are happy to be invited to provide further</p>	<p>In light of the representation, including additional technical evidence provided, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.</p>

				comments and evidence should that be required.	
Res30	B77	DMMod100 - DMMod106	DM47	<p>RE: Haringey's Local Plan Examination in Public (EIP) – letter of support to Local Plan policies on the promotion of improved health and wellbeing outcomes, including tackling obesity</p> <p>Public Health England (PHE) exists to protect and improve the nation's health and wellbeing, and reduce health inequalities. We are an executive agency of the Department of Health, and a distinct delivery organisation with operational autonomy to advise and support government, local authorities and the NHS in a professionally independent manner.</p>	Noted.
Res30	B78	DMMod100 - DMMod106	DM47	<p>The built and natural environment are recognised as major determinants of health and wellbeing across the life course and can determine the establishment of social networks, the location and quality of housing, and human exposure to air and noise pollution. It can determine connectivity within a neighbourhood, the creation of a safe and accessible transport system and active travel. It also plays a crucial role in promoting access to open space, employment and healthy food options. These are aspects of the environment which have a significant impact on health.</p> <p>Some of the UK's most pressing health challenges – such as obesity, mental health issues, physical inactivity and the needs of an ageing population – can all be influenced by the quality of our built and natural environment. In other words, the considerate design of places can help promote good health, access to goods and services and alleviate, or even prevent, poor health.</p> <p>Our Strategic Plan, published in 2016, recognises the importance of the built and natural environment as one of the major determinants of health and wellbeing across the lifecourse. The Strategic Plan also recognises obesity as one of the most significant issues affecting the health and wellbeing of the nation. Obesity and poor diet, alongside smoking, are two of the leading causes of poor health in Britain. This is in line with the Foresight Report & Global Burden of Disease which</p>	Noted.

				<p>identified need to tackle “obesogenic environments” as urgent and failure in doing so having grave consequences for individuals, communities and society as a whole.</p> <p>Tackling obesity is complex and requires approaches focussing both on individuals, their behaviours and lifestyle choices as well as action which affects the whole of the local population involving multiple sectors. We call this addressing the ‘wider determinants’ of health. There is broad consensus that obesity is the result of a very large number of factors, activities and determinants and that similarly there is no single solution. Multiple policies and actions are required, operating across a range of causal factors, and at various systems levels, including the built environment.</p> <p>PHE’s ‘Whole System Approach’ is based on this rationale. The built environment, and consequently the planning system, can promote access to healthier food as well as encouraging physical activity and the pursuit of healthier living choices. Please also see attached PHE’s obesity work plan: five pillars for action (attached). The national importance of obesity as a health threat to England has been signalled in the Childhood Obesity Plan, which includes fiscal and structural measures to tackle obesity, and goes beyond plans from other countries. The national importance of obesity as a health threat to England has been signalled in the Childhood Obesity Plan, which includes fiscal and structural measures to tackle obesity, and goes beyond plans from other countries</p>	
Res30	B79	DMod100 - DMod106	DM47	<p>Evidence shows that over one fifth of children aged 4-5 years old;, more than a third of 10-11 year olds; and two thirds of English adults, are obese or overweight.. Being obese can increase the risk of developing a range of serious diseases, including hypertension, type 2 diabetes, cardiovascular diseases, some cancers, obstructive sleep apnoea, and musculoskeletal problems. Obesity is a major risk factor for morbidity and early death and is characterised by its impact on mental health and, in children, there appears to be a widening in the inequalities gap between the most and least deprived.</p>	Technical evidence noted.

			<p>Put simply, obesity levels amongst adults and children remain too high and it continues to be a priority for PHE.</p> <p>However, the obesity 'epidemic' has immense consequences beyond that just for the individual and their health and wellbeing but for the NHS and indeed, the wider economy: the costs associated arising from obesity to the wider economy, NHS and social care systems are estimated to be £27 billion, £6.1 billion a year and £352 million respectively.</p> <p>It is well evidenced that physical activity alone will not tackle the nations obesity problem alone, reduction in calorie intake is required. Recently published evidence which studied the associations between exposure to takeaway food outlets, takeaway food consumption and body weight in Cambridgeshire, concluded that, overall, access to takeaway food outlets in all domains combined (home, work and along commuting routes) was positively associated with takeaway food consumption, body weight and obesity¹. Strong links between obesity and deprivation² have also been established as well as links between higher levels of deprivation and higher concentration of hot-food takeaways³.</p> <p>There is also evidence to show that fast food outlets tend to sell food that is energy dense, high in saturated fat and have low micronutrient content⁴.</p> <p>PHE's position in relation to A5 uses is set in the Regulating the growth of fast food outlets briefing document, published in 2014. This briefing summarises the importance of action on obesity, with a specific focus on hot food takeaways, and outlines the regulatory and other approaches that can be taken at local level to manage its growth.</p> <p>Following from its publication, PHE, in association with the Town and Country Planning Association (TCPA) has also published the Planning</p>	
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Res30	B80	DMod100 - DMod106	DM47	<p>PHE recognises that the appropriate location and density for hot food takeaways in a specific area is a matter for each local planning authority to determine under their local plans, but PHE would encourage and support the development of local plan policies which aim to achieve this.</p> <p>As per the Health and Wellbeing PPG in support of chapter 8 of the NPPF, when developing local plans, local planning authorities should work with public health leads, including the Director of Public Health, and other health organisations to understand and take account of the health status and needs of the local population, including issues linked to food.</p> <p>We also believe there is a precedent in this area, with several other local planning authorities in London, with high levels of deprivation and higher than average concentration of hot food takeaways, having policies in place which aim to tackle what is locally defined as an over concentration of A5 uses. For example, we believe this is the case of the London Borough of Tower Hamlets, Newham and Lewisham, to quote a few examples.</p>	<p>In light of the representation, including additional technical evidence provided, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.</p>
Res30	B81	DMod100 - DMod106	DM47	<p>1Burgoine T FN, Griffin S. Wareham N, Monsivais P. Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight in Cambridgeshire, UK: population based, cross sectional study. <i>BMJ</i>. 2014;348:g1464.</p>	<p>Technical evidence noted.</p>

				<p>2National Observatory Obesity. About Obesity - Health Inequalities: Public Health England; 2015 [cited 2015]. Available from: http://www.noo.org.uk/NOO_about_obesity/inequalities</p> <p>3National Observatory Obesity. Fast Food Outlets by Local Authority, 2016 [cited 2016] Available from: https://www.noo.org.uk/securefiles/170111_1741//FastFoodmap_FINAL.pdf</p> <p>4Fraser Lorna K. et al The Geography of Fast Food Outlets: A Review Int. J. Environ. Res. Public Health 2010, 7(5), 2290-2308; doi:10.3390/ijerph7052290</p>	
Res31	B82	DMMod100 - DMMod104	DM47	<p>Introduction:</p> <p>Haringey is not unique in its battle with obesity, but the scale of the problem in our borough is daunting; on average obesity affects one in three children about the start secondary school, along with the majority of adults. More worryingly, in some of the more deprived parts of our borough, almost one in two children are affected.</p> <p>The NHS Five Year Forward View sets out a vision for the future of the NHS. It outlines how action needs to be taken on four fronts, including doing more to tackle the root causes of ill health. The Forward View supports hard-hitting action on obesity and advocates for stronger public health-related powers for local government and elected mayors. Further Simon Stevens, Chief Executive of the National Health Service, said at Haringey's Obesity Conference in June 2015, <i>'by not tackling obesity we are storing up a huge tidal wave of diabetes, heart disease and cancers. And the negative impact this will have on the NHS, and people's quality of life is enormous'</i>.</p> <p>The latest National Child Measurement Programme (NCMP) found that nationally, regionally and locally overweight and obesity among children is rising. In Haringey, overweight and obesity rates have risen by 1.2% among Reception year children and 0.8% among Year 6 children between 2014/15 and 2015/16. Given this rapid rise and the negative health consequences of obesity and its impact on the future</p>	Technical evidence noted.

				sustainability of our National Health Service, successful prevention efforts are needed urgently.	
Res31	B83	DMMod100 - DMMod104	DM47	<p>Changes to Haringey Council's Development Management Plan as outlined in the Main Modifications Public Consultation has seen the removal of the 400m boundary to control the concentration of Hot Food Takeaways. This will impede efforts by Haringey's Health and Wellbeing Board to improve diet and health outcomes among Haringey's children by making the healthier choice the easier choice¹.</p> <p>Changes to DM47 - Hot Food Takeaway Policy</p> <p>Haringey's Clinical Commissioning Group is disappointed to see the following points removed from DMMod100-1-4 part one of DM47 in Haringey Council's latest Local Plan:</p> <ul style="list-style-type: none"> • <i>Healthy Eating Zones</i> • <i>The council will resist proposals for hot food takeaway shops located within 400 meters of the boundaries of a primary or secondary school</i> • <i>The percentage of hot food takeaway shops will not exceed 5% of designated shopping frontage in the Metropolitan and District Town Centres and local centres</i> • <i>Within neighbourhood parades, other non-designated frontages and elsewhere in the borough</i> <p>Haringey CCG is also disappointed to see the amendment to the first sentence of paragraph 6.60 - DMMod 103, has removed the management of hot food takeaways around primary and secondary schools where they pose a significant health risk to children.</p> <ul style="list-style-type: none"> • <i>' In light of the above evidence base, it is considered appropriate for the Local Plan to seek to manage the development of hot food takeaways, particularly around primary and secondary schools where they pose a significant health risk to children to deliver mixed and sustainable communities, including viable town and local centres.</i> 	In light of the representation, including additional technical evidence provided, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.

				<p>We believe that these changes are a missed opportunity to improve the health of our local community and children and therefore request that they are inserted back into the final Development Management Plan.</p>	
Res31	B84	DMMod100 - DMMod104	DM47	<p>Links between the food environment and obesity</p> <p>What we choose to eat plays a large role in determining our risk of gaining weight but the choices school children make are shaped by four key issues 'Access, Availability, Affordability and Acceptability, also known as the 4A's². In addition there is also a growing body of evidence which links aspects of the built environment, which includes exposure to fast food outlets, with an increase in energy consumption and thus obesity³⁴⁵. This is because food purchased from fast food outlets is 65% more energy dense than the average diet and it also tends to be higher in fat and sugar. When consumed regularly, these foods can result in an imbalance between calories consumed and calories expended which results in weight gain⁶.</p> <p>The Cambridge study, which is the latest evidence published in the British Medical Journal, looked at the eating habits and weight of nearly 5,500 people who took part in a lifestyle study in 2011, and compared the results to information on the number of takeaway outlets in their area. The study shows that those exposed to takeaway food outlets in home, work and commuting environments combined, was associated with marginally higher consumption of takeaway food, greater body mass index, and greater odds of obesity⁷. This challenges the notion that people's diet are solely influenced by personal choice but instead a result of complex relations between social, economic and physical environments which makes it far more likely that people will gain weight. As such, many academics, argue that obesity is a normal reaction to our abnormal environment⁸.</p> <p>National Health Policy</p> <p>Haringey Council's approach to regulating planning permission for</p>	<p>Technical evidence noted.</p>

			<p>takeaway's is in line with national policy recommendations.</p> <p>The National Institute for Health and Care Excellence (NICE), which provides evidence based recommendations and guidance to improve health and social care, issued its public health guidelines on preventing cardiovascular disease in 2010. Its recommended that local authorities should be encouraged to restrict planning permission for fast food takeaways and other food retail outlets in specific areas (for example, within walking distance of schools). Therefore the approach taken by Haringey Council to restrict Hot Food Takeaways' within 400m of schools was consistent with this recommendation.</p> <p>In addition, the 2007 UK government Foresight Report 'Tackling obesity: future choices' remains' the most comprehensive investigation into obesity and its causes. One important action which the Foresight report identified was the need to modify the environment so that it supports being active and does not provide easy access to energy-dense food.</p> <p>Deprivation and obesity</p> <p>There is a link between socioeconomic status and obesity nationally⁹ and in Haringey there is a clear relationship between the prevalence of obesity and the level of deprivation for both reception and Year 6 children. Year 6 and Reception children are measured annually in Haringey as part of the National Child Management Programme, key findings from 2015/16 are:</p> <ul style="list-style-type: none"> • Reception children in the most deprived areas (1st quintile) have the highest obesity rate at 28% compared to just 15.4% in the least deprived areas (5th quintile). • Year 6 children in the most deprived areas (1st quintile) have the highest obesity rates at 43.7% compared to just 13.5% in the least deprived areas. <p>Mapping of fast food outlets in Haringey showed an over concentration</p>	
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			<p>of fast food outlets almost exclusively in the deprived east of the borough, which was also judged by the National Obesity Observatory to be in the top quintile of local fast food outlet concentrations. This stark inequality was further highlighted in a recent report by the Royal Society of Public Health which showed that Haringey was the only borough in London to be placed in both the top ten healthiest high streets and the top ten unhealthiest high streets¹⁰. In addition, the RSPH recommended a threshold of 5% to manage clustering. This was sought to capture the detrimental impact of the clustering of fast food takeaways and betting shops by removing one Richter score point for each successive outlet once the proportion of them in an area hits a threshold of more than 5% of total outlets⁹.</p> <p>Given the stark rates of obesity in the most deprived wards in Haringey and the growing evidence base linking the food environment to increased consumption and greater odds obesity, there is an urgent need to improve the food environment around schools, which has the potential to influence children’s food –purchasing habits and therefore influence their diets and health. Therefore Haringey CCG would like to see the inclusion of the spatial link between schools (400m boundary) and 5% threshold which is in line with national recommendations from the Royal Society of Public Health.</p> <p>Strong local support</p> <p>There is strong local support for addressing the over concentration of fast food outlets and improving accessibility for healthier food options. During the October half term Haringey residents participated in the Great Weight Debate (GWD) which is a conversation to fully engage and involved Londoners in the future health of their children. Results from the GWD A high proportion of our residents are aware of the childhood obesity epidemic. Haringey residents also told us that: The top 3 things that made it hard for children to lead healthier lives were:</p> <ul style="list-style-type: none"> • Too many fast food outlets 	
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				<ul style="list-style-type: none"> • Too many cheap unhealthy food and drink options • Too much advertising of unhealthy food and drink options <p>Haringey residents told us that in order for children to be better supported to lead healthier lives, there needed to be:</p> <ul style="list-style-type: none"> • Limits on the number of fast food outlets • Support or families to cook healthier food • Cheaper healthier food and drink options 	
Res31	B85	DMMod100 - DMMod104	DM47	<p>Conclusions</p> <p>Obesity and the rising trend of child obesity is a serious public health challenge. However tackling obesity is a complex and multifaceted problem and the evidence suggests that we need a multi-layered approach as there is no single silver bullet' which will reverse the rising trend of obesity. Instead we need many interventions, policies and actions from individuals and society across multiple sectors to improve the food environment. Haringey's approach to regulating the clustering of Hot Food Takeaway's, which combined with other interventions to improve the food environment will support reversing the rapid rise of obesity locally in Haringey.</p> <p>Given the evidence linking the food environments to obesity we also welcome the re-inclusion of part one of DM47 DMMod 100- 104 back into Haringey Council's latest Development Management Plan.</p> <ul style="list-style-type: none"> • <i>Healthy Eating Zones</i> • <i>The council will resist proposals for hot food takeaway shops located within 400 meters of the boundaries of a primary or secondary school</i> • <i>The percentage of hot food takeaway shops will not exceed 5% of designated shopping frontage in the Metropolitan and District Town Centres and local centres</i> • <i>Within neighbourhood parades, other non-designated frontages and elsewhere in the borough</i> 	<p>In light of the representation, including additional technical evidence provided, the Council requests that consideration is given to reinstating the DM47 policy wording, as set out in the publication document.</p>

				<p>and reference to the amendment of the first sentence of paragraph 6.60</p> <ul style="list-style-type: none"> • <i>‘Particularly around primary and secondary schools where they pose a significant health risk to children’.</i> 	
Res31	B86	DMod100 - DMod104	DM47	<p>1Haringey Health and Wellbeing Strategy 2015-18 2Children’s Food Choices on the Streets around Schools in Haringey: A wall of crisps and other food choices. 3L K Fraser, K L Edwards, J Cade and G P Clarke. The Geography of Fast Food Outlets: A Review. Int. J. Environ. Res. Public Health 2010, 7, 2290-2308 4T Burgoine, N G Forouhi, S J Griffin, N J Wareham, P Monsivais. Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight in Cambridgeshire, UK: population based, cross sectional study. BMJ 2014;348:g1464 5Burgoine, N G Forouhi, S J Griffin, N J Wareham, P Monsivais. Does neighbourhood fast-food outlet exposure amplify inequalities in diet and obesity? A cross-sectional study. The American Journal of Clinical Nutrition. 2016;103(6):1540-1547. doi:10.3945/ajcn.115.128132 6Prentice, Andrew M., and Susan A. Jebb. "Fast foods, energy density and obesity: a possible mechanistic link." Obesity reviews 4.4 (2003): 187-194 7Burgoine T, et al. Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight in Cambridgeshire, UK: population based, cross sectional study. BMJ 2014;348:g1464 8Urgently needed: a framework convention for obesity control. The Lancet. Published: 27 August 2011 DOI: http://dx.doi.org/10.1016/S0140-6736(11)61356-1 9NOO data factsheet. Child Obesity and Socioeconomic Status. September 2012 10Royal Society of Public Health. Health on the High Street. 2015</p>	Technical evidence noted.
Res32	B87	DMod100 -	DM47	<p>Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1)99 and 2007;</p>	The Council notes that the Mayor considers the

		DMMod104		<p>Town and Country Planning (Local Development) (England) Regulations 2012</p> <p>Haringey Local Plan: Post EIP Mods to:</p> <ul style="list-style-type: none"> o Strategic Policies o Development Management DPD o Site Allocations DPD o Tottenham Area Action Plan <p>Thank you for consulting the Mayor of London on the Draft Local Plan. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.</p> <p>The proposed Modifications generally conform with the London Plan and there are no further specific points from Transport for London.</p>	<p>proposed Modifications to be in general conformity with the London Plan.</p>
Res32	B89	DMMod100 - DMMod104	DM47	<p>However, I would highlight the following three points for your consideration:</p> <p>1 The London Plan was updated in March 2016, the full Title is The London Plan (Spatial Development Strategy for London Consolidated with Alterations since 2011). It appears that the previous Modifications were made prior to the above London Plan update, therefore the development Plan Documents should reference this version of the London Plan (rather than the 2015 version).</p> <p>2 Similarly the Mayor of London's Housing SPG was updated in March 2016.</p>	<p>Noted.</p> <p>The Council suggests that references to the appropriate adoption dates of the Mayor's Housing SPG and London Plan could be addressed as minor modifications (factual updates) to the Local Plan.</p>
Res32	B90	DMMod100 - DMMod104	DM47	<p>3 It is noted that in Modification DMMod101, the Inspector proposes to delete Part A of Policy DM47; 'The council will resist proposals for hot food takeaway shops located within 400 metres of the boundaries of a primary or secondary school'</p> <p>The proposed change is disappointing considering:</p> <ul style="list-style-type: none"> - the evidence about the location of hot food takeaways relevant to Haringey 	<p>In light of the representation, including additional technical evidence provided, the Council requests that consideration is given to reinstating the DM47</p>

				<p>- London Plan Policy 3.2 and the Mayor's commitment to improving the health of Londoners</p> <p>- 9 other London Boroughs have adopted a similar approach.</p>	policy wording, as set out in the publication document.
Res32	B91	DMMod100 - DMMod104	DM47	<p>Evidence</p> <p>Public Health England has stated that 'improving the quality of the food environment around schools has the potential to influence children's food-purchasing habits', and that 'there are strong theoretical arguments for the value of restricting the growth in fast food outlets'¹.</p> <p>Haringey has a higher proportion of children who are overweight or obese than the London average. Hot food takeaways are generally a source of cheap, energy-dense and nutrient-poor food and Haringey council has identified that there is a high concentration of AS outlets near to primary and secondary schools, which increases the availability of fast food to children.</p> <p>London Plan Policy Policy 3.2 Improving Health and Addressing Health Inequalities in the London Plan, states that 'boroughs should work with key partners to identify and address significant health issues facing their area'. The support text of policy 3.2 also states that the detailed design of neighbourhoods is very important for health and well-being and that measures such as 'local policies to address concerns over the development of fast food outlets close to schools' can complement this approach.</p> <p>This is also further detailed in the Mayor of London's Takeaway Toolkit (2012), which recommends 'the promotion of clear guidance in planning policies that allow the restriction of fast food takeaways.' It should be clear from these references that the London Plan is supportive of a policy approach to restrict hot food takeaways close to schools. This position was set out in GLA comments submitted on 4 March 2016 (reference LDF14/LDDO9, LDD10, LDD14 &LDD1S/CGO1) where the GLA supported LB Haringey's proposed policy.</p> <p>Local authorities and clinical commissioning groups have a statutory</p>	Technical evidence noted.

				<p>duty to develop a Health and Wellbeing Strategy through the health and wellbeing board. Reducing obesity is one of the three key priorities in Haringey's Health and Wellbeing Strategy². At the centre of Haringey's approach is a whole systems obesity delivery plan which is committed to creating a healthier built environment³.</p> <p>The policy to resist hot food takeaway shops close to schools is one of a number of measures developed to provide a healthier environment for Haringey residents by improving the availability of healthy food.</p> <p>1 Public Health England (2014) Obesity and the Environment: Regulating the Growth of Fast Food Outlets 2 Haringey's Health and Wellbeing Strategy 2015-2018 Http://haringey.gov.uk/sites/Haringey.gov.uk/files/health_and_wellbeing_strategy_2015-2018_summary_version_1.pdf 3 Haringey's Obesity Whole System Delivery Plan http://haringey.gov.uk/sites/haringeygovuk/files/whole_systems_approach.pdf</p>	
Res32	B92	DMMod100 - DMMod104	DM47	<p>Examples from other London Boroughs</p> <p>Across London, 9 authorities have now adopted Local Plan policies to address hot food takeaways around schools (including Brent, Ealing, Hackney, Islington, Lambeth, Lewisham, Tower Hamlets, Waltham Forest, Wandsworth). A further 5 London Boroughs currently have Local Plan policies in draft form. This is an issue that many boroughs across London have felt appropriate to address through planning policies and the Mayor supports boroughs in using their powers to address this issue.</p>	Noted.
Res21	B93	DMMod107	DM48B	<p>We object to Criterion B which lists areas where the Council may seek planning obligations. In particular, we consider that public art should not be listed under B as clearly it is not necessary to make development acceptable.</p>	<p>The Council considers criterion B to be important in giving clarity on the nature of Planning Obligations that may be sought depending of the mitigation required. This aids in the effectiveness</p>

					<p>of the Plan. Public Art could be necessary on a development where an existing art work or cultural asset could be lost as a result of re-development or to mitigate against a potential visual impact, such as a blank facade within an otherwise active frontage – to name but two examples.</p> <p>No change</p>
Res17	B94	DMMod109	DM 55	<p>Hackney therefore welcomes the inclusion in the proposed modifications of the jointly agreed changes to policy DM39 (warehouse living) of the Haringey Development Management DPD in regard to proposals for live/work in Haringey and the incorporation of changes to policy DM55 of the same document</p>	<p>Support noted.</p> <p>No change</p>
Res33	B95	DMMinor29	DM5	<p>In addition Appendix A of the modifications document also includes a list of 'Locally Significant Views' but it is not clear whether these are also relevant for Policy DM5. The School considers that if such a significant modification to the Plans is proposed then greater clarity on the views that need to be considered when developing proposals is necessary and would suggest that a list of these would be most appropriate. Alternatively, additional explanatory text should be included in paragraph 2.35 which would also clarify the views to be considered.</p>	<p>Paragraph 2.34 clearly states that a Schedule (Appendix A) sets out the Locally Significant Views relevant to Policy DM5. For clarity in implementation this Schedule has now been updated to include coordinates indicating origin points of the views, as per DMMinor29.</p> <p>No change</p>

Res13	B96	N/A	DM30	DM 30: Objection. This should be further amended by replacing “a significant” by “ any ”. Does Haringey Council think it is acceptable to damage the health of the population and the environment in the name of “development”?	The Council disagrees. It may not be possible or realistic to expect a waste facility to have no impacts in terms of noise or odour and therefore the significance of the impact would be a key consideration as to whether a proposal was acceptable. No change
Res13	B97	N/A	DM34A	DM 34 Part A: This needs to be further amended by substituting “should” by “ must ”. (“Should” is far too vague and achieves nothing.)	For clarity, the Council would accept this proposed change.
Res20	B98	N/A	DM39	ProveWell are concerned there is no modification to Policy DM39 relating to how individual applications are to be determined that come forward outside of a masterplan process. Whilst ProveWell support the preparation of a masterplan for their sites, there may be circumstances that in the interim that ProveWell will want to improve, extend or reconfigure existing warehouses or build temporary structures. This issue was discussed at the Examination in Public and it was agreed there would be appropriate wording inserted to allow individual applications to come forward without the need for a full masterplan. It is therefore requested the following wording is included to allow this within the policy text: In the case of small applications for improvements or extensions to existing buildings or temporary structures the applicant will not be required to complete a full masterplan, but will be required to demonstrate it does not compromise the wider sites from coming forward for redevelopment and these applications will be determined against the other policy requirements of Policy DM39. Without the additional wording smaller individual applications will be restricted from coming forward. It is therefore essential this wording is	The Council would support the inclusion of the proposed wording within Policy DM39 to ensure the plan is effective and clarifies the circumstances to apply in the consideration of applications for improvements and extensions ahead of a site-wide masterplan.

				included to add clarity that smaller individual applications will be considered in the absence of a masterplan for the wider site.	
Res35	B99	N/A	DM49 para 7.17	NHS PS has reviewed the Schedule of Modifications to the Development Management DPD: November 2016 and recognises there have been no proposed modifications to Policy DM49 or supporting paragraph 7.17. NHS PS continues to support the inclusion of paragraph 7.17 unchanged as part of this consultation.	Support noted. No change
Res13	B10 0	N/A	Appendix A	In Appendix A, "Schedule of Locally Significant Views" there is something locally significant to the area of Devonshire Hill Lane, N 17, missing from your schedule: The amazing view from the junction of Devonshire Court/Devonshire Hill Lane through the gap between the houses on "The Green", right to the City of London (so many miles away!) with the well-known and loved buildings of the Gherkin, Cheesegrater etc., as a reminder that we live, albeit in a suburb, in this great city of London which we can actually see at a great distance. I suggest that this view be protected .	The view was not one identified through the borough-wide character appraisal as being worthy of protection, and has not been subject to consultation for protection. It is therefore not possible to add this view at this stage in the plan-making process but the Council will assess this view as part of any subsequent update to the Local Plan. No change

Respondents to the Modifications to the Site Allocations DPD Consultation

ID	Respondent	ID	Respondent
Res40	Ursula Riniker	Res54	Highgate Bowl Action Group
Res41	Environment Agency	Res55	North London Waste Authority (NLWA)
Res42	Historic England	Res56	St William Homes LLP
Res43	Sport England	Res57	Freehold Community Association
Res44	Savills - Safestore	Res58	DP9 obo Austringer Estates Ltd
Res45	Collective Planning on behalf of Provewell	Res59	Alexandra Palace
Res46	Susie Barson	Res60	Education Funding Agency
Res47	Rapleys on behalf of La Salle	Res61	Barton Willmore obo Workspace
Res48	Savills on behalf of Legal and General	Res62	Broadwater Farm Resident's Association
Res49	Greater London Authority	Res63	Keston Action Group
Res50	Cllr Clive Carter	Res64	Pinkham Way Alliance
Res51	Tony Rybacki	Res65	GBN
Res52	CBRE obo Highgate School	Res66	Tottenham Hotspur Football Club
Res53	Michael Burroughs Associates obo Omved International Ltd	Res67	Savills obo NHS Property Services

Responses to the Modifications to the Site Allocations DPD Consultation – In Modifications Order

ID	Rep ID	Mod Ref	Policy / Para / Figure	Comment	Council's Comments / Response
Res41	C1	All	All allocations with waterways	We note that our requests for additional wording in the site allocations relating to deculverting and delivering Water Framework Directive Actions have not been incorporated. We feel this is a missed opportunity to ensure that the allocated sites include specific actions to ensure that the objectives within the Thames River Basin Plan can be delivered. Particularly as Regulation 17 of the Water Environment Regulations 2003 (WFD) places a duty on local planning authorities to 'have regard to' River Basin Management Plans (RBMP).	The Council has no objection to references to these actions being included within the relevant allocations.
Res42	C2	All	Whole Plan	We support the proposed changes and have no further	Support is noted

				comment to makes	No change
Res43	C3	All	Whole Plan	Sport England has reviewed the modifications in light of these planning objectives, national planning policy set out in the National Planning Policy Framework (NPPF) and in the context of Sport England's previous comments on the aforementioned documents and has concluded that there does not appear to have been any modifications that affect sport, sport facilities and playing pitches from the pre-submission documents and therefore Sport England's comments and concerns are still applicable.	Noted No change
Res49	C4	All	Whole Plan	<p>Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012</p> <p>Haringey Local Plan: Post EIP Mods to:</p> <ul style="list-style-type: none"> o Strategic Policies o Development Management DPD o Site Allocations DPD o Tottenham Area Action Plan <p>Thank you for consulting the Mayor of London on the Draft Local Plan. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.</p> <p>The proposed Modifications generally conform with the London Plan and there are no further specific points from Transport for London.</p>	The Council notes that the Mayor considers the proposed Modifications to be in general conformity with the London Plan. No change
Res49	C5	All	Whole Plan	However, I would highlight the following three points for your consideration:	Noted.

				<p>1 The London Plan was updated in March 2016, the full Title is The London Plan (Spatial Development Strategy for London Consolidated with Alterations since 2011). It appears that the previous Modifications were made prior to the above London Plan update, therefore the development Plan Documents should reference this version of the London Plan (rather than the 2015 version).</p> <p>2 Similarly the Mayor of London's Housing SPG was updated in March 2016.</p> <p>(Note: Point 3 pertains to DM DPD and comments are set out in corresponding schedule for that document).</p>	<p>The Council suggests that references to the appropriate adoption dates of the Mayor's Housing SPG and London Plan could be addressed as minor modifications (factual updates) to the Local Plan.</p>
Res52	C6	All	Whole plan	<p>HARINGEY LOCAL PLAN CONSULTATION ON THE FOLLOWING DOCUMENTS:</p> <ul style="list-style-type: none"> - MODIFICATIONS TO THE DEVELOPMENT MANAGEMENT DPD - MODIFICATIONS TO SITE ALLOCATIONS DPD <p>We write on behalf of Highgate School in relation to the above consultation documents.</p> <p>We have no substantive comments to make on the modifications to the abovementioned documents. However, the subsequent modifications do give rise to a requirement to clarify what the Council's intent is in respect to some of these within the Development Management DPD and the Site Allocations DPD. The details of these suggestions are set out below for your consideration.</p>	<p>Noted.</p> <p>No change</p>
Res47	C7	SAMod1	SA18, SA19, SA20, SA21, SA24,	<p>On the basis that the Strategic Policies document includes these sites for delivery of both employment and housing, for clarity, the proposed modification should be amended further as follows:</p> <p>"This Site falls within a Regeneration Area, and as such</p>	<p>The Council considers this proposed modification unnecessary. It is clear that mixed use can include residential, alongside many</p>

			SA30, SA31, SA32, SA33	employment-led mixed use development, including residential development , will be appropriate here.”	other uses, there is no need to spell them all out in Policy. No change
Res44	C8	SAMod2	All	<p>Within the Regulation 18 consultation Safestore expressed concerns with the inclusion of “Capped Commercial Rents” within the site specific policy for Wood Green Cultural Quarter (East) (formerly draft Policy SA25, now draft Policy SA20). This was considered to be contrary to the London Plan (Para. 4.51) and brought into question the soundness of the emerging development plan documents.</p> <p>Safestore supports the Inspectors conclusion in the Draft Matters and Issues for Examination document that “capped rents is not a helpful term” and subsequently acknowledges the proposed modification SAMod2 which replaces any reference to “capped rents” in the plan with, “affordable rent may be sought having regard to the viability of the scheme as a whole”. However, we request one point of clarification on the amendment as it is our understanding that the modification proposed for “capped rents” also applies to “capped commercial rents”. This was confirmed to be the case by telephone call to the LB Haringey Planning Policy team on 13th January 2017 but it would be helpful if this is confirmed in writing.</p> <p>In light of the proposed modification we understand that the fifth bullet point of the Site Requirements of Policy SA20: Wood Green Cultural Quarter (East) (p.57 of the Site Allocations DPD) will now read: <input type="checkbox"/> Capped rent Affordable rent may be sought having regard to the viability of the scheme as a whole in line with Policy DM38”.</p> <p>We trust that the above is of assistance in the preparation of the Haringey Local Plan.</p>	Support for modification noted. It is confirmed that the modification proposed for “capped rents” also applies to “capped commercial rents”.
Res47	C9	SAMod2	All	We support the removal of “capped rents” and the	Support noted

				introduction of consideration of the viability of the scheme in the consideration.	No change
Res47	C10	SAMod5	All	We support the proposed replacement of the term “subsidise/cross subsidise” with “viability” considerations.	Support noted No change
Res65	C11	SAMod21	SA4	This refers to a licensed waste facility operated by Redcorn Car Breakers. The throughput to which the modification refers (increasing from 36,486 to 60,000 tonnes) relates to this site and not to the adjacent Brantwood Autos Site which is not owned or leased by Redcorn and so cannot overcome Redcorn’s tonnage from 44 White Hart Lane. Considers the two sites have become confused (includes map in rep).	It is the Council’s understanding that these sites, and therein, the waste management use/functions, were merged by way of planning permissions HGY/2005/0918 and HGY/2008/1344. HGY/2005/0918 was made by Brantwood Auto Breakers and sought demolition of part of the factory premises on the northern portion of the site fronting Willoughby Lane (indicated as Phase 1) and the merger of this site and activities with that of the adjoining car breakers on Brantwood Road (indicated as Phase 2). The proposed use of both sites is as an Auto Breakers. This is shown in the attached drawing 15335. HGY/2008/1344 was also made by Brantwood Auto Breakers. This application refers to the 2005 permission and clearly states that HYG/2005/0918 has been fully implemented and has

					<p>spread the activities associated with the car breakers use across the larger site. HGY/2008/1344 related to the warehouse building located on the corner plot of Willoughby Lane and Brantwood Road, as sought demolition of this (indicated as Phase 3) to provide a new canopy building to create a working area for the dismantling of vehicles/de-pollution facilities associated with uses across the remainder of the site, and new customer parking serving the entire operation (Phases 1, 2 & 3). This is shown on the attached drawing 175177 which also provides an inset drawing showing the three phases with Phase 1 shown as complete.</p>
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Based on the above, the Council is content that the waste management use applies to the entire area, and the entire area is correctly identified for safeguarding in the Site Allocations DPD.

Reference in the SoCG to the Brantwood site refers to the entire area as functionally merged by the above

					applications. No change
Res66	C12	SAMod21	SA4	THFC note that the modifications to Policy SA4 (Safeguarded Waste Sites) align with the Statement of Common Ground (SoCG) between THFC and LB Haringey and support the proposed modifications to the policy. The associated amendments as set out in the SoCG have also been made to Site Allocation NT5 (High Road West) and para. 5.92 of the Tottenham Area Action Plan.	Noted. No change
Res47	C13	SAMod22	para 2.6	SAMod22 (Paragraph 2.6) – We support the proposed clarification of the emerging Wood Green Area Action Plan (AAP) which will revisit and reassess the site allocations and supersede the existing allocations once the AAP is formally adopted in 2018. It is considered that the allocations in the meantime are necessary to ensure that sites which have not yet come forward will not be undermined by redevelopment of sites coming forward in the early phase.	Support noted No change
Res40	C14	SAMod29	SA11	SAMod29 of SA 11: I object to this modification which does not sufficiently protect the residents of those buildings.	Council would disagree – the proposed modification retains criteria to ensure residential amenity is adequately considered. No change
Res40	C15	SAMod33	SA15 2.42	SAMod33: SA 15 para. 2.42: Please define “landmark building”. Some of the most inappropriate/ugly buildings have, in the past, been referred to as “landmark	The Council would propose to add to the Glossary – ‘Landmark Building: A building which serves as a marker of a particular location and/ or a prominent feature in the urban landscape.’
Res47	C16	SAMod36 and	SA18	SAMod36 and 41 (5th site requirement and 9th bullet point under Site Requirement) – We support the proposed	Support noted

		SAMod41		amendments on the basis that the requirement to maximise quantum of employment floorspace is subject to viability, which is assessed looking at the mix of uses, the provision of affordable rents and the scheme as a whole. This would provide the necessary clarity to the applicant in demonstrating “maximum employment floorspace” feasible.	No change
Res47	C17	SAMod38	Paragraph 2.49	SAMod38 (Paragraph 2.49) – we object to the first amendments under SAMod38. We support the removal of the term “ancillary” residential use. However, residential use should not be expressed as “enabling” use on the basis that it is located within the mixed use regeneration area, and it is not clear why it has to be expressed as “enabling”.	The word ‘Enabling’ is necessary as the Council is seeking the maximum feasible amount of employment floorspace. The residential component of any scheme would be ‘enabling’ the employment floorspace, given the vast differential in values for the different types of use. No change
Res47	C18	SAMod42	SA18	SAMod42 (8th bullet point under Site Requirement) – We object to this amendment., as it requires that development on SA18 should have regard to the adjoining site allocations (SA19 and SA20) while both SA19 and SA20 Allocations do not have the same requirement to have regard to SA18. Therefore, it is unreasonable and ineffective to seek SA18 only to have regard to the adjoining allocations. We consider that all three sites should ensure that each development site will not compromise the deliverability and viability of the adjoining site and this should be reflected in SA19 and SA20 also.	The Council would support a modification to include this requirement within the other two allocations (SA19 and SA20) for consistency and clarity
Res47	C19	SAMod43	SA18	SAMod43 (Development Guideline on the connection of the pedestrian and cycle route) – We object to the modification on the basis that the exact alignment of a new pedestrian/cycle route is unknown and no work is undertaken to assess whether it is appropriate in highway	The Council would support this proposed modification.

				<p>design terms or safe to create a junction at Mayes Road and Western Road. Therefore, we consider that this is amended as follows:</p> <p>“The connection of this route at Mayes Road, Western Road or the confluence of Mayes Road and Western Road should be carefully managed to ensure that an optimal and safe new connection to the existing road network, which is acceptable in highway terms is created.”</p>	
Res61	C20	SAMod44	SA19 Site Req ^t 4	<p>This modification seeks to replace Requirement 4 with: <i>“The development should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability which must be assessed looking at the mix of uses and the scheme as a whole.”</i></p> <p>It is noted that this wording is common to a number of site allocations (see SAMod46, SAMod51 SAMod62), however that slightly amended wording is proposed for Site Allocation SA18 which includes reference to ‘provision of affordable commercial rents’, it is unclear why such a distinction would be made for this site?</p> <p>The MM should also be read in the context of MM SAMod3 which identifies that any redevelopment which results in a loss of employment floorspace may result in a requirement for a financial contribution.</p> <p>The wording of the MMs when taken together is to achieve no net loss and the maximum quantum of employment floorspace. This is overly restrictive in that it makes the quantum of employment floorspace the ‘marker’ of an acceptable scheme in policy terms. It places a burden on the allocation that could impede sustainable development and the creation of a scheme that not only responds to the needs of the local market but also the wider policy objective of creating mixed and balanced communities.</p>	<p>Reference to capped rents has been removed and replaced in SAMod2 to read ‘affordable rent may be sought having regard to the viability of the scheme as a whole’. SAMod44 is consistent with that of other RA Site Allocations.</p> <p>The issue regarding compensatory payment for lost employment floorspace is mute as it is simply a cross reference to an existing policy.</p> <p>No change.</p>
Res47	C21	SAMod48	SA21	<p>SAMod48 (Site requirement 4) – we do not have objection to the proposed modifications.</p>	Noted

					No change
Res58	C22	SAMod48	SA21 Site Req ^t 4	Agree	No change required.
Res47	C23	SAMod49	SA22	SAMod49 – The proposed modifications state that the site could support increased scale and densities beyond that already provided, subject to achieving an acceptable overall land use mix. As this site adjoins other development allocations within the Regeneration Area, including SA21, any increase in scale and density would have an impact on the surrounding sites. It is therefore important to ensure that any new planning application should also be required to demonstrate that proposals would not compromise the deliverability of development of the adjoining sites. This should be incorporated in SA22.	The Council would support a modification to include this requirement within SA22 for consistency and clarity.
Res56	C24	SAMod49	SA22	The modification does not include the updated SoCG, namely Downhills Park should read Downhills Park <u>Road</u> , as previously agreed.	Noted. The Council agree to make this correction with the Inspector’s approval.
Res45	C25	SAMod58	Haringey Warehouse District Introduction	The modification states, ‘ <i>Due to the inherent uncertainty regarding the existing nonconventional housing on these sites, it is not possible to assign an indicative capacity for each site in this area. For monitoring purposes, the indicative capacity for the area is considered to be 386 net additional residential units, and approx. 13,300m² of gross new commercial floorspace.</i> ’ Provwewell welcome the omission of indicative capacities for each site given the different levels of lawful uses on each site and site circumstances.	Support noted. No change
Res45	C26	SAMod60	SA 30,32 & 34	The modification proposes amendment of ‘site requirement’ for SA30, SA32 and SA34 to read as follows: <i>A site-wide management plan masterplan will be required as part of any planning application in accordance with Policy DM39 and having regard to site circumstances.</i> Provwewell welcome the addition here for each site	Support noted

				masterplan to come forward in accordance with Policy DM39 and also having regard to site circumstances, given the significant variations in site circumstances.	
Res45	C27	SAMod60	SA 30,32 & 34	<p>ProveWell however also suggests a modification to reflect opportunities where smaller stand alone applications may come forward on these sites, e.g. improvements or extensions to existing units or temporary buildings, where it would be onerous for these to include a site wide masterplan as agreed at the EiP. It is suggested the following wording is added:</p> <p>A site-wide management plan masterplan will be required as part of any major planning application in accordance with Policy DM39 and having regard to site circumstances. In the case of small applications for improvements or extensions to existing buildings or temporary structures the application will not be required to complete a full masterplan, but will be required to demonstrate it does not compromise the wider sites from coming forward for redevelopment and these applications will be determined against the other requirements of Policy DM39.</p>	<p>The Council has agreed to include this within Policy DM39 and it is therefore not considered necessary to replicate this within each of the Warehouse Living site allocations.</p> <p>No change</p>
Res45	C28	SAMod61	SA30 and 2.88	<p>The modification proposes to amend site allocation SA30 at paragraph 2.88 as follows:</p> <p><i>‘Potential development to increase accessibility, providing increased employment mixed use floorspace and provide including warehouse living accommodation.’</i></p> <p>ProveWell support the changes to the policy wording here. ProveWell however consider this modification should also be made for site SA34 Eade Road and Overbury Road, for consistency given it has the same allocation and same wording for the ‘proposed site allocation’.</p>	The Council would accept this modification applying to SA34 for consistency.
Res45	C29	SAMod62 and SAMod67	SA30 & 34	<p>This modification has changed the wording of site requirement 2 (Site SA30) and site requirement 8 (site SA34) to <i>‘The development should demonstrate that the maximum quantum of employment floorspace has been provided</i></p>	The Council considers the current wording as adequate – this ensures considerations take into account all current uses,

				<p><i>subject to viability which must be assessed looking at the mix of uses and the scheme as a whole</i>’.</p> <p>ProveWell welcome this proposed wording however recommend additional wording is added to reflect consideration of the lawful existing uses on the site. The following wording is suggested: ‘The development should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability which must be assessed looking at the <u>existing lawful uses</u>, mix of uses and the scheme as a whole’</p>	<p>lawful or otherwise.</p> <p>No change</p>
Res48	C30	SAMod63	SA31	<p>As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p> <p>The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and that Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic. Paragraph 158 of the NPPF requires the use of a proportionate evidence base which provides adequate, up-to-date and relevant evidence about the economic, social, and environmental characteristics and prospects of the area. Paragraph 173 requires careful consideration of viability and costs. Plans should be deliverable and the scale of development identified in the plan should not be subject to such obligations and policy burdens that their ability to be developed viably is threatened.</p> <p>We support the re-designation of the site from a LSIS to a Regeneration Area, in order to allow a more flexible range of uses on the site as identified under Draft Policy SP8 of the Pre-Submission Version of the Alterations to Strategic</p>	<p>Support noted.</p> <p>No change</p>

				<p>Policies Local Plan DPD (January 2016). This is a brownfield site within close proximity to Harringay Town Centre and Harringay Green Lanes Station, and best use should be made of it in line with key national policy directions. The site is bound by residential dwellings along both its eastern and western boundaries. We also note that prior approval for the change of use of the former Omega Works site, located to the south of Crusader Industrial Estate along Hermitage Road, from storage (Class B8) to residential (Class C3) was granted in December 2016 (Ref. HGY/2016/3604). This further changes the character of the surrounding area, comprising predominantly residential use.</p>	
Res48	C31	SAMod63	SA31	<p>With regards to the Schedule of Modifications to the Alterations to Strategic Policies DPD (November 2016) we support the proposed housing trajectory tables set out in Appendix 2 which identifies the Crusader Industrial Estate site as a 'deliverable housing site', expected to come forward within the first five years of the Plan (2016/17 – 2020/21). We consider this timescale for delivery to be wholly realistic and in the spirit of being positively prepared, as sought by the NPPF. However, we consider the proposed capacity of the site for only 64 residential dwellings to comprise a missed opportunity to optimise its development potential and to <i>"boost significantly the supply of housing"</i> as sought by national planning policy.</p> <p>The allocation of the site should promote flexibility and should seek to optimise its development potential. A designed approach should be encouraged, which should then inform the overall density of housing schemes coming forward. Initial feasibility assessments indicate that up to 275 dwellings could be delivered at the site, and the proposed housing trajectory for the site should be amended to reflect this. The policy as drafted is therefore inconsistent with national policy and in order to be effective, should be amended to encourage a higher density of residential</p>	<p>The capacities within the plan are indicative, and so the Plan is considered sufficiently flexible. The Council would object to a higher target being imposed on this site, given it is expected to deliver a component of employment floorspace, of which this should be the leading land use unless determined unfeasible. Therefore, having the current indicative housing figure is appropriate based upon expected site outputs. This housing output contributes to meeting the Borough's overall housing target, and whilst it may be the case that targets and need may be revised upwards, as it stands the Plan is able to demonstrate sufficient sites to meet and exceed the Borough's London</p>

			<p>accommodation to come forward at the site.</p> <p>The Schedule of Modifications to the Alterations to Strategic Policies DPD (November 2016) sets out an out an annual target for 1,502 dwellings per annum from 2015-2026. Whilst this accords with the annual average housing supply monitoring target set out in Table 3.1 of the London Plan, we consider that an increased target is required in order to meet the needs of the borough and London as a whole.</p> <p>There is a consensus that London’s adopted housing target of 42,000 new homes a year is too low. The London SHMA, published in 2013, states that London needs between 49,000 and 62,000 new homes a year to address the backlog of housing shortfall over a period of 10 or 20 years. Other assessments estimate an even higher need: employment-driven forecasts made pre-referendum by Oxford Economics indicate an annual housing need of 64,000 a year over the next five years with no allowance for meeting the backlog; and to clear the backlog since 2011 in five years, the TCPA puts London’s housing need at 87,000 a year. We therefore estimate that London should be delivering more than 60,000 new homes a year if we are to meet need and address imbalances in the housing market that have resulted from the ongoing undersupply of homes. We strongly feel that London Borough of Haringey has a responsibility to assist in overcoming the chronic housing shortage facing London as a whole.</p> <p>It is therefore considered that there is significant scope for the annual target to be pushed in the spirit of significantly boosting housing supply and feel that more innovative solutions could be used to assist in meeting specific needs. The emerging policy documents acknowledge that the Crusader Industrial Estate site is appropriate for alternative uses (including residential) and could become available for redevelopment within the next five years. Both the Council’s overall housing target and the Crusader Industrial Estate’s</p>	<p>Plan target, and so there is no justification for this site to deliver above the current output, given the other constraints and land use objectives the Plan and site seeks to achieve.</p> <p>It should also be noted that it was agreed through the Hearing on Warehouse Living that the indicative site capacities would be removed from the individual site allocations and would be combined in the Housing Trajectory for the purposes of strategic monitoring.</p> <p>No change.</p>
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				capacity should therefore be corrected upwards in line with the above.	
Res48	C32	SAMod63	SA31 & Table 17	<p>The Schedule of Modifications to the Alterations to Strategic Policies DPD (November 2016) also includes employment trajectory tables. The Crusader Industrial Estate is identified as having an estimated capacity of 2,218 sq m, although the Schedule of Modifications includes wording to state these figures are indicative and are based on gross floorspace. The actual amount of employment floorspace to be delivered will depend on the floorspace to be retained and reconfigured, the achievement of the maximum employment floorspace on existing employment sites having regard to the proposed overall mix, site layout and constraints, and viability. We note that modifications are also proposed to Draft Policy SP8, including the forecast demand for employment floorspace which is considered to be 23,800 sq m of Class B floorspace up to 2026. This forecast demand is to be met through:</p> <ul style="list-style-type: none"> the reconfiguration and re-use of surplus employment designated land in B2 and B8 Use Classes; the intensification of the use of existing employment sites (where possible); the provision of B1a/b floorspace as part of mixed-use development on suitable sites, including town centre sites; and the protection of existing viable B Class Uses on designated and non-designated sites. <p>Whilst it is appreciated that there is a requirement to explore the feasibility and viability of re-providing some employment generating uses as part of any redevelopment proposals for the site, the Mayor acknowledges in his draft 'A City for all Londoners' document that whilst there is a need to promote economic growth, the economy is changing and land must be used intelligently, particularly in the context of a housing</p>	<p>The Council would disagree. As noted the employment floorspace figures are indicative, and subject to feasibility, and so the Council considers the allocation sound on this basis. The Plan as a whole seeks a managed release of certain employment land to help meet the Mayor's objectives, and this site has been identified as being appropriate for continued employment use to meet the Borough's employment projections by way of in part, enabling development. There is no evidence to suggest this site is not viable or suitable for a proportion of employment use, and therefore the Plan is not seeking to protect it long-term when there is no realistic chance of it being brought forward. It is important therefore for this site and others to be retained as employment-led sites to meet the Plan's employment growth projections. Given the site is outside a town centre, the Council would consider it inappropriate to promote A Class uses here and D class uses, which would be</p>

			<p>crisis.</p> <p>The Mayor advises that in some areas, industrial land may be surplus to current needs and could be better used for housing. It may be possible to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial land. The Crusader Industrial Estate should be acknowledged within emerging policy as having the potential to provide a range of other compatible uses alongside residential. Class A and Class D uses also have the potential to provide employment opportunities so should be encouraged where appropriate.</p> <p>The Schedule of Modifications to the Development Management Policies DPD (November 2016) seeks to amend Part A of Draft Policy DM38 to state “The Council will support proposals for mixed-use, <i>employment-led</i> development within a Regeneration Area”. The proposed modifications also seeks to ensure applicants will be required to submit a viability assessment that clearly demonstrates that the proposed mixed-use scheme maximises the development of employment uses.</p> <p>To ensure maximum flexibility for the development of this key site and in order to provide much-needed housing, we do not support the emphasis on employment-led redevelopment for the site. The amount of employment floorspace to be provided as part of redevelopment proposals will be different on each of the allocated sites and will be based on appropriate viability and marketing evidence. Allowance for this and greater flexibility in terms of a mix of uses should therefore be incorporated into the policy. This would not inhibit the ability of the site to re-provide employment generating uses where there is market demand, but would optimise its potential for being brought forward for housing, which is considered to be of key importance given the Council’s considerable requirement for new housing.</p>	<p>more suitable to a town centre location.</p> <p>No change</p>
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Res40	C33	SAMod68	SA36	<p>SAMod68: SA 36: This needs to be further amended by deleting “This site may be suitable for a tall building if designed in accordance with Policy DM 6”. The area of Finsbury Park is most definitely not suitable for any tall building, as any such building would clash with the traditional housing of the area and the open space of this lovely park, and would merely provide another eye-sore, of which there are already far too many in Haringey due to the council’s poor planning control. (I can give you examples on request.)</p>	<p>The Council’s evidence base study- Tall Buildings Validation Study (2015) identifies this site as potentially appropriate. Therefore, in tandem with other policies within the Plan, notably DM6, the Council believes that a suitably designed tall building could be appropriate on this site.</p> <p>No change</p>
Res46	C34	SAMod68	SA36	<p>I attended the hearing at the Wood Green Civic Centre held in September 2016 on the Haringey Local Plan Site Allocations, and was given permission to make my objections to the site allocation proposals for site SA36, (currently the ‘Rowan’s site’) which stated that ‘tall buildings would be permitted on either side of the new entrance to Finsbury Park’. This has been amended to: ‘this site may be suitable for a tall building if designed in accordance with Policy DM6’.</p>	<p>The Council’s evidence base study- Tall Buildings Validation Study (2015) identifies this site as potentially appropriate. Therefore, in tandem with other policies within the Plan, notably DM6, the Council believes that a suitably designed tall building could be appropriate on this site</p>

			<p>I am disappointed that the in-principle support for tall buildings has not changed. Finsbury Park is a currently a low-medium rise Victorian suburb. This will change in the next few years now that the City North development, with two tall towers of 23 storeys, is going ahead. My view that it is not appropriate to take the cue from these towers to continue to build high right next to the entrance to Finsbury Park; I believe that this will have a detrimental effect on the park, especially where the mature plane trees are now, behind the Rowan's site. The sight of the tops of these trees from the station tell you where the park is much better than tall buildings.</p> <p>Sunset-watchers inside the park facing west – a popular place to relax in the summer and with currently a wide unimpeded view westwards – would be blocked and over shadowed by a tall building here.</p> <p>Rowan's is listed as a community asset. The emerging Finsbury Park neighbourhood working group are working to formulate a Neighbourhood Plan. We will be collating ideas from the community for the kinds of development they would like to see in the area; clearly Rowan's and adjacent buildings including the Twelve Pins pub, will be a major site for consideration. We should like to work closely with the Council on proposals for the site, rather than have it 'given away' before we have had a chance to engage, which is effectively what happened with the City North development next to the station on the Islington side.</p> <p>We residents of Finsbury Park care very much what our neighbourhood looks like, and what services and facilities are provided. We want a say in what happens in terms of development in the emerging Town Centre, as encouraged</p>	<p>whilst respecting and not adversely affecting upon Finsbury Park.</p> <p>No change</p>
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				<p>by the Localism Act, via the Neighbourhood Plan.</p> <p>In conclusion, I urge that any reference to tall buildings be omitted from section SAM od68, so that proposals for tall buildings are not encouraged; rather, low- to- medium proposals are submitted, as befits the location adjacent to a grade II registered park.</p>	
Res50	C35	SAMod68	SA36	<p>I wish to endorse the comments that you Received on 11 January 2017 from Ms S. Barson, in connection with SA36 (the Rowans site) and to which I wish to draw your attention.</p>	<p>Noted.</p> <p>No change</p>
Res50	C36	SAMod68	SA36	<p>I want to emphasise the existence of the nascent Finsbury Park Neighbourhood Plan. This is still in its relatively early stages but both Ms Barson and I are involved in it, as are others from <i>three</i> Boroughs.</p> <p>The <i>Localism Act</i> was enacted because Parliament believes that Neighbourhood Fora and their ensuing Neighbourhood Plans are thought generally to be a good idea. Those that have them in place already are at an advantage, whereas those whose Plans are at an earlier stage would seem to be at a disadvantage.</p> <p>It seem premature to pave the way for tall buildings ahead of a wider consideration that would, and should, involve the affected and interested residents in <i>three</i> Boroughs. It is this aspect that does not fully meet the test of Soundness.</p> <p>Before this has been considered in a wider context, a bald reference to tall buildings on the Rowans site is crude and precipitate. The continuing inclusion of reference to tall buildings is tantamount to an invitation. <i>This is premature.</i></p>	<p>Noted. The Council has not formally received an application to establish a Finsbury Park Neighbourhood Forum, which is the precursor to bringing forward a Neighbourhood Plan for the area.</p> <p>The Council supports all designated Neighbourhood Forums in preparing Plans which facilitate delivery of sustainable development and are in general conformity with the strategic policies of the development plan, in line with the Basic Conditions set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.</p> <p>The Council considers the approach to the management of tall buildings to be sound. SA36 has been prepared having</p>

					<p>regard to the “Tall Buildings Locations Validations Study” which identifies this site as an appropriate location for a tall building.</p> <p>No change</p>
Res50	C37	SAMod68	SA36	<p>The most important element in the area is the Metropolitan Open Land of Finsbury Park.</p> <p>The effect on the park of any tall building <i>immediately</i> adjacent has not been adequately considered, if at all. The Rowans site is an anomaly: around a lengthy perimeter of road and railway line, this boundary is the only part of the park that is not protected by some form of buffer, from any form of encroachment, or significant over-looking or over-bearing structure.</p>	<p>The Council considers the approach to the management of tall buildings to be sound. SA36 has been prepared having regard to the “Tall Buildings Locations Validations Study” which identifies this site as an appropriate location for a tall building. SA36 provides that all proposals will be expected to consider impacts on the park and demonstrate how they will improve the park’s overall function and appearance. Further, SA36 will be considered in conjunction with DM6 (Building heights) - as per SAMod68 - and ensure that the amenity provided by the park is protected and enhanced.</p> <p>No change</p>
Res50	C38	SAMod68 and SAMod71	SA36	<p>The park THE park represents the <i>core amenity</i> for all three boroughs and is a central consideration in any co-ordinated regeneration scheme. Any high-rise development on the Rowans site would inevitably have a detrimental impact on the amenity of the park, as it is the only part of the park’s</p>	<p>The Council considers the approach to the management of tall buildings to be sound. SA36 has been prepared having regard to the “Tall Buildings Locations Validations Study”</p>

				perimeter that is directly built up to.	<p>which identifies this site as an appropriate location for a tall building. SA36 provides that all proposals will be expected to consider impacts on the park and demonstrate how they will improve the park's overall function and appearance. Further, SA36 will be considered in conjunction with DM6 (Building heights) - as per SAMod68 - and ensure that the amenity provided by the park is protected and enhanced.</p> <p>No change</p>
Res40	C39	SAMod73	SA37	SAMod73: SA 37: further modification: insert: "and height" after "The design".	The Council would support this addition given the constraints within and around this site, and the potential impact upon MOL.
Res51	C40	SAMod77	SA39	Thank you for your email dated 18 November. The modifications proposed to Site Allocations contain various errors as described below and in general do not offer adequate protection to the Highgate Conservation Area. I expect the Council to make some simple Plan modifications to meet the reasonable concerns previously outlined (C/F Representor 22).	Noted.
Res51	C41	SAMod77	SA39	The Plan still does not clearly label Coleridge Gardens - the public green space on Archway Road. This park comprises a major component of site SA39 (called Gonnerman and Goldsmiths Court). The new Development Guideline being proposed regarding Coleridge Gardens (SAMod77) is therefore as a consequence <i>wrongly recoded as referring to</i>	The Council confirms that modification SAMod77, an additional development guideline, is intended for Policy SA39 (Gonnerman Antiques Site and Goldsmith's Court) and not

				<p><i>SA40.</i> Because the subject of the modification – Coleridge Gardens - forms part of SA 39 any new development Guideline with regard to it belongs in the text to SA39 - and not SA40 where it's import (if any) would be lost.</p>	<p>Policy SA40 as currently set out in the Main Modifications Schedule.</p> <p>The Council suggests that a minor modification is made to clarify that SAMod77 refers to Policy SA39.</p> <p>Notwithstanding the above, the Council does not consider it necessary to indentify Coleridge Gardens on the corresponding site map. All proposals will be expected to give consideration to retaining or re-providing the Gardens, consistent with the policy.</p>
Res51	C42	SAMod77	SA39	<p>It's clear that the soundness of the Plan has been reduced by the inconsistency of approach adopted in proposed modifications to the Site Allocations Document.</p> <p>For example, the Council has proposed amendments to protect green space elsewhere in the borough, eg in Lynton Road N8 (SA Mod 93) which, according to the new proposed text "is in the Council's ownership and provides local amenity" and therefore according to the modification proposed "must be retained".</p> <p>This stance is in stark contrast to the approach being adopted over, eg, Coleridge Gardens – equally valued green space in the Council's ownership which also provides local amenity within the Highgate Conservation Area <i>and is therefore also in need of equally clear and unambiguous protection.</i></p>	<p>The Council considers that a flexible approach to open space provision at this site is necessary to deliver the strategic objectives for the Highgate area and the Borough's spatial strategy. Coleridge Gardens is not designated open space however the modification provides that all proposals give due consideration to its amenity value, recognising the broader strategic aim within this area is to facilitate improvements to the Parkland Walk.</p>

				<p>The best that the Council presently offers this local green space (see SA Mod77) is simply not good enough:</p> <p><i>“The requirement to retain or reprovide Coleridge Gardens should be considered against the value of providing improved access between open space(s) elsewhere”</i></p> <p>This statement provides continued scope to dispose of Coleridge Gardens for redevelopment - justified by provision of improved “access “(somewhere else and to something else) as a “quid pro quo”.</p> <p>However, the proposed modification’s wording sets up a false dichotomy – the idea that a choice needs to be made, between the garden’s retention and the (erroneous) notion that it could just as easily and meaningfully be “reprovided” somewhere else. The idea that “access” between (two) other pre-existing open space/s would compensate for (and therefore needs to be “considered against”) the loss of this separate, valued, public amenity space is equally false.</p> <p>The present plan’s stance on such existing amenity green space is discriminatory; the Council is not treating the residents of different locations within the Borough in an equal, consistent or even-handed manner. Just like the Lynton Road space, Coleridge Gardens is in the Council’s ownership and <i>also</i> provides an important local amenity. Likewise, it must be retained and protected from development by the Council. Equal treatment in needed.</p>	No change
Res52	C43	SAMod78	SA41	The proposed modification SaMod78 (Policy SA41) is welcomed by the Highgate School as the revised boundaries are now fully inclusive of the School’s Estate.	Noted. No change
Res52	C44	SAMod79	SA41	The proposed inclusion of an additional ‘Site Requirement’ (SaMod79, Policy SA41) is understood in light of the	Part of the site falls within a designated Archaeological

				<p>comments from Historic England, however the School would appreciate further clarification from Historic England as to the location of the archaeological remains (medieval settlement) so that they can fully understand the extent of the remains and thus can incorporate the protection of these should any development proposals come forward.</p> <p>Whilst we appreciate that these are not substantive comments and suggestions, we would welcome these amendments being included within the final version of the plans for Haringey.</p>	<p>Priority Area on Haringey's Policies Map. The Council would therefore require that any future development proposal is accompanied by an assessment of archaeological assets, in line with Policy DM9, with Historic England/Greater London Archaeological Advisory Service consulted early in the planning application process. However, it should also be noted that GLAAs are currently reviewing the archaeological priority areas but the School will be informed if this further affects the school estate.</p> <p>No change</p>
Res54	C45	SAMod80 – SAMod85	SA42	<p>Please find set out below comments on SA 42 in the Site Allocations Document forming part of the Local Plan documents on which you are consulting prior to adoption by the Council. These comments are made by the Highgate Bowl Action Group which comprises:</p> <ul style="list-style-type: none"> -The Highgate Society -Highgate Neighbourhood Forum -Highgate Conservation Area Advisory Committee -Friends of Highgate Bowl -The Harington Scheme <p>Firstly, we set out below for the avoidance of misunderstanding, having looked at the recommendations made by the Examiner following the Examination in Public, what we believe is the currently proposed policy (the items in</p>	<p>Noted.</p>

			<p>italics are the clauses where changes have been recommended. The numbering of the clauses is for ease of reference) :</p> <p>SA 42 HIGHGATE BOWL : EXAMINER'S AMENDMENTS</p> <p><u>Examiner's comments amalgamated into Pre-Examination Version</u></p> <p>Amend the site allocations map for Site Allocation SA42: Highgate Bowl to show the potential open space boundary within the site as set out in the Preferred Option consultation document.</p> <p>Proposed Site Allocation</p> <p>2.120 Protection of the Highgate Bowl as open space, and improvement of public access to it through limited redevelopment of Townsend and Duke's Head yards.</p> <p>Commentary</p> <p>2.121 The site falls within the Highgate Conservation Area. The site abuts the rear of several listed and locally listed buildings along Highgate High Street. The significance of the Bowl lies within its topography and the open character. The undeveloped nature of the Bowl, together with its appreciable gradient and extensive tree cover provides a soft setting for the Highgate High Street, allowing it to stand out as a distinctive feature in the townscape. This arrangement also separates the older village core, with burgage plot layouts, from the later suburban development to the north, thereby emphasising its evolution as a historic settlement. The community association of the site and the Bowl's role in</p>	
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			<p>the organic development of Highgate is the essence of its heritage significance that makes a positive contribution to the conservation area as a whole</p> <p>2.122 This policy will establish the Highgate Bowl as a local open space, and the heart of the Highgate Bowl section of Highgate Conservation Area. Limited redevelopment within the area between the proposed open space, and the existing High St buildings will be permitted where it is possible to create complementary uses to the bowl, and improve access to and through the Bowl.</p> <p>Site Requirements</p> <ul style="list-style-type: none">• <i>Development should show how the land included meets this policy and does not compromise co-ordinated development on the other land parcels within the Allocation. (1)</i>• <i>The buildings facing the High Street, and their burgage plots should be retained. (2)</i>• <i>Development offers the opportunity to secure the area identified by the green line on the site allocation and Policies Map as open space. Map of open space in the context of the allocation included as Figure 1 below.(3)</i>• <i>Limited redevelopment of the garages and workshops in the two yard areas will be allowed to create mews-style residential development. This should not involve the loss of employment floorspace on the site.(4)</i>• <i>Enhanced access to the Bowl will be supported through Townsend Yard and through the arch of Duke's Head Yard (5)</i>• <i>Public routes through the various land parcels that make up the Bowl could be introduced to unify the open space, subject to the operational requirements of existing</i>	
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				<p><i>landowners and/or occupiers (6)</i></p> <ul style="list-style-type: none"> • The site lies within the Highgate Conservation Area and development should preserve or enhance its appearance as per the statutory requirements. (7) <ul style="list-style-type: none"> • The existing educational/horticulture use on the eastern portion of the site will be retained. (8) <p>Development Guidelines</p> <ul style="list-style-type: none"> • Where new development takes place, heights should be subsidiary to those on the High Street. (1) • Development should not impact on the residential and neighbourhood amenity of the adjacent blocks. (2) • <i>Due to the site's backland location, development should reflect a mews-typology (3)</i> • Some development may be possible within the 'yards' but these should be in a mews style development, perpendicular to the High Street. (4) • The entrances to the yard roads should signal the open space hidden behind, with a visual link established where feasible. (5) • <i>The provision of public access to the area to be designated as open space would be supported. (6)</i> • Part of the site has a Local SINC designation, and this should be protected. (7) • The open character of the Bowl is essential to the character of the conservation area and should be retained. (8) • New development should be of the highest quality and enhance the character and appearance of the conservation area and the Bowl and outweigh any harm that may be caused by any demolition and redevelopment along with demonstrable public benefits. (9) 	
Res54	C46	SAMod80 –	SA42	We understand that the intention of the Examiner and of this	Noted. The Council considers

		SAMod85		<p>policy is that no development will be allowed within the green line shown on the plan.</p> <p>For the avoidance of misunderstanding we attach the plan which we understand is to be included in the final version of the Site Allocations document. HBAG is happy with the position of the green line shown on this plan given the specific protection given to continuing educational/horticultural use of the whole of the Harington Scheme site.</p> <p>We also understand therefore that any development in the area defined as Highgate Bowl will be confined to the yards, namely, Townsend Yard, Broadbent Yard and Duke's Head Yard.</p> <p>Other than Whistler's Cottage and a greenhouse associated with the garden centre no development has ever occurred on the area within the green line and, whilst not being 'public open space', it has always been open space and that it is and has always been recognised as having a special character.</p> <p>With the above points in mind, we wish to submit the following comments on and changes for the policy for SA 42 for the Examiner's consideration:</p>	<p>that the modifications clarify the position with respect to the current status of the bowl land as previously developed land, and the Council's intention to secure the area identified on the site allocation as designated open space upon acceptable development coming forward on the individual land parcels to secure this. Where existing development extends into the area identified for potential open space designation, the Council will need to consider the individual site circumstances and determine whether an acceptable outcome can be reached, noting that previous appeals regarding the Conservation Area status applying to the Bowl and the importance of the openness of land within the Bowl to the heritage setting.</p>
Res53	C47	SAMod80	SA42	<p>RE: HARINGEY LOCAL PLAN MAIN MODIFICATIONS PUBLIC CONSULTATION OUR CLIENT: Omved International Ltd ("the Objector").</p> <p>1. The Objector owns the land at Southwood Nursery as delineated on PLAN 1 attached to this submission. The Objector was represented at the Examination in Public ("EiP") in August 2016 and made representations with regards to SA42- Highgate Bowl and Development</p>	Noted.

				<p>Management Policy DM20.</p> <p>2. The Council has now published its proposed modifications to the Local Plan. This representation relates to modifications that directly affect the Objector's property interests in the Plan area.</p> <p>3. The relevant documents are: a. The Site Allocations DPD; and b. The Development Management DPD.</p>	
Res53	C48	SAMod80	SA42	<p>Site Allocations DPD: SA42 - Highgate Bowl: Proposed Modification SAMod80</p> <p><i>“Amend the site allocations map for Site Allocation SA42: Highgate Bowl to show the potential open space boundary within the site as set out in the Preferred Option consultation document.”</i></p> <p>(Note: Map included with submission)</p> <p>4. The site allocation map identifies the Southwood Nursery portion of the allocation as open space to include the existing employment site where Capital Gardens landscape and maintenance business continues to operate from the various sheds in the landscape contractor's yard. This has been in operation for 25 years. It is securely fenced with no public access. It employs around 10 full time employees and some sub-contractors.</p> <p>5. It also includes Whistler's Cottage, where the Council has certified that there is a lawful residential use. We confirm this has been implemented.</p>	Noted.
Res53	C49	SAMod80	SA42	<p>6. The allocation is not justified on the Objector's portion of the allocation as the proposed designation conflicts with the existing private land use rights of the Objector. It is not an appropriate designation for this portion nor effective as open</p>	The Council considers that the modifications clarify the position with respect to the current status of the bowl land as

				<p>space as it is not deliverable. The Council has no resolution supporting compulsory acquisition of the land.</p> <p>7. The Local Plan's recognition that there is no need for further open space and the Council's severe budgetary constraints, make this a most implausible prospect.</p> <p>8. There is an extant commercial and residential user on the site and the land is in private ownership. There is no possibility that open space on this portion will be delivered voluntarily and so the continued proposed designation for such a use is irrational, illogical and commercially harmful because it would place the present employment use in jeopardy. This issue was brought to the attention of the Council at the EiP.</p> <p>9. The proposed designation cannot, on any objective reading of the NPPF, be sustained and will not pass the soundness test. The Council cannot close its mind to this material consideration brought to its attention repeatedly.</p>	<p>previously developed land, and the Council's intention to secure the area identified on the site allocation as designated open space upon acceptable development coming forward on the individual land parcels to secure this. The purpose for securing the identified area in designated open space is to preserve and protect the historic character of the bowl and its setting. The open space designation will be secured via a planning obligation upon grant of planning permission for development of the individual parcels. The securing of the open space is likely to be in phases and over a long-term.</p> <p>No change</p>
Res53	C50	SAMod80	SA42	<p>10. A further fundamental error infects the allocation in addition to failing the NPPF soundness test - SA 42 and the proposed modification SAMod80 is contrary to the Council's own policy DM40.</p> <p>11. Policy DM40 does not permit loss of existing employment-generating land. This is inconsistent with an open space allocation. It would be Wednesbury unreasonable for the Council to fail to give determining weight to its own policy in defining the boundary of this open space allocation, particularly as it has identified there is no local need for additional open space.</p>	<p>Disagree. Through the plan process, the Council has designated sufficient employment land to meet identified need over the plan period. The site in question is not designated employment land. Whilst the Local Plan broadly seeks to safeguard existing non-designated employment land for employment generating uses, Policy DM40 provides scope for</p>

				<p>12. This conclusion is reinforced by the fact SAMod80 disregards the Inspector's advice at the EiP that stressed the importance of the Development Management policies informing the site allocations to ensure positive preparation and consistency in plan making.</p> <p>13. This conflict adds to the unsoundness of continuing to propose the allocation of the objector's land as part of the open space. It will place the landscape contractor's business in jeopardy, resulting in the loss of employment-generating land and jobs.</p>	<p>the release of this land to other uses where appropriate. The Council does not consider that SA42 is at odds with other Local Plan policies.</p> <p>The allocation does not impose an open space designation on the site; rather it identifies an opportunity to secure provision of open space through future redevelopment within the site area, consistent with other Local Plan policies, including those regarding heritage conservation.</p> <p>No change</p>
Res67	C51	SAMod80	SA42	<p>The Council's summary table of the main modifications is incorrect in reporting under "reason for change" in relation to modification referenced SAMod80 - whereby it has been indicated that NHSPS have requested the open space boundary in relation to the SLOL designation be reflected as indicated in the Preferred Options DPD. To be absolutely clear, NHSPS sought to only identify the fringe development sites on then edge of the Bowl area to include the NHS site (as shown on the Preferred Options Proposals Map) but continue to strongly object to the principle of the SLOL designation and it's identified boundaries, and more specifically in relation to promoting the exclusion of part of the NHS site known as the "walled garden" area within the south eastern part (as hatched on site plan 1 at Appendix 1). The details of these earlier representations which are now reinstated below are set out later within this letter and which continues to remain an outstanding objection.</p>	<p>The Council accepts this is an error and notes the NHSPS's position in respect of identifying the potential open space boundary on the accompanying map for the site allocation.</p>

Res53	C52	SAMod81	SA42	<p>Site Allocations DPD: SA42 - Highgate Bowl: Proposed Modification SAMod81 Amend the third site requirement as follows: <i>“Development offers the opportunity to secure the area identified by the green line on the site allocation and Policies Map as open space Highgate Bowl itself will be redefined as Significant Local Open Land.”</i></p> <p>14. Whilst we fundamentally disagree with the green line for the reasons outlined above, we strongly support the decision to remove the proposed Significant Local Open Land (“SLOL”) designation from the Highgate Bowl allocation as a whole because it is inconsistent with the previous UDP Inspector’s conclusion about the land’s function, who concluded it would be adequately safeguarded as a result of inclusion in the Conservation Area.</p>	<p>Noted.</p> <p>No change</p>
Res54	C53	SAMod81	SA42	<p>Third Site Requirement: <i>Development offers the opportunity to secure the area identified by the green line on the site allocation and Policies Map as open space.</i></p> <p>It is not clear precisely what land the reference to development offering an opportunity refers to. We assume that a distinction is being drawn within the SA42 allocation between the open space element within SA42, i.e. inside the green line and the rest of the SA42 allocation. It would be sensible to make this distinction entirely clear to guard against future challenge, but also future lack of clarity if wider development is proposed. We propose the wording should be changed to:</p> <p>"Limited and sensitive development within the Yards offers the opportunity to secure the area identified by and lying within the green line on the site allocation and Policies Map as designated open space"</p>	<p>The Council would support the suggested further amendments as providing clarity to the intent of the allocation.</p>
Res54	C54	SAMod81	SA42	<p>Again, Third Site Requirement: <i>Development offers the opportunity to secure the area identified by the green line on the site allocation and Policies Map as open space.</i></p>	<p>Noted.</p>

				<p>Ownership of the parcels of land does not necessarily straddle the Yards and the designated open space. There will be few situations where the opportunity to secure open space through development would apply. If the green line delineates an area which is sacrosanct, the meaning of this Site Requirement is unclear and therefore subject to challenge. Again, we would recommend the re-wording set out in above.</p>	
Res67	C55	SAMod81	SA42	<p>NHSPS supports the modification referenced SAMod81 which now strikes-through references to the Significant Local Open Space Land (SLOL) designation for the Highgate Bowl area. However, our earlier objection in relation to the wider open space designation to include the south eastern part of the NHS site remains.</p> <p>There are continued concerns of the extent of the open space boundary and its overall purpose (in a similar vein to our earlier objections against the SLOL which is now removed).</p> <p>There is no updated evidence to support the open space designation and its extent. Further, there is no functional justification or planning reason for improving public access to this area given the abundance of public open space within the wider area; the local area has not been identified as an area of local open space deficiency and the designation has been driven by a Neighbourhood Forum and their neighbourhood plan not by the Council itself on any planning and environmental merit. The Bowl does not have a public destination and it is hard to see what the benefits would be to improve public access to the local area given the Bowl's self contained nature with no destination identified within it or key routes through it.</p> <p>Moreover, private landownership is affected by identifying land for public access with no justified reason to do so – and</p>	<p>The Council considers that the modifications clarify the position with respect to the current status of the bowl land as previously developed land, and the Council's intention to secure the area identified on the site allocation as designated open space upon acceptable development coming forward on the individual land parcels to secure this. Where existing development extends into the area identified for potential open space designation, the Council will need to consider the individual site circumstances and determine whether an acceptable outcome can be reached, noting that previous appeals regarding the Conservation Area status applying to the Bowl and the importance of the openness of land within the Bowl to the heritage setting. Public access would be desirable but the</p>

			<p>more specifically in relation to the walled garden area within the south eastern part of the site.</p> <p><i>The “walled garden” area of the NHS site</i> Under the Pre Submission Plan and its Modifications (now subject to this current consultation), we welcome the continued identification of the NHS’s site which currently accommodates existing horticultural buildings within a “fringe” redevelopment site outside the designated open space designation. However, as stated above, we continue to object to the private “walled garden” area being included within the wider open space boundary designation – both on a strategic and more site specific level.</p> <p>The “walled garden” area</p> <p>1) is private land with no current public access where there is no “public interest” case or technical evidence that can justify providing public access across it 2) will never act as a functional public open space area given its contained location within the NHS site and no connecting public access routes close by or in any proximity 3) any future public access created through the site at this part would significantly impact on Council (and Neighbourhood Forum) objectives to redevelop the site for housing purposes as an identified fringe site. Any redevelopment scheme is also likely to include this part of the site as a private amenity space area in any event and therefore, on this basis, it could remain open in nature. The inclusion of it within a wider open space designation is therefore not justified on fundamental grounds and found overly restrictive.</p> <p>We therefore ask the Inspector to firstly challenge the validity and extent of the open space designation on the basis of the strategic points set out above and secondly propose to</p>	<p>primarily purpose in seeking to secure the identified are in an open space designation is for conservation reasons that have been borne out through a number of appeals.</p> <p>No change</p>
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				exclude the walled garden area from the wider open space designation, if the Inspector agrees with the Council on the validity of the designation itself, the exclusion of the site from the open space designation should be illustrated as found on our proposed modification to Map 1 shown on Appendix 3 .	
Res54	C56	SAMod82	SA42	Fifth Site Requirement: for the reasons set out in above we recommend the fifth Site Requirement should be re-worded as follows: "Enhanced access to the Bowl will be supported through the Yards , etc., etc."	While outside the scope of the consultation on the main modifications, the Council would support the suggested further amendment as a factual update.
Res67	C57	SAMod82	SA42	ModificationSAMod82 is subject to objection on the basis that the Council has not provided any evidence to justify an " <i>enhanced access to through the arch of the Dukes Head Yard</i> " which will have significant impact on private landownership and access through it to include the NHS site adjoining the Duke's Head Yard site. Public access through these sites will not only impact on private rights across private land but also create anti social behaviour and localised crime areas within a built up area where creating public access to the Bowl would have no functional purpose. It is recommended that this guideline is removed.	Public access would be desirable and could be facilitated through use of the existing yards. However, the primarily purpose in seeking to secure the identified are in an open space designation is for conservation reasons that have been borne out through a number of appeals. No change
Res53	C58	SAMod82 SAMod83 SAMod84	SA42	Site Allocations DPD: SA42 - Highgate Bowl: Proposed Modification SAMod82 Amend the fifth site requirement as follows: <i>"enhanced access to the Bowl will be required supported through the arch of Duke's Head Yard, and through Townsend Yard"</i> ; Site Allocations DPD: SA42 - Highgate Bowl: Proposed Modification SAMod83 Amend the sixth site requirement to read: <i>"public routes through the various land parcels that make</i>	Noted. No change

				<p><i>up the Bowl could be introduced to unify the open space, subject to the operational requirements of existing landowners and/or occupiers.”</i></p> <p>Site Allocations DPD: SA42 - Highgate Bowl: Proposed Modification SAMod84 Amend the sixth development guideline to read: <i>“the provision of public access to the are to designated as open space would be supported should be within the new users of the open space will be encouraged, while generally keeping it open for public use”</i></p> <p>15. The Southwood Nursery portion of the allocation is in private ownership with no public access.</p> <p>16. We support the softening of language to say enhanced access will be supported rather than “required” and <i>“subject to the operational requirements of existing landowners and/or occupiers.”</i></p>	
Res67	C69	SAMod83	SA42	<p>In relation to modification referenced SAMod83, NHSPS continues to object on the basis that private landownership rights should be protected; and that it will be very difficult to apply any public rights of way across private land without any overriding "public interest" case or technical case on planning and environmental merit to support the open space designation at the Bowl. Similarly, modification referenced SAMod84 should also be excluded in deleting the sixth requirement under development guidelines which refers to public access to the open space designation.</p>	<p>The Council considers that the modifications clarify the position with respect to the current status of the bowl land as previously developed land, and the Council’s intention to secure the area identified on the site allocation as designated open space upon acceptable development coming forward on the individual land parcels to secure this. Public access to the open space, once formally secured, would be desirable if this can be feasibly achieved.</p>

					No change
Res67	C60	SAMod85	SA42	In relation to SAMod85, NHSPS continue to object to the principle of promoting a mews-type typology through redevelopment of the fringe sites. As indicated previously any redevelopment of these sites will be subject to a sensitively planned design which meets housing requirements at the time of the scheme promotion in terms of housing type and ensures viable and deliverable schemes come forward at these locations. It is therefore recommended that this guideline is removed.	The Council maintains that this type of typology would best fit the context of the wider area, its conservation areas status, the topography of the Bowl, and the nature of the site being a backland are promoting mostly in-fill development. No change
Res53	C61	SAMod85	SA42	Amend the third development guideline to read: <i><u>“due to the proximity of public amenity offered by the newly designated open space) Due to the site’s backland location development should reflecting a mews-typology.”</u></i> 17. The objector has nothing further to add on this point.	Noted. No change
Res53	C62	SAMod80 – SAMod85	SA42	Conclusion 25. The Council is asked to modify the final DPDs as set out above. All the objections are consistent with the Inspector’s request at the EiP that the Council should consider non-designated open space and previously developed land within the context of the requirements of Policy DM20 . This objection shows that inclusion of the identified land within the open space allocation has not been properly considered within the modifications, which, as a result, are fundamentally unsound.	Noted. The Council considers that the modifications clarify the position with respect to the current status of the bowl land as previously developed land, and the Council’s intention to secure the area identified on the site allocation as designated open space upon acceptable development coming forward on the individual land parcels to secure this. No change
Res55	C63	SAMod99	SA52	NLWA understands the rationale for removing SA52 from the list of sites, however all other employment sites appear in the	Disagree. The Pinkham Way site is designated as Employment

				<p>Sites Allocations DPD, with the exception of SIL which is covered by the London Plan.</p> <p>The NLWA therefore request written reassurance that the existing planning designation of the site is retained for the reasons set out in the NLWA's responses to previous versions of the Site Allocations DPD, or that the above SP8 amendment is further amended as follows:</p> <ul style="list-style-type: none"> - The protection of existing viable B Class Uses on designated and non-designated sites <u>such as the Pinkham Way site (as per the attached plan).</u> <p>It is imperative to the NLWA that the Pinkham Way site remains designated in an adopted planning policy document in such a way that employment use applications will be favourably received (subject to the dual SINC designation and other relevant prevailing policies). The NLWA should not be hindered from developing the site in pursuit of its statutory duties because it is not able to put forward a specific development proposal at the time of the Haringey's reviews of its Sites Allocation DPD.</p>	<p>Land as set out in the Alterations to the Strategic Policies (SP8). The Council does not consider this suggested amendment necessary for the protection of the employment designation of this site.</p> <p>No change</p>
Res57	C64	SAMod99	SA52	<p>Our consultant's report clearly evidenced the importance of the land to the future elimination of strategic flood risks in LB Barnet and LB Enfield. The land should be 'safeguarded' for future flood alleviation infrastructure.</p>	<p>Disagree. Issues of flood management will be assessed in line with Strategic Policy SP5 and Development Management Policies DM24, DM25 and DM26.</p> <p>No change</p>
Res57	C65	SAMod99	SA52	<p>Haringey's Open Space Study failed to fully assess the evidence supporting an 'open space' designation for Pinkham Way.</p> <p>Para 73 & 74 NPPF requires assessment of "NEED" for open space, which is defined in the framework as "All open space of public value...." However Section 336 of the Town and Country Planning Act1990 provides a statutory definition of Open Space for land owned by a public authority and "used</p>	<p>The site is previously developed land that is designated as Employment Land and SINC. The Council notes that the Employment Land Review and Strategic Plan policy SP8 seeks to protect employment land to meet the boroughs employment</p>

				<p>for the purposes of public recreation". See THE QUEEN ON THE APPLICATION OF GOODMAN [2015] EWHC 2576 (Admin).</p> <p>The Village Green application clearly demonstrated lengthy use of the public land at Pinkham Way by Freehold and other residents for public recreation and as such this use established a "bare license" which cannot be removed without following the statutory procedures laid down in Sections 122 and 123 of the Local Government Act 1972. As these procedures were not followed by the public land owner (LB Barnet) then the S.336 statutory designation of Pinkham Way as open space prevails and must be recognised in Haringey's Main Modifications of their strategic and site specific policies and the land afforded the protection from development as stated in NPPF 74. We contend that the S.336 open space designation is also a matter for the Inspection to consider and decide upon as failure to do so would be unlawful and render Haringey's local plan unsound. NPPF 17: Core Planning Principles - SINC, Flood alleviation and open space designations for Pinkham Way are all fully compatible with each other and meet the core planning principles at bullet point 9. These designations would also meet the need for different land uses to support the sustainability of the Freehold community.</p>	<p>needs. The owner of the site confirms that the site is not redundant or surplus to employment use need. Further, the Council notes that the Village Green application for Pinkham Way was unsuccessful and that the Biodiversity and Open Space study does not identified this area as being deficient in open space. On the basis of the evidence outlined, the retention of the current designations applying to Pinkham Way is appropriate.</p> <p>No change</p>
Res64	C66	SAMod99	SA52	<p>PWA welcomes this modification. However, the description of the proposed change is inaccurate. We believe the reference to "Policy SA52" is incorrect and should read "remove Site SA52 from the SADPD"</p> <p>4.3 The reason given for the modification is irrational. It states "Due to having no identified development over the plan period/designation as employment land in Strategic Policies. Modification arising from Examination in Public Hearings"</p>	<p>The Council considers the description and the reasoning given in the schedule of modifications is clear.</p> <p>No change.</p>

			<p>4.4 If there is no identified development for the site then there is no justification for its inclusion and the reason for removal should be “no justification for inclusion in the document”. PWA would like to see this reason substituted for the existing wording.</p> <p>4.5 The introduction to the Site Allocations DPD sets out the process through which the sites for inclusion have been identified and states at 1.16 that the inclusion of a site is based on supported evidence. It further states at 1.17 that the decision to include sites is supported by a Sustainability Appraisal which tests policies and proposals to assess the impacts that might arise from including a site in the SADPD.</p> <p>4.6 Because SA52 was not only a designated employment site but also a valuable ecological site designated SINC of Borough wide Importance that required protection, particular attention should have been paid to ensuring that there was full justification for its inclusion in the SADPD. The fact that the council was unable to explain at the EiP hearing why it had been included and immediately agreed to remove it reflects the attitude the council has consistently adopted when dealing with this site over many years.</p> <p>4.7 The same careless approach was witnessed earlier last year when the site was included in a schedule of sites proposed to be covered by an Article 4 Direction. In that instance, the council was trying to control the recent relaxation on changes of use from employment to residential. However, the requirements for inclusion in the Article 4 Direction were that a site must be in employment use at the time the Direction was made. PWA challenged the inclusion of Pinkham Way site in that Direction as the site was not in any use, it had no buildings etc. Again, as soon as they were challenged, the council immediately removed the site from</p>	
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				the draft Article 4 Direction.	
Res60	C67	SAMod101	SA59	Delete “potentially” from the reference to education in the list of uses in the Site Allocation.	While we recognise that work is being undertaken to secure an education use on this site, it is considered appropriate that flexibility is retained in the policy. No change.
Res63	C68	SAMod104	SA60 Dev ^t G ^{line 5}	S/b The Keston Centre has some heritage merit and retention of the building should be considered prior to any development taking place ADD "and should be looked at for educational or community usage" Delete last sentence re Community use NB The heritage buildings themselves s/b looked at for this usage not that as community use i.e. the community centre is part of scheme	There is no identified unmet need for an educational use on this site. The term community use is appropriate, and offers flexibility in the type of use to be located on the site. As there is no guarantee that the building will be retained, it is inappropriate to add this restrictive wording to the policy. No change
Res63	C69	SAMod105	SA60	SA60 Site Requirements Paragraph SAM105 should read “Access to site requiring use of or impacting on any element of MOLetc...mitigate any impact And should have added “and be considered against all relevant MOL policies”	The Council considers this is already implicit in the reference to ‘consideration against relevant policies’, which would include MOL policies. No change
Res62	C70	SAMod108	SA62	'- the capacity of the existing community facilities to match any development, including existing shortfalls where they exist'	The existing statement requires the SPD to analyse the ability of existing infrastructure to meet

				<p>to <i>'the need to preserve existing community facilities, while addressing any shortfalls where they exist'</i></p> <p>Reason: We believe that the preservation of existing community facilities was agreed at the Inspection hearing, whereas this modification implies existing facilities may be demolished if new facilities are promised. This fails to take into account the amount of community involvement and public expenditure (and hence long term obligations) in the creation of existing facilities. The need for clarity on this is further underlined by the tendency of developers to initially promise improved facilities in their new developments and then fail to keep these promises on ground of 'viability'. (see for example on the Heygate Estate: https://southwarknotes.wordpress.com/tag/rip-off/page/2/)</p> <p>There is a further need for clarity if the policy is not to generate gross uncertainty and insecurity for the facilities in the area, undermining their overriding need to plan, manage and access funding for the future.</p> <p>According to our contemporaneous note, the above was accepted by Matthew Pattison for the Council in discussion over concerns to protect existing facilities. Following our representations, the Inspector seemed to share our concerns and stated that "existing policies [re community infrastructure] are adequate and strong." She said that the SPD should "include recognition of the community and public investment" made in the area. She asked the Council to "look at it all against the [existing] policies." Mr Pattison explicitly replied: "We are not doing away with any of the existing infrastructure." This reassurance was taken as precluding the need for any further representation on this matter.</p>	<p>the needs of the current (including any existing deficit) and future requirements that arise in the future.</p> <p>The proposed change doesn't add anything to the policy, apart from adding confusion by assessing the "need to preserve" in place of analysing the "capacity of the existing community facilities". This conflates issues of conservation and infrastructure capacity, and seeks to predetermine that preservation is the best way to meet future needs.</p> <p>No change</p>
Res62	C71	SAMod108	SA62	a. ADD: ' <i>Will include a range of options'</i>	The Council is clear that there is

				Reason: Mr Patterson stated that "I think it [the SPD] would include a range of options and list of outcomes".	already a requirement for options to be included in the SPD within the opening to modification SAMod108 "...will assess existing issues within the area and options to address these..." No change.
Res62	C72	SAMod108	SA62	ADD: ' <i>Will be framed in an open way</i> ' Reason: The Inspector stated that the SPD "must be framed in an open way with no assumptions"	While we support the tone of openness, it is unclear how a document would be framed in an open way, compared to an un-open way? No change
Res62	C73	SAMod108	SA62	Re the points relating to: 'Where new development is proposed:' ADD: ' <i>Existing residents affected by any development to be offered social rented housing in the new development with a secure, permanent tenancy</i> ' Reason: The Inspector explicitly stated that, in an SPD, "I would like to see [Existing] residents right to a secure home on any new estate".	This is a duplication of Policy SP2 which deals with matters of replacement stock on housing estate renewal developments. Planning Policy does not have the statutory power to guarantee particular individuals specified rents or tenures, this is addressed through the Council's Housing Strategy which is already included in the list under 'where new development is proposed'. No change.
Res62	C74	SAMod108	SA62	Plus AMEND the existing principle: 'the different and distinct characteristics of areas within the Allocation...'	The suggested amendment would be supported by the Council to add clarity and

				<p>to ‘the different and distinct characteristics of areas within <i>and adjacent to</i> the Allocation <i>area</i>...’</p> <p>Reason: This point was acknowledged by the Inspector to ensure that any SPD must take into account the context of what the Inspector called the "surrounding area", being 100% suburban to the east and south sides of the Allocation, 100% suburban/conservation area to the north side, and 100% MOL parkland to the west side.</p>	ensure the policy is effective.
Res58	C75	SAMinor10	SA21 New Site Req ^t	<p>The modification seeks to introduce an additional ‘Site Requirement’, which states the following: <i>“The site is subject to the requirements of Policy DM38 – Employment Led Regeneration.”</i></p> <p>The current wording of Condition DM38 is included within the ‘Schedule of Modifications to the Development Management DPD (November 2016)’. This is currently out for consultation and we have also commented on this.</p> <p>Whilst we recognize that the site is within the ‘Local Employment Area: Wood Green Regeneration Area’ planning designation, we do not consider it appropriate or necessary to include reference to Policy DM38 as a ‘Site Requirement’ when there are other policies that are applicable to this site.</p> <p>We therefore request that this modification is rejected.</p>	<p>The Council considers this is an important cross-reference, and considered appropriate to draw attention to.</p> <p>No change</p>
Res58	C76	SAMinor11	SA21 Site Req ^t move	Agree	No change required.
Res45	C77	N/A	Appendix 4 Table 17	Provwell however consider the indicative capacities for the area for monitoring purposes are incorrect. These figures were derived through a methodology that assumed an incorrect site area for site SA34 Overbury Road & Eade Roads, and incorrect assumptions for site SA30Arena Design	The Council considers PTAL 1a to be appropriate in this instance, given it covers a substantial part of the site, and so is more accurate to be used

			<p>Centre. The corrected methodology is set out at appendix J of Provwell's representations to Proposed Alterations to Development Management DPD and Site Allocations DPD, and further set out below.</p> <p>SA30 Arena Design Centre Current Presumption Site Area: 1 hectare PTAL: 1 Setting: Urban LP density matrix ranges: 60 units/hectare Mix: 33% commercial, 67% residential Total developable floorspace: 4,200sqm Therefore the estimated residential capacity of the site is: 40 new homes</p> <p>However, the PTAL output on the TfL website (at appendix J of representations to Proposed Alterations to Development Management DPD and Site Allocations DPD) shows that the site PTAL rating is 1a-3, with the centre point being 3. Therefore the density of the site should be calculated using PTAL rating 3. As detailed below, the residential development capacity for this site is 67 new homes:</p> <p>Corrected Presumption Site Area: 1 hectare PTAL: 3 Setting: Urban LP density matrix ranges: 100 units/hectare Mix: 33% commercial, 67% residential Total developable floorspace: 7,000sqm Therefore the estimated residential capacity of the site is: 67 new homes</p> <p>Sa34 Eade Road and Overbury Road The Site Allocations DPD states that the site area for SA34: Eade and Overbury Roads is 1.5 hectares; this is inaccurate. Measuring the area set out by the red line boundary in the Site Allocations DPD calculates that the area is in fact 2.3</p>	<p>for indicative capacities, which are minimums.</p> <p>As agreed at the Hearing, the Council will combine the indicative figures in the site capacities (Table 17 of Appendix 4) for the Warehouse Living sites.</p> <p>No change</p>
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				<p>hectares result in the following: Site Area: 2.3 hectares PTAL: 4 Setting: Urban LP density matrix ranges: 140 units/hectare Mix: 33% commercial, 66% residential Total developable floorspace: 22,540sqm Net residential units: 216 The following modification is therefore proposed to change the indicative capacity of the site from 386 to 551, as proposed below. <i>Due to the inherent uncertainty regarding the existing nonconventional housing on these sites, it is not possible to assign an indicative capacity for each site in this area. For monitoring purposes, the indicative capacity for the area is considered to be 386 551 net additional residential units, and approx. 13,300m2 of gross new commercial floorspace</i></p>	
Res50	C78	N/A	SA36	<p>I also attached a PDF: <i>SA36 & SA37 – The Rowans Site By Finsbury Park</i>. It's from a local resident and recent chair of the Friends of Finsbury Park. It is dated 17 August of last year and is directly relevant. Please read it!</p>	<p>Noted. No change</p>
Res50	C79	N/A	SA36 SA37	<p>BOTH SA36 and SA37 tend to frustrate an improved park, an improved transport nexus and especially, a much-needed and <i>genuine</i> Town Centre</p>	<p>Disagree. The site allocations help give effect to the Borough's spatial strategy for delivering sustainable development. No change</p>
Res50	C80	N/A	SA37	<p>SA 37 – 18–20 Stroud Green Road THIS is described as a <i>New town centre frontage onto Stroud Green Road</i>, however it is really no more than a housing development. It's also described as "an opportunity to create new town centre uses within the Finsbury Park District Centre" but it is hard to see this as other than a</p>	<p>Disagree. The site allocation (paragraph 2.106) along with site requirements and development guidelines are clear that the policy provides for a mix of uses.</p>

				residential development alongside Islington's misnamed 'town centre'. It's hard to know what is meant by, <i>Town centre uses will be required at ground floor level on the Stroud Green frontage of this site.</i>	Town centre uses are those defined as 'main town centre uses' in the NPPF. The DM DPD provides further details in respect of acceptable uses in primary and secondary town centre frontages. No change
Res50	C81	N/A	SA36	<p>SA 36 – Finsbury Park bowling alley</p> <p>THE principal feature of this Haringey site is that it sits close to the extreme peripheries of Haringey, Hackney and Islington and far from the centres of those three London boroughs. The site allocation maximizes benefit to one Council at the expense of the local community and especially at the expense of the potential for a genuine 'town centre'.</p> <p>If this SA36 is sound, it is sound only within artificial confines while it disregards the immediately adjacent areas that have factors of great significance. It is not clear that a major stakeholder (Transport for London) was consulted. Given that this site is (a) near one of London's major transport interchanges and (b) on the edge of the Borough and (c) next to one of north London's largest parks, this site should have been subject to different criteria from say, a similar site in the middle of the Borough.</p> <p>One of the main reasons for Neighbourhood Forums is to bridge borders and to try to make sense of areas and localities that are currently subject to arbitrary, artificial, administrative boundaries.</p>	Hackney and Islington Boroughs as well as the Mayor of London/Transport for London have been consulted and engaged throughout the plan process, in line with the Council's statutory Duty to Cooperate. No change
Res50	C82	N/A	SA37	<p>Neighbourhood forum: not yet</p> <p>ALTHOUGH the Finsbury Park Neighbourhood Forum (FPNF) has begun and will cover the area of SA36, the local</p>	Noted. The Council has not formally received an application to establish a Finsbury Park

				<p>community is at a disadvantage compared with other areas that already have Forums set up. When up and running, the nucleus of the FPNF is likely to be one of London's more important transport nodes: Finsbury Park station. It would encompass a significant area that would include all of SA36 and a large margin around –the link below is of the draft area; ignore Crouch End NF (pink) and the area marked Harringay (blue):</p> <p>https://www.google.com/maps/d/viewer?mid=12unyJn8Pt7xtqPT4J-sa6pbjclM</p> <p>The object of the FPNF would be to consider Finsbury Park area as a whole. Because this locality exists at administrative extremes, it has for decades been little regarded. Now and again efforts are made at co-operation, but these have tended not to last long or to be meaningful. At any given time, one Borough or another tends to dominate and a third expresses little interest.</p> <p>It is this lack of enduring common purpose for the area and the absence of meaningful responsibility that is one of the driving forces for a NF that would bridge the three Borough borders.</p> <p>The current ambitions for this site are strictly within one Borough. It could be seen as a local plan to maximise one council's tax receipts, with little or no regard for the needs of the wider area as the public may view it.</p>	Neighbourhood Forum, which is the precursor to bringing forward a Neighbourhood Plan for the area.
Res50	C83	N/A	SA37	<p>Finsbury Park is a transport interchange TOWN planning needs to consider Finsbury Park as <i>a transport interchange</i> because this is what the area is primarily about. It's about the <i>movement</i> of people. We need statistics of what that movement is going to be and how the</p>	SAMod69 will enable the achievement of the site requirement regarding replacement and enhancement of the existing secure cycle

				<p>arrival of Thameslink would affect it. Interchanges work best when all modes are close to each other so the time taken transferring between two modes is minimized and optimised.</p> <p>The biggest use of the rail is <i>through-traffic</i> but the bus stations are the <i>feeders</i> for commuting locals who live nearby and who support local businesses, on those days when there are no football matches or concerts in the park. In the artist's impression (below) published about three years ago, part of proposal appears to abolish the East Bus terminus and put all the bus stops onto Seven Sisters Road increasing the walking distance from trains – again making the interchange less, not more, efficient.</p> <p>Removing the East Bus station would be a big step backwards.</p> <p>The <i>cycle park</i> is an initiative to make Finsbury Park more accessible for local commuters. Using bikes to get to the station reduces kiss-and-ride motorists (who slow traffic at peak times) and is therefore good for pedestrian and traffic flow. The cycle park has gone from the artist's impression.</p> <p>Cycle routes: why are they not shown? One of the main ones goes down Finsbury Park Road – but that is not considered relevant to the development area.</p> <p><i>Removal or placing the cycle park at a greater distance is regressive.</i></p> <p>Similarly, for those disabled or otherwise unable to use buses, taxis are very important in their lives. Taxi drop off and pick up has to be as close as possible to the station entrance. It is surprising that the artist impression appears to have deleted the Taxi rank .</p>	<p>parking facility.</p> <p>Comments regarding the “artist’s impression” of a future redevelopment are not considered relevant to the main modifications consultation.</p> <p>No change</p>
Res50	C84	N/A	SA36	Effective /Deliverable? Question 15	The Council considers that it

			SA37	<p>IN THE <i>Haringey Local Development Framework Core Strategy Submission Soundness Self-Assessment</i>, key question number 15 asks, <i>Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</i> The answer is couched in sweeping generalities: <i>LBH works closely with ..., and also works with ...; work together ...</i> An oblique reference is made to SA36 and 37, where the document says that, <i>Other action areas of the borough which require partnership working with neighbouring boroughs include: Finsbury Park and Manor House – with major regeneration projects at Finsbury Park station (in Islington) and at Woodberry Down (in Hackney).</i></p> <p>Attempts at cross-border co-operation have been fitful, feeble and fruitless. Co-operation, or partnership <i>is</i> needed but there’s no evidence of it being effective or sustainable, in the current absence of a fully set up Neighbourhood Forum and Plan. As a consequence, SA36 and 37 are limited in scope and lack ambition for the area as a whole.</p>	<p>has complied with its statutory duty to cooperate, as set out in the Duty to Cooperate statement submitted with the Local Plan. This includes consultation and engagement with neighbouring boroughs.</p> <p>No change</p>
Res50	C85	N/A	SA36	<p>Corridor for permeability</p> <p>THERE is one aspect that relates to the neighbouring Borough that needs to be addressed. The corridor that might run between or through two large buildings has been said to increase <i>permeability</i>.</p> <p>It has been advanced as a means of improving the view of Finsbury Park from the station (in Islington). However, not only is this not so, the proposed (over-) development of the site would <i>detract</i> from the current view.</p> <p>1. Many tall, mature trees are currently easily visible over the Rowans building. Replacement buildings of anywhere near the heights proposed (since increased) would obscure the trees from view at ground level from anywhere near the bus station.</p>	<p>The Council considers the approach to the management of tall buildings to be sound. SA36 has been prepared having regard to the “Tall Buildings Locations Validations Study” which identifies this site as an appropriate location for a tall building. SA36 provides that all proposals will be expected to consider impacts on the park and demonstrate how they will improve the park’s overall function and appearance. Further, SA36 will be</p>

				<p>However, this assumes that the trees remained. Despite assurances that any construction work would not take place on the park, due to their closeness to the proposed building site, there is no guarantee that this large stand of trees would not be felled.</p> <p>2. The width of the corridor would likely be narrow yet this corridor was the subject of misleading depictions and currently, of misleading description. The so-called artist's illustration published by promoters, shows a <i>Champs-Élysées</i>-sized avenue (above and next page). This is a distortion of the likely narrow shopping arcade. The <i>narrow</i> angle of view through to the park could only be had by (a) someone standing on or close to the central axis of the shopping arcade and (b) looking directly down it. For the majority of people exiting the station, the gap would be unlikely to be noticed, let alone for the park to be seen.</p>	<p>considered in conjunction with DM6 (Building heights) - as per SAMod68 - and ensure that the amenity provided by the park is protected and enhanced.</p> <p>Comments regarding the "artist's impression" of a future redevelopment are not considered relevant to the main modifications consultation.</p> <p>No change</p>
Res50	C86	N/A	SA36	<p>TfL and the railway station A LARGE number of residents in large blocks of flats, close to this key transport node, would likely create a constituency of 'nimbys' who would likely object, frustrate or stop further change or improvement in the area. Housing is needed but it needs to be <i>further away</i> from this key transport node.</p> <p>The alley/shopping arcade is the sole concession that the area is a major transport interchange. However, it is TfL and the station that ought to have the major influence.</p> <p>The artist's impression put out by the promoters even airbrushed out the huge porch by the bus station. Indeed, the entire bus station disappeared.</p> <p>There is already access to the park alongside the bicycle storage facility. The main difficulty with the proposed development for this site allocation, is that it would frustrate or preclude a superior solution for the area, if it were</p>	<p>The Mayor of London/Transport for London have been consulted and engaged throughout the plan process, in line with the Council's statutory Duty to Cooperate.</p> <p>No change</p>

				<p>considered as a whole.</p> <p>There is little point in the planners talking about permeability to the park unless they address east/ west permeability through/ over/ under the station.</p>	
Res50	C87	N/A	SA36	<p>Would SA36:</p> <p>1) remove the play group/garden/playground facility? If so why? To be replaced where? In a south-facing not east facing location?</p> <p>2) make it easier for parents with children to use park benching (and access toilets/ nappy change) near this playgroup area?</p> <p>3) stop local supermarkets selling cheap booze to alcoholics?</p> <p>4) take any account of the number of methadone uses who use the chemist opposite for their (daily) fixes?</p> <p>5) answer the public safety issues/public fears regarding local stabbings?</p> <p>Highbury police station has closed for conversion to flats: Is the 'new' Blackstock Road shop unit an effective replacement?</p>	<p>This representation is not considered to be relevant to the main modifications consultation.</p> <p>No change</p>
Res50	C88	N/A	SA36 SA37	<p>Footfall</p> <p>IF Islington and Haringey want more of a sense of place and seamless integration of the commercial Stroud Green Road with commercial Seven Sisters Road and Blackstock Road then the 'key' is <i>not</i> footfall to Rowans.</p> <p>If this were a footfall issue, we would be talking about Arsenal Football Club match day attendances and how pressure on the Tube system could be relieved if there were more things to do and see before and after games.</p>	<p>This representation is not considered to be relevant to the main modifications consultation.</p> <p>No change</p>
Res50	C89	N/A	SA36 SA37	<p>Retail and commerce</p> <p>TO MAKE more of a sense of place, the arches under the station need to be opened up to encourage movement</p>	<p>This representation is not considered to be relevant to the main modifications consultation.</p>

				<p>(footfall) between the east and west commercial areas.</p> <p>People travel to Fonthill Road Fashion Shops from far and wide (even from south London): how could this vibrancy be used to make the wider area more commercially viable? A rival to Petticoat Lane or Camden Market? Where is the planners' vision?</p> <p>That part of Blackstock Road, known as Highbury Vale has secondary shopping on both sides of the road, so that should be shown on maps.</p> <p>Highbury Vale was known once upon time, in retail terms as the local 'Bond Street'. Where is the vision in the plan for Finsbury Park to be regenerated from the south?</p> <p>What indices/ benchmarks will they be using to demonstrate success? Are any of them based on socio-economic class presumptions or prejudices?</p>	No change
Res50	C90	N/A	SA36 SA37	<p>Concerts conflict</p> <p>THE impression given is that this largely about Haringey getting planning-gain money for flats on the edge of the borough. However, the narrow goal of selling more housing at this point conflicts with Haringey's goal of monetizing the park in the shape of increased concerts. The owners of expensive flats would be the most vociferous in opposing the Council's major events policy.</p> <p>Finsbury Park has charity shops, Pound stores, pawnshops and Pay-day lenders: what exactly was being sold in the artist's impression market stalls?</p> <p><i>A Town Centre concept is not about footfall to Rowans.</i> The point about the 2,500 objections to more Emirates concerts (never mind Finsbury Park ones) is that many</p>	<p>This representation is not considered to be relevant to the main modifications consultation.</p> <p>No change</p>

				concertgoers arrive/ depart through Finsbury Park station.	
Res50	C91	N/A	SA36 SA37	<p>Town Centre planning To present a Town Plan as merely about street frontages misses the point. Town centres are about commercial activity: this means people movement and footfall.</p> <p>The Finsbury Park area needs to be looked at, not in a linear sense of the main roads only, but in terms of people flows, the existing aspects that promote and those that inhibit these flows.</p> <p>It is difficult to create a tranquil and bustling space next to a Red Route (Seven Sisters Road)—N.B. Windrush Square in Brixton. Is it animated in the classic way we associate with Italian plazas or is it a joyless open space?</p> <p>This proposal differs from other proposals for new blocks of flats that are alongside a transport interchange and conforming with the London Plan, because of two additional factors: (a) the three borders (and all that implies) and (b) adjacent to a large park. This is the main reason why we flag up this Site Allocation as significantly different and needing special attention.</p>	<p>This representation is not considered to be relevant to the main modifications consultation.</p> <p>No change</p>
Res50	C92	N/A	SA36 SA37	<p>Red-route alert TOWN squares have the characteristic of enclosure and for the most part (at ground level) human-scale.</p> <p>To be human-scale one might argue that you should probably be able to walk across the shortest dimension of a square in, say, less than a minute.</p> <p>The space occupied by City North/United House and faced by Wells Terrace could be re-configured (under a long term plan) to make a great square unmolested by the red route (and complement the bustle of Fonthill road).</p>	<p>This representation is not considered to be relevant to the main modifications consultation.</p> <p>No change</p>

				Why did not Islington propose the N4 Library site on Blackstock Road as a Town Square?	
Res50	C93	N/A	SA36 SA37	<p><i>The key to any concept of 'Town Centre Finsbury Park' is the station and improving East /West permeability.</i></p> <p>Opening up Station Place to the Public Park is quite literally a side issue (for reasons discussed elsewhere).</p> <p>The railway arches under the rail viaduct could be opened up to encourage people movement.</p> <p>The more people movement there is, the more retail opportunity, the more self-policing surveillance goes on.</p> <p>The poor management of <i>Live-Nation</i>- type events makes the Town Centre unattractive and makes it a no-go area in people's mind for not just concert days but other days too.</p> <p>Lots of people avoid shopping locally on match days. Let us see the 'dispersal zones' (for 30,000 people) <i>on the Maps</i>.</p> <p>Let us see some benchmarking against the measures Brent Council took in preparation for/response to the Wembley Stadium (not all favourable/progressive).</p> <p>People-friendly initiatives are taking place: pavements have been widened to assist pedestrians going to/from the Emirates.</p> <p>Cycle Routes are being taken off the main roads through side streets – but they should be recognised as part of the hierarchy of spaces and uses that contribute to a balanced and well-thought-out town centre. Let us see them <i>on Maps</i>.</p>	<p>This representation is not considered to be relevant to the main modifications consultation.</p> <p>No change</p>

				<p>Successful town squares are often one-street back from a 'red route' thoroughfare (e.g. Christopher Place in relationship to Oxford Street).</p> <p>Finsbury Park Station is a significant asset on London's transport infrastructure (and currently, a missed opportunity for more commercial development): how many places in Zone 2 are so well served?</p> <p>Finsbury Park can support commercial activity. Workplaces, retail and social/leisure activities <i>should be close to the station.</i></p>	
Res50	C94	N/A	SA36 SA37	<p>Housing HOUSING could and should be slightly further away so as not to be disturbed by trading. People also work shifts so bedrooms should be further away from noisy railway lines.</p> <p>The block of flats is promoted at the same time that homeowners in local streets are refused dormer-windows to do loft conversions – an increase of housing density close to the station that would be sustainable (the local area is not a Conservation Area, dormers do not overlook the way high-rise flats do).</p> <p>Putting denser housing closer to a remote <i>outer</i> suburban station might be justified because reduced footfall means there is less scope for commerce.</p> <p>The Square Mile discourages housing because it becomes an obstacle to commercial redevelopment/ economic activity.</p> <p>Finsbury Park is so well connected to the transport system it should be a <i>work destination</i>: London plc has to use its assets if it is to provide employment and compete locally and</p>	<p>This representation is not considered to be relevant to the main modifications consultation.</p> <p>No change</p>

				<p>globally.</p> <p>Along the Islington side of Blackstock Road in recent years, the Pickfords Depository and the petrol station sites that once provided employment were converted to housing (and one of them a gated community) and not even work-live units. Unless local children grow up seeing (small-scale) business around them, what ambitions will they have?</p> <p>Also should we not be encouraging people to work locally and not commute long distances?</p> <p>Converting Rowans to housing would be another dumbing down of the area's potential. It should be bustling city-life driven commerce.</p> <p>The aspirations for the area across Stroud Green Road looks like a plan by Islington to <i>reduce</i> the potential of Finsbury Park.</p> <p>Housing this close to Finsbury Park is not ideal and the long term potential for justifiable 'Nimbyism' is a conflict to be avoided.</p>	
Res50	C95	N/A	SA36 SA37	<p>Overground ALREADY this stretch of Victoria Tube line is at capacity. How long before the idea of a London Overground branch to Finsbury Park is revisited?</p> <p>Where would such platforms (not) go? And what objections would these newly arrived flat owners then raise?</p> <p>Any Finsbury Park Town Plan proposal has to look at the strategic future of Finsbury Park as a major London asset.</p>	<p>This representation is not considered to be relevant to the main modifications consultation.</p> <p>No change</p>

				<p>Key urban sites (adjacent major transport hubs) should be active revenue generating: not passive housing. <i>The closer to mass footfall a site is, the more commercial it should be.</i></p> <p>If commuters/ employers/ planners of all three boroughs saw Finsbury Park as a destination, the potential for economic growth would be great because so many people can access the station.</p> <p>Turning prime sites next to the likes of Finsbury Park into sleepy housing is undesirable and would deny future work opportunities to the local economy.</p>	
Res50	C96	N/A	SA36 SA37	<p>The proposal would be a seriously regressive step that is not easily reversed and would compromise future progressive ideas. These are half-baked plans. Whether or not planners manage to force them through, this part of the Local Plan will stand as a monument to lack of vision and a textbook case as to how not to do town planning.</p>	<p>Noted.</p> <p>No change</p>
Res54	C97	N/A	SA42	<p>2.120 Proposed wording: Protection of the Highgate Bowl as open space, and improvement of public access through limited redevelopment of Townsend Yard, Broadbent Close and Duke's Head Yard (referred to below as 'the Yards')</p>	<p>While outside the scope of the consultation on the main modifications, the Council would support the suggested further amendment as a factual update.</p>
Res54	C98	N/A	SA42	<p>2.122 Proposed wording: This policy will establish the Highgate Bowl as a designated open space, and the heart of the Highgate Bowl section of Highgate Conservation Area. Limited redevelopment within the Yards, etc., etc.</p>	<p>While outside the scope of the consultation on the main modifications, the Council would support the suggested further amendments as providing clarity to the intent of the allocation.</p>
Res54	C99	N/A	SA42	<p>Fourth Site Requirement: we are not sure why Broadbent Yard is not included. It does not, on the face of it, afford the opportunity to provide access but owners may wish to</p>	<p>While outside the scope of the consultation on the main modifications, the Council</p>

				<p>develop it. If applications did come forward we would wish to see that the criteria set out in SA 42 would apply to it. We recommend the fourth Site Requirement should be re-worded as follows:</p> <p>"Limited redevelopment of the garages and workshops in the Yards will be allowed, etc., etc."</p>	<p>would support the suggested further amendment as a factual update.</p>
Res59	C10 0	N/A	SA53 Dev ^t G ^{line 2}	<p>Request regarding the visitor experience reference on page 131 is taken into consideration.</p> <p>APPCT would like to request this is re-considered; we appreciate that the comment is not in relation to soundness or compliance, however we feel it is important to reiterate. The East Wing restoration project proposals are for a much more innovative and forward-thinking experience rather than a traditional museum, and we consider it is vital that the Site Allocations DPD reflects this.</p>	<p>The Council would be happy to change "museum" to "visitor experience" as a minor modification.</p>

Respondents to the Modifications to the Tottenham Area Action Plan Consultation

ID	Respondent	ID	Respondent
Res68	Ursula Riniker	Res73	Greater London Authority
Res69	Haringey Defend Council Housing	Res74	North London Waste Authority (NLWA)
Res70	Historic England	Res75	Fiona Carson
Res71	Sport England	Res76	Springfields obo Mems DIY Ltd
Res72	Our Tottenham	Res77	Tottenham Hotspur Football Club

Responses to the Modifications to the Tottenham Area Action Plan Consultation – In Modifications Order

ID	Rep ID	Mod Ref	Policy / Para / Figure	Comment	Council's Comments / Response
Res71	D1	All	Whole Document	Sport England has reviewed the modifications in light of these planning objectives, national planning policy set out in the National Planning Policy Framework (NPPF) and in the context of Sport England's previous comments on the aforementioned documents and has concluded that there does not appear to have been any modifications that affect sport, sport facilities and playing pitches from the pre-submission documents and therefore Sport England's comments and concerns are still applicable.	Noted
Res73	D2	All	Whole Plan	<p>Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1)99 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012</p> <p>Haringey Local Plan: Post EIP Mods to: o Strategic Policies o Development Management DPD o Site Allocations DPD o Tottenham Area Action Plan</p>	The Council notes that the Mayor considers the proposed Modifications to be in general conformity with the London Plan.

				<p>Thank you for consulting the Mayor of London on the Draft Local Plan. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.</p> <p>The proposed Modifications generally conform with the London Plan and there are no further specific points from Transport for London.</p>	
Res73	D3	All	Whole Plan	<p>However, I would highlight the following three points for your consideration:</p> <p>1 The London Plan was updated in March 2016, the full Title is The London Plan (Spatial Development Strategy for London Consolidated with Alterations since 2011). It appears that the previous Modifications were made prior to the above London Plan update, therefore the development Plan Documents should reference this version of the London Plan (rather than the 2015 version).</p> <p>2 Similarly the Mayor of London's Housing SPG was updated in March 2016.</p> <p>(Note: Point 3 pertains to DM DPD and comments are set out in corresponding schedule for that document).</p>	<p>Noted.</p> <p>The Council suggests that references to the appropriate adoption dates of the Mayor's Housing SPG and London Plan could be addressed as minor modifications (factual updates) to the Local Plan.</p>
Res72	D4	AAPMod12	AAP3	<p>In reference to AAPMod12 page 3-4 'D. To optimise the use of land in delivering wholesale renewal of Haringey's housing estates in Tottenham (as listed in Policy SP2 of the Strategic Policies), the Council will support proposals which are designed to:</p> <ul style="list-style-type: none"> a. Improve the quality and range of affordable housing options; b. Better address housing needs in Haringey; c. Secure a more inclusive and mixed, sustainable 	<p>Partial support. The Council would support an amendment to ensure consistency with Alt53 but rather than use of the term 'refurbishment' the Council would support 'wholesale renewal or strategic improvements of Haringey's housing estates ...'</p>

				<p>community; and d. Increase housing delivery in Tottenham.'</p> <p>We believe the first sentence should be changed to 'To better optimise the use of land in delivering wholesale refurbishment or renewal of Haringey's housing estates...'</p> <p>We argue this makes it consistent with Alt 53 of the Alterations to Strategic Policies which does actually say that estates in Northumberland Park will be considered for refurbishment.</p> <p>Alt 53 states on page 17: 'Insert the following additional policy following Policy SP2 (10): 'The regeneration of Haringey's Housing estates renewal and improvement. The Council will bring forward a programme to undertake regeneration strategic improvements to, or renewal of, Haringey's housing estates, with priority being accorded to those located within wider regeneration proposals and/or identified as being most in need. An initial list is set out below: <ul style="list-style-type: none"> ▪ Northumberland Park ▪ Love Lane...'' </p>	
Res70	D5	AAPMod20	AAP5	<p>First concerns the introduction of a new Part A, which appears to be in addition to the existing Part A (as presented in the pre-submission version). The wording appears not to flow and appears to partially duplicate Part A b of the existing draft policy, in terms of its relationship to regeneration and local communities/neighbourhoods. To help address this potential overlap we would suggest the following amendments. In addition the inclusion of Conservation Area Appraisals as part of the new</p>	<p>The Council agrees with the suggested changes to the AAP Policy, and would support their inclusion as a replacement for the proposed modifications to aid with legibility and to improve the effectiveness of the Policy.</p>

				<p>combined Part A includes the opportunity to review boundaries. Whilst amendments to Part A are to provide clarity on the range of appraisals and management plans to consider:</p> <p><i>A. The Council will seek to deliver growth and regeneration in Tottenham through well-managed and <u>balanced</u> changes, This means balancing continuity and the preservation conservation of local distinctiveness and character whilst ensuring the historic environments continues to contribute to the remain functional places and spaces that respond to the needs and identity of local communities.</i></p>	
Res70	D6	AAPMod20	AAP5	<p>A <i>To achieve this aim the Council will seek to strengthen the <u>historic and local</u> character and local identity of Tottenham by <u>conserving</u> sustaining and enhancing heritage assets, their setting and the wider historic environment. This includes reviewing Conservation Area <u>Appraisals and Management Plans</u> where appropriate, including reviewing existing boundaries. Proposals for new development will be required to:</i></p>	The Council agrees with the suggested changes to the AAP Policy, and would support their inclusion as a replacement for the proposed modifications to aid with legibility and to improve the effectiveness of the Policy.
Res70	D7	AAPMod20	AAP5	<p><i>a. Reflect, where available and relevant character <u>and heritage</u> appraisals, <u>statements</u> and management plans for the area <u>and/or heritage assets</u>.</i></p> <p>Parts b, c and d to remain the same.</p>	The Council agrees with the suggested changes to the AAP Policy, and would support their inclusion as a replacement for the proposed modifications to aid with legibility and to improve the effectiveness of the Policy.
Res70	D8	AAPMod20	AAP5	<p>c. Reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries.</p>	The Council agrees with the suggested changes to the AAP Policy, and would support their inclusion as a

					replacement for the proposed modifications to aid with legibility and to improve the effectiveness of the Policy.
Res70	D9	AAPMod22 – AAPMod24	AAP5 Parts B, C & D	The second concern related to the deletion of Parts B, C and D of the pre-submission version of AAP5. These sections sought to provide clarity on the tests of harm and justification to support such harm. These are key points to consider at the local level and in the context of substantial change proposed in Haringey their deletion raises concerns of how issues of harm will be treated in line with national policy. At present the supporting text (para 4.23) provides a broad test, but not sufficient in detail to reflect the nuances of the tests clearly set out in national policy (NPPF para 133-135).	The Council has no objection to the re-instatement of these Policy points.
Res68	D10	AAPMod27	AAP6 E	AAPMod 27: AAP6, Part E, Objection. The 2 nd part of the sentence, “whilst optimising opportunities for intensification and regeneration”” should be deleted , because it does not belong there, i.e. it has nothing whatsoever to do with the need “to ensure the height of new buildings responds (NB. The “s” is missing in your document) and helps (NB the “s” is missing) to define the surrounding character.” The latter provision must not be watered down, because it is important.	The part of the sentence which reads “whilst optimising opportunities for intensification and regeneration” was part of the submission AAP, and has not been altered by the proposed modifications, and the Council is satisfied it should remain. No change
Res69	D11	AAPMod41	SS3, TG3, NT3, NT4, NT5	This paragraph concerns council estates at Turner Avenue, Brunel Walk, Reynardson Court, Northumberland Park and Love Lane. It is sad to read a proposed modification which seems predicated on the supposed inevitability that demolition and redevelopment must take place at all of these sites. This contradicts the excellent modifications made	The commitment to holding a vote on whether an estate is subject to improvements or demolition is outside of the scope of the Local Plan. Nevertheless, as set out in AAPMod41, the first step is for the Council to engage the

			<p>at Alt 45 and Alt 64 of the Alterations to Strategic Policies: requiring that strategic improvement must be properly considered for all the council estates affected by the Local Plan.</p> <p>Such basic improvements at Northumberland Park as fixing broken windows, fixing broken roof tiles in stairwells, and clearing up neglected and smelly pram sheds; or putting a concierge service into the Love Lane tower blocks, have never been properly considered by the Council.</p> <p>The millions spent trying to demolish Love Lane could have been much better spent on improvements and remodelling, as well as on social support for residents and communities.</p> <p>Many tenants and owners are proud of their homes and wish to remain in them.</p> <p>At Turner Avenue and Brunel Walk (SS3), the Council themselves say that ‘residents generally oppose redevelopment’ (p 572, Cabinet reports pack, 18/10/16). At Northumberland Park, where we have canvassed for many weeks, most residents do not support demolition and more than 300 have signed petitions demanding the final say in a ballot. Because of the Council’s denial of its own undeclared policy, many residents even in the centre of the demolition areas have little idea what is planned for them.</p> <p>Therefore, the proposed modification to AAP Alt 41 is inadequate. There should be a proper evaluation of</p>	<p>residents across the site prior to commencement of any proposal. It would be at this stage that residents would be able to voice their opinion as to whether improvement or demolition is the most appropriate approach and for the Council to give detailed reasons why redevelopment is justified if that is decision taken.</p> <p>No change</p>
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				<p>strategic improvements as well as demolition.</p> <p>Estate redevelopment schemes are controversial, and rightly so. Research has demonstrated that a loss of social housing results from most such schemes; especially since governments cut national funding for new social housing at Target Rent, after 2010, and cut funding for most new sub-market renting of any kind, after 2015.</p> <p>We recommend that this section of the Local Plan should specify proper provision at all demolition sites for a decisive residents yes/No Vote on the demolition proposals, as recommended by the 'Knock it down, or do it up' report from the Housing Committee of the London Assembly, published in 2015.</p> <p>We recommend that residents of all tenures must be allowed to vote in a secret ballot counted by the Electoral Reform Society or a similar organisation.</p>	
Res72	D12	AAPMod41	4.14	<p>In AAPMod41, page 10-11: insert the following after 'The process for undertaking estate renewal will follow the following steps:':</p> <p>'- the potential for refurbishment; - the principles under which demolitions would be considered;'</p> <p>Reason: This reflects the modifications made to SA62 in terms of consulting residents about the possibility for refurbishment as well as demolition. It also is in accordance with Alt 53 to the Alterations to Strategic Policies (see above.)</p>	The Council would support the suggested modification for consistency and effectiveness.
Res77	D13	AAPMod59	AAP Key Diagram	<p>THFC support the update to the AAP Key Diagram that shows the extended local centre boundary for North</p>	Noted.

				Tottenham which was agreed as part of the SoCG between THFC and LB Haringey and presume that this will also be included on the updated Proposals Map. THFC support the insertion of the new supporting paragraph after para. 2.37 which relates to the new local centre and also formed part of the SoCG. 6	No change
Res77	D14	AAPMod68	NT7	THFC agree with the modifications to Site Allocation NT7 (Tottenham Hotspur Stadium) which recognise the latest planning permissions and the retail uses that form part of the consented scheme as well as the modification to para. 5.84 to create a 'premier' leisure and sports destination for London.	Noted. No change
Res74	D15	AAPMod76	TH6	Following the examination in public hearing there are a number of modifications proposed to the Tottenham AAP regarding these sites of which the NLWA is supportive. However, the NLWA recommends that AAPMod76 be changed so that the last sentence reads: 'It is required that the redevelopment of this site will not create a net reduction in employment floorspace.' In order to provide additional protection to employment use in the area, where the Authority's main administrative office is.	Disagree. The Council wishes to maintain a degree of flexibility in relation to future development of this site, No change
Res74	D16	AAPMod79 & AAPMod81	TH6 & TH7	The NLWA welcomes the recognition and appropriate measures introduced through the Main Mods because both sites are within an area of flood risk.	Noted. No change.
Res75	D17	AAPMod80	TH7	Details noted on the square and mature trees.	Noted. No change
Res72	D18	AAPMinor8	4.13	In AAPMinor8, page 22: Change: 'Tottenham also has an ageing stock of Council housing and rather than re-providing or renovating low quality existing stock which is not a sustainable solution and it	The commitment to engaging residents across the site prior to commencement of any proposal is set out in AAPMod41, as the first step in undertaking any proposals for estate renewal or

				<p>not viable, the Council will support proposals for more widespread renewal of Tottenham's housing estates in accordance with policy AAP3(D).'</p> <p>to</p> <p>'Residents will be fully consulted and will decide themselves whether to re-provide or renovate existing council housing stock in Tottenham. If the residents support proposals for more widespread renewal of a housing estate in Tottenham instead of refurbishment, it will take place in accordance with policy AAP3(D).'</p> <p>Reason: The currently proposed modification contains a clear bias in favour of demolition and against consulting residents about refurbishment options. Again this contradicts Alt 53.</p>	<p>strategic improvement. It would be at this stage that residents would be able to voice their opinion as to whether improvement or demolition is the most appropriate approach and for the Council to give detailed reasons why redevelopment is justified if that is decision taken. The point raised in AAPMinor8 is still valid in that the estates identified for potential estate renewal were done so on the basis of the quality of the existing stock as well s other considerations.</p> <p>No change</p>
Res76	D19	N/A	BG2	<p>Detailed representations were made on 4th March 2016 to the Regulation 19 Local Plan consultation concerning the above listed Site Allocation and related text. The basis for the client's objection as made was that the Site allocation was not justified, not effective and not consistent with national planning policy. The council will recall that our client operates his business from 22-24 Moorefield Road, the land of which forms part of the wider BG2 Site Allocation.</p> <p>We have reviewed the various consultation and background documents for Main Modifications consultation and it appears that no modifications to the Tottenham Area Action Plan are proposed to be made by the council, either to the policy allocation BG2 or the related text insofar as this affects 22-24 Moorefield Road. Our client therefore maintains his objection to the Local Plan as per the original representations.</p>	<p>There are two parts to this allocation, the east and western sides of the railway line. The Council is actively seeking to make better use of the eastern side of the line, including an improved station entrance, and newly improved shopfronts which are more befitting of a District Centre site. There are at present no application planned for the site in question, which lies on the western side of the railway line.</p> <p>Despite this, the Council retains its view that the existing use is</p>

			<p>We note that prior to the Examination in Public last summer, the Independent Inspector set out matters which the council were required to address. In the 'Matter and Issues' document, at Matter 4 Question 16 the Inspector states:</p> <p><i>"16. TG2, BG2. How has the effect on the existing community or business use been taken into account? Can it be demonstrated that these sites are deliverable if there are existing, viable uses."</i></p> <p>The council subsequently issued a note entitled 'Matter 4 Response' which sets out its response to Question 16 as follows:</p> <p><i>"In the case of BG2, it is observed that there is currently a viable builder's merchant located next door to a London Zone 3 rail station. This is not the most suitable use for this high PTAL location. The Council will support the relocation of the builder's merchant to create an opportunity for new mixed use development on this site."</i></p> <p>In our view the council's response is inadequate. It does not fully or properly address the issues raised by the inspector particularly concerning impacts on the existing business or community. Neither does it address the key issue of deliverability, noting the client's lease arrangements. It is clear that the inspector had been concerned by the matters raised in our client's original representations. This lends further force to our client's belief that he should maintain his objection as before. Our client has traded from Moorefield Road for over 30 years. The business provides the local community with a local and personal service that cannot be provided by the bigger stores. The business is positioned so that the elderly and infirm can still attend the premises. The company is a major part of the community providing the carnival with vehicles and providing maintenance services</p>	<p>not the most appropriate use for this piece of land. Directly adjacent to a railway station is not the most appropriate location for a car-driven logistics support business. It is important to Tottenham that valuable sites such as this are optimised to benefit the visitors to Tottenham's District Centres</p> <p>We note the existing occupants (leasehold) interest in the site, and the view locally that the business makes a contribution to the local economy. The Council is not seeking to move local businesses out of the area, and would support relocation to a more appropriate site in the borough. Alternatively, a remodelling of the operation has the potential to create a suitable mixed use on the existing site.</p> <p>It is considered appropriate that the whole of the Bruce Grove station area is considered together as a comprehensive allocation, thus ensuring that if a proposal does come forward on this site (noting the respondent's leasehold arrangement), it is considered appropriately having regard to</p>
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			<p>to the local schools as well as the old and disabled. From conversations with planning officer, it appears there is an acknowledgement from the council that the full redevelopment of site BG2 could only happen if our client chooses to relocate or if there is a hostile compulsory purchase. Our client is not intending to relocate mainly because the business operation is established in this location and it operates on favourable lease terms. Even if there were any intention to relocate there is seemingly a lack of available and suitable sites. It is also doubtful whether lease terms of other sites could be as favourable as existing.</p> <p>We trust these objections will be taken into account. Assuming the Inspector agrees with our position we would expect that modifications to the Local Plan concerning BG2 will be made accordingly.</p>	<p>the future improvements to the station and the wider site environs.</p> <p>No change</p>
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Respondents to the Modifications Consultation – No Specific Document

ID	Respondent	ID	Respondent
Res78	Canal & River Trust	Res80	HSE
Res79	Highways England		

Responses to the Modifications Consultation – No Specific Document

ID	Rep ID	Mod Ref	Policy / Para / Figure	Comment	Council's Comments / Response
Res78	E1	NA	NA	The Canal and River Trust have no further comments.	Noted. No change
Res79	E2	NA	NA	We have reviewed the documents and conclude that we do not have any comment.	Noted. No change
Res80	E3	NA	NA	No relevant comments.	Noted. No change

Respondents to the Policies Map

ID	Respondent	ID	Respondent
Res81	Sallyann Bradnam		

Responses to the Policies Map

ID	Rep ID	Mod Ref	Policy / Para / Figure	Comment	Council's Comments / Response
Res81	E4	N/A	N/A	Concern that the Heartlands Article 4 direction applied to the Tower	The Article 4 that applies to replacing windows in the Tower Gardens Conservation Area, and the Coronation

				Gardens Conservation Area.	Sidings Article 4 are separate, but acknowledge the map identifies all Article 4 directions with the same yellow line. This should be modified in the final Policies Map, but it is not considered that this is a soundness issue.
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