


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

**Tottenham AAP**

**Please return to London Borough of Haringey by 5pm on Friday 4<sup>th</sup> March 2016**

This form has two parts:

Part A – Personal Details

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

## Part A

1. Personal Details <sup>1</sup>	2. Agent's Details
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
<b>Our Tottenham network</b> <a href="http://ourtottenham.org.uk">http://ourtottenham.org.uk</a> , <b>Planning Policy Working Group</b> (contact persons: David Morris, Anne Gray, Claire Colomb)	
Address Line 1	
Address Line 2	
Address Line 3	
Post Code	
Telephone Number	
Email address	
<a href="mailto:ourtottenham@gmail.com">ourtottenham@gmail.com</a> <a href="mailto:dmorris@onetel.com">dmorris@onetel.com</a> <a href="mailto:amgggg2@yahoo.co.uk">amgggg2@yahoo.co.uk</a> <a href="mailto:ccolomb30@googlemail.com">ccolomb30@googlemail.com</a>	

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

## Part B – Please use a separate sheet for each response

Name or Organisation: **Our Tottenham network** <http://ourtottenham.org.uk>  
**Planning Policy Working Group**

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

Paragraph	<input type="text"/>	Policy	<b>AAP3: HOUSING</b>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes <input type="text"/>	No <input type="text"/>
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4.(2) Sound	Yes <input type="text"/>	No <input checked="" type="text"/>
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4.(3) Complies with the Duty to co-operate	Yes <input type="text"/>	No <input type="text"/>
--------------------------------------------	--------------------------	-------------------------

Please tick as appropriate

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

Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The **Our Tottenham network brings together 50 key local community groups, projects and campaigns** standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <http://ourtottenham.org.uk/>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham. **Organisations affiliated to the Our Tottenham network** include (as of 1.03.2016):

- Bull Lane Playing Fields Campaign / Weir Hall Action Group
- Chestnuts Community Centre
- Clyde Area Residents Association
- Day-Mer
- Defend Haringey Health Services
- Dissident Sound Industry Studios
- Find Your Voice
- Friends of Downhills Park
- Friends of Lordship Rec
- Growing-In-Haringey Network
- Haringey Alliance for Public Services
- Haringey Defend Council Housing
- Haringey Federation of Residents Associations
- Haringey Friends of Parks Forum
- Haringey Green Party
- Haringey Housing Action Group
- Haringey Independent Cinema
- Haringey Justice for Palestinians
- Haringey Left Unity
- Haringey Living Streets

- Haringey Needs St Ann's Hospital
- Haringey Private Tenants Action Group
- Haringey Solidarity Group
- Haringey Trades Union Council
- Living Under One Sun
- Lord Morrison Hall / Afro International
- N.London Community House
- Peoples World Carnival Band
- Selby Centre
- The Banc
- Tottenham and Wood Green Friends of the Earth
- Tottenham Chances
- Tottenham Civic Society
- Tottenham Community Choir
- Tottenham Community Sports Centre
- Tottenham Concerned Residents Committee
- Tottenham Rights
- Tottenham Theatre
- Tottenham Traders Partnership
- Tower Gardens Residents Group
- Tynemouth Area Residents Association
- Ubele
- University and College Union at CONEL
- Urban Tattoo
- Wards Corner Community Coalition
- 1000 Mothers' March Organising Group
- 20's Plenty for Haringey

See a description of our member at: <http://ourtottenham.org.uk/about/supporting-groups/http://ourtottenham.org.uk/about/supporting-groups/>.

This response, formulated by the **Our Tottenham Planning Policy Working Group** (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the **Our Tottenham Local Economy Working Group**, is based on the principles embedded in the **Community Charter for Tottenham** agreed by the **Our Tottenham network** at our first Community Conference on 6 April 2013 (available here: <http://ourtottenham.wordpress.com/community-charter/>). This was followed up by two more Community conferences in February and October 2014. All the materials produced by the **Our Tottenham network** are available on our website. The **Our Tottenham Community Charter** and subsequent revisions are enclosed in **Appendix 1** of the present submission.

**This response builds upon the previous responses we submitted:**

- i. in March 2014, in response to the public consultation on *the draft Tottenham APP Regulation 18 Consultation Document*;
- ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the *Tottenham AAP, February 2015 version*. Our response (in two parts) is available here:

[http://www.haringey.gov.uk/sites/haringeygovuk/files/our\\_tott\\_network\\_-\\_pp\\_working\\_grp\\_taap\\_overall\\_response.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_taap_overall_response.pdf)

[http://www.haringey.gov.uk/sites/haringeygovuk/files/our\\_tott\\_network\\_-\\_pp\\_working\\_grp\\_taap\\_detailed\\_response.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_taap_detailed_response.pdf)

The present response needs to be read in conjunction with the separate response we have submitted about the **Alterations to Strategic Policies 2011-2026. Haringey's Local Plan. Pre-Submission Version January 2016** (thereafter referred to as **Alterations**).

In para. 1.24 of the AAP, the concerns of the local community which arose out of previous consultations are rather well summarized:

Initial consultation on the broad proposals for Tottenham was undertaken in January 2014. A number of public consultation events were also held that attracted over 80 residents and stakeholders. The full report is available on the Council's website. In summary, consultation feedback highlighted a number of common themes:

- The need for the AAP to be clear about what is being proposed (i.e. where and why, as well as the implications for local neighbourhoods, local residents and businesses);
- That the area is already densely populated and concern as to whether the number of new residential developments proposed for Tottenham is appropriate and equitable in a Borough-wide sense;
- That existing deficiencies in community infrastructure (including health care facilities, primary school places and local open space) serving the area will be further exacerbated if additional housing is added - new infrastructure provision must be secured and not just promised;
- Concern that regeneration will lead to the gentrification of Tottenham, with existing residents and businesses forced out of the local area;
- A desire to see the distinctive existing character and heritage of neighbourhoods retained and preserved;
- The need for further detail on employment provision, including: the types of jobs proposed to be delivered, how these will be secured for local benefit and greater clarity on the proposals for existing local employment sites, including proposals to support, retain (including through relocation) and grow local businesses, as well as the need to secure affordable workspace; and
- That regeneration in Tottenham should not be solely for, or in the hands of, major developers and landowners but should be in collaboration with the existing community.

**However, we feel that many policies and site allocation proposals in the Tottenham AAP directly ignore those concerns, and are based on unsound evidence.**

**In the first part of our response, we focus our response on Policy AAP3 HOUSING. In the second part of our response, we have made detailed comments on each of the sites listed in the Tottenham AAP (see [Appendix 2](#)).**

### **POLICY AAP3: HOUSING**

- A To improve the diversity and choice of homes, and to support mixed and balanced communities in Tottenham, the Council will seek the delivery of 10,000 additional new homes across the Tottenham AAP area in order to meet housing needs, contribute to mixed and balanced communities and to improve the quality of homes;
- B The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation;
- C Development proposals incorporating a housing element will be expected to provide the housing in accordance with the minimum capacities, set out in the Site Allocations in this AAP. Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised.
- D To better address the concerns of viability in delivering wholesale renewal on Haringey's housing estates in Tottenham (as listed in Alt53 of the Local Plan Strategic Policies), the Council will support higher density mixed tenure development, as a mechanism to:
- a improve the quality and range of affordable housing options,
  - b better address housing needs in Haringey;
  - c secure a more balanced community; and
  - d increase housing delivery in Tottenham.

## 1. Has the plan been positively prepared?

*The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development (p. 63 of the Alterations document).*

We argue that several policies and proposals made in the *Tottenham AAP* **do not meet the existing local communities' requirements** (from both residents and businesses). On the contrary, they represent an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Tottenham to the detriment of current communities and of Tottenham's character. This particular affects Tottenham, as a significant amount of foreseen development is concentrated in this part of the Borough.

Additionally, they fail to demonstrate how the revised Strategic Policies will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on). The *Alterations* fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.

a) In several ways the AAP do not fulfill, or contradict, some of the objectives laid out in para. 3.2.2, Policy SP2 HOUSING of the Strategic Policies, in particular: 'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of'.

b) The objectively assessed requirements are for building as much genuinely affordable housing as possible, as well as meeting a deficit of green space in the densely populated wards of Tottenham. The Strategic Housing Market Assessment ([http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic\\_housing\\_market\\_assessment.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf), p. 8) shows that 58% of currently resident households could not afford to pay even 80% of market rents in 2010. Since then, there has been rapid growth of both house prices and rents, making that assessment seriously out of date with its assumptions of very low inflation of housing costs in 2010-16. The *Alterations* (Para 3.2.18) state that the Council 'aims to ensure an adequate mix of dwellings is provided' but there is no detail as to how this will be achieved, especially with regard to social housing for families. The proposals for new developments are primarily for high density flats including many very tall buildings. These are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs covered. Given the extensive need in Haringey for social housing for families, how can this approach be described as a 'strategy which seeks to meet objectively assessed requirements?' The Council says responding to family housing need is 'a priority for the Council', so the question is, will this plan address this in making provision of family housing for people living here?

The proposals for the "renewal and improvement" (including demolitions) of the council housing estates listed in the Strategic Policies, SP2 point 10, p. 42, do not include comprehensive detailed options for re-housing families living in, at minimum, like for like accommodation. Neither are there alternative options for improving the estates so people can remain there. This is not objective in any sense. Yet this is the priority group in housing need. A large consultation exercise carried out by the Council to gauge people's priorities showed that the main issue of concern to local people in Tottenham was provision of social housing, and the need to tackle rogue landlords.<sup>2</sup>

There are serious questions which need to be answered regarding the concept of 'rent'. 'Affordable' levels (defined as 80% of market rent in the plan and the London Plan) may not be affordable, especially if we add the substantial service charges which both social and private landlords charge in addition to rent in many buildings (see next section).

<sup>2</sup> 2014 Tottenham's Future Consultation Report, at <http://www.haringey.gov.uk/regeneration/tottenham/tottenham-regeneration/tottenhams-future>

c) The Council's Sustainable Community Strategy (2010-2016)<sup>3</sup> states 'We will continue to increase the availability of affordable housing through the optimum use of existing dwellings and by building more affordable homes'. With Government cuts and caps to benefits affecting thousands of local residents, and almost no private tenancies available at LHA rates or below, the desperate need for genuinely affordable housing and social housing generally is of even greater urgency. For people in housing need in Haringey this means social rented housing. Yet, the Council has not produced any alternative option which demonstrates how this might be achieved, even within the current housing and planning environment. Councils such as Islington and Brighton have used different strategies, but the *Alterations* rely on simply working with developers and the private rented market. The LB Islington Housing Strategy 2014-2019<sup>4</sup> challenges the concept of 80% market rent being a suitable ceiling of 'affordability', works to curb bad landlords and secure longer more secure tenancies, and seeks to make council homes cheaper to run. In Brighton, the Estate Regeneration programme<sup>5</sup> focuses on identifying small infill sites within existing council estates and building on them subject to detailed consultation work with local residents.

The plan needs to provide enough social housing to meet the needs of Haringey's housing waiting list within a 5 year period, plus enough for population growth. The waiting list had 8,362 people in 2013; since then the lower-priority categories (bands D and E) have been removed from the list. The ostensible reason was because it was unmanageably large, but removal of these two bands also conceals the extent of housing need, and the numbers of people living in private, temporary and sub-standard, overcrowded and sub-standard accommodation. In this context, the 2013 figure may give a better idea of concealed housing need than the up-to-date one.

In addition, the plan needs to meet the requirements of population growth, assuming that this will follow the trajectory of the last decade minus the portion of that population growth attracted by residential building for sale at Hale Village and the New River development, the major new developments of that period. To accommodate the 2013 waiting list, the absolute minimum number of new social housing units should be around 8,360 plus an additional 1,700 every 3 years to cater for population growth, even before considering any **further increase** in the proportion of households who cannot afford market rents. In summary, our estimate is that, before considering any change in that proportion, Haringey would need **at least 16,300 social rented units over 15 years or 1,066 per year**. This is more than 100% of the previous building targets **for all types of housing** before the London Plan was revised in 2015, showing that without the excessive densification now proposed, Haringey would need to find ways of helping some of its residents to meet their housing needs in other boroughs which are currently less crowded or in 'new town' type developments outside London. Even if the new target of over 20,000 homes could be achieved without excessive densification (which we very much doubt), over 75% would need to be genuinely affordable to achieve the central objective of Housing Policy 3.2.

Remarkably, Haringey Council's own Joint Strategic Needs Assessment states that 'to address both projected newly arising need and the current backlog, an annual programme of over 4,000 additional affordable homes is estimated to be required' (see <http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsna-housing#levelofneedofpopulation>). This simply cannot be achieved without overspill to other areas. But it is clear that the *Alterations*' target of only 40% of units to be 'affordable' is absolutely inadequate and there is little clarity that 'affordable' would include social rented housing which families in Tottenham on low incomes could afford.

<sup>3</sup> [http://www.haringey.gov.uk/sites/haringeygovuk/files/sustainable\\_community\\_strategy.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/sustainable_community_strategy.pdf)

<sup>4</sup> <http://www.islington.gov.uk/publicrecords/library/Housing/Business-planning/Policies/2014-2015/%282014-06-03%29-Housing-Strategy-2014-2019.pdf>

<sup>5</sup> <http://www.brighton-hove.gov.uk/content/housing/council-housing/new-homes-neighbourhoods>



## 2. Is the plan justified?

*This means that the Plan should be founded on a robust and credible evidence base involving:*

- *Evidence of participation of the local community and others having a stake in the area.*
- *Research/fact finding: the choices made in the plan are backed up by facts.*

*The Plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved (p. 63 of the Alterations document).*

### **2.1 Evidence of participation of the local community and others having a stake in the area:**

In asking if this plan is justified, one of the required criteria is 'evidence of participation of the local community and others having a stake in the area'. There is not enough evidence of community participation encouraged or promoted by the LPA in this final round of consultation which goes beyond a minimum. Independently of this part of our submission, we presented a more detailed analysis of the consultation process and its shortcomings (see text box below). The Council posted the consultation on its website and offered two hour sessions for people to attend at local libraries, at hours most people could not make, even if they were aware of the sessions. These were not very well publicized, and were very poorly attended. This is not the fault of local people. There were no public meetings to explain these plans even though the consultation runs for several weeks. The Council's borough-wide magazine *Haringey People* – which goes to households directly – did not include one word or reference to this consultation (see <http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-people-archive>). This would have been the most effective method for directly communicating with residents. The documents are hard to read on line yet active residents' groups had to ask and press for printed copies in order to meet with their members.

The **Supreme Court in the Moseley v Haringey Council** judgement set out conditions for fair consultation. Amongst the four criteria it states that 'the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.' It is questionable as to whether this condition to allow for 'intelligent consideration and response' has been met with regard to this vital consultation on the Local Plan.

#### **Consultation issues**

The Council's 'Statement of Community Involvement' says that the Council will provide summaries in plain language. Although in correspondence with *Our Tottenham* last year, a senior Council officer expressed the view that to provide summaries would lead to confusion about whether the public should respond to the summary without reading the full text, we think summaries should have been provided at the library drop-in sessions and elsewhere (community centres, online, and in *Haringey People*) and that without them, it is difficult for residents to gain interest in or grasp the meaning and significance of the full text to which they are required to respond.

The Council did not pro-actively seek to involve non-English speaking communities with special meetings for example with Turkish translators. There was also some delay from the start of the consultation period in accessing translation apps for the documents online.

From the start of the consultation the Council were reluctant to provide any hard copies of the documents. They claimed that a set of the documents were available in libraries and that was good enough. Latterly they accepted it was not sufficient and provided copies to community representatives and groups. In addition, an extra two sets were provided to each of the open public libraries and a set was sent to elected councillors with the instruction that they should make their copy available to their electors.

The first tranche of consultation events were held at Haringey's public libraries during the day time. This prevented those with 9-5 Monday to Friday jobs from attending. At Coombes Croft and Alexandra Library our members observed that they were the ONLY members of the public

present. At Wood Green there were only 5. Cllr Clive Carter reported to Friends of Finsbury Park that only one person had been recorded as attending the consultation at Highgate Library. Later in the consultation period a number of evening events were organised. However, these were poorly advertised - mainly through the council website - and since most residents only use the Council web site, if at all, if they are looking for something they already want or know about, it was no surprise that they failed to attract people to get along. One evening event - held at 639 High Road, where the council's Tottenham regeneration team have an office - was attended by only one member of the public. In desperation, council officers resorted to standing on the High Road failing to entice passers-by inside.

There was no mention of the consultation in the February-March 2016 edition of the Council's borough-wide publication *Haringey People*. Not having a major article on the Local Plan in the one publication going to all households, and not placing advertisements in the local press, is a serious failure to engage as many people as possible in the consultation. Indeed, many residents may have known nothing about the consultation until some residents complained to the press (see

[http://www.thetottenhamindependent.co.uk/news/14246972.Council\\_criticised\\_over\\_Local\\_Plan\\_consultation\\_timings/](http://www.thetottenhamindependent.co.uk/news/14246972.Council_criticised_over_Local_Plan_consultation_timings/)).

The provided documents contain many mistakes. For example, in the Site Allocation DPD, section SA62 on Broadwater Farm gives a contradictory account in different parts of the page about who owns the land and neglects the private ownership of houses in Lordship Lane which may be marked for demolition under the proposed plan. The map for this page shows the boundary of the redevelopment zone going through the middle of a very large and important building, the Broadwater Farm Community Centre. Section SA15 concerning Whymark Avenue, N22, contains the extraordinary statement that 'no buildings need be retained' even though it contains a new block of mixed residential and retail units only about three years old which presumably had planning permission when constructed. Another mistake is that on the map Bruce Grove station is represented as a national rail station, when it has been a London Overground station for several months.

## **2.2 Research/fact finding: the choices made in the plan are backed up by facts:**

**We would like to challenge some key assumptions and evidence base used to justify Policy AAP3 HOUSING of the Tottenham AAP, which itself reflect the Alterations to Policy SP2 HOUSING of the Strategic Policies (see our separate response), under 3 broad themes:**

- **Overall scale of housing growth and implications for existing and future social infrastructure**
- **The question of affordability**
- **The chosen approach to housing provision and to 'housing estate renewal'**

### **1.2.1 Overall scale of housing growth and implications for existing and future social infrastructure in Tottenham:**

a) The Alterations to the Core Strategy have been prompted by the adoption of the Further Alterations to the London Plan (FALP) which were adopted in March 2015. The Haringey Local Plan has to comply with the FALP and thus the proposed alterations reflect the major changes in housing and employment targets which were included in the FALP. The strategic housing target for Haringey was increased from 820 homes per annum to 1,502 homes per annum on the basis of the GLA SHLAA - an 83% increase. This is the single highest increase of any London Borough (the increases ranging from 3% for Greenwich to 83% for Haringey. The distribution of targets across London Boroughs displays a bias towards poorer (and denser) Boroughs, the ones which suffer from highest levels of deprivation. It is highly questionable whether Haringey land and infrastructure have the capacity to accommodate so many extra homes and the London Plan target needs to be challenged, in particular compared to the much lower rates of expansion given to West Central and Outer South-eastern boroughs. We strongly context and oppose this massive increase affecting the Borough of Haringey. We made a submission during the public consultation on the Further Alterations to the London Plan in 2014 (here



<https://www.london.gov.uk/sites/default/files/302OurTottenhamPlanningPolicyWorkingGroupResponse.pdf>) and presented evidence at the EiP at Session 2b (Housing need and supply) on Wednesday 3 September 2014 to make this argument. It was ignored in the subsequent version of the FALP post-EiP. These figures are unsustainable, unrealistic and unfair. The strategic priority given to new, large-scale development in Tottenham in the London Plan and in the Haringey Local Plan consultation documents cannot be realized at the expense of the people already living and working there. In the response by the LB Haringey to the consultation on the Further Alterations to the London Plan (in 2014), Steve Kelly, Assistant Director of Planning, himself noted that this was a 'stretching' target that it would not meet on its own without external GLA funding and support (<https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf>).

b) The Tottenham AAP identifies land capable of delivering 10,000 new homes and 5,000 new jobs. We contest the scale of this growth and its concentration in Tottenham. The proposal to concentrate half of the housing delivery target (=10,000 homes) in Tottenham is particularly not realistic and potentially very highly damaging to the existing residents and businesses, environment and character of the area (see our Response to the Alterations to Strategic Policies 2011-2026). We disagree with the fact that Tottenham should host half of this targeted growth. Several wards of Tottenham already have the highest densities in the Borough (see table and map in the overall response to this APP). Bruce Grove, St Ann's, Seven Sisters and Tottenham Green have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate). White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land – which means that the population density in the residential areas of those North Tottenham wards is high, too.

**QS102EW - Population density in Haringey<sup>6</sup> (from 2011 census)**

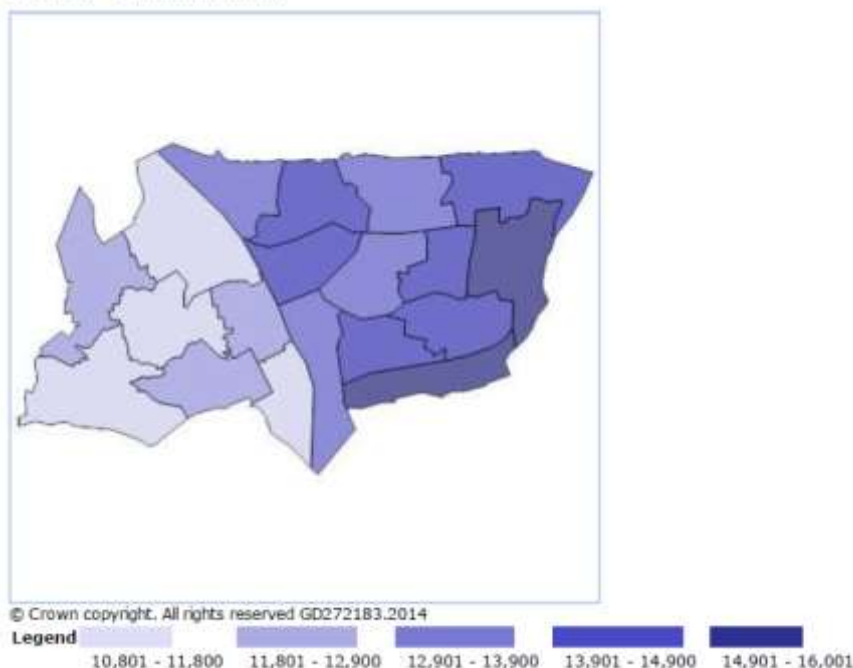
ONS Crown Copyright Reserved [from Nomis on 2 March 2014]

The wards highlighted in yellow are located in Tottenham.

2011 ward	All usual residents	Area Hectares	Density (number persons hectare)	of per
E05000268 : Bruce Grove	14.483	93,14	155,5	
E05000277 : St Ann's	14.638	109,73	133,4	
E05000278 : Seven Sisters	15.968	129,20	123,6	
E05000273 : Hornsey	12.659	105,54	119,9	
E05000275 : Noel Park	13.939	122,97	113,4	
E05000279 : Stroud Green	11.758	109,46	107,4	
E05000280 : Tottenham Green	14.580	136,10	107,1	
E05000267 : Bounds Green	13.725	138,40	99,2	
E05000284 : Woodside	14.514	149,21	97,3	
E05000282 : West Green	13.372	139,84	95,6	
E05000269 : Crouch End	12.395	143,99	86,1	
E05000271 : Harringay	13.272	156,16	85,0	
E05000283 : White Hart Lane	13.431	169,72	79,1	
E05000281 : Tottenham Hale	15.064	191,15	78,8	
E05000276 : Northumberland Park	14.429	188,48	76,6	
E05000274 : Muswell Hill	10.784	165,16	65,3	
E05000270 : Fortis Green	12.488	199,44	62,6	
E05000272 : Highgate	11.632	249,89	46,5	
E05000266 : Alexandra	11.795	261,27	45,1	

<sup>6</sup> <https://www.nomisweb.co.uk/census/2011/QS102EW/view/1946157250?cols=measures>

QS102EW - Population density



Tottenham has the highest level of social deprivation and suffers from a chronic shortage of key facilities such as GPs, open space, schools etc...Tottenham cannot cater for 10,000 extra residents without grave problems for its social infrastructure and existing population. This is an unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough.

How and where will social infrastructure be provided to accompany the planned 10,000 new homes is absolutely not demonstrated in this AAP. A precise list of the needed social infrastructure, with supporting evidence, to cater for (i) the backlog of need and (ii) anticipated growth is needed in the next draft AAP, with precise proposals for location on particular sites. How these amenities and services would be provided and funded – in particular through Section 106 agreements and the CIL – is not explored convincingly in the AAP.

There should be a strict policy of protection of existing community centres - some of which are under threat or seeking renewed or longer leases - of pubs, post offices, and corner shops from change of use. An expansion of youth services and facilities and nurseries is absolutely vital across Tottenham.

We consequently demand that any new development encouraged by the AAPs should not lead to any net loss of social infrastructure, and should include additional social infrastructure to serve the existing and future residents in and near Tottenham, in particular:

***i. Adequate levels of GP and health services provision:***

In London the average is 1639 patients per GP, according to a Kings Fund report on '*General Practice in London*'<sup>7</sup>. However, by going through the information for each practice provided for patients on <https://www.myhealth.london.nhs.uk/>, we can show that the average for Tottenham GPs is 2002 patients each, as outlined in the table below<sup>8</sup>. Thus Tottenham GPs have 22.2 per cent more patients on their list, on average, than London GPs in general.

<sup>7</sup>[http://www.kingsfund.org.uk/sites/files/kf/field/field\\_publication\\_file/general-practice-in-london-dec12.pdf](http://www.kingsfund.org.uk/sites/files/kf/field/field_publication_file/general-practice-in-london-dec12.pdf)

<sup>8</sup>Data on the GPs was collected from <http://www.nhs.uk/Service-Search/GP/LocationSearch/4> and <https://www.myhealth.london.nhs.uk/>, taking in all practices which are within one mile of St Ann's Hospital and/or 639 High Road, N17 and which are also located within Haringey boundaries.

Patients per doctor in Tottenham					
Name of surgery	Map ref *	Map ref*	No. of patients registered	No. of GPs** in the practice	Patients per GP
Spur Road Surgery		2	970	1	970
Dr AUK Raja		12	1019	1	1019
Dr RS Caplan & Partners		22	6660	5	1332
Dr K Sivasinmyanathan & Partner		1	2913	2	1457
Dr R Singh & Partner		25	3028	2	1514
Tynemouth Road Health Centre		19	9116	6	1519
THE BRIDGE HOUSE SURGERY		24	9903	6	1651
West Green Surgery		4	7525	4,5	1672
Dr DK Kundu		20	1698	1	1698
Lawrence House Surgery		3	10507	6	1751
Dr DK Suri	2		1887	1	1887
JS Medical Practice		5	3860	2	1930
Dr AP Ansari		10	1978	1	1978
Charlton House Medical Centre		23	6140	3	2047
Dr ATM Hoque		11	4334	2	2167
Park Lane Medical Centre	6		2345	1	2345
Somerset Gardens Family Health Care Centr	7		11929	5	2386
The Old Surgery 572 Green Lanes		13	2469	1	2469
Grove Road Surgery		8	2661	1	2661
Havergal Surgery		14	5444	2	2722
Dowsett Road Surgery	5		3037	1	3037
Bruce Grove PHCC		16	8979	4	2245
Westbury Medical Centre		18	8169	6	1362
The Morris House Group Practice		15	11722	2	5861
Broadwater Farm Health Centre		9	3549	1	3549
Dr KR Jeyarajah & Partner	3		4345	1	4345
CASTLEVIEW SURGERY	4	21	8979	4	2245
Total			145166	72,5	2002

So in effect Tottenham is short of over one fifth of the GPs it needs even before we have an extra 10,000 or so homes as envisaged in the Tottenham regeneration plans. The existing situation may even be worse than that for at least three reasons:

- The number of GPs in this calculation assumes that they are all working full-time, except for one who says on the practice web site she is part-time and was counted as half. If other GPs are in fact working only part-time, the number of patients per *full time equivalent* GP would be higher.
- As a deprived area with therefore a relatively high incidence of various illnesses, and moreover many people for whom English is not their first language, Tottenham probably imposes on GPs a heavier workload per patient than the London or national average.
- Since Tottenham is characterised by a highly transient population with many migrants and students, the proportion of the resident population actually *registered* with a GP may be unusually low. If all who are entitled to be registered did register (regarded by the NHS as a desirable goal to keep people out of A and E departments) the number of patients per doctor might rise considerably.

This raises the question of what specific plans are being made for extra health infrastructure in the Area Action Plan and Site Allocation documents. This is simply not clear. If an extra 10,000 homes bring in an extra 25,000 people (the exact number obviously depends on the size of dwellings and the vacancy rate), this population would need an extra 15 GPs to provide for their needs at the London average ratio of patients to doctors. A further 16 GPs are needed to reduce the patient/doctor ratio for the *existing* registered patients to the London average. This makes a total of 31 doctors needed for the N15/N17 areas. It is unrealistic to think these can be accommodated within the premises of the 25 existing practices listed in the attached spreadsheet, even if all the partners working there wanted to take on new colleagues. So a number of new doctors' surgeries will be needed and provision for them needs to be made within the land allocations for social infrastructure.

This has important implications for the future of the St Ann's Hospital site. It is a large area of land currently devoted to health service use and capable of housing one or more GP practices, possibly also an urgent care centre, which would serve the N15 area as a whole. This would be the obvious and probably the most economical way to address the 'doctor deficit' in South Tottenham. However it is too far from the new housing developments planned around High Road West and the northern part of N17, for which additional health use land will be needed.

**ii. Adequate levels of quality, public open space (including major new spaces to address areas of deficiency), play areas and sports facilities:**

Based on the London Plan's public open space hierarchy, around 50% of Haringey is deficient in public open green space. In addition, using the Mayor's *Guide to Preparing Open Space Strategies - best practice guidance of the London Plan*, there are also huge areas of deficiency in allotment provision, children's play areas, sports pitches and nature conservation areas. These officially recognised criteria for assessing deficiency are minimums. The London Borough of Haringey Open Space Strategy - Action Plan (November 2005), Objective 1.2, reads: '*To adopt the GLA Guidelines for provision of the different types of open space as the standard to which Haringey will work towards.*' '*Priority: High*' '*Timescale: Immediate*'.<sup>9</sup> That Action Plan still applies. To achieve minimum standards requires a massive expansion of provision. So the AAP and Site Allocation DPD need to make very significant provisions to deliver not only the missing open spaces but also any additional open space needed to cater for any future growth in the resident population of Tottenham.

**Parks:** The *Haringey UDP 2006* states: '*Haringey's open space falls below the National Playing Field Association's 2.43ha per 1000 of the population, standing at only 1.7ha*'. This is a substantial shortfall requiring an increase of 43% just to meet minimum standards. The *LBH Open Space Strategy* para 3.7 further recognises that Haringey residents have far less open space per resident (590 residents per ha) than the London average (363 per ha).

**Allotments:** The *LBH UDP* recognised that there's '*an estimated requirement for up to 1552 plots of [additional] allotment land*'. This represents an additional 31ha, according to the *Atkins Assessment*, on which this is based [Atkins Vol. 1, para 8.67]. However, Atkins Vol 1, para 8.55 states: '*The way in which plots are promoted and publicised also influences demand. At present very little active promotion and publicity has taken place*'. Even to achieve the artificially low number of total plots required, every ward should have an average of around 175 plots (about 15 plots for every 1000 residents). For example, the three wards in South Tottenham currently have a combined total of 63 plots and hence require an additional 462 plots to meet needs. There are only 63 plots for the whole of N15 and only 22 plots in the N4 area of Haringey. There are no plots at all in Bounds Green, Bruce Grove, Harringay, Hornsey, Noel Park and Northumberland Park wards. The only site in St Ann's ward has just 8 plots, and the one site in Tottenham Green ward only 21 plots, therefore residents in those wards have little chance of obtaining a plot near to them. There are in fact

<sup>9</sup> The LBH website has maps of areas of deficiencies for various types of open space: [http://www.haringey.gov.uk/index/housing\\_and\\_planning/planning-mainpage/policy\\_and\\_projects/local\\_development\\_framework/openspace\\_rec.htm](http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/openspace_rec.htm)

It should be noted that some of the Council's definitions of deficiency do not meet the London Plan standards so the actual areas of deficiency are greater than shown on some of the maps.

11 wards in Haringey which have less than 0.24 ha of allotment space per 1000 residents. Many residents are on waiting lists for allotments.

**Children's Play Areas:** the NPFA minimum standard for children's play is 0.2-0.3 ha outdoor equipped playgrounds and 0.4-0.5 ha informal play space per 1000 population, i.e. 0.6-0.8 ha children's play space per 1000 residents. There should be a Local Area for Play within 60 metres of all homes, and a Local Equipped Area for Play (with at least 5 types of play activity equipment) within 240 metres. To achieve minimum standards requires a massive expansion of provision.

**Areas of Nature Conservation and Reserves:** As recognised [*LBH OSS* para 3.27], English Nature minimum standards recommend there be Local Nature Reserves of 1 ha per 1000 residents - currently in Haringey there is only 0.16 ha per 1000, therefore requiring a 7-fold increase. *LBH OSS* 3.28 recognises that the LPAC/GLA standard for areas of nature conservation value is a catchment area of 280 metres. *LBH OSS* 3.28 suggests this 'could potentially be addressed by creating additional habitats on sites where none currently exist'. While additional habitats on existing sites are to be welcomed, this will not come near to addressing the deficiency unless a substantial number of new sites are created.

**Outdoor sports pitches:** The Council's Open Space Assessment [The Atkins Study] recommends that the 'minimum standard of access to outdoor sports pitches within Haringey should be that "All households should be no more than 280m from an outdoor sports pitch in secured public use". To achieve this minimum standard requires a massive expansion of provision, including the creation of new green spaces.

**In terms of sports facilities,** The Haringey Open Space and Sports Assessment (2003) provides excellent information on the need to address deficiencies of a whole range of much needed facilities. Since then the population of Tottenham has increased greatly, and is projected to increase even further. The Council has produced a number of useful sports-related plans including: LB Haringey Sport and Physical Activity Action Plan 2005; LB Haringey Tennis Development Plan - 2010-2013; LB Haringey Football Development Plan - 2009-2012; LB Haringey Football Development Plan - 2009-2012. As an example, the Football Development Plan (Section 4 - Key Issues and Recommendations) contains detailed and useful recommendations about facilities, education, club development, health, Voluntary Sector development, girls and women's development, disability development, celebrating cultural diversity, coach education, and disaffected young people. Key recommendations regarding facilities include:

- 'develop additional pitches and ancillary facilities in the east of Haringey where quality facilities and provision are most needed'
- 'develop Service Level Agreements with a number of schools to extend community access to school facilities and to implement dual use'
- 'develop the use of s. 106 agreements ..... to create or improve local sports and leisure facilities. The population in Haringey is set to rise.... Haringey Council is responsible for providing the growing community with sport and recreation facilities that are accessible and inclusive to meet the demand of an increasing population'.

Here are some extracts from the Summary of the **Football Development Plan** regarding Facility development:

**Accessibility:** *The Haringey Open Space and Sports Assessment identified a 400m walk as the appropriate catchment for football pitches. At present, around half of the population of the borough is outside such a catchment.*

**Localised facilities:** *To seek to provide at least one multi-use games area in each of the 19 wards in the borough, to support local efforts to expand the small-sided game. Reviewing the size and quality of the hard play areas at all 62 primary school sites in the borough and making improvements as appropriate, to facilitate skills training for the 5 - 11 year old age group.*

**Overall sports participation rates:** *The overall rates of sports participation in Haringey are below the regional and national averages, according to the 2008 Active People survey. Participation by under-represented groups: The Active People survey found participation amongst under-represented groups such as women, BME groups and disabled people is disproportionately low in*



*Haringey.*

*Football conversion rates: FA data shows the proportion of footballers as a percentage of the overall population is significantly lower in Haringey than for London or England as a whole. The mini-soccer figures are lowest of all, with conversion rates only 20% of the national average.*

*Small-sided football: Small-sided football is poorly developed at junior level, with no teams at all in the borough. Eight of the 19 wards in Haringey do not have a kickabout area at present.*

*Pitch provision: There are currently enough football pitches to meet existing demand in Haringey, but the number of pitches per capita is well below regional and national averages. This suggests current provision is only adequate because local demand levels are suppressed, possibly as a result of the lack of pitch supply. Quality of pitches and ancillary facilities: 17% of all football pitches are in poor condition, 22% do not have access to changing facilities and 60% do not have any on-site social facilities.*

### **iii. Adequate levels of school provision (and other educational facilities):**

According to a report compiled by Haringey Council in 2013<sup>10</sup> there is already a shortage of school places in various part of the Borough, in particular Tottenham. This report provides an extensive and detailed picture of the existing situation. Surplus capacity at school reception level is already incredibly tight. The Published Admissions Number are projected by the Council to be in deficit against the GLA's projections by 143 needed reception places by 2023 for Tottenham Green, Tottenham Hale, Northumberland Park, White Hart Lane and Bruce Grove wards (p. 41). Secondary school places will be in deficit by 10% by 2021/22. Appendix 12 of the report analyses the implications of the proposed new housing developments in identified growth areas (most of which are located in Tottenham) for school place planning, and states that to support the inevitable demand that will arise from the provision of more than 6,000 units across the area, *'planning for further capacity within local primary and secondary schools as well as any special school provision will be an important component in ensuring that additional school place provision is joined up and sustainable'* (p. 67). The report goes on to recognize the huge challenge posed by the need for further school provision, for example in Northumberland Park: *'Schools in the local area are at or close to capacity at primary reception level and even before the grant of planning permission for additional units at Spurs and at Canon Rubber we were aware of the need to increase local capacity. The provision of a two form entry primary school by EACT Free School, Hartsbrook Primary, which opened in September 2012, went some way to relieving local pressure for places, but, with the roll out of the development outlined above, we are aware that we will need additional provision... There are physical constraints at almost all of the existing local school in the area meaning expansion of existing schools will be challenging at best'* (pp. 69-70).

## **2.2.2 The question of affordability**

a) The assumptions in the **Housing Market Assessment** about growth rate of house prices and rents are far too low. Values applied to the viability calculations (i.e. how many 'affordable' units developers can reasonably be asked to build whilst leaving them an 'acceptable' profit) may be out of date given that many sites are public land whilst sales values for homes to be built in the next few years will be affected by the unexpectedly rapid growth of house prices in 2014-15. For example Table 1, p. 10 states that 'medium value' areas like Wood Green (N22) had a price at the base date (Dec 2010) for a 3 bed, 4 person flat of £280k but even 2 bed flats are now over £400k and even in N17 they are typically over £350k. Appendix B 1.2 table 5 has the assumption that house prices (HPI) will hardly rise between 2010 and now. But they have risen enormously! Average sales prices of residential property rose 10.71% over the last 12 months in N17 (compared to 10.28% in N15 and 9.6% in London as a whole) and 46.59% over the last five years (compared to 49.17% in N15 and 40.17% in London as a whole – data from Zoopla web site on Jan. 19<sup>th</sup> 2016). The rise in house prices and rental values in Tottenham is especially out of line with local incomes, since as noted in Haringey's Homelessness Strategy, there is a gap of £16,000 between average incomes in the east and west of the borough, and according to the Housing Market Assessment a gap of over £12,000 in the median income. The London Poverty Profile data

<sup>10</sup>[http://www.haringey.gov.uk/school\\_place\\_planning\\_appendices\\_2013.pdf](http://www.haringey.gov.uk/school_place_planning_appendices_2013.pdf)

shows Haringey lower quartile rents are £1,257 monthly and lower quartile GROSS earnings are 74% of lower quartile rents.<sup>11</sup> This means that the conclusion of the **Housing Market Assessment** that most of the new housing will be 'unaffordable' for existing Haringey residents is truer now more than ever. This also means that genuinely affordable housing is needed at rents that can be afforded by households on those incomes.

b) There is also considerable ambiguity about what the affordability of 'rent' means in the context of the 'affordable rent' concept. 'Affordability' is defined to mean 80% of market rent but the rise in market rents of recent years has been much faster than incomes. Moreover a rent which is 'affordable' may not be so if we add service charges, which could be considerable, especially in high rise buildings which need lifts, water pumps and cradle-suspended operations for window cleaning and for external painting.

c) The recent growth of rents and house prices also means that many of the viability calculations on particular sites are thrown into question – as sales values rise more than was expected, developers will obtain a windfall gain and should be required to build a larger proportion of genuinely affordable units and/or pay larger s.106 contributions. For example, in the case of the redevelopment of St. Ann's Hospital, in South Tottenham, the community group which formed the St Ann's Redevelopment Trust finally got the viability assessments disclosed after planning consent was granted. The independent viability assessment commissioned by Haringey calculated that there could have been more affordable housing on the site than the 14% figure which the Council and developer settled for (i.e. a further £23m worth of affordable housing). Where developers can make an acceptable level of profit with a higher proportion of affordable homes, the argument for densification falls, and with it the case for the imposition of tall buildings on a suburban landscape, with huge pressure on green space and social infrastructure and attendant risks about the unaffordability of future maintenance charges. This is especially an issue for Northumberland Park.

### 2.2.3 The chosen approach to housing provision and to 'housing estate renewal'

**Obj. 4 of the AAP (p. 32) proposes a 'different kind of housing market'. We oppose the wording and the approach suggested by this with regard to the social housing estates located in the East of the Borough, and earmarked in the Strategic Policies for 'renewal and improvement', namely:**

- Northumberland Park
- Love Lane
- Reynardson
- Turner Avenue
- Leabank View / Lemsford Close
- Park Grove and Durnsford Road
- Tunnel Gardens, including Blake Road
- Noel Park
- Broad Water Farm

**The arguments below underpin the site-specific comments we have made with regard to each of these housing estate sites.**

a) There is an assumption that bringing in higher-income residents by intensive high-rise development will produce 'mixed communities'. What does this mean? The intended inference is that Tottenham is not a mixed community now. This is a deeply flawed and spurious argument both with regard to Council estates and Tottenham as a whole. Our estates, and Tottenham as a whole, are very mixed communities indeed. The postcodes N17 and N15 are reputed to be the most diverse in Europe, and these of course are the target Tottenham postcodes for this plan. Council estates are mixed – by race, class, culture, socio-economic status and, since the Right to Buy, by housing tenure, with some leaseholders and some private tenants of leaseholders. These estates are not islands – they are in local communities and have rich and extensive social networks as evidenced by the many groups, associations and community organizations. The membership of Our Tottenham evidences this. This has

<sup>11</sup> <http://www.londonpovertyprofile.org.uk/indicators/topics/housing-and-homelessness/rents-and-affordability/>

also been demonstrated by research recently carried out by University College London (the Bartlett School of Planning).<sup>12</sup>

b) There is no evidence that the development of 'mixed' communities by densification of existing housing estates and change of use from industrial to residential on council-owned industrial estates will be beneficial to the local community, either in terms of housing or employment. We presented in our earlier response submitted in March 2015 (see text box below) a mass of academic and policy research evidence to show that drawing in higher-income residents to 'dilute' council estate populations leads to disruption of community networks, class-segregated living and social tension, rather than greater cohesion. The history of many London estates where this 'solution' has been applied testifies to this, and there is extensive academic research which confirms it.

#### **'Tenure mix policies' as tools of 'regeneration': evidence from research**

Concentrations of social housing are viewed as a negative feature which should be addressed through 'mixed tenure' and 'mixed communities' policies. We question the claim that housing regeneration through estate renewal and new build has the potential to create new residential neighbourhoods and improve the quality, mix, tenure of housing in the area if this is done via demolitions, a net loss of existing social housing units, and the creation of highly divided new developments with gated/separated market-rate housing in areas of existing social housing. Such development would also increase densities unacceptably, reduce the green and amenity space serving the occupants, and cause unnecessary social disruption to the estate's community during the works. The objective of 'mixed and balanced communities' should not be done through demolition or a reduction in the net stock of social housing, insufficient community participation, overall net loss in the number of social housing units after regeneration, decanting of the original population and gentrification as unfortunately has been the case in other parts of London (Woodberry Downs in Hackney, Aylesbury in Southwark...).

If such a policy is applied only to social housing residents (as it is here), it is clearly discriminatory and arguably unlawful.

There has been a lot of research done, over the past fifteen years, about the effectiveness of such policies in dealing with socio-economic deprivation, the social problems of an area and generally the regeneration of a neighbourhood. Such policies are based on the notion of the '*neighbourhood effect*' (or *area effect*), which hypothesizes that a high concentration of poor, or ethnic minority, people in specific areas reinforces and perpetuates poverty and exclusion. The key assumption is that mixing different types of housing tenure would lead to greater *social mix* and to positive effects for (poor) urban residents and for deprived neighbourhoods at large. This is achieved by getting higher income groups to live there (and rarely by bringing bring lower income residents to rich neighbourhoods). **The conclusion of the majority of the studies carried out in the UK and in countries where similar policies have been carried out is that there is rather limited evidence that interventions in the housing mix alone can lead to greater social mix and to positive effects for deprived urban neighbourhoods and their residents, in particular tenure mix interventions in social housing estates.**<sup>13</sup> Often old and new residents live parallel lives side by side with little

<sup>12</sup> See the EU-funded DIVERCITIES project reports, which show the incredible vitality of social and community networks in Tottenham: [http://www.urbandivercities.eu/wp-content/uploads/2013/05/UK\\_WP5\\_FinalReport.pdf](http://www.urbandivercities.eu/wp-content/uploads/2013/05/UK_WP5_FinalReport.pdf) and [http://www.urbandivercities.eu/wp-content/uploads/2015/08/UK\\_WP6\\_final\\_report.pdf](http://www.urbandivercities.eu/wp-content/uploads/2015/08/UK_WP6_final_report.pdf)

<sup>13</sup> See among others:

ARBACI, S. and RAE, I. (2013) *Mixed tenure neighbourhoods in London: policy myth or effective device for social mobility?* In: *International Journal of Urban and Regional Research*, 37(2), pp. 451-79.

CHESHIRE, P. (2009) *Policies for mixed communities: faith-based displacement activity?* In: *International Regional Science Review*, 32 (3): 343-375, 2009.

CHESHIRE, P. (2007) *Are mixed communities the answer to segregation and poverty?* York, Joseph Rowntree Foundation. Available at: <http://www.jrf.org.uk/publications/are-mixed-communities-answer-segregation-and-poverty>.

CHESHIRE, P., GIBBONS, S. AND GORDON, I. (2008) *Policies for 'mixed communities': a critical evaluation*. London, UK Spatial Economics Research Centre. Available at: <http://cep.lse.ac.uk/textonly/SERC/publications/download/SERCPP002.pdf>.

LUPTON, R. and FULLER, C. (2009) *Mixed communities: a new approach to spatially concentrated poverty in England*. In: *International Journal of Urban and Regional Research*, 33 (4): 1014-1028.

contact. Social worlds, places of consumption and socialisation are markedly different (different supermarkets and pubs, for example), and newcomers often send their children to private schools outside the area. Additionally, mixed-tenure neighbourhoods do not necessarily lead to an improvement in the quality of local services and amenities if there is no parallel public investment and if the incoming middle-class households consume such services outside the neighbourhood or recur to the private sector. There is no evidence that 'the new resources that may come with higher income residents (e.g. shops) either materialise or are beneficial to people on low incomes'<sup>14</sup>, for example through job opportunities.

Whilst it is true that residents in areas of concentration of social housing, such as Northumberland Park, suffer considerably worse outcomes than the national average for selected indicators of deprivation (e.g. income, general and mental health, educational attainment, benefit claims), the causal explanation for this does not reside with the fact that they live in a mono-tenurial area. Sociological research has clearly shown that individual and family characteristics are more important than the *neighbourhood* in explaining individual life trajectories. Research has even shown that in some cases mixing policies can have negative impacts on low-income or ethnic minority groups, because, through the influx of new residents and new services, such interventions may break social networks and endanger businesses catering for a low-income population or for specific ethnic minority groups, leading to more class or ethnic conflicts. Many sociological studies have since long shown that a degree of concentration may benefit particular social or ethnic groups, which means that an imposed de-concentration may break crucial community ties. The presence of family networks, small businesses, support organisations and informal networks can support the process of survival and of socio-economic integration or social mobility. Social mix policies were provocatively labelled 'faith-based displacement activity' by the respected LSE economist Paul Cheshire (2009), who argued that they treat the symptoms of urban deprivation and inequality rather than tackling its causes.<sup>15</sup>

Altogether, in the UK, there is thus 'substantial evidence that areas with more mixed social composition tend to be more popular, more satisfying to live in, and have better services than poorer areas', but 'to date the evidence is limited that neighbourhood has a large effect on individual outcomes, over and above individual and household factors. Nor is there robust evidence that neighbourhood mix per se or changes to mix (over and above other neighbourhood characteristics) is influential'<sup>16</sup>. The authors of the evidence review commissioned by the DCLG in 2010 on the evaluation of past mixed communities policy conclude that it is *not* evident that mixing communities are a more effective strategy for the regeneration of disadvantaged neighbourhoods than traditional neighbourhood renewal approaches – i.e. those which target public resources to particular areas to support integrated strategies of social, economic, and physical regeneration in partnership with local residents:

*'if there had to be a crude choice between traditional urban and neighbourhood renewal and mixed communities policies to address the top quarter most deprived local authorities (as Neighbourhood Renewal Fund did) or even the most deprived 10% or 5% of wards, the evidence suggests the former offer more limited but better-evidenced benefits at lower costs, and are also more achievable during a recession. If there is a choice between doing nothing in deprived areas and doing something, the evidence suggests doing something. The evidence suggests that:*

*(a) There should be continued support for 'traditional' urban and neighbourhood renewal,*

MIXED COMMUNITIES EVALUATION PROJECT TEAM (2009). *Evaluation of the Mixed Communities Initiative Demonstration Projects. Initial Report: Baseline and Early Process Issues*. London, DCLG. Available at: <http://eprints.lse.ac.uk/27143/>  
MIXED COMMUNITIES EVALUATION PROJECT TEAM (2010) *Evaluation of the Mixed Communities Initiative Demonstration Projects. Final report*. London: DCLG. Available at:

<https://www.gov.uk/government/publications/mixed-communities-initiative>

TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>

<sup>14</sup> TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

<sup>15</sup> CHESHIRE, P. (2009) *Policies for mixed communities: faith-based displacement activity?* In: *International Regional Science Review*, 32 (3): 343-375, 2009.

<sup>16</sup> TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.



*which might include a modest mixing element.*

*(b) On the precautionary principle, and on the grounds that the costs of preventing non-mix are lower than those of altering it, mix should be encouraged in new developments, and through any schemes to support developers and registered social landlords during the housing market downturn.*

*(c) Mix should be considered in existing areas through methods such as pepper potted-tenure change, tenure blurring, sensitive allocations policy and targeted fiscal stimulus'.<sup>17</sup>*

c) Community stability, adequate green space and community facilities are the key to low crime and tenant satisfaction. Densification is hostile to these objectives. In this connection we would mention a statement by *Architects for Social Housing* citing a survey that Broadwater Farm has a very low rate of crime, a very high rate of tenant satisfaction with regard to safety<sup>18</sup> and very low rent arrears. The plan asserts that the proportion of social housing in Tottenham, particularly in North Tottenham, is excessive. But no objective criterion or argument is given about what constitutes the 'ideal' tenure mix, or over what area it should be measured. According to the Haringey Joint Strategic Needs Assessment (Fig. 1 in <http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsna-housing>), Haringey as a whole has a proportion of social rented housing very little above the London average. Moreover, given the current crisis about affordability of housing in London, the central objective of the plan as **stated in the Strategic Policies - Housing Policy SP2 can only be achieved if a high proportion of social housing is maintained**. It should also be noted that estates originally built as council housing are now effectively mixed tenure since a significant proportion of homes have been purchased under the right to buy, there are leaseholders living on estates, and other properties are now let out by private landlords.

d) The plan does not deliver its objective of providing for the housing needs of the Haringey population, as stated in point 1 above. Where and how will those people and families displaced by these plans be housed? The plan has no detail on these critical points.

e) Nor will it provide jobs for them, since the jobs associated with construction of new housing will be temporary and most local residents do not have the skills to access them; and moreover the plan involves the loss of many cheap, accessible small business premises of the type that Tottenham needs, both industrial and retail.

f) The rise in private sector rents, induced by the expectation of a 'gentrification' of Tottenham and the continued grave shortage of social housing, will force many more residents to have to seek homes in neighbouring outer boroughs, for example Enfield, Waltham Forest and Redbridge, as well as beyond the north and eastern boundaries of London. This will put pressure on housing markets and waiting lists there, and on transport infrastructure as they try to commute to jobs in Haringey or in central London and to continue at local schools in Haringey so as not to disrupt children's education. But there is no guarantee such housing exists. In particular in any site where it is proposed to demolish housing association stock, the price paid by the Council or its development partner(s) to the housing association may not be enough to finance building or acquisition of equivalent units elsewhere to re-house the tenants, who will be the housing association's responsibility. There will then be a displacement effect on social housing waiting lists elsewhere in London as the housing associations struggle to find homes to re-house people whose homes they have sold for demolition.

<sup>17</sup> TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

<sup>18</sup> On their website, <https://architectsforsocialhousing.wordpress.com/>, Architects for Social Housing write: 'Since its regeneration following the 1985 riots, Broadwater Farm has had one of the lowest crime rates of any urban area in the world. In an independent 2003 survey of all the estate's residents, only 2% said they considered the area unsafe, the lowest number for any area in London. The estate also has the lowest rent arrears of any part of the borough. With £33 million investment, a community centre, neighbourhood office, children's nursery and health centre have been built, social projects, sports clubs and youth programs have been funded, concierges introduced, raised walkways removed, murals painted, communal gardens planted, transport links improved, shops and amenities made accessible, a more representative Tenants and Residents Association installed, and an estate isolated out on a flood plain of the River Moselle has been turned around and integrated into the Tottenham community'.



### **2.3 Is it the most appropriate strategy when considered against the alternatives?**

No.

There is no assessment of the comparative economic and social costs of providing a given number of homes by demolition and rebuilding versus the cost of refurbishing, extending and converting many of the existing ones. Even some office blocks could potentially be converted to housing by stripping out the interior and leaving the basic structure standing. Architects for Social Housing (<https://architectsfor-social-housing.wordpress.com/page/2/>) have illustrated in the example of Knights Walk in Kennington how refurbishment and extension of existing buildings, for example by building additional storeys, can be much cheaper than rebuilding, as well as far less disruptive to existing residents and less wasteful of environmental resources. According to a report from the Urban Lab and Engineering Exchange at University College London, 'there is a growing body of research suggesting that extending the lifecycle of buildings by refurbishment is preferable to demolition in terms of improved environmental, social and economic impacts'<sup>19</sup>. See also the *Our Tottenham Housing Factsheet: Demolition vs Refurbishment* <http://ourtottenham.org.uk/our-tottenham-factsheet-housing-demolition-v-refurbishment/>.

Historically the decision to refurbish or rebuild has been subjected to NPV analysis, along the line for example of the model used by Sovereign Housing Association (see <https://www.sovereign.org.uk/about-us/strategic-asset-management/>). We would expect to see a similar assessment of whether the Haringey Plan's proposals for estates such as Northumberland Park or Broadwater Farm represent best value for public money, taking into account also the intangible *social* costs and benefits of each alternative such as keeping the community together and continuity of children's schooling. For one specific group of estates, the 'Orlit' homes in Bounds Green, the site DPD argues that refurbishment is technically impractical, but we have spoken to residents who are convinced otherwise and heard of an internal Council report which said refurbishment **is technically feasible**.

**See our response to the Alterations of the Strategic Objectives, where we highlight a series of alternative mechanisms/options/policies to creating extra low-cost homes and reducing rent levels. These alternatives have not been fully considered in the Tottenham AAP:**

- a) bringing into residential use rooms and flats above shops which are currently empty or used for storage, including in particular the many shops owned by the Council.
- b) control of rents and of the quality of private sector lettings by registration of landlords and by creating competition from a non-profit best-practice lettings agency, which could be run as a municipal enterprise with minimal tenancy setup charges and low commissions to landlords who offer a fair deal.
- c) inducing private landlords to let for longer tenancies, thus reducing the vacancy rate due to churning of tenants (approximating to almost 5% if flats remain empty for 1 week every 6 months, but only 2.5% if tenancies last a year with a week's vacant period in between. This factor alone could 'provide' the equivalent of an extra 700 homes just by reducing the vacancy rate). It could be done through a non-profit lettings agency as proposed above. It should be noted that 17% of the households becoming homeless in Haringey become so because of no-fault evictions at the end of short term tenancies, requiring about 100 social rented vacancies per year.
- d) buying empty and hard-to-sell homes to let to homeless families through a municipal housing company (along the Enfield model) which would buy empty or under-occupied homes and save the huge cost of temporary accommodation for homeless families, thus freeing up more money for refurbishments/new building.
- e) facilitating self-build and community non-profit developments (by community development trusts or coops) on small and large sites. The Plan fails to, for example, adequately promote Community Land Trusts whose average 3% of surplus margins sought are clearly more appropriate when contrasted with the obscenely inflated and unacceptable profit margins being sought by most profit-led property development. Such property development, upon which the current Plan has chosen to rely, is presented

<sup>19</sup> 'Demolition or refurbishment of social housing, a review of the evidence', Oct. 2014

as 'the only show in town' and used as justification for failures to implement or enforce social infrastructural, affordable housing and s106 obligations. Low-rise building could be done using prefabricated units which are cheaper and quicker to build than conventional construction methods.

f) use of space over car parks, so that housing could be built over them with parking only at ground level, and car parking would rarely be the only land use for spaces currently used as car parks. Several hundred homes could be accommodated in this way at sites such as Stoneleigh Road N17 and Summerland Gardens N10.

g) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. This could be encouraged in particular areas in partnership with local small builders and selected banks to provide finance for home extensions/attic conversions, and would provide opportunities for solar panels and quality insulation to be incorporated into the works, thus increasing the sustainability of the housing stock. There would be substantial spin-off benefits in terms of job creation, development of refurbishment/repair capacity in the local construction sector, improved community cohesion, lower childcare and elder care costs due to families being able to stay together if they wish.

h) logistical help for older people who own much larger homes than they need (3-5 bedrooms) to let rooms or find suitable ways to sell up and move to smaller accommodation, possibly outside London, if they want to.

i) enhancements and improvements to more single storey retail sites to make use of any available additional space, where appropriate.

j) reduction of refurbishment/maintenance costs for social housing by adopting a different way of doing the works; this might mean re-constituting a direct labour force (with attendant important opportunities for training local youth) and/or offering tenants a cash-back on part of their rent for doing minor repairs that they are competent and willing to do, for example painting, some kitchen fitting, and some repairs to windows, doors, locks, taps, light fittings and floors, garden fences and gates. These are all things which owner-occupiers often do for themselves.

k) having clear contract and/or planning conditions with developers that sites developed on public land must include social rented council homes which could be funded via the private sector element of the development.

If the intention is to have a genuinely 'mixed community' which meets the housing needs evidenced in many reports, the Local Plan should include these other options and ideas.

Regrettably the phrase 'mixed community' appears to be used in the context of the Haringey Local Plan in the way critiqued by some academics 'who question the evidence base for social mix policies and rhetorics that advance processes of gentrification' (*Mixed Communities; Gentrification by Stealth?* Edited by Gary Bridge, Tim Butler and Loretta Lees, 2012, Bristol: Policy Press).

### 3. Is the plan effective?

*This means the Plan should be deliverable, embracing:*

- *Sound infrastructure delivery planning;*
- *Having no regulatory or national planning barriers to delivery;*
- *Delivery partners who are signed up to it; and*
- *Coherence with the strategies of neighbouring authorities.*

*The Plan should also be flexible and able to be monitored.*

*The Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The Plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Plan should make*

*clear that major changes may require a formal review including public consultation.*

*Any measures which the LPA has included to make sure that targets are met should be clearly linked to an Authority Monitoring Report (p. 63 of the Alterations document).*

We have several concerns regarding the effectiveness of the proposed AAP.

a) **Policy AAP3 and the site-specific proposals for sites currently occupied by social housing estates** will result in expulsion of many residents who will be 'priced out' of Tottenham into neighbouring areas or out of London altogether. In the meantime, rising rents brought about by the introduction of higher-value housing and the attendant uplift to the property market for older homes will mean a higher housing benefit bill, increasing arrears and increasing homelessness.

b) As we have extensively argued above, there is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need, nor any assessment of the need for school places. There is no provision for additional community centres despite the loss of the Welbourne Centre, the ambiguity with regard to the Broadwater Farm Community Centre<sup>20</sup> and even the possibility of losing Tottenham Chances if a developer comes forward with a proposal that appears to justify the loss of a listed building.

Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. But if there is no specific provision of additional childcare space in the new buildings, either this policy will be unworkable or it will result in an exacerbated shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use. There is a very serious lack of health provision, especially in Tottenham Hale. With a further 5,000 homes proposed, there should be detail about how services will be provided.

c) According to Cabinet papers revealed to the public on 17.11.2015, the Council envisages extensive use of a single private sector partner for development, in a 50/50 jointly owned venture company, but this exposes the Council, our public assets and the community to serious risks. What if the chosen development partner goes bankrupt, or uses its enormous market power to bargain for higher profits and less affordable units? What if the company gets into financial difficulty and reneges on whatever commitments will be made about s.106 contributions, affordability or guarantees of re-housing to existing tenants? It is important that site development should rely on **a variety of actors and development partners** in order to spread the risks and to avoid any profit-driven party having undue market power. The joint venture arrangement appears to give no opportunity for community partners such as coops, community land trusts or social enterprises.

#### **Is it deliverable?**

Many of the **site-specific proposals in the AAP** are potentially not deliverable.

a) The plan involves serious over-development of many sites as already stated in point 2(d) above.

b) Some of the sites which will have very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will itself increase the flood risk with more land built over and unable to absorb rainwater into gardens and landscaped areas.

c) The Council has expressed a preference for a very small number of development partners, which renders the plan vulnerable to being 'beaten down' in negotiations on the proportion of 'affordable' units and on infrastructure contributions, as with the Spurs development.

d) As we have argued in our response to the *Alterations to Strategic Policies*, the *Alterations*, and their translation into Policy AAP1 and AAP3 of the Tottenham AAP, reinforce the fact that is a one-dimensional plan which relies on private developers and a buoyant housing market to achieve its

<sup>20</sup> In Site Allocations DPD SA62, the community centre building is mainly within the development zone, but curiously the boundary actually goes through the building. There is no commitment that the masterplan will ensure preservation of the community centre.

objectives. We believe this is short-sighted and irresponsible. There are already concerns, most recently expressed by the Chancellor of the Exchequer, that the economy is weakening. There is no guarantee that a further recession might not happen, especially given the situation with the EU. In our view the Local Authority has a responsibility to develop alternative strategies for Tottenham. If the economy goes into downturn, what commitment would these developers have to Tottenham and its communities?

e) Part of developing alternative approaches would be to examine eventualities which might occur – in other words, to carry out a risk assessment. Relying on this plan, should there be an economic collapse, this would leave, in particular, Tottenham blighted, with many communities caught within red-lined zones.

f) Haringey's proposal for a joint venture company comprising 50/50 ownership with a private development partner compounds the huge risk of this one-dimensional plan. The plan to transfer two estates to a private company is predicated on this local plan – they go hand in hand. This makes housing and development even more vulnerable to the market and leaves hundreds of tenants and residents exposed. This is discussed further in paragraph 7, section d, below.

### **Is it flexible?**

As we have argued in our response to the *Alterations to Strategic Policies*, the *Alterations*, and their translation into Policy AAP1 and AAP3 of the *Tottenham AAP*, make the plan inflexible since it is one-dimensional as described above in paragraph d.

a) Estates could be refurbished and alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards from existing buildings, adding extra storeys or wings, are now well-tested strategies for this.

b) There is nothing in the plan to say what will happen is the envisaged strategy (overall or for specific sites) cannot be achieved. We know from the Council's latest proposal for a Joint Venture Company approved by Cabinet in December that the Council plans to transfer to a Joint Venture Company much of its property portfolio including many sites in Wood Green and Northumberland Park which are the subject of specific Site Allocation Documents. Much will then depend on how the market affects one particular private sector partner, the one which will be chosen as 50% owner of the Joint Venture Company. If this company should get badly into debt, or if it should decide to pull out of the arrangement because better profits are to be made elsewhere, the strategy for these sites could be in jeopardy.

c) The Council is planning to rely too much on a single private sector partner, and too much on large private developers altogether. It would be less risky and more flexible to envisage for each site a community partner, such as a co-op, community land trust, or community investment fund drawing on the savings of the wealthier west-of-borough residents by selling them bonds. The Council could facilitate the development of several community partners of this kind. It could also engage small local builders for small parcels of building land or for refurbishment work. This would be more flexible than relying on the Joint Venture Company and would have greater prospects of local job creation. We note that in the case of the Hale Village, the collapse of the housing market in the late 'noughties' caused financial difficulties for the chosen private sector partner and whilst solutions can be found for a single site, this is rather more difficult where the same company is involved in several sites.

d) Moreover, there is no flexibility envisaged in the event that publicizing plans which include demolition as an option should lead to a sharp decline in market values and 'lettability' in particular areas, notably Broadwater Farm and the surrounding area in SA62, and in Northumberland Park. Homes being left empty could lead to dereliction and social problems (such as a 'sink estate' reputation, rubbish dumping and drug dealing), affecting the attractiveness and value of nearby private housing as well as the actual estates marked for demolition.

e) Our over-riding concern is that refurbishment should always be considered as an option alternative to demolition.

### **Will it be able to be monitored?**

We have concerns that the *Tottenham AAP* cannot all be properly monitored.

a) The site allocation documents do not specify the number of affordable units envisaged for particular sites. Thus as agreements are reached with developers for particular sites, it will be impossible to say whether meeting targets for total units or affordable units are likely to be met taking into account the remaining sites. Table 2 (Broad distribution of new housing) on p. 35 of the *Alterations* says nothing about how much 'affordable' housing will be built on each main site. This is also the case in the Site Allocation DPD and in the Tottenham AAP.

We would expect that at the least, targets for 'affordable' units should be supplied for the sites in the upper Lee Valley Housing Opportunity Area. We also note that it is not clear whether the 'affordable' percentage target of 40% is calculated as 'new build affordable/total new build' or 'new build affordable/(total new build minus the number of social rent properties demolished or amalgamated into larger units)'.

b) The 'housing trajectory' graph (Appendix 1, p. 58 of the *Alterations*) which states how many units will be built in each year does not say how many will be affordable at each stage. This means that the 'affordable housing' proportion of the total cannot be monitored against the target year by year.

#### 4. Is the plan consistent with national policy?

As stated above, the *Tottenham AAP* fail to demonstrate how they will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on).

The *Tottenham AAP* fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of the Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.

##### **Equalities legislation:**

The effect of the *Alterations to Strategic Policies*, the *Alterations*, and their translation into Policy AAP1 and AAP3 of the *Tottenham AAP*, would be an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Haringey to the detriment of current communities and of Haringey's character. National policy (the Equalities Act) would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, the fact that the plan will 'dilute' and drive out the existing residents of Tottenham means that negative impacts will disproportionately affect ethnic minority people. Appendix C to the *Consultation on Haringey's Draft Housing Strategy 2015-2020* also demonstrates how the policy of knocking down council housing in order to increase home ownership through Shared Ownership would be discriminatory. It states:

'Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period. Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east. Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are over-represented in comparison with their representation in the general population of Haringey... The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily.'<sup>21</sup>

We believe that replacing council housing with so-called Affordable Rent properties is also discriminatory,

<sup>21</sup> *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C. Page 12.*

*Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C*

[http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/AI00041306/\\$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf](http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/AI00041306/$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf)



given the concentration of black people in the East of the Borough where household incomes tend to be around £20,000 a year.<sup>22</sup> Such incomes clearly make so-called Affordable Rents of over £800 a month desperately unaffordable. £800 is over 45% of the gross income of the typical household in Northumberland Park and the East of the borough, let alone their net income (which is the GLA's affordability criteria, see page 53 of *Appendix C*).

We believe that the policy of demolishing council estates therefore breaches the commitment in Haringey Council's Equal Opportunities Policy of April 2012 to the fair provision of services. Paragraph 3.2.2 of *Haringey's Local Plan: Strategic Policies 2013-2026* states that: 'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community where they want to live.'<sup>23</sup> In the light of the above it is clear that the Council proposal to demolish Northumberland Park is in breach of the Local Plan. It would only be non-discriminatory if there was a plan to re-provide the same quantity of social, rented housing with permanent secure tenancies and low rents similar to the rents currently charged to council tenants in Northumberland Park. Given that no such plan exists, the inclusion of council housing in Northumberland Park in the site allocations is discriminatory and improvements to existing homes rather than demolition should be substituted.

We would also note council plans to house more homeless families outside London (see Haringey Council's *Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18*). (This was a report made to the Cabinet as part of agenda papers on 16/12/2014)<sup>24</sup>. Clearly demolishing social housing without appropriate replacement in areas like Northumberland Park will lead to increasing numbers of Haringey's homeless families being forced out of London. This 'social cleansing' aspect, adds to the discriminatory nature of the proposal to demolish social housing. As Appendix C of the *Consultation on Haringey's Draft Housing Strategy 2015-2020* states<sup>25</sup> 'Black households approach as homeless at a level which is more than twice their representation in Haringey's population compared with White households who present in numbers which are around two thirds of their representation in Haringey's general population. This indicates that Black households are particularly affected by homelessness in the borough.' Therefore reducing the amount of social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. This is additional evidence of the discriminatory nature of the Council's plan for Northumberland Park and Tottenham as a whole.

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

**As a consequence of the arguments presented above and in our response to the Alterations to the Strategic Policies, we would like to see changes in the formulation of POLICY AAP3 HOUSING:**

**POLICY AAP3 A:** *To improve the diversity and choice of homes, and to support mixed and balanced communities in Tottenham, the Council will seek the delivery of 10,000 additional new homes across the Tottenham AAP area in order to meet housing needs, contribute to mixed and balanced communities and to improve the quality of homes;*

- Lower the 10,000 target, whose burden unfairly falls on Tottenham, and justify how the extra needed social infrastructure, in addition to the existing backlog, would be provided.

**POLICY AAP3 B:** *The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the*

<sup>22</sup> Ibid. Page 58.

<sup>23</sup> *Haringey's Local Plan 2013-2026*

[http://www.cartogold.co.uk/haringey/text/strategic\\_policies\\_2013\\_doc/03\\_people\\_ahoc.htm#3.2](http://www.cartogold.co.uk/haringey/text/strategic_policies_2013_doc/03_people_ahoc.htm#3.2) Paragraph 3.2.2.

<sup>24</sup> *Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18* at

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

<sup>25</sup> *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C, page 5.*

*exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation;*

- We strongly oppose the reduction in the affordable housing requirement for development above 10 units from 50% to 40%. It should be increased to the maximum possible.
- We disagree with the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). Based on the evidence we exposed in the previous section, it is not acceptable to meet affordable accommodation targets only with shared ownership or intermediate rent housing, both of which are out of the price range of low income families in Haringey. A truly affordable home is one that is affordable to any tenant earning the London Living Wage. This means that the only truly affordable form of housing for many low-income Haringey residents is social rented. 'Affordable' should not be defined as 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. We therefore demand that
  - a separate and clear percentage for social rented housing be set in the affordable housing provision target;
  - 70% of that affordable housing target should be social rented housing.

**POLICY AAP3 D:** *To better address the concerns of viability in delivering wholesale renewal of Haringey's housing estates in Tottenham (as listed in Alt53 of the Local Plan Strategic Policies), the Council will support higher density mixed tenure development, as a mechanism to:*

- a improve the quality and range of affordable housing options,*
- b better address housing needs in Haringey;*
- c secure a more balanced community; and*
- d increase housing delivery in Tottenham.*

We support Haringey Council's objective as laid out in para. 3.2.2, Policy SP2 HOUSING that 'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of'. **This key priority can only start to be met by embedding the following principles CLEARLY in the wording of Policy AAP3 D (on housing estate renewal in Tottenham):**

- No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes.
- Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.
- There should be absolutely NO NET LOSS of social housing units and no displacement of existing tenants as part of any plan for an estate. The proposed wording 'reprovide the same amount of social housing on an equivalent floorspace basis' does not guarantee those principles, and should be rephrased.
- There should be no demolition of structurally sound homes.

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

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

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

☐

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

☒

**Yes**, I wish to participate at the oral examination

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

Extensive work done by the *Our Tottenham* Planning Policy Working Group on planning issues, building on a network of 50 key community groups, residents' associations and other organisations active in Tottenham.

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

9. Signature

**David Morris, for the  
*Our Tottenham* Planning Policy Working  
Group**

Date:

**4.03.2016**

## Part B – Please use a separate sheet for each response

Name or Organisation: **Our Tottenham network** <http://ourtottenham.org.uk>  
**Planning Policy Working Group**

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

Paragraph

Policy

[Section 05:  
Neighbourhood  
Areas and  
Opportunity  
Sites](#)

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the Duty to  
co-operate

Yes

No

Please tick as appropriate

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

**See the detailed comments made for each specific site directly into the PDF version of the Tottenham AAP, using “sticky notes”, in [Appendix 2](#).**

**Based on the arguments presented above, we would like to see the following principles reflected in the site requirements and development guidelines for all the sites listed in the Tottenham AAP.**

**GUIDING PRINCIPLES FOR DEVELOPMENT OF SITES IN TOTTENHAM ADVOCATED BY THE OUR TOTTENHAM NETWORK - TO BE APPLIED TO THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES OF THE AAP**

**These principles were spelled out in Our Tottenham Response to the previous draft of the Tottenham AAP (February 2015 version). They are based on the *Our Tottenham* Community Charter (Appendix 1) and represent a consensus about how new developments should protect existing residents and businesses and enhances their quality of life and opportunities. **THESE PRINCIPLES SHOULD BE APPLIED TO THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES** for all the sites in the revised AAP.**

**Under Site Requirements, proposals for each site should:**

1. Relate to sites that are mostly vacant or derelict. Any site consisting of mostly viable buildings and usage should not be subject to a Site Allocation or earmarked for demolition or change of use, except in very exceptional circumstances (such as those buildings and activities not contributing to any of the agreed goals for Tottenham and Haringey, or being predominantly vacant or derelict). No housing that is structurally sound should be demolished. It should be recognised that a Site Allocation for development is likely to create huge uncertainty, stress and

blight for the current occupants of the site – this is unnecessary and unacceptable except in the most exceptional circumstances. Local Plan policies already allow for refurbishment and renewal of existing buildings, improvements to social infrastructure and the streetscape etc.

2. Conform to Lifetime Neighbourhoods criteria (as set out in the London Plan)
3. In Tottenham, conform to the Community Charter for Tottenham
4. Conform to best practice for similar sites around the UK and Europe
5. All new housing on the site should be high quality and genuinely affordable:
  - An affordable home is one that is affordable to any tenant earning the London Living Wage. 70% of such housing should be social housing.
  - A quality home means all of the following: Secure; Physically comfortable (with adequate indoor space to at least 'London Housing Design Guide 2010' standards ie Parker Morris standards plus 10% more space - and access to adequate outside garden space); It should comply with, and not exceed, the density matrix as set out in the London Plan, and built to 100% lifetimes homes standards. Designs should promote a permeable and convivial street pattern; protect and enhance the conservation and positive character of the local area. There should be easy access to schools, work, healthcare, cultural facilities, public transport, fresh affordable food, and green space. It should allow people to have control over their indoor and outdoor space, and to develop communities and support each other. Residents and communities should be empowered to make decisions and have control over their housing.
  - As stated in the Haringey Local Plan, Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough, and 3-4 storey development in its town centres. The pattern of local housing heights in the various neighbourhoods should be respected and all new housing sites should conform to such patterns. In some very exceptional circumstances where the overwhelming pattern of development in an area is greater, heights may be appropriate up to a maximum of 6 storeys as long as there is no overshadowing or blocking of light to nearby residences, or key sightlines.
6. Refurbishment and renewal is preferred to demolition and re-build, unless this is impossible
7. Development to include additional social infrastructure, including adequate levels of quality, public open space (including major new spaces to address areas of deficiency as set out in the London Plan), play areas/equipment, and a range of other social infrastructure and amenity infrastructure, to serve the residents in and near the site. No net loss of social infrastructure.
8. No net loss of employment land and facilities unless the existing site can be demonstrated to have been unviable for a clear 3 year period.
9. All new facilities (residential, commercial, social) to be environmentally sustainable, ie conform to highest carbon-neutral criteria
10. Preserve the heritage and positive characteristics of the surrounding area and of Tottenham as a whole. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list
11. For each development, all interfaces with streets, public areas or back gardens should enhance the view and contribute positively to local community experience of the site.
12. Change of use of a site will only be allowed in exceptional circumstances (such as the current usage proven to be unviable), subject to the criteria set out here being fully adopted.
13. A Social and Community Impact Assessment outlining how it conforms to the above principles is to be produced for each proposed development.

**Under Development Guidelines, proposals for each site should:**



- a. For Site Allocations, s106 and CIL to be paid towards community benefit to be calculated as all the development profit/surplus expected less 7% for the developer (which we understand is the approx.. European average profit margin). The current CIL to be recalibrated at much higher rate to reflect this figure. At least 20% of the total to be paid shall go to local green space improvements, and at least 20% shall go to youth services and facilities in the area.
- b. Anyone displaced by the development (whether residential or commercial tenant) must be rehoused by the developer in an equivalent or improved arrangement in the final site or nearby
- c. Any prospective developer must demonstrate an active and genuine local community partner involved in the decision-making around the design and management of the future site.
- d. If there is an expression of interest for a Community Plan for the site a minimum period of 12 months shall be set aside to enable such a Plan to be developed before any further action is taken
- e. All jobs created during and following the development to be quality jobs, above the London Living Wage, with local trade union branch involvement, and earmarked for local people as far as possible, and to include local apprenticeships.

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

**See the detailed comments made for each specific site directly into the PDF version of the Tottenham AAP, using "sticky notes", in [Appendix 2](#).**

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

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

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

☐

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

☒

**Yes**, I wish to participate at the oral examination

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

Extensive work done by the ***Our Tottenham Planning Policy Working Group*** on planning issues.

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

16. Signature

**David Morris, for the  
Our Tottenham Planning Working Group**

Date:

**4.03.2016**

## Appendix 1: Our Tottenham Community Charter and subsequent modifications/action points

# OUR TOTTENHAM A COMMUNITY CHARTER

**Planning & Regeneration by and for the Community**

*Adopted at the Our Tottenham conference, April 6<sup>th</sup> 2013. Amended at the conference, Oct 11<sup>th</sup> 2014*



**OUR voices, OUR  
communities, OUR  
neighbourhoods**

**Tottenham is a great place** with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues!

**The Council are promoting their 'Plan for Tottenham'**, backed by property developers, big business, and the Mayor of London. The Council is gifting public money and assets to the profit-driven developers, and have so far largely refused to listen to the views of residents. The plans include a range of measures, some of which will seriously impact on our lives and our communities. The plans promote corporate-led and large scale urban development; increased rents and unaffordable housing; and the loss of some independent local shops, homes, community facilities and small businesses.

**Coupled with the Government's planning policies and attacks on vital public services and people's welfare**, the major effect of all this will be to over-develop Tottenham, to threaten its positive community-scale character in many areas, to promote profiteering at the community's expense, and the forced displacement of thousands of local people who can no longer find or keep any affordable place to live.

**This is unacceptable.** It doesn't have to be like this. Together we are very powerful.

**We pay tribute** to all those thousands of Tottenham residents and community groups who have campaigned and worked so hard to improve their local areas and facilities.

**We pledge to fight for OUR common interests**, OUR neighbourhoods, OUR community facilities and for the needs of OUR communities throughout Tottenham.

**We call on the people of Tottenham** to oppose all inappropriate planning and developments and campaign to defend facilities and proposals which are led by local residents, for our benefit, and which improve neighbourhoods for our communities - not just for the benefit of big business.

**We will show support for and help initiate** new resident and community-led development plans that support the interests of local people. We support the Our Tottenham community planning and regeneration action network set up to spread co-operation and solidarity throughout Tottenham's neighbourhoods.

**Together with local people we will take action to....**

**Defend community facilities \* Stand up for decent and affordable housing for all**  
**Support the local economy \* Promote quality design and respect for heritage**  
**Improve the street environment \* Support youth voices, services and facilities**  
**Defend and expand good public services \* Work towards environmental sustainability**  
**Empower our communities \* Develop local community plans**

## **OUR TOTTENHAM – A COMMUNITY CHARTER: Objectives**

Together with local people we will take action to....

**DEFEND COMMUNITY FACILITIES:** protect and expand the 'social infrastructure' our communities value and rely on, including community centres, local pubs, corner shops, playgrounds & parks, GP surgeries, post offices etc

**STAND UP FOR DECENT AND AFFORDABLE HOUSING FOR ALL:** ensure that new developments provide the secure, affordable housing that people need, and that 'gentrification' doesn't force thousands of local residents out of our borough

**SUPPORT THE LOCAL ECONOMY:** Starting with the strengths and needs of Tottenham's residents, small businesses, social enterprises, cooperatives and community assets, putting sustainability, equality, local needs and community service at the heart of the local economy

**PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE:** protect Tottenham's listed buildings, conservation areas and general positive architectural characteristics, and ensure any new development is of good quality

**IMPROVE THE STREET ENVIRONMENT:** ensure safer, friendlier, traffic-calmed, 'living' streets with less clutter and more greenery

**SUPPORT YOUTH VOICES, SERVICES AND FACILITIES:** encourage and support our local youth speaking out for the services, centres and facilities they need

**DEFEND AND EXPAND THE PROVISION OF GOOD, FREELY-ACCESSIBLE TO ALL, PUBLIC SERVICES** They should be responsive to the everyday needs of our communities eg Health, Education, Welfare, Social Services and Social Care, Public Transport etc

**WORK TOWARDS LONG-TERM ENVIRONMENTAL SUSTAINABILITY:** promote and encourage low/zero carbon energy, reduced consumption and waste, sustainable travel, biodiversity and

natural habitats, and local production of food and other necessary goods and services. Our lives, our communities and our society should be sustainable for generations to come.

**EMPOWER OUR COMMUNITIES:** ensure real respect, engagement and empowerment for our communities and community groups so that they are driving the decision-making

**DEVELOP LOCAL COMMUNITY PLANS:** develop our own ideas and visions for our local sites & neighbourhoods

*The Our Tottenham Charter was drafted by a series of open meetings of Tottenham community groups from January to April 2013. The Charter's Action Points were developed, discussed, amended and adopted, along with the Charter as a whole, by the Our Tottenham open conference on 6<sup>th</sup> April 2013, attended by 110 people from over 30 local community organisations. They were collectively formulated by those attending workshops at the conference, and those that have been adopted are the ones ratified by the conference as a whole (through an overwhelming show of hands in support). There were further clauses discussed and agreed at the Oct 11<sup>th</sup> 2014 conference. It is intended that the Charter - especially its Action Points - is able to be further reviewed and developed in the future, as needed. This may be done at a recall conference or via some other appropriate inclusive process.*

**The Our Tottenham network includes:** Bull Lane Playing Fields Campaign / Weir Hall Action Group, Chestnuts Community Centre, Clyde Area Residents Association, Day-Mer, Defend Haringey Health Services, Dissident Sound Industry Studios, Efiba Arts, Find Your Voice, Friends of Downhills Park, Friends of Lordship Rec, Growing-In-Haringey network, Haringey Alliance for Public Services, Haringey Defend Council Housing, Haringey Federation of Residents Associations, Haringey Friends of Parks Forum, Haringey Green Party, Haringey Housing Action Group, Haringey Independent Cinema, Haringey Justice for Palestinians, Haringey Left Unity, Haringey Living Streets, Haringey Needs St Ann's Hospital, Haringey Private Tenants Action Group, Haringey Solidarity Group, Haringey Trades Union Council, Living Under One Sun, Lord Morrison Hall / Afro International, Lordship Rec Eco-Hub Co-op, N. London Community House, Peoples World Carnival Band, Selby Centre, The Banc, Tottenham and Wood Green Friends of the Earth, Tottenham Chances, Tottenham Civic Society, Tottenham Community Choir, Tottenham Community Sports Centre, Tottenham Concerned Residents Cttee, Tottenham Constitutional Club, Tottenham Rights, Tottenham Theatre, Tottenham Traders Partnership, Tower Gardens Residents Group, Tynemouth Area Residents Association, Ubele, University and College Union at CONEL, Urban Tattoo, Wards Corner Community Coalition, 1000 Mothers' March Organising Group, 20's Plenty for Haringey

# OUR TOTTENHAM – A COMMUNITY CHARTER

## Action Points

(As agreed April 2013, and amended Oct 2014)

**Together with local people we will take action to....**

**DEFEND COMMUNITY FACILITIES:** protect and expand the ‘social infrastructure’ our communities value and rely on, including community centres, local pubs, corner shops, playgrounds & parks, GP surgeries, post offices etc

- Encourage and produce case studies from users to protect existing facilities, conduct needs assessments for what local people need, and compile a dossier to present to the relevant authorities
- Hold the Council accountable for funding choices and patterns around the borough and in comparison with other boroughs so that Tottenham gets the best facilities to serve our communities
- Support threatened community-run community centres in any lobbies or protests they organise
- Encourage community groups and centres to share resources and experiences

**STAND UP FOR DECENT AND AFFORDABLE HOUSING FOR ALL:** ensure that new developments provide the secure, affordable housing that people need, and that 'gentrification' doesn't force thousands of local residents out of our borough

- Support residents associations and residents action groups that raise, or can raise these issues
- Challenge Council policies on housing in new developments. Set our own agenda for, and definition of, genuine ‘affordability’ and ‘security of tenure’, in contrast to Council definitions.
- Raise public awareness regarding the need for genuinely affordable housing, long-term security of tenure and people’s housing needs generally, and the need to speak up for this.
- Support the residents of Love Lane Estate, and any other residents, threatened with possible relocation and demolition

**SUPPORT THE LOCAL ECONOMY:** Starting with the strengths and needs of Tottenham’s residents, small businesses, social enterprises, cooperatives and community assets, putting sustainability, equality, local needs and community service at the heart of the local economy

- Support local businesses at risk of displacement through development schemes.
- Support good pay, conditions and rights for local workers.
- Campaign for sustainable, quality jobs and training for local people through any new development, with training delivered by local organisations
- Develop our knowledge of the local economy and build relationships between residents and traders.
- Promote and celebrate the strengths and assets of the existing Tottenham economy



**PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE:** protect Tottenham's listed buildings, conservation areas and general positive architectural characteristics, and ensure any new development is of good quality

- Safeguard and value heritage buildings, including those outside Conservation Areas
- Campaign for at least 50% of all new homes to be genuinely affordable social rented housing
- Ensure that heritage-led regeneration benefits Tottenham residents in the short, medium and long term, and doesn't lead to the kind of gentrification which forces people out of Tottenham
- Identify and improve quality of design, amenity and sustainability standards for all new development

**IMPROVE THE STREET ENVIRONMENT:** ensure safer, friendlier, traffic-calmed, 'living' streets with less clutter and more greenery

- Council to ensure that Tottenham's air quality is as good as in the West of Haringey
- Maximise the spread of 20mph zones, car-sharing schemes, on-street cycle lock-ups, and pedestrian and cycling connections/networks across the borough
- Encourage Residents Associations (RAs) & the Haringey Federation of RAs to set up a street scene sub-group/network
- Publicise and promote options for street improvements, including Streets In Bloom, DIY Streets, Home Zones, Play Streets, improvements to front gardens, more benches and community-run notice-boards
- Campaign for High Streets to be re-designed more for people and less for cars

**SUPPORT YOUTH VOICES, SERVICES AND FACILITIES:** encourage and support our local youth speaking out for the services, centres and facilities they need

- Support young people to take make the key decisions about their needs, to demand the best possible opportunities and funding due to them (equal to the best practice elsewhere), and to take charge of their future
- Support organisations who work with young people - in a way they are happy with - to deliver future services, and publicise successful youth activities and projects as an example to emulate
- Support ex-youth workers to get together to form their own network and to conduct local outreach
- Re-establish and open additional dedicated venues for young people to meet and socialise, that are adequately supported and resourced.
- Ensure young people can access the information and skills they need

**DEFEND AND EXPAND THE PROVISION OF GOOD, FREELY-ACCESSIBLE TO ALL, PUBLIC SERVICES** They should be responsive to the everyday needs of our communities eg Health, Education, Welfare, Social Services and Social Care, Public Transport etc

- free healthcare to be preserved and extended, and accessible to all
- improved and expanded healthcare to be an integral part of any new Plans

**WORK TOWARDS LONG-TERM ENVIRONMENTAL SUSTAINABILITY:** promote and encourage low/zero carbon energy, reduced consumption and waste, sustainable travel, biodiversity and natural habitats, and local production of food and other necessary goods and services. Our lives, our communities and our society should be sustainable for generations to come.

We will promote and encourage:

- sustainable energy policies in all areas of society - eg reduced general usage, and maximum use of renewable, non-fossil fuels and self-generated sources
- reduced consumption & waste, and maximum re-usage & recycling
- sustainable travel - including more walking & cycling, better public transport & less motorised traffic
- local production of food and other necessary goods and services, and appropriate allocation and sharing of limited resources
- protection and improvements to green spaces and natural habitats

**EMPOWER OUR COMMUNITIES:** ensure real respect, engagement and empowerment for our communities and community groups so that they are driving the decision-making

- Defend and create new spaces and hubs where people can meet and organise themselves, share skills and expertise. – and form a working group to achieve this \*
- Develop our own outreach to involve and link in with wider groups and all sections of our communities
- Encourage and promote a range of communications among local people, including face-to-face, blogs and a newspaper.

**DEVELOP LOCAL COMMUNITY PLANS:** develop our own ideas and visions for our local sites & neighbourhoods

- Promote community planning and community plans of all scales and at all levels – for sites, streets/estates, neighbourhood and Tottenham-wide - and form a working group to achieve this. \*\*
- Organise workshops to empower people to develop community plans, especially ones that are enforceable.
- List and publicise all the positive examples of community plans

# COMMUNITY PLANNING POLICIES

## AS AGREED AT CONFERENCE, Feb 1st 2014

### Key guidance and action points

#### Develop community visions and turn them into Plans

- Map out existing community assets to help in the development of community planning
- Create physical and virtual space to collect together information about everything that local community / campaign groups are doing in Tottenham, in order to make such information widely accessible
- Present plans in a financially and socially viable way

#### Access and press for the funding/resources needed to implement Plans

- Our Tottenham members are encouraged to map, register and where possible run community assets
- We should consider forming appropriate planning and development bodies (eg Neighbourhood Forums & Trusts)
- To research and consider the range of potential resources and how to access them

#### Relations with Council and other official and commercial bodies to achieve Plans

- Keep building up the Our Tottenham network to increase legitimacy, co-operation and cohesion, so that groups in Tottenham are strong and working together
- Develop our research and evidence base, sharing knowledge, experience and information about the area and what is important to us in Tottenham
- Be prepared to negotiate in various ways and times with the authorities generally and around specific schemes - and be aware of how the authorities work so that we can participate in official discussions and planning

#### Understand, use and negotiate legal/planning processes

- As individuals, groups and where possible as a network we should formally respond to relevant council consultations, especially the Tottenham Area Action Plans and the Sites Allocations.
- We need to insist that consultation processes are accessible, transparent and genuine
- We must publicly hold councillors to account for their policy decisions
- We need to have multiple lines of engagement over planning issues, and must continue to develop our own community vision and policies, alongside our critique of existing official proposals, plans and policies.

#### Mobilise public support and exercise our power to achieve Plans

- When developing Plans we need to engage young people and all sections of our local communities
- Find a common simple message to unite and rally people around
- Be well organised through developing action plans, and local community and solidarity networks.

### The agreed next steps

1. We pledge to support Community Planning throughout Tottenham. We will encourage local people to develop their own plans for the improvements to local sites, facilities and neighbourhoods, and for Tottenham as a whole.
2. We insist that all those with wealth, resources or decision-making power affecting any or all of our neighbourhoods work in genuine partnership with those who live or work here, support our community organisations, and help implement local community plans and community-led regeneration.
3. We will continue to encourage and support local people to challenge any and all inappropriate or inadequate development proposals which do not address the real needs of our communities, or which displace local people. Our Tottenham pledges to continue to support all groups that are developing their own plans or defending community assets that are under threat. Our Tottenham will respond to official Council consultations regarding Tottenham.
4. We will set up a Community Planning Working Group promoting and supporting community planning, local planning workshops and residents' own consultations. The group will also co-ordinate the efforts to

develop a Community Plan for Tottenham. The Community Planning group will be guided by the Community Charter, and by the agreed action points coming out of the conference workshops.

5. We will support the development of other Our Tottenham Working Groups, eg on the Local Economy, Housing, Planning Policy, Community Facilities, Youth, Community Planning, Communications etc,...
6. We agree there should be an Our Tottenham Recall Conference in summer/autumn 2014 to strengthen the work and increase the size of the network and its Working Groups, evaluate the Community Charter, and to discuss how best to mobilise our communities to speak out for their interests.

# **A Community Plan for Tottenham: 'Road Map'**

[Agreed at Conference 11.10.2014]

**We have agreed as a network to create a Community Plan for Tottenham as a whole.**

This is so that the real collective needs and desires of the people who live or work in Tottenham can be put centre stage in the debate and battles over the decision-making over the future of our own communities and neighbourhoods. Below we set out a process for achieving much of this over the next 12 months.

**A good foundation has already been made!**

What we want to achieve is guided by our Community Charter, the experiences of successful local community planning efforts and community visions for various sites, various genuine consultations already done, and the preliminary work of the Our Tottenham Community Planning Working Group.

**Some of the key questions we will have to address are:**

- How do we create an **over-arching Plan**, whilst including the **existing community visions and Plans for various sites**, and maybe developing **several mini-Plans for different geographical areas** on the map (eg N/S/E/W/Central Tottenham?).
- How do we integrate the **various key 'sectors'** e.g. community buildings; shops and workplaces; green spaces; housing; public facilities, etc?
- How can **everyone contribute to the process**, including involvement and support from community groups and the wider public? How do we make sure this is an inclusive process? Workshops, Questionnaires etc?
- At the same time how can we **forestall adverse moves by Council/developers** in time to prevent things we don't want from becoming irreversible?

**What we've already achieved so far - as a foundation for the next steps:**

- 1. Produced a summary of a wide range of successful & inspiring community-led Tottenham projects**
- 2. Adopted a Community Charter** (April 2013) with positive policies on what we want
- 3. 46 community organisations have so far signed up to the Charter.**
- 4. Held a Conference on Community Planning** (Feb 2014), which adopted a series of further recommendations for moving forward
- 5. Agreed a set of Guiding Principles** for the evaluation of proposed urban development plans/sites etc
- 6. Set up a Community Planning Working Group**
- 7. Started compiling a range of Reports and Consultation documents already produced**



(eg Tottenham Futures, Atkins Open Space Assessment etc) which contain quite a lot of detail about what people want and deficiencies that need addressing etc

**8. Started Information Mapping (online and on paper)** collating a large amount of data about Tottenham, its facilities, services, buildings, open spaces, population, community groups etc

**9. Started developing Working Groups on a number of key themes** (Economy, Housing, Planning Policies etc) which will help focus and guide activity

**Some next steps up to the spring 2015:**

**10. Have a more detailed look at successful Community Plans in Tottenham and elsewhere**, eg the process, visioning, community involvement, funding etc. How did they do it? What could we learn from them?

**11. Identify special qualities, strengths and uniqueness of Tottenham**, and our local communities / neighbourhoods / facilities / services / peoples etc

**12. Make some comparisons between Tottenham and other parts of London** to show how we are integrated into the wider city

**13. Start to involve more of Tottenham's community groups and our wider communities** in this process, including specialist groups which can advise the network regarding key themes.

**14. Update and launch the Information Mapping about Tottenham**, including an audit of black and minority ethnic Centres and spaces. Find a technical coordinator.

**15. Clarify the planning policy basis for a Community Plan** ie Local, London and National official policies supporting Community Planning

**16. Do fundraising** to support development of an initial draft Plan

**17. Assemble a team of volunteers** to kick off the creation of the draft Plan – outreach / community workshops / volunteers (eg network members, Team London etc), with a strategy for involving students.

**Steps up to the Summer 2015:**

**18. Create a Visioning Document** (Skeleton) to be adopted at the next OT conference

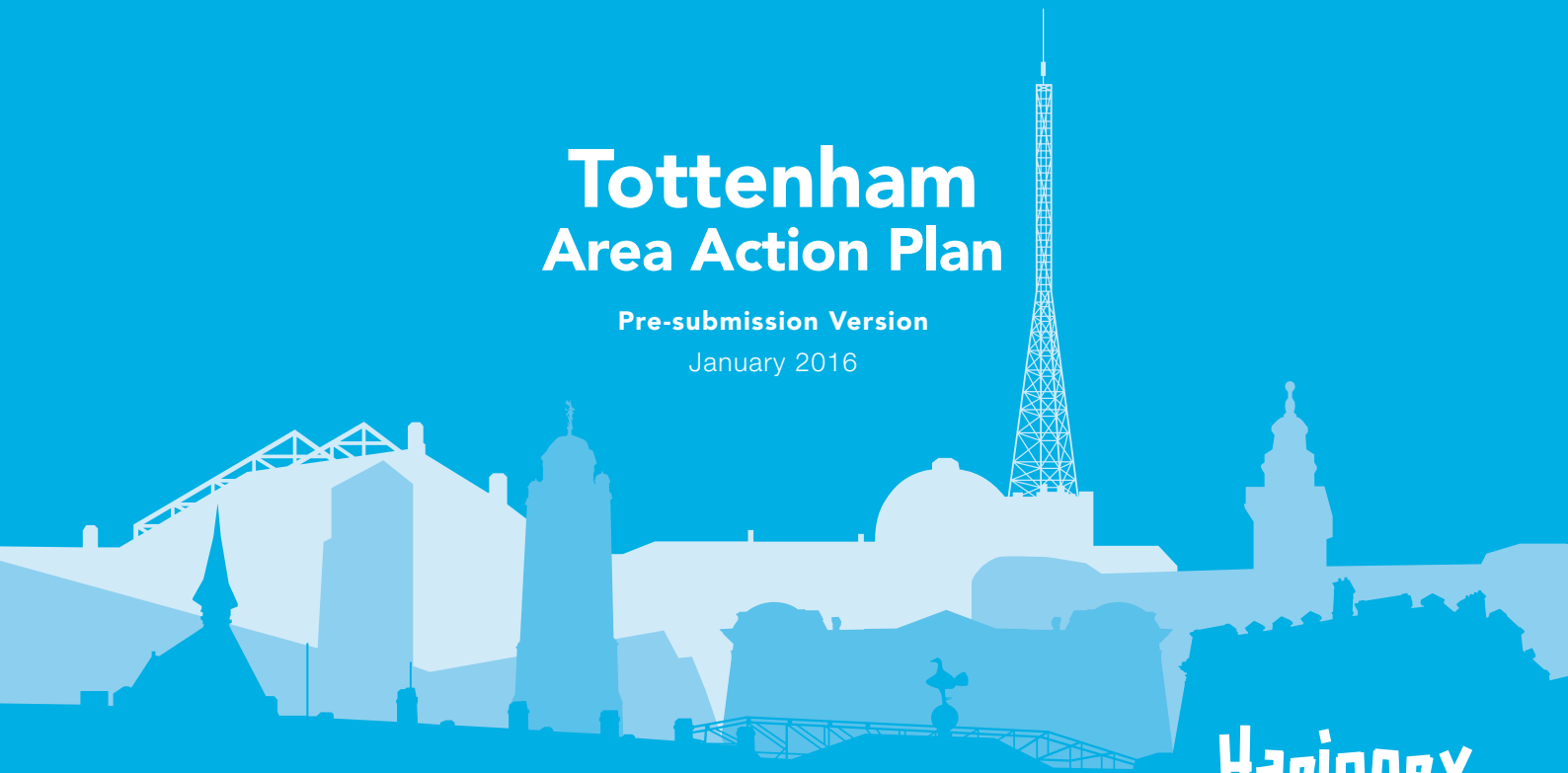
**Appendix 2: Detailed responses made on each specific site listed in the Tottenham AAP.**

# Tottenham

## Tottenham Area Action Plan

**Pre-submission Version**

January 2016



[www.haringey.gov.uk](http://www.haringey.gov.uk)

**Haringey**  
LONDON



London Borough of Haringey  
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Cartography & desktop publishing by:



# FOREWORD

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

I am encouraged by the positive statements made in many of the comments received to the last round of consultation on the Council's Preferred Option in February 2015. In particular, recognition of the need for a plan to manage and guide future development and investment decisions in this part of the borough, and the general support given to the site proposals and policies.

The comments received have helped to strengthen and refine both the policies and the proposals for specific sites.

Taking those comments on board, as well as comments received to previous consultation, this document sets out the Council's Pre-Submission document (i.e. its final draft plan) for Tottenham.

This next round of consultation is focused on the 'soundness' of the plan, ensuring the final plan is robust, effective and deliverable. However, we want the Area Action Plan to be more than just a policy tool. It is important to us and our delivery partners that the local community and key stakeholders can give their support to the final Plan and can work with us to deliver it over both the short and long-term.

Therefore I encourage you to continue to engage with us in the preparation of this important Plan for Tottenham and for the Borough as a whole.



**Cllr Ali Demirci**  
**Cabinet Member for Planning**



## How to respond to the consultation?

The Council will consult on the proposed submission of the Tottenham Area Action Plan for nine weeks from **8<sup>th</sup> January to 4<sup>th</sup> March 2016**. At this stage of the Plan's preparation the consultation is primarily concerned with the 'soundness' of the document.

A sound Plan must be:

**Positively prepared** – it must be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;

**Justified** – it should be based on robust evidence and should be the most appropriate strategy when considered against reasonable alternatives;

**Effective** – it should be deliverable over the plan period and be based on effective joint working; and

**Consistent with national planning policy** – it has to have regard to, and give effect to, the policies contained within the National Planning Policy Framework as well as extant national planning policy statements and guidance.

Further guidance on this criteria, how to make your comments and the type of information required is provided in Appendix E.

In particular, if you wish to make a representation seeking a change to the Plan you should:

- Be clear about which policy or paragraph, figure or part of the plan your representation relates to;
- State clearly why you consider the Plan is not sound having regard to the above tests;
- Provide supporting information or evidence to justify why the Plan should be changed; and
- Put forward the changes that you consider necessary to make the Plan sound.

The Plan and all supporting documents can be found at:  
[www.haringey.gov.uk/tottenham\\_area\\_action\\_plan](http://www.haringey.gov.uk/tottenham_area_action_plan)

Hard copies are also available for inspection at the following locations:

Planning Department  
Level 6 River Park House  
225 High Road  
Wood Green  
N22 8HQ

Civic Centre  
High Road  
Wood Green  
N22 8LE

All public libraries

You can submit your comments:

By email to [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

In writing to Planning Policy Team, Level 6, River Park House, 225 High Road Wood Green, London N22 8HQ.

All comments should be submitted by **4<sup>th</sup> March 2016**.

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# **Purpose and Scope of the Tottenham Area Action Plan**

CHAPTER

**01**

## Chapter 1

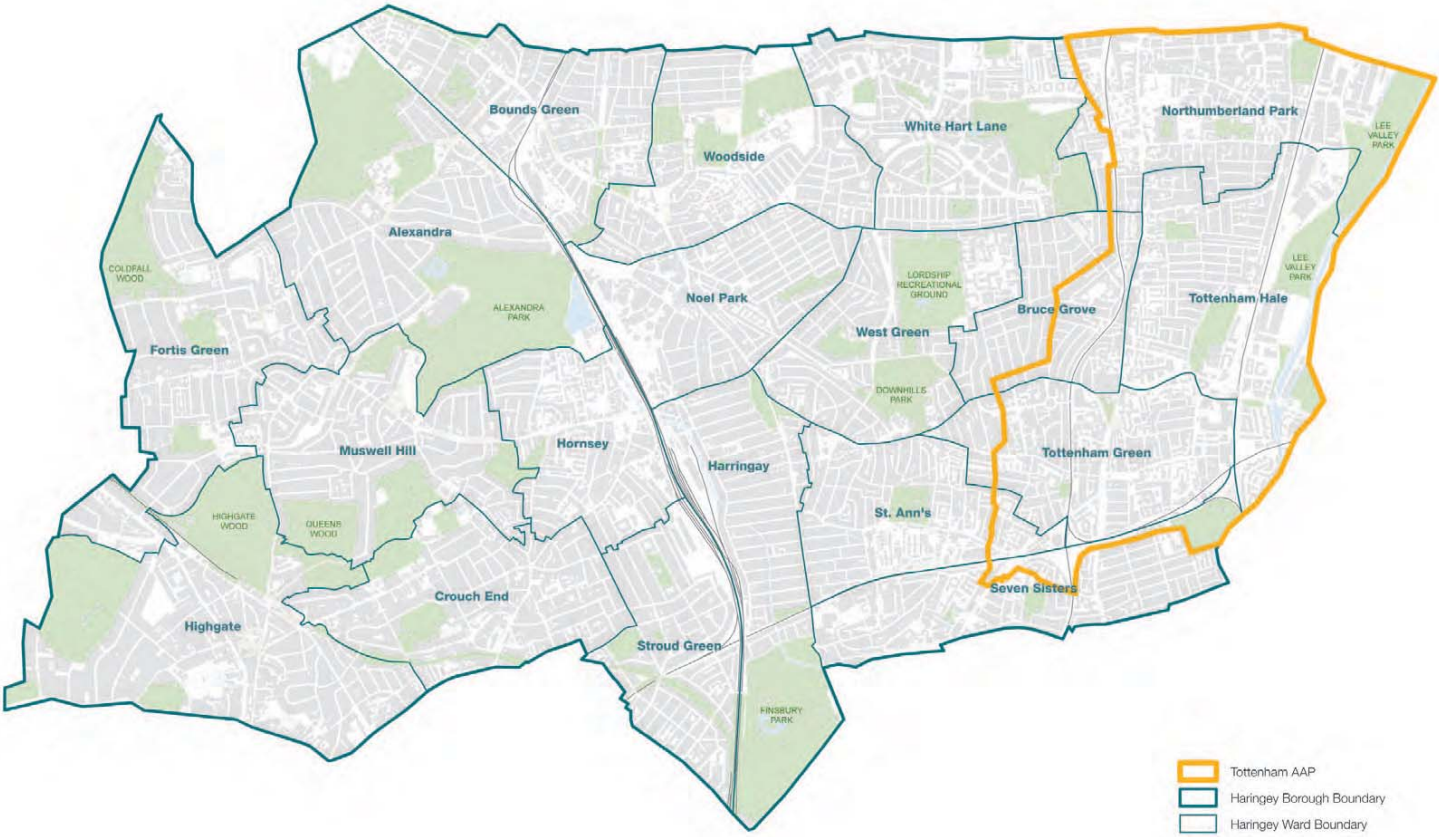
# PURPOSE AND SCOPE OF THE TOTTENHAM AREA ACTION PLAN

### Purpose of the Area Action Plan

- 1.1 The Area Action Plan (AAP) is being prepared in order to ensure that the scale of development and change proposed for Tottenham through 2026 and beyond is positively managed and guided by a planning framework. It also ensures that investment decisions meet the aspirations of the local community and the Council for the area as a whole, as well as specific places and locations within it.
- 1.2 The AAP identifies land capable of delivering 10,000 new homes and 5,000 new jobs. It provides a legal basis for developments including establishing a new retail centre at Tottenham Hale, the intensification and diversification of existing industrial estates, and mixed leisure development around Tottenham Hotspur stadium.
- 1.3 The AAP seeks to provide clarity and certainty about how the opportunities for improving Tottenham's places will be realised, and the challenges addressed. Specifically, it prescribes a vision for how neighbourhood areas can develop, allocates strategic sites for particular uses and types of development, and sets out Tottenham specific policies aimed at ensuring new development is ambitious, appropriate and sustainable in a Tottenham context. It ensures infrastructure matches the development proposed, ensures local access to training and employment, and enables housing choice for both existing and new residents.
- 1.4 The AAP has a strong focus on delivery and implementation. It is intended to alert infrastructure providers and public sector agencies to the growth targets and existing deficiencies present, so that they may schedule service and capacity upgrades accordingly. The Council's Infrastructure Delivery Plan will be used in conjunction with the AAP for this purpose. Effective cross-service working, securing the coordinated and timely delivery of social and physical infrastructure improvements, will be essential to support new development and ensure that continued growth across Tottenham is sustainable. The AAP provides further guidance on the appropriate phasing of new development, taking into account the need to ensure that positive regeneration occurs and benefits the whole of Tottenham.
- 1.5 The boundary of the AAP (see Figure 1.1) has been drawn to include the key neighbourhoods that have the capacity to accommodate growth (i.e. those with developable strategic brownfield sites, existing transport connections, and which can maximise the benefits that come from regeneration). It recognises that sites identified sit within and alongside other sites and neighbourhoods that are not intended to be subject to the same level of change, but will also benefit from targeted regeneration and proposals to improve physical connections, transport accessibility, employment creation and enhanced social infrastructure. The AAP boundary does not preclude opportunities outside of the AAP area to realise better connections and other improvements such as green space access, heritage and leisure facilities, and links to other employment hubs.



FIGURE 1.1: Tottenham AAP Area



## What is the Tottenham Area Action Plan (AAP)?

- 1.6** Tottenham has been identified in the London Plan (2015) and Haringey's Strategic Policies Local Plan (2013) as a key regeneration area within the capital capable of accommodating significant growth. In addition to these statutory planning documents, the Council has developed a number of non-statutory regeneration plans for Tottenham, culminating in the Strategic Regeneration Framework for Tottenham.
- 1.7** This Area Action Plan (AAP) sets out a strategy for how this growth will be managed to ensure the best quality of life for existing and future Tottenham residents, workers and visitors. It will be a key tool in determining planning applications in Tottenham in the period up to 2026. The Area Action Plan is a Development Plan Document which forms part of the Council's Local Plan. It has been prepared in accordance with the regulations contained in the Town and Country Planning (Local Development) (England) Regulations 2012.
- 1.8** The subsequent chapters in this plan are structured as follows:

**Section 2: Tottenham's Character and Challenges** provides a summary of the characteristics of Tottenham and sets out the key issues, challenges and opportunities in the area.

**Section 3: Vision and Objectives** sets out the Spatial Vision and Objectives for the future of Tottenham.

**Section 4: Tottenham AAP Policies** sets out detailed Tottenham specific policies that supplement or supplant the Borough-wide planning policies, to guide and manage new development.

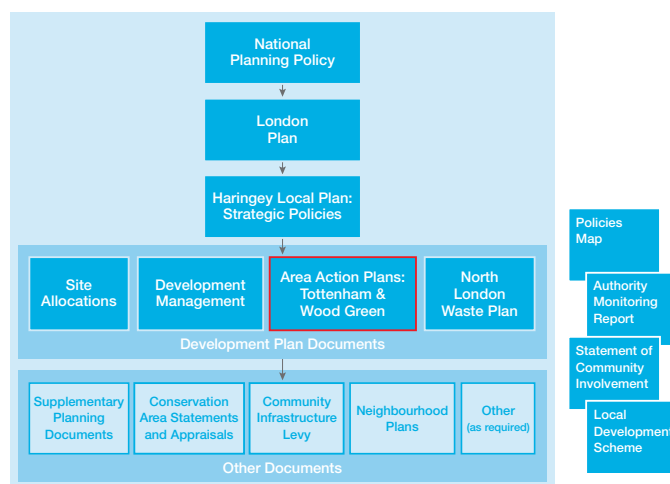
**Section 5: Neighbourhood Areas and Opportunity Sites** sets out the approach to Tottenham's neighbourhoods and identifies the strategic opportunity sites that the Council is seeking to allocate to deliver the development identified in the Plan.

**Section 6: Implementation, Delivery and Monitoring** provides details on how the AAP will be implemented, and its delivery monitored.

## Planning policy context

- 1.9** The AAP is consistent with relevant national, regional and local planning policies. As part of the borough's Local Plan, the AAP will be applicable to the determination of planning application proposals located within the AAP boundary area. Figure 1.2 shows the Tottenham AAP in the wider policy context.

**FIGURE 1.2: Policy Context Flow Diagram**



## National Planning Policy Framework

- 1.10** The National Planning Policy Framework (NPPF) sets out the presumption in favour of sustainable development. Planning applications that accord with the policies in this Plan will be approved without delay, unless material considerations indicate otherwise. The Council will work proactively with applicants to secure developments that economically, socially and environmentally benefit the area.

- 1.11 Where the Local Plan is absent, silent on or relevant policies are out of date, planning permission will be granted unless the adverse effects would outweigh benefits when assessed against the policies in the NPPF taken as a whole or specific policies in the NPPF indicate that development should be restricted.

### London Plan (2015)

- 1.12 The London Plan sets out regional planning policies for all of London and forms part of Haringey's Development Plan. The AAP must therefore, be in general conformity with the London Plan.
- 1.13 Tottenham contains areas of Strategic Industrial Land, which are safeguarded for employment use by the London Plan. Similarly areas of Metropolitan Open Land are protected through the London Plan, including Bruce Castle Park/ Tottenham Cemetery, Lordship Recreation Ground, and Downhills Park just to the west of the AAP area. In addition to MOL, the Lee Valley Regional Park, including Markfield Park and Tottenham Marshes, is designated as Green Belt.

### Upper Lee Valley Opportunity Area Planning Framework (2013)

- 1.14 The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF), adopted in July 2013, was produced by the Greater London Authority (GLA) working with Transport for London (TfL) and the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney.
- 1.15 The OAPF sets out an overarching framework for the regeneration of the area which is amplified where necessary by the Boroughs' own planning documents for specific areas. It is Supplementary Planning Guidance to the London Plan and will be used as a material consideration in the determination of planning applications.

### Local plans and strategies

- 1.16 The AAP is the key statutory planning document delivering the regeneration strategy for Tottenham. It establishes the local spatial planning framework for the area, giving detailed expression to the overall growth objectives for Tottenham as contained in the Haringey's Strategic Policies Local Plan.

- 1.17 In particular, the AAP seeks to realise the significant potential for urban renewal and intensification, particularly within Tottenham Hale and North Tottenham. The AAP builds on the conclusions and recommendations of the following documents:

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

- 1.18 There are a number of other plans and strategies which will also set the context for Tottenham's regeneration. These documents should be read in conjunction with this AAP. Key documents are listed below.

- A Plan for Tottenham: sets out a vision for the area to 2025 – re-building the area through economic growth, investment, improved neighbourhoods and regeneration of key sites.
- Housing Strategy: helps to define the Council's requirements for the kind of housing, and in particular, affordable housing, that needs to be built as part of new developments in the Borough.
- High Road West Masterplan Framework: highlights opportunities for improvement and change and identifies where housing, open space and play areas, as well as community, leisure, education and health facilities and shops could be provided. The master plan helps to demonstrate how the growth and development planned for HRW could be delivered through strategic interventions over the short to longer term.
- Northumberland Park Masterplan Framework: identifies the key principles for change and tests development capacity scenarios to realise opportunities for comprehensive physical regeneration in Northumberland Park.
- Tottenham Hale District Centre Framework: has been prepared specifically to provide clarity and guidance relating to relevant development parameters for identified sites in Tottenham, ensuring coordinated delivery of the strategic outcomes sought for the area.
- London Stansted Cambridge Strategic corridor: This corridor is a growth area of national importance requiring coordination across regional boundaries and joint strategic working.

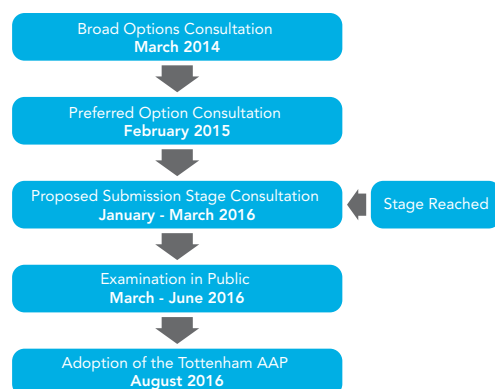
## Preparation of the proposed submission document AAP

**1.19** Figure 1.3 illustrates the current stage the AAP has reached in the statutory process of plan preparation. The AAP, once adopted, will give effect to Haringey's Strategic Policies Local Plan. It sets out in further detail the planning framework which will help to guide future development in Tottenham.

**1.20** The AAP has been prepared through consultation with the local community, statutory consultation bodies and other key stakeholders having particular regard to:

- Consultation feedback received on an early draft of the AAP (March 2014) and the "Preferred Option" AAP (February 2015), as well as other strategic documents including: 'Tottenham Futures', the Strategic Regeneration Framework and more recently, consultation on High Road West (September 2014), Tottenham Hale District Centre Framework (October 2014) and Northumberland Park (October 2014). Further information is included in the 'Previous consultation outcomes' sub-section below;
- The findings of the Physical Development Framework for Tottenham (2012);
- Engagement with landowners and developers through, including through the pre-application process, to gain an understanding of the aspirations they hold for their sites and potential for delivering development;
- Engagement with key stakeholders, such as Transport for London and the NHS, who need to support the proposals and commit to their delivery;
- The findings of evidence base studies, including masterplan work, Tottenham specific studies on transport, as well as Borough-wide technical studies on various policy topics such as housing need, flood risk management, employment, open space and urban character; and
- Other policy developments related to Tottenham, including the designation of Tottenham Hale as a Housing Zone and the scope for Crossrail 2 to serve Tottenham, providing significantly greater access to locations within the Borough, London and the wider South east.

**FIGURE 1.3:**  
Plan Development Process



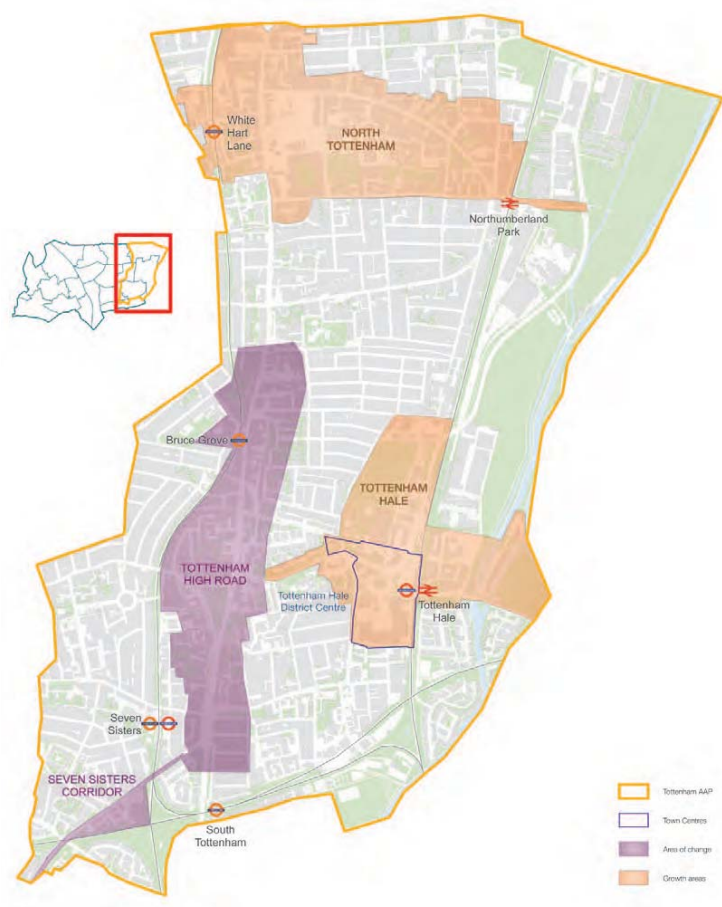
## Scope of the AAP

**1.21** The delivery of key developments within the Plan's timeframe is critical to realising the vision and objectives of the AAP and delivering the spatial strategy. Sites that can feasibly be developed within this timeframe have been prioritised. It is acknowledged that other sites, currently unidentified, may become available during the Plan period. The AAP therefore includes policies and guidance for each neighbourhood and across the entire Plan area to ensure that all new development is appropriately managed, irrespective of whether it falls within a site specific allocation.

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

**1.23** The key proposals advocated for Tottenham through the AAP are summarised in Figure 1.4.

FIGURE 1.4: Tottenham Area Action Plan Key Diagram



## Previous consultation outcomes

**1.24** Initial consultation on the broad proposals for Tottenham was undertaken in January 2014. A number of public consultation events were also held that attracted over 80 residents and stakeholders. The full report is available on the Council's website. In summary, consultation feedback highlighted a number of common themes:

- The need for the AAP to be clear about what is being proposed (i.e. where and why, as well as the implications for local neighbourhoods, local residents and businesses);
- That the area is already densely populated and concern as to whether the number of new residential developments proposed for Tottenham is appropriate and equitable in a Borough-wide sense;
- That existing deficiencies in community infrastructure (including health care facilities, primary school places and local open space) serving the area will be further exacerbated if additional housing is added - new infrastructure provision must be secured and not just promised;
- Concern that regeneration will lead to the gentrification of Tottenham, with existing residents and businesses forced out of the local area;
- A desire to see the distinctive existing character and heritage of neighbourhoods retained and preserved;
- The need for further detail on employment provision, including: the types of jobs proposed to be delivered, how these will be secured for local benefit and greater clarity on the proposals for existing local employment sites, including proposals to support, retain (including through relocation) and grow local businesses, as well as the need to secure affordable workspace; and
- That regeneration in Tottenham should not be solely for, or in the hands of, major developers and landowners but should be in collaboration with the existing community.

**1.25** In addition to public consultation on the draft AAP specifically, the Council has been seeking the views and priorities of Tottenham residents in relation to a wide range of social and economic issues. This includes commissioning, in 2013, of an independent organisation (Soundings) to undertake a five-month consultation exercise called 'Tottenham's Future'. More than 3,700 responses were received and analysed as part of this exercise, a significant number of which focused on matters that fall within the remit of the AAP to address. A full summary of all responses received to 'Tottenham's Future' is available on the Council's website<sup>1</sup>, whilst the key messages relevant to strategic planning and the AAP are summarised below:

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

**1.26** Consultation on the proposed masterplan for High Road West ran from 13<sup>th</sup> September 2014 to 25<sup>th</sup> October 2014, generating 292 responses including the following of relevance to the AAP:

- Broad agreement to the comprehensive estate renewal of the Love Lane Estate;
- Support for the provision of an additional 1,200 new homes where this increases housing choice and provides for a better mix of housing in the area;
- Residents wished to see the High Road remain as the main shopping area, with improved public spaces, new retail and community hub provision;
- Improvements to local transport facilities, including the station and bus stops, are required to support new development;
- Protection of the local quality heritage buildings also came through strongly;
- Many local businesses raised concerns to the regeneration proposals for the area and, in particular, proposals requiring the relocation of existing businesses.

<sup>1</sup> [http://www.haringey.gov.uk/index/housing\\_and\\_planning/tottenham/tottenham-consultations/previous-consultation-work.htm](http://www.haringey.gov.uk/index/housing_and_planning/tottenham/tottenham-consultations/previous-consultation-work.htm)



**1.27** Finally, a public consultation was held in February and March 2015 on the 'Preferred Options' draft of the AAP<sup>2</sup> (alongside consultation on other Local Plan documents, including emerging Alterations to the Strategic Policies, Development Management DPD and the Site Allocations DPD). All comments to this consultation were summarised and considered, and where appropriate, changes were made to the AAP in response to these. The key messages from the consultation were:

- Concerns regarding how and where infrastructure will be delivered to service the planned residential and commercial growth, in particular, health care and school places;
- Tottenham's existing heritage and character should be protected and used as a basis for conservation-led development;
- Refurbishment and the continuance of the Decent Homes programme for estates are preferable to other forms of estate renewal;
- Affordable housing is not genuinely affordable for many of Tottenham's population; and
- Local businesses need to be supported in the regeneration of Tottenham.

**1.28** In drafting the pre-submission version of the AAP, the Council has had regard to recent policy developments (both at the national and regional level), all responses received to-date to consultation in Tottenham and findings from engagement with key stakeholders. The current version of the AAP has been prepared over several stages and through that process, been subject to amendments and refinements in light of responses received.

<sup>2</sup> As required by regulation 18 of The Town and Country Planning (Local Planning)(England) Regulations 2012.

## Sustainability Appraisal, Habitats Assessment, Equalities Impact Assessments

**1.29** In addition to the evidence base studies, the AAP is also supported by a Sustainability Appraisal, including a Habitats Regulation Assessment, Strategic Environmental Assessment and an Equalities Impact Assessment. The Sustainability Appraisal tests the policies and proposals to identify the likely social, environmental and economic impacts that may arise, and evaluates options for mitigating potential negative impacts and enhancing positive impacts. The Habitats Assessment determines whether the proposals in the AAP might have a significant effect on a European designated natural habitat. The Equalities Impact Assessment examines how the AAP meets the needs of the whole community and makes sure that the proposals and policies being advocated through the AAP do not result in any disproportionate disadvantage to any group in the community.

**1.30** The Sustainability Appraisal is undertaken as an iterative process, providing further assessment at each stage of the Plan's preparation. It is published alongside the AAP for public consideration and comment.

## Infrastructure Delivery Plan

**1.31** Haringey's Infrastructure Delivery Plan (IDP) sets out the infrastructure that will be required over the Plan period to support the residential and commercial growth planned across the Borough. The IDP identifies the types of infrastructure required, where this infrastructure should be located and (where known) what it will cost, how it will be funded, and who will be responsible for its delivery.

**1.32** Additionally, the Greater London Authority is working with the local authorities in the Upper Lee Valley 'Opportunity Area' to develop a Development Infrastructure Funding Study (DIFS). The overall objective of the DIFS for the Upper Lee Valley is to:

- Identify the critical enabling infrastructure necessary to deliver the growth;
- Provide an assessment of the capacity of development to fund this infrastructure, and identify funding gaps; and
- Recommend what alternative funding mechanisms might be available to fund the infrastructure.

**1.33** Haringey's IDP has had regard to, and builds upon, the DIFS as appropriate to the Borough.

## What happens next?

- 1.34** The Council will publish this document for a period of six weeks from **8<sup>th</sup> January to 4<sup>th</sup> March 2016**. At this stage of plan preparation, public consultation is concerned with the soundness of the document. Guidance on how you can make your comments, and the information required, are set out at Appendix F. (Please note that all comments received during this consultation will be made available in the public domain).
- 1.35** Following the consultation, copies of all responses received during pre-submission publication will be forwarded to the Planning Inspectorate for consideration alongside the submission AAP, together with a summary of key issues setting out the Council's response to points raised. In contrast to previous stages of consultation, the Council is not able to make any further substantial changes to the AAP prior to submitting the Plan. However, a Schedule of Minor Post-Publication Changes (editing) will be prepared and submitted to the Planning Inspectorate. An Inspector will then make an independent assessment of the AAP and will hold an Examination in Public (anticipated for Spring 2016). If the Inspector determines that the AAP is sound, he or she will publish a report containing a number of recommendations that the Council should include within the final document before it is adopted as the new planning framework for the area.

# Tottenham's Character and Challenges

CHAPTER

02

## Chapter 2

# TOTTENHAM'S CHARACTER AND CHALLENGES

- 2.1** The following section sets out the context and character of Tottenham along with the key drivers for change which will influence and shape the area. These drivers reflect the challenges Tottenham faces and opportunities for addressing them.

### Location

- 2.2** The Tottenham AAP area covers approximately 560 hectares, comprising the wards of Northumberland Park, Tottenham Hale and Tottenham Green, and parts of Bruce Grove, St Ann's and Seven Sisters. Tottenham is located in the east of the London Borough of Haringey. It borders London Borough of Waltham Forest to the east and London Borough of Enfield to the north.

**FIGURE 2.1:** Haringey London Context



Tottenham High Road

FIGURE 2.2: Tottenham AAP Area Context



## History

- 2.3** The earliest written evidence of Tottenham's existence is in the Domesday Book of 1086. The existence of a weir by 1086 and a mill by 1254 also suggests early habitations at the Hale (later Tottenham Hale) midway between High Road and Mill Mead. Other Manors included Bruce Castle, recorded in 1134 and 14th Century sub-manor of Mockings on the south side of Marsh (later Park) Lane.
- 2.4** Tottenham High Road has its origins in the Roman Period as it forms the successor to Ermine Street, which connected London, via Bishopsgate, to Lincoln and York. Ermine Street however, was situated to the west of contemporary Tottenham High Road. The road's current alignment was adopted during the 16th Century due to its predecessor's proximity to the flood prone Moselle River. In later years the road also became the main route between London and Cambridge. Accordingly, Tottenham High Road has for centuries formed an important route through north London, and as early as the 15th and 16th Centuries, inns, almshouses and residential properties began to develop at strategic points along the highway.
- 2.5** Following the introduction of the Great Eastern Railway in 1872 the area's population grew at an unprecedented rate. The introduction of affordable early morning tickets encouraged workers to commute. Accordingly, artisans and clerks began to move to Tottenham during this period and the area's streets became lined with terraced housing to accommodate the growing population of lower middle and skilled working class residents.
- 2.6** By the 18th century a range of residential, commercial and philanthropic buildings lined Tottenham High Road, especially its eastern side. There were few significant buildings away from the ribbon development along the High Road, especially at Tottenham Hale. The spread of villas along some of the lanes branching off High Road was more noticeable than the growth of separate hamlets.

## People and Community

- 2.7** At the last Census in 2011, the population of the Tottenham AAP area was just over 78,000<sup>3</sup>, making up around one-third of the total population of Haringey. The demographic profile of the area has changed considerably over the last two decades. It has a much younger population than the rest of the Borough and the Capital - 28.1% aged 0-19 compared to 25.6% for Haringey and 24.5% in London (NB: White Hart Lane has the highest proportion of 0-19 year olds (32.5%)). It is also one of the most ethnically diverse areas in the country, with over three quarters (78.9%) of residents from minority groups, compared to 55.1% for London. Both its ethnic diversity and younger population are significant factors driving housing need within the area.
- 2.8** The sense of community is however very strong in Tottenham. Residents identify with the place and there are many local groups and organisations that are vocal and active, helping to shape civic, community and cultural life in this area, including: Our Tottenham; Chestnut Estate Community Centre; Tottenham Civic Society; Paddock Community Nature Park; 'Friends of' groups including for Tottenham Marshes, Markfield Park, Down Lane Park; Lee Valley Regional Park Authority; Wards Corner Community Coalition, and numerous Residents' associations, to mention a few.

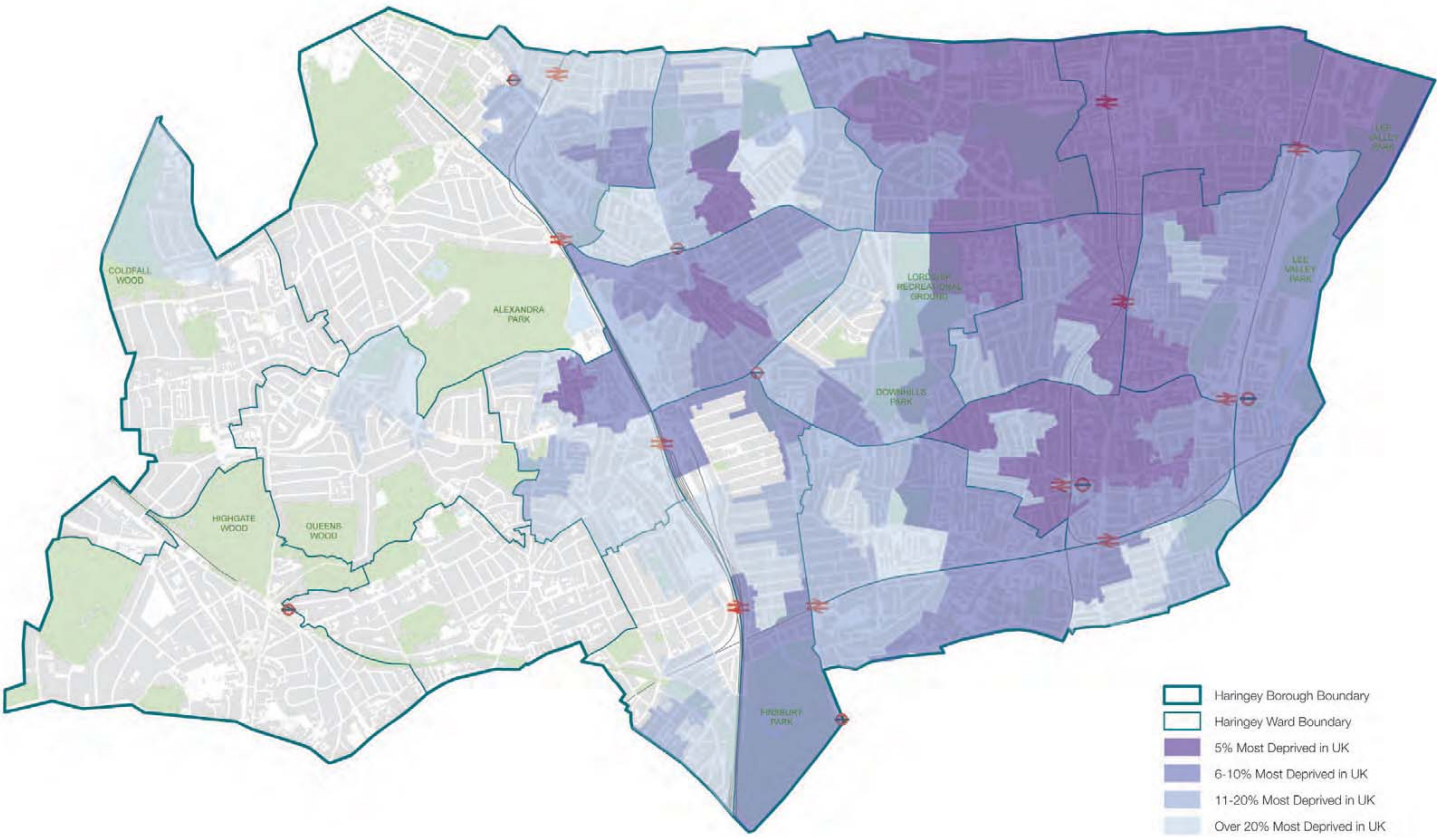
## Deprivation and inequalities

- 2.9** Tottenham is one of the most deprived areas in the country. As Figure 2.3 shows, the entire Tottenham AAP area falls within the top 20% most deprived areas in England, and more than half within the top 10%. It is one of the poorest performing areas in the country for income, education, skills and health. 41% of local children live in poverty, compared to a UK average of 20.9%, and around 40% are in workless households, compared with the London average of 21%. 25% of households are experiencing overcrowding. Much of this deprivation stems from labour market disadvantage, with unemployment and a low skills base being the two biggest issues facing Tottenham today.

<sup>3</sup> GLA (2012) GLA Ward-Level Population Projections 2012 Round, SHLAA-Based, Trend-Constraint Variant  
<http://data.london.gov.uk/dataset/gla-2012md-trend-ward-proj/resource/bdc2c3d8-3feb-44ba-a5dd-13ad9e54ea7b>



FIGURE 2.3: Indices of Multiple Deprivation in Haringey



- 2.10** The high levels of deprivation have a negative impact on people's health and well-being. In 2012/13, 44.9% of all 10 and 11 year olds living in Tottenham were either overweight or obese, compared with 37.4% for London. 15.6% of residents suffer from a long term limiting illness and 6.8% described their health as either bad or very bad. This compares to 14.2% and 5% for London respectively.
- 2.11** Poor health and well-being is also affecting life expectancy in the area. In Northumberland Park, life expectancy for males is 7.7 years shorter than for males living in the more affluent parts of the Borough. For women, the gap is less but is still significant at 3.5 years.
- 2.12** A key challenge is to help address some of the underlying factors contributing to the levels of deprivation experienced in Tottenham. Without positive intervention, the causes of deprivation are likely to continue to persist, undermining efforts to positively affect regeneration within the area.
- 2.13** Those residents in employment tend to be in lower paid jobs. In 2012/13 the median household income in Tottenham was £21,834, substantially below both Haringey (£33,140) and London (£35,740). This is likely a reflection of educational attainment, which in Tottenham is improving but remains below London levels. In 2013, only 69% of the pupils who lived and studied in the area achieved level 4+ at Key Stage 2, and 57% of pupils 5 or more A\*- C at GCSE level, compared to 79% and 64.5% for London respectively. Of those aged 16 and over, only 37% have a qualification at level 3 or above, lower than Haringey (50.4%) and London (48.8%). A quarter of all adults in Tottenham have no qualifications at all.
- 2.14** The work of some excellent schools and colleges will be built upon, and Tottenham's increasing educational standards are expected to push upwards. Further school provision needs to be made within the area to serve both the existing and new communities. Where new schools are proposed, opportunities for the use of shared facilities should be fully explored.

## Economy

- 2.15** Tottenham was once a thriving and prosperous area. As recently as the 1960s and 70s local employers included many household names, such as duplicator manufacturer Gestetner (3,000 employees); the makers of Basildon Bond, (900 employees); and Harris Lebus – a then internationally known maker of furniture (6,000 employees). Other sizable firms included bottlers, bakers and a division of what later became Trebor Bassett, the confectioners (700 employees). Today all of these names are gone. Tottenham has however recently experienced an increase in small and medium enterprise (SME) activity, mostly associated with creative industries, but this sector is still in its infancy.
- 2.16** Many of Tottenham's problems are a direct consequence of the demise of its manufacturing base. Despite strong transport links and the availability of good employment sites, those jobs have not been replaced and have contributed to the high levels of unemployment experienced in the area.
- 2.17** Although unemployment is declining, the Tottenham area still experiences some of the highest levels of unemployment in London and the UK. Some 17,430 residents are claiming an out-of-work benefit – equivalent to 22.3% of the population – and markedly higher than rates across the rest of London (12.4%). This rate is amongst the highest 5% in the country, and one ward in particular – Northumberland Park – has the highest rate of out-of-work benefit claimants in the whole of London, at 31.5%. Youth unemployment is also particularly acute, with 5.4% of 18-24 year olds in the area claiming Job Seekers Allowance, increasing to nearly 10% in Northumberland Park.

## New Jobs

- 2.18** Tottenham is expected to meet provision for the bulk of the London Plan's forecast growth of 12,000 jobs in the Borough by 2026. There is a need to create new jobs, both to replace the businesses that left in the 1960s and 1970s but also as a component of managed growth, providing a balance of homes and jobs to achieve more sustainable communities. With excellent transport connections, low business costs and an affordable/low cost housing offer, there is real potential to attract new businesses to the area.

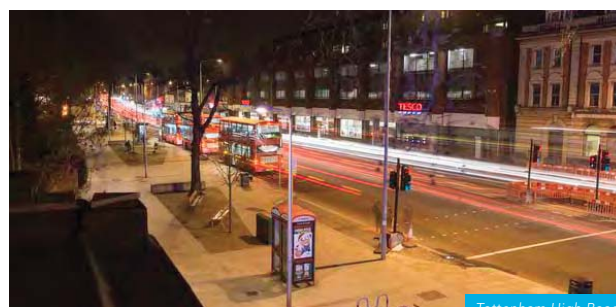
- 2.19** Local evidence suggests Tottenham is experiencing high demand for small-scale, low cost and flexible space for small businesses. These firms require floor space in highly accessible, high amenity areas. The Tottenham High Road Corridor and Tottenham Hale are already experiencing start-up activity and actions to help existing firms grow, as well as to attract new firms, will increase local jobs in the area.
- 2.20** A sufficient amount of suitable employment floorspace provision needs to be made to help renew and diversify Tottenham's industrial estates. This is necessary to realise the prospect of accommodating more intensive employment uses, including those in the burgeoning creative industries sector and 'maker' economy. Given the need for start-up businesses to exist cheaply, and with the right support, there is potential to make the area a hub of early-stage entrepreneurship. This includes provision for appropriately sized move-on space to enable new and existing businesses to grow.
- 2.21** The AAP will set out approaches to deliver new and improved employment floor space in Tottenham. It will also ensure that new development in the area secures opportunities for skills training, apprenticeships and local employment. This includes capitalising on the potential for all new major development to provide construction apprenticeships and training targeted at local young people.

## Tottenham's Employment Land

- 2.22** Tottenham's current economy contains a diverse range of employment areas and premises. The largest employment areas are industrial estates within the Upper Lee Valley. There are smaller manufacturing hubs clustered around the High Rd, while District and Local centres offer a locus for businesses to be located in areas with high footfall.
- 2.23** The Borough's largest industrial area straddles the West Anglia rail line in the North Tottenham area. Brantwood Industrial Estate comprises a large employment area with a mix of industrial and logistics premises, and the North East Tottenham/Leaside Trading Estate comprises mainly warehouse and logistics space, with strong trunk road access via Watermead Way. These areas are supplemented by industrial space at Willoughby Lane, and Marsh Lane. North east of the Tottenham AAP area, in London Borough of Enfield, is the Meridian Water redevelopment which will provide for new retail, leisure and business uses.

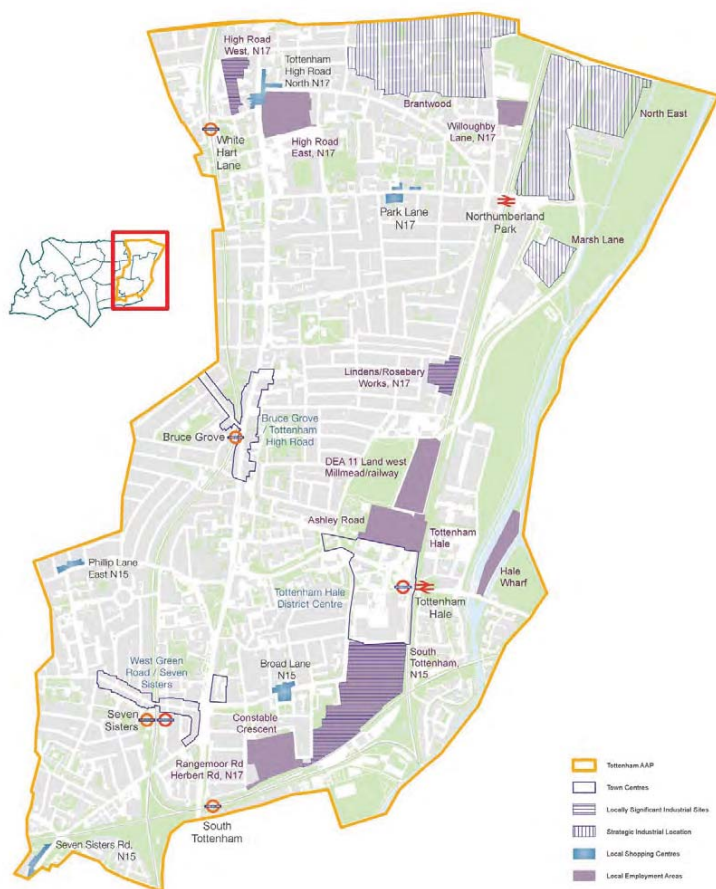
**TABLE 1: Economic Assets**

Strategic Industrial Land	Locally Significant Industrial Land
Brantwood Rd Industrial Estate, North Tottenham	South Tottenham Industrial Estate
North East Tottenham Trading Estate, North Tottenham	Lindens/Roseberry Works, Tottenham Hale
Marsh Lane, North Tottenham	High Rd West, North Tottenham
Millmead/Lockwood, Tottenham Hale	
Local Employment Areas	District Centres
Ashley Rd Area, Tottenham Hale	Seven Sisters/West Green Rd
Rangemoor Rd/ Herbert Rd, Tottenham Hale	Tottenham High Rd/Bruce Grove
Willoughby Lane, North Tottenham	Tottenham Hale (proposed)
Hale Wharf, Tottenham Hale	
	Local Centres
	Broad Lane
	Lordship Lane East
	Park Lane
	Phillip Lane East
	Tottenham High Rd North



Tottenham High Road

FIGURE 2.4: Economic Assets



## Town centres

*Tottenham Green and Seven Sisters/West Green Rd District Centre*

- 2.24** Tottenham Green and Seven Sisters are at the southern end of the Tottenham High Road, and Seven Sisters is the sole London Underground station on the High Road. As such it acts as a gateway to Tottenham from many parts of London. Seven Sisters hosts a wide range of multicultural retail premises, including the Seven Sisters Market, which is the anchor development for the retail offer at Seven Sisters, with provision extending westwards down West Green Road. The market is predominantly South American in character with stalls selling goods from countries such as Colombia, Peru, and Brazil.
- 2.25** West Green Road provides a thriving local parade of small high street units (with generally poorer quality residential accommodation located above) occupied almost entirely by local independent traders. The majority of the offer is targeted at the Caribbean community and based on convenience and service retail comprising barbers shops/hairdressing salons, small food stores/newsagents, specialist butchers, greengrocers and money exchange/ travel agents.
- 2.26** North of Seven Sisters tube station lies Tottenham Green which is a key focus for civic life in Tottenham. Assets in this area include the former Tottenham Town Hall, Bernie Grant Arts Centre, Marcus Garvey Library, and further north, Tottenham Police Station and Tottenham Chances.

#### Bruce Grove/Tottenham High Rd

- 2.27** Bruce Grove is located approximately halfway along Tottenham High Road within the AAP context, with Bruce Grove Station at its heart. This area is a focal point for retail on the High Road, comprising a long linear retail pitch of mainly independent retailers trading from 'traditional' high street units, comprising small ground floor sales areas with residential or office uses on one or two floors above. These units provide predominantly service and convenience retail including: food takeaways, estate agents, bookmakers and banks, charity shops and small convenience/newsagents. In addition, a limited number of multiple operators such as Peacocks, Santander and McDonalds are located in this area.
- 2.28** A different retail offer is provided along the eastern end of Bruce Grove. There are two set back retail areas in Bruce Grove - one in front of Bruce Grove station and the other a fruit, vegetable and fish market at Holcombe Road.

#### Tottenham Hale

- 2.29** Tottenham Hale is identified as a potential District Centre in the future, and already boasts a considerable retail offer. Tottenham Retail Park is a large retail warehouse development catering predominantly for car-borne shoppers. The Retail Park contains the majority of multiple retailers within the Tottenham area, which comprises mainly bulky good retailers. However, the newer development space includes a slightly different offer, including Costa Coffee, Boots and Next. The recently constructed Hale Village development offers office, retail, health and community facilities beneath higher density residential space, signalling the transition of this area towards a public transport-oriented centre.
- 2.30** To the east and north are Hale Wharf and Millmead and Lockwood Industrial Estates, forming part of the Upper Lee Valley industrial area. Other industrial estates around Tottenham Hale include the Ashley Road area which comprises a light industrial estate including the former TechnoPark site, a purpose built office development which is becoming a new Academy school.
- 2.31** The South Tottenham industrial area is located south of Tottenham Hale Retail Park. It includes a mix of uses including offices and light industrial uses. The area has given rise to a warehouse living community in recent years, including a mix of artists' residences and creative industries.

#### North Tottenham

- 2.32** The High Road in this part of Tottenham provides a local centre, however it could benefit from sensitive improvements and investment. A number of the units, particularly north of White Hart Lane, have relatively large sites including goods yards and storage facilities to the rear which back onto the Peacock Estate/Chapel Place. With the exception of Sainsbury's, retail units are typically occupied by independent operators and there are a high proportion of hot food takeaways and convenience stores. There are also a number of food and beverage outlets in this area which are linked to the activities that take place at Tottenham Hotspur FC (THFC) football stadium.
- 2.33** Planned regeneration includes the proposed new THFC stadium development, which involves comprehensive redevelopment with a new hotel, significant retail and leisure offer, museum, offices and housing. The existing stadium will be demolished in order to allow new leisure hotel and residential development at the southern end of the site. The first phase of the development is complete and includes a large retail superstore, office space and a University Technical College which is being delivered in partnership with Middlesex University.
- 2.34** Park Lane includes a secondary parade of shops and further shops are found on the High Road. In the south of the area is the 639 Enterprise Centre, which has been redeveloped as a business centre, and Tottenham Community Sports Centre.

### The future of Tottenham's Town Centres

- 2.35** Town centres are at the heart of local communities and essential components of sustainable places. In Tottenham, town centres need to retain their distinctiveness and offer different experiences so as to complement rather than compete with each other. There is a need to improve the town centre offer across the whole of the Tottenham area, particularly to increase visitation to the centres and ensure their vitality. Maintaining local character will be an important challenge when considering opportunities for accommodating future growth and development in Tottenham.

- 2.36** The AAP offers opportunities to support the vitality of town centres. For example, centres can be proactively managed, including by reducing in size the Primary Shopping Area, so as to encourage a wider range of uses to move into the periphery of centres, to help attract visitors and better concentrate shopping activity. Such measures would allow well-known retailers to congregate in Tottenham's retail cores, together with a mix of smaller units elsewhere, allowing the flexibility for family businesses to continue to form and expand. The Council will need to work with the community and local businesses to ensure they are supported in the growth of Tottenham.
- 2.37** The growth in Tottenham Hale will be supported and benefit from the provision of both new office space and increased retail development as a new District Centre. This will be guided by a District Centre Framework. In North Tottenham, there is a need to realise the investment being made by Tottenham Hotspur FC on their stadium site as a catalyst for wider change, ensuring this area becomes a hub of activity throughout the week and not just on match days. This can be achieved by establishing the location as a premier leisure destination for London, whilst also retaining a local retail function to support the community.
- 2.38** Improving the retail offer in Tottenham will require positive interventions. This includes public realm and other enhancements to improve the townscape and reduce congestion in centres, as well as encouraging a better variety of local amenities such as recreation, leisure, community spaces and cultural facilities.

**FIGURE 2.5: District and Local Centres**

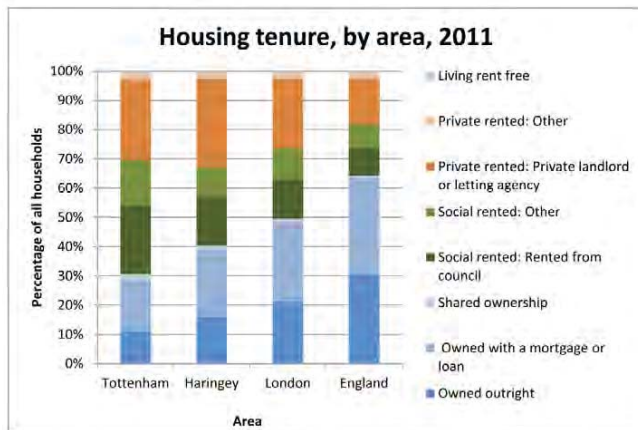




## Housing

- 2.39** The residential hinterland of the AAP area exhibits a range of different characteristics including a mix of late Victorian and Edwardian housing, with later in-fill development of high rise tower blocks and low and mid-rise housing estates. The area experiences high concentrations of social housing and poor quality privately rented accommodation. More than 60% of the Borough's social housing is in and around Tottenham, approximately 40% of that being located in the Northumberland Park ward alone (the Borough has around 30,000 social homes of which 16,000 are owned by the Council).
- 2.40** The majority of people living in Tottenham rent their house either from the Council or a private landlord (67.3 per cent). This is much higher than Haringey as a whole (58.2 per cent) and the difference is even greater compared to London (49.1 per cent). Of the four wards which have been used for this analysis Northumberland Park has the highest number of renters, both private and social, with approximately three in every four people renting their home. Bruce Grove at the other end of the spectrum more closely resembles the pattern of tenure in Haringey as a whole.

FIGURE 2.6: Housing Tenure



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

## Existing housing stock and overcrowding

- 2.42** Part of the challenge in regenerating Tottenham is to improve the quality of the existing housing stock, which in some areas suffer from poor layouts, lack of permeability and legibility in street networks, and/or is over concentrated with smaller homes (those with predominantly one or two bedrooms). While efforts have been taken through the Decent Homes Programme to retrofit properties to bring them up to an acceptable modern living standard, this is not possible for all homes, especially those within estates that are poorly laid out and constrained in terms of the ability to make further modifications.
- 2.43** A quarter of the homes within Tottenham are overcrowded. Cramped living conditions can harm family relationships, negatively affect children's education, affect sleep, and cause depression, stress and anxiety. Overcrowding can also detrimentally affect a person's perception of options and future prospects.
- 2.44** The renewal and redevelopment of lower density estates provides the opportunity to tailor replacement housing to better meet existing residents' housing needs, to increase overall housing numbers and to provide a better mix of housing choice, including social, privately rented and privately owned housing. Estate renewal can be a cost effective means by which to bring homes up to modern living standards.
- 2.45** Renewal and redevelopment of poor quality housing, prioritising family sized housing, strict application of the Mayor's internal space standards and adherence to good design and layout principles can all help to significantly alleviate the overcrowding being experienced within parts of Tottenham.

- 2.46** The Local Plan will seek to prioritise family housing across the east of Haringey, including Tottenham, through a restriction on converting family homes to small units. This should ensure sufficient stock of family sized properties in Haringey to meet the needs of both existing and future residents

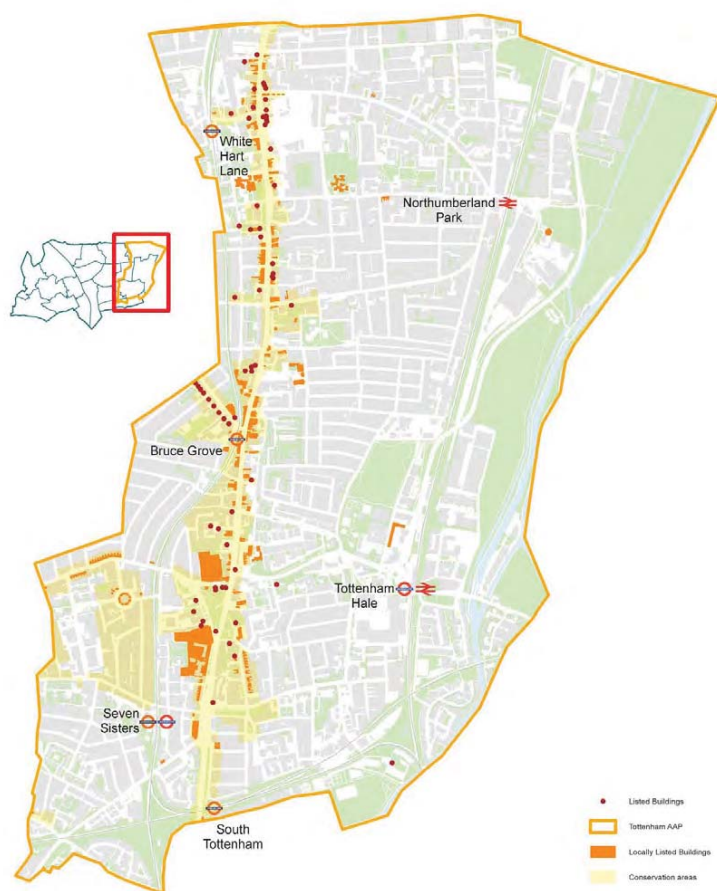
## Population and housing growth

- 2.47** As London's population continues to grow, so does pressure on all boroughs to accommodate housing growth to meet need. The latest projections suggest that London's population could increase from 8.4 million in 2011 to 9.54 million by 2026. Over the same period, Haringey's population is also projected to grow by an additional 37,300 people.
- 2.48** To meet the housing needs of the growing population, Haringey must provide a minimum of 19,800 new homes across the Borough between 2011 and 2026. Tottenham is expected to contribute half of this (i.e.10,000 new homes). This is on the basis of the availability of developable strategic brownfield sites, the area's excellent transport connections and planned future investment in this regard, as well as the need for investment and managed change to bring about regeneration within Tottenham. It is considered that this housing target can be met through new sustainable residential development in Tottenham, in the form of higher density and well-designed taller buildings in accessible locations. However, it is crucial for the AAP to ensure that the delivery of the growth agenda runs hand-in-hand with delivery of the regeneration agenda, particularly as a proportion of the new homes provided will come from the renewal of the Council's housing estates.
- 2.49** Addressing the high levels of population churn is therefore a priority, and will be achieved partly by across-the-board increases in the quality of education, the protection and provision of more family housing and home ownership, improvements to the local environment and the creation of local job opportunities. It is hoped that together these will ensure that Tottenham is an area in which residents wish to stay for the longer term.

## Heritage and cultural assets

- 2.50** The Tottenham area contains a number of listed buildings, both statutory listed and local listed. These tend to be grouped on the High Road as well as other major roads such as Bruce Grove, Phillip Lane and Town Hall Approach. Significant buildings further afield include Markfield Beam Engine House in the south east and Bruce Castle Museum to the west. Significant cultural assets in Tottenham include Tottenham Hotspur FC Stadium, Bernie Grants Arts Centre, and the College of Haringey, Enfield and North East London.
- 2.51** The Tottenham area has a number of conservation areas. A conservation area designation is a means of recognising the importance of the historic quality of an area as a whole, as well as protecting individual buildings where these contribute to the special character of the area. Five conservation areas are wholly within the boundary of the AAP area, while two are partly included. The High Road is an important historic corridor, comprising six separate but adjoining conservation areas along its length. Recent investment by the Council, using Lottery Heritage funding, has specifically targeted the refurbishment and enhancement of the Nineteenth Century shop fronts and their facades along the High Road. However, there remain a large number of heritage assets across the AAP area on the Heritage at Risk Register.
- 2.52** The AAP needs to ensure that the regeneration of the area acknowledges the importance of local cultural and heritage assets to the character and vitality of the area. There is the opportunity to continue to promote conservation-led development of Tottenham. Adaptive reuse of heritage buildings can help maintain the character of Tottenham while meeting growth targets. Ensuring these assets are appropriately integrated into new developments will also ensure their continued use and protection.
- 2.53** The AAP also recognises the need to strengthen the understanding of the significance of the heritage assets and their potential to add value to regeneration. This needs to be integrated holistically so that Tottenham's historic buildings are perceived as adding unique value to the regeneration of the wider area.
- 2.54** Engaging with Historic England at the earliest opportunity will be a key to delivering the aims of this AAP and the Council will continue to engage positively on the preparation and delivery of this AAP with the London Advisory Committee of Historic England in a proactive and collaborative manner.

FIGURE 2.7: Tottenham Conservation Area



## Heritage at risk

**2.55** The general economic deprivation of the area has led to several heritage assets being neglected, with poor or no maintenance of internal spaces and external facades, as well as proliferation of clutter and loss of architectural details. Given the opportunities presented by regeneration, some sites are also under severe development pressure and are in danger of being lost completely. Recognising this, Historic England has included several of the listed buildings in the Heritage at Risk Register. In addition, the conservation areas along the high Road are also included in the Register.

**2.56** With the current transformation vision of Tottenham there is great opportunity to maximise major public and private investment for improvements to infrastructure, housing, employment and public spaces. These major developments are both a challenge to and an opportunity for the fragile historic fabric of Tottenham High Road. The approach to the process should be that of “well managed change”, balancing continuity and the preservation of local distinctiveness and character with the need for historic environments to be active living spaces that respond to the needs of local communities. The historic fabric of Tottenham should be considered an asset which can anchor the character of the proposed new quarter and regeneration schemes in deep historical roots, adding precious cultural capital and avoiding the bland homogeneity of many large scale regeneration projects.

## Meeting social needs

**2.57** New development and growth must be supported by adequate social infrastructure. Community centres, health centres, schools, open spaces, libraries and religious facilities and other infrastructure should all become part of an integrated urban and social fabric.

**2.58** There is the opportunity to work collaboratively with infrastructure providers to ensure the right type of infrastructure is provided both when and where it is needed. Working positively and collaboratively with both NHS England and the Haringey Clinical Commissioning Group will be the key to ensuring the need for improved primary health care provision in Tottenham is delivered.

**2.59** It is important that infrastructure is provided in a space-efficient manner. Partnerships with schools could help to open up facilities such as gyms, playing fields and theatres at night and on the weekend for sports, music or similar events. Opportunities for flexible, multifunctional community facilities to provide space-efficient, quality spaces for a range of different activities will be key to ensuring services can be provided in a cost-effective manner.

**2.60** Engaging with new commercial operators and local charities is important for the provision of new leisure and recreational facilities, such as cinemas and theatres. The provision of new local centres should include provision to share facilities with local charities to facilitate their services.

## Parks and open spaces

**2.61** The Lee Valley Regional Park forms both the Borough and AAP boundary to the east, much of which is designated Green Belt land. Accessibility to this open space from most parts of Tottenham is poor due to severance caused by both the over ground railway line and the A1055. The River Lee runs the length of the eastern boundary of the AAP, within the regional park. It provides both recreational and ecological benefits to the area.

**2.62** Tottenham Marshes, within the regional park, has won a Green Flag Award. Green Flags are awarded to the best parks in the country. Tottenham is also home to two other Green Flag Award winning public parks, Down Lane Park in Tottenham Hale and Markfield Park in South Tottenham. Living Under One Sun Community allotments have also won a Green Flag Community Award.

**2.63** Bruce Castle Park, Lordship Recreation Ground, and Downhills Park offer excellent recreation spaces just outside the AAP area to the west. Across the rest of the AAP area there are a limited number of open spaces such as pocket parks, play spaces and amenity spaces.

## Open space deficiency

**2.64** A number of areas in Tottenham have been identified as being deficient in open space. These include large sections of Northumberland Park, Bruce Grove and Seven Sisters wards.

**2.65** New public spaces need to be added and existing spaces significantly improved, including access improvements, so that each part of Tottenham has a quality network of green and accessible space. Opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged.

**2.66** The Council will work to improve the open spaces in Tottenham to increase capacity and quality for residents and visitors. As outlined in the Strategic Policies Local Plan, the Council will look to improve access to existing parks as increasing the quantity of open space is difficult in an urban borough. Specifically, improved access to the Lee Valley Regional Park and Walthamstow Wetlands in the east of Tottenham will help address levels of deficiency in the east of Tottenham.

## Transport

**2.67** Tottenham High Road is the main transport corridor, connecting Tottenham to Enfield and the M25 in the north and Hackney and central London to the South. There is also an extensive bus network running through the area and excellent connections to the regional and national road network.

**2.68** The area is well served by rail and tube lines, including the Victoria line, which serves both Seven Sisters and Tottenham Hale, and over ground connections to Stansted airport, as well as links to Cambridge and Liverpool Street from Seven Sisters, Tottenham Hale, Northumberland Park, Bruce Grove, and White Hart Lane stations. The Southbury Loop line (through Seven Sisters, Bruce Grove and White Hart Lane Stations) was incorporated into the London Overground network in May 2015.

**2.69** A cycle superhighway is under construction in Tottenham. Cycle Superhighway 1 links White Hart Lane with the City of London. It follows the High Road between Tottenham Green and South Tottenham but links to streets parallel to the west along Ermine Road and along Napier Road, Broadwater Road and Church Lane near Bruce Grove.

**2.70** Public transport accessibility plays an important role in helping to reduce inequalities by improving access to a variety of services. Over the Plan period, Tottenham is expected to see significant investment in public transport with consequential improvements in accessibility, including a new intermodal station at Tottenham Hale, a new entrance to White Hart Lane station, the three tracking of the West Anglia Main Line, the electrification and longer trains on the Barking-Gospel Oak line, and improvements in frequency between Stratford and Angel Road via Tottenham Hale (STAR scheme). This sits alongside improvements in road, bus, cycle and pedestrian networks, and by 2026, the introduction of Crossrail 2 stations at Seven Sisters, Tottenham Hale and Northumberland Park, significantly increasing the accessibility of Tottenham to wider London.

# The Vision & Strategic Objectives for Tottenham

CHAPTER

03

## Chapter 3

# THE VISION & STRATEGIC OBJECTIVES FOR TOTTENHAM

### VISION FOR TOTTENHAM

- 3.1** Tottenham will be the next great area of London. It will build on its geographical, natural and cultural strengths and capitalise on the dynamics of neighbourhood improvement, the significant infrastructure investments being delivered in the area and the availability of large development sites. The combination of transformative actions and continuous incremental improvement will unlock Tottenham's potential as an increasingly attractive place to live, work, study and visit, a neighbourhood fully benefitting from London's growth and its position in a world city.
- 3.2** Tottenham's transformation will benefit existing as well as future residents of Tottenham. It will build on the strength and resilience of the existing community to help deliver a positive future for Tottenham. The vision for Tottenham was developed in consultation with the local community and is contained within the 'Tottenham Strategic Regeneration Framework' which was adopted by the Council in March 2014.
- 3.3** Building upon the overarching vision the following establishes the AAP's 'spatial vision' for how Tottenham and the places within it will develop by 2026.

### Spatial Vision for Tottenham

- 3.4** By 2026 Tottenham Hale will have become a thriving District Centre focused on an improved Station Square around Tottenham Hale Station. A mix of town centre uses, including high end retail, leisure and healthcare facilities, along with a high quality public realm, continues to attract shoppers to the centre, where footfall numbers continue to increase year on year. The station itself has become a key transport interchange including underground, national rail, Crossrail, and Stansted Express services. The new residential and office developments have contributed significantly to the vibrancy of the area throughout the day and week, and continue to drive demand for additional restaurants and bars.
- 3.5** The redevelopment around Ashley Road is now held up as an exemplary of successful employment-led mixed use development, integrating tertiary education provision with intensive employment and residential uses. The outstanding Harris Academy, the network of green links to and around the centre, and the improved access to Down Hills Park and the Lee Valley Regional Park, continues to attract young families from across the borough.
- 3.6** Ashley Road itself now forms the High Street through the new District Centre offering different experiences along its length from the thriving creative communities in Fountayne and Markfield Roads, through the bustling business sectors in the South Tottenham industrial area, and through to the new town centre itself, with its plaza arrangements that break out from the High Street and offer places to dwell and relax.

- 3.7 Hale Wharf is also a successful new mixed-use riverside development, and the links created back through to the District Centre are treasured by the local community for their ease of safe access to the Lee Valley Regional Park.
- 3.8 The protection and enhancements made to the strategic industrial areas in the Upper Lee Valley area, both in Tottenham Hale and North Tottenham have led to these areas becoming one of London's hubs for small firms to set up, thrive and grow.
- 3.9 North Tottenham has undergone significant change. Following the successful redevelopment of the THFC Stadium, this provided a catalyst and anchor for the High Street and the area, and is now the premier leisure destination in London. New links between the stadium, White Hart Lane and Northumberland Park stations, and the Lee Valley Regional Park have increased access and the physical activity of local residents, and have resulted in improvements in the health statistics for the area. Alongside the new green spaces and excellent schools, the estate renewal programme continues to deliver much needed higher quality council housing within new mixed communities, and is driving significant demand from housing tenants outside of the area to relocate to North Tottenham.
- 3.10 Tottenham High Road has strengthened its role as the main thoroughfare for community life in the area. New development along the High Road has integrated seamlessly with the historic buildings, many of which have now been restored to their former glory and are in high demand for occupation by local businesses and community organisations. Tottenham Green too has enhanced its role as the civic hub for the area. Seven Sisters and Bruce Grove District Centres initially saw their retail extents reduced, but are again seeing further demand as new businesses take up opportunities to share in Tottenham's success.

## Strategic Objectives

- 3.11 The vision for Tottenham is supported by eight strategic objectives. These objectives have been developed through documents such as the Tottenham Physical Development Framework and the Tottenham Strategic Regeneration Framework. They are supported by the Mayor of London, private sector investors and Government. But most importantly they are based on the views and the feedback of our residents.

### Objective 1: World class education and training

- 3.12 Tottenham already has outstanding rated schools, but we want our provision to be the best to the age of 18 and beyond. We will work with existing schools and providers and attract new schools and new providers to ensure Tottenham residents have opportunities equal to the best life chances in London. This includes improved access and higher participation rates in apprenticeships and university, enabling Tottenham residents to access the full range of options available to them in London.

### Objective 2: A prosperous hub for business and local employment

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



### Objective 3: High quality public realm

3.14 Through appropriate planning measures, great town centres, public spaces and streets will be created, giving Tottenham residents places to meet, shop and play. Well designed public spaces will be at the heart of district centres which focus on creating a pleasant and functional pedestrian urban realm. Additionally, improving access to significant local open spaces such as Walthamstow Wetlands and Lee Valley Regional Park will ensure everyone in Tottenham has the space they need for recreation and relaxation.

### Objective 4: A different kind of housing market

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

### Objective 5: A fully connected place with even better transport links

3.16 Tottenham is only 12 minutes to the centre of London on the tube or train, but improvements are already being made and we will work to improve the connections within Tottenham for all types of transport – including walking and cycling. In the longer term we will consistently make the case for the delivery of Crossrail 2 and further rail, pedestrian, and cycling improvements to increase the connectivity of Tottenham with central and other parts of London.

### Objective 7: A strong and healthy community

3.17 Tottenham is a network of strong, cohesive and diverse neighbourhoods. Many people love living there and feel they belong, but a growing Tottenham will need improved health care provision, a continued joint effort to further reduce crime and support to foster strong and new social networks.

### Objective 8: Enhancement of heritage assets

3.18 Tottenham has a number of significant heritage assets, which are facing pressures from development as well as wear and tear over time. Heritage buildings, and the conservation area which lines the high street, are important markers of the past and are assets which add value to the character of the high street. Therefore we will promote the enhancement of heritage assets through appropriate heritage led redevelopments as part of the overall regeneration of Tottenham to ensure these buildings are enhanced through new development. Conservation Areas will be actively managed, and regularly reviewed as regeneration progresses to ensure resources are effectively targeted in this area.

## The Spatial Strategy for Tottenham

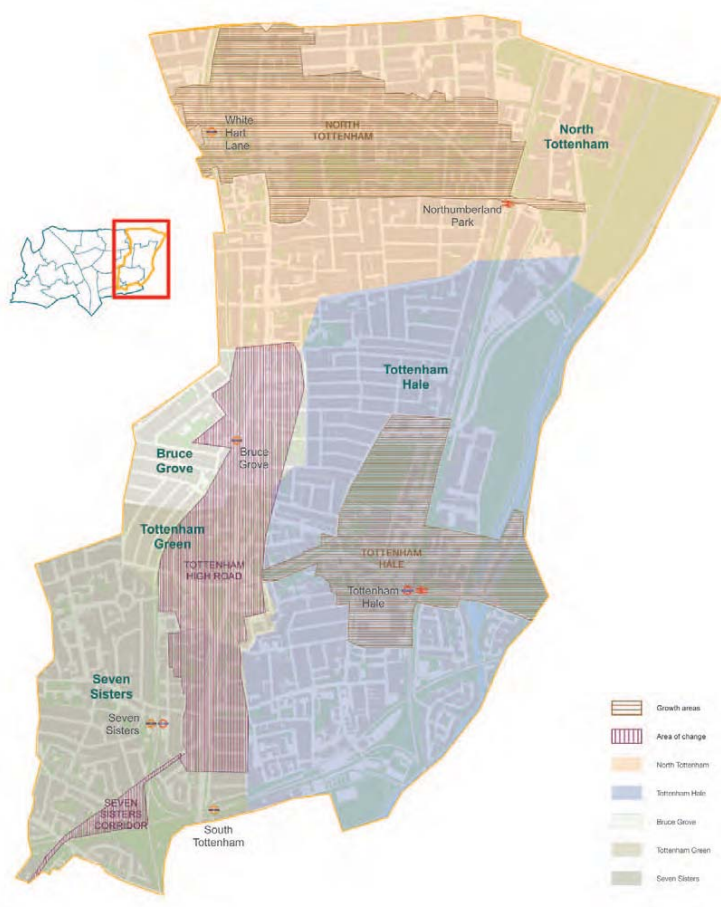
**3.19** Development and regeneration within Tottenham will be targeted at four specific neighbourhood areas. The four neighbourhood areas are identified in Figure 3.1 and comprise of:

- Tottenham Hale;
- Seven Sisters/West Green Road and Tottenham Green;
- Bruce Grove; and
- North Tottenham (which includes Northumberland Park, the Tottenham Hotspur Stadium & High Road West).

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

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

**FIGURE 3.1:** Tottenham Growth Areas and Areas for Change



- 3.22** This infrastructure will help facilitate the creation of a new District Town Centre through the redevelopment of the existing Retail Park and Ashley Road area, within which the Council expects to see provision made for a range of town centre uses, including retail, office, hotel community, leisure and higher education facilities. Within the South Tottenham and Tottenham Hale industrial areas, the Council will encourage renewal and reorientation to more intensive industrial and employment uses, and within select parts, will promote warehouse living where this supports existing creative communities and secures the employment use of these sites. On other industrial estates within the Tottenham Hale neighbourhood, such as the Millmead estate, the Council will seek to retain these in their current use and will strongly resist proposals to introduce non-industrial uses.
- 3.23** In the North Tottenham neighbourhood, the new Tottenham Hotspur FC stadium development will provide the catalyst for comprehensive regeneration of both High Road West and Northumberland Park. The priority is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further cement the area's reputation as a premier leisure destination within North London.
- 3.24** Comprehensive estate renewal is proposed for both Northumberland Park and Love Lane which includes a programme to deliver better mix of social housing, tailored to meet residents housing needs, particularly for affordable family housing, alongside a mix of market, private rented and intermediate housing, providing for a substantial increase of 3,850 net new homes within this neighbourhood.
- 3.25** Both existing and new residents within the North Tottenham Neighbourhood will benefit from enhanced provision of new schools, health care facilities, community uses, increased train frequencies, Crossrail 2 at Northumberland Park station (in the long term), and the creation of new local parks and open spaces, forming a network of green spaces and play spaces, linking through to the Lee Valley Regional Park.
- 3.26** The proposal for Bruce Grove is to consolidate and strengthen its role as the retail heart of the High Road, with underutilised or poorer quality sites around the station proposed for redevelopment, providing new housing, retail and community uses. The levels of development proposed for the area are modest in comparison with the other three neighbourhood areas, but will require careful consideration to ensure they integrate with and enhance the distinctive heritage character of the area, and contribute to the area's vibrancy.
- 3.27** Further down the High Road, proposals at Tottenham Green are aimed at enhancing the cultural offer of the area, reinforcing the area's role as focal point for cultural and civic activity within Tottenham, including making the most of the Green itself as a significant community asset on the High Road. Provision is therefore to be made for new cafes and restaurants to enhance and support the existing cultural offer in the area. The recent public realm improvements to Tottenham Green will be further extended along the High Road to the north of the Green where the new development will be required to reflect and enhance the heritage and conservation status of the area.
- 3.28** At Seven Sisters and West Green Road, new landmark buildings around the station will help communicate the area's significance as a vibrant district centre, a gateway into Tottenham, and a major transport hub – the latter to be further enhanced through investment as part of London's Overground network and, in the longer term, Crossrail 2. Further public realm improvements are proposed to help address the current dominance of the heavily trafficked road network.
- 3.29** Beyond the District Centre boundary, development is focused mostly on estate renewal programmes aimed at enhancing the existing housing stock and providing existing and new residents with greater housing choice within a higher quality residential setting. Whilst proposals for Gourley Place and Lawrence Road offer the opportunity for mixed use development which should secure the replacement of the existing employment floorspace and where possible, deliver light industrial uses and affordable workspace for small to medium enterprises.
- 3.30** Outside of the targeted regeneration areas, it is expected that residents will benefit significantly from the improvements to public transport, better east – west connections, the provision of new and expanded schools and health care facilities, new parks and new employment opportunities. Further, these areas will benefit from planning policies that seek to protect existing family sized housing by restricting the conversion of houses to flats and Houses in Multiple Occupation. As well as maintaining a supply of family housing, in Tottenham, such restrictions will help stem the tide of poor quality private rented accommodation and assist in retaining the residential amenity within these predominantly suburban areas.

# **Tottenham AAP Area-Wide Policies**

CHAPTER

**04**

## Chapter 4

# TOTTENHAM AAP AREA-WIDE POLICIES

### Introduction

**4.1** The following planning policies form part of a suite of policies which will be used for assessing and preparing development proposals in Tottenham. The suite of policies includes:

- Tottenham: Area Wide Policies;
- Neighbourhood Areas: Neighbourhood Policies; and
- Sites: Site Allocations

**4.2** This chapter sets out the detailed Tottenham specific policies and site allocations that supplement or supplant the borough-wide planning policies, to guide and manage new development within the area. They do not repeat the Council's wider Local Plan policies or the London Plan and should be read in conjunction with the London Plan and Haringey's Strategic Policies DPD and Development Management DPD.

**4.3** The Area Wide policies are

- AAP1: Regeneration & Masterplanning
- AAP2: Supporting Site Assembly
- AAP3: Housing
- AAP4: Employment
- AAP5: Conservation and Heritage
- AAP6: Urban Design and Character including Tall Buildings
- AAP7: Transport
- AAP8: Views along Tottenham High Rd
- AAP9: Tottenham's Green Grid
- AAP10: Meanwhile Uses
- AAP11: Infrastructure

## POLICY AAP1: REGENERATION & MASTERPLANNING

- A. The Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in this Plan. Applicants will be required to demonstrate how the proposal:
- a. Contributes to delivering the objectives of the Site, Neighbourhood Area, and wider AAP;
  - b. Will integrate and complement successfully with existing and proposed neighbouring developments; and
  - c. Optimizes development outcomes on the site
- B. The Council will direct development to Growth Areas and Areas of Change, and will support planning applications which accord to the delivery of Neighbourhood Objectives, and site requirements. Planning applications for development within the Tottenham AAP area which promote the positive regeneration of Tottenham, in line with the principles of the Strategic Regeneration Framework.
- C. The Council will take a proactive approach to working with landowners, the Mayor of London, the local community and other interested parties to help deliver the changes needed in Tottenham to meet the shared vision for the regeneration of Tottenham.
- D. Development proposals will be expected to maximise the use of public and private sector investment to provide a range of types and sizes of homes, create mixed and balanced communities within neighbourhoods, create economic opportunities for local residents and businesses, improve and enhance the local environment, and reduce carbon emissions and adapt to climate change, in accordance with the other policies of this AAP and Haringey's Local Plan.

- 4.4 To ensure the vision of the AAP is achieved, Policy AAP1 seeks to ensure all development proposals submitted to the Council proactively respond to the vision and ensure the regeneration objectives for the Tottenham AAP area are achieved. At the same time, the Council also has a responsibility to proactively work with landowners, local communities and other parties to help deliver the aims of the AAP. The programme for growth is ambitious but with the support from the Mayor of London, the community, stakeholders, and the development industry, the vision for Tottenham will be realised. AAP1(B) provides the Council's commitment to helping facilitate and deliver the necessary change.
- 4.5 Private and public investment will be key to delivering the ambitious regeneration vision for Tottenham. The Housing Zone is one example of investment which will contribute significantly to delivering the aims of this AAP. The Housing Zone monies will direct important investment to the AAP area supporting transport and public realm improvements which will benefit existing and future residents of Tottenham. Development will be expected to harness the benefits of such investment and maximise the opportunities this presents which could lead to more sustainable development outcomes. Another such example will be Crossrail which will redefine the accessibility levels of parts of the AAP area. Developers and the Council should utilise this to optimise housing delivery and more effectively meet the objectives of the Haringey Local Plan.
- 4.6 Ensuring development proposals are designed and submitted to Haringey as part of wider comprehensive developments will help to alleviate concerns associated with piecemeal development, and ensure that new development maximises benefit locally. The aim is to ensure landowners are talking to each other and are aware of the shared vision for the AAP area, including the sites allocated for important infrastructure projects. Haringey wants to ensure development proposals do not prejudice each other, or the wider development aspirations for the Tottenham AAP area. Comprehensive redevelopment which is designed in consultation with the Council is likely to result in a faster planning consent being granted and will avoid any undue delays in the planning process, to the benefit of everyone involved.

- 4.7** Particular areas in which masterplans will be required in order to demonstrate that proposals include:
- Sites within the emerging Tottenham Hale District Centre to ensure a coherent Centre is created;
  - Estate Renewal projects in which developments will need to be co-ordinated and community consultation held;
  - Larger sites on which there are multiple landowners in order to ensure that proposals are not prejudicing development of the remaining parcels (including those with extant planning consent);
  - Sites which fall within the Borough's Warehouse Living Areas (see Policy DM39).

- 4.8** The sites in which a masterplanned approach will be required are set out in Table 1 below:

**TABLE 2: Example Sites with requirements for comprehensive development**

Tottenham Hale District Centre	Large/Complex Sites
Station Square West	Gourley Triangle
Station Square North	Apex House
Tottenham Hale Retail Park	Wards Corner
Tottenham Hale Station	Tottenham Hotspur Stadium
	Hale Village
	North of White Hart Lane
Estate Renewal schemes	Warehouse Living Sites
Turner Ave & Brunel Walk	Constable Crescent
Northumberland Park North	Fountainne Rd
Northumberland Park	
High Rd West	

## POLICY AAP2: SUPPORTING SITE ASSEMBLY

- A** The Council will support land assembly to achieve comprehensive development, and will use compulsory purchase powers, only where necessary, to assemble land for development within the Tottenham AAP area where:
- a Landowners and developers can demonstrate that they have:
    - i A viable, deliverable and Local Plan compliant scheme; and
    - ii Have made all reasonable attempts to acquire, or secure an option over, the land/building(s) needed, through negotiation.
  - b Comprehensive redevelopment of the assembled site is required to deliver the site's allocation as prescribed in Section 5 (including the requirements of a Masterplan where stated in the Plan) of this AAP; and
  - c The development proposed for the assembled site would contribute to the delivery of the Tottenham AAP objectives.
- B** Where compulsory purchase is necessary, applicants will be required to demonstrate how the associated costs impact upon development viability.

- 4.9** A comprehensive approach to development will often be in the public interest within the Tottenham AAP area. Whilst incremental schemes might be more easily delivered, the constraints posed by site boundaries, neighbouring development or uses, and below-ground services all have potentially limiting consequences for scale, layout and viability. Across the Tottenham area as a whole, such consequences could depress the optimum use of land, the proper planning of development (in terms of layout, design, use etc) and the ability of development to support the achievement of wider regeneration initiatives or objectives.
- 4.10** As with Policy AAP1, the necessity to use compulsory purchase powers is more likely on more complicated sites, which have land in multiple ownerships. These sites are set out in Table 2. These sites are considered to be the ones most likely to require compulsory purchase powers to be used. It is possible that other occasions may come forward that require site assembly to be carried out by the Council on sites other than those set out in Table 2.



## POLICY AAP3: HOUSING

- A To improve the diversity and choice of homes, and to support mixed and balanced communities in Tottenham, the Council will seek the delivery of 10,000 additional new homes across the Tottenham AAP area in order to meet housing needs, contribute to mixed and balanced communities and to improve the quality of homes;
- B The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation;
- C Development proposals incorporating a housing element will be expected to provide the housing in accordance with the minimum capacities, set out in the Site Allocations in this AAP. Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised.
- D To better address the concerns of viability in delivering wholesale renewal on Haringey's housing estates in Tottenham (as listed in Alt53 of the Local Plan Strategic Policies), the Council will support higher density mixed tenure development, as a mechanism to:
  - a improve the quality and range of affordable housing options,
  - b better address housing needs in Haringey;
  - c secure a more balanced community; and
  - d increase housing delivery in Tottenham.

- 4.11 Tottenham is expected to experience significant growth over the next decade as set out in SP1 of the Local Plan: Strategic Policies. Parts of Tottenham suffer acutely from overcrowding and deprivation compounded by poor quality social housing, significant churn in population, polarised communities and limited housing. The Plan seeks to enable delivery of 10,000 new homes across the Tottenham AAP area as a mechanism for stimulating regeneration and economic growth. The capacity to deliver 10,000 new homes has been identified in the allocated housing sites outlined in the allocations sections of this document. Additional sources of capacity may come forward as a result of the investment going into the area and as these developments come forward, they will contribute to meeting housing needs in Tottenham.
- 4.12 To rebalance the high levels of social rented accommodation in Tottenham, which equates to more than 60% of the Borough's total social rented stock (40% of which is located in Northumberland Park alone); Policy AAP2 seeks to introduce alternative affordable tenures into areas currently dominated by a single tenure type.
- 4.13 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 is not viable, the Council will support proposals for more widespread renewal of Tottenham's housing estates in accordance with policy AAP2(E). This support will lead to significant improvements in the quality of affordable housing which better address housing needs, secures a balanced community, and increases housing delivery.
- 4.14 In order to meet both of these aims, a "portfolio" approach where a group of sites can be seen to work together to meet the overall objectives of the Plan will be encouraged. This could for example mean that two or more sites working in parallel deliver different mixes or tenures of units which together make a policy-compliant outcome in the area.
- 4.15 Improving the quality of housing in Tottenham is a key priority and policy AAP2(D) will ensure that proposals are consistent with the Council's wider aims for improving development design in Haringey, as set out in the Development Management DPD.

## POLICY AAP4: EMPLOYMENT

A Within the Tottenham AAP area, the Council will facilitate the regeneration and renewal of selected Designated Employment Areas (DEAs) through a reconfiguration of the local employment offer in order to intensify land uses, maximise the amount of business floorspace and premises, and to increase the number and variety of jobs. This will be achieved by:

- a Re-classifying some of the area's Designated Employment Areas;
- b Protecting where appropriate industrial areas from inappropriate development as set out in SP8 and DM37;
- c Supporting development proposals for enabling led mixed-use schemes, in line with Local Plan Policy DM38;
- d Supporting development proposals for B1 Office uses in Tottenham Hale;
- e Supporting additional employment uses to be created along the High Road
- f Intensification of industrial uses on the Borough's stock of SIL; and
- g Effective enforcement of non-employment or non-conforming uses which if retained would be of detriment to the area's employment stock.

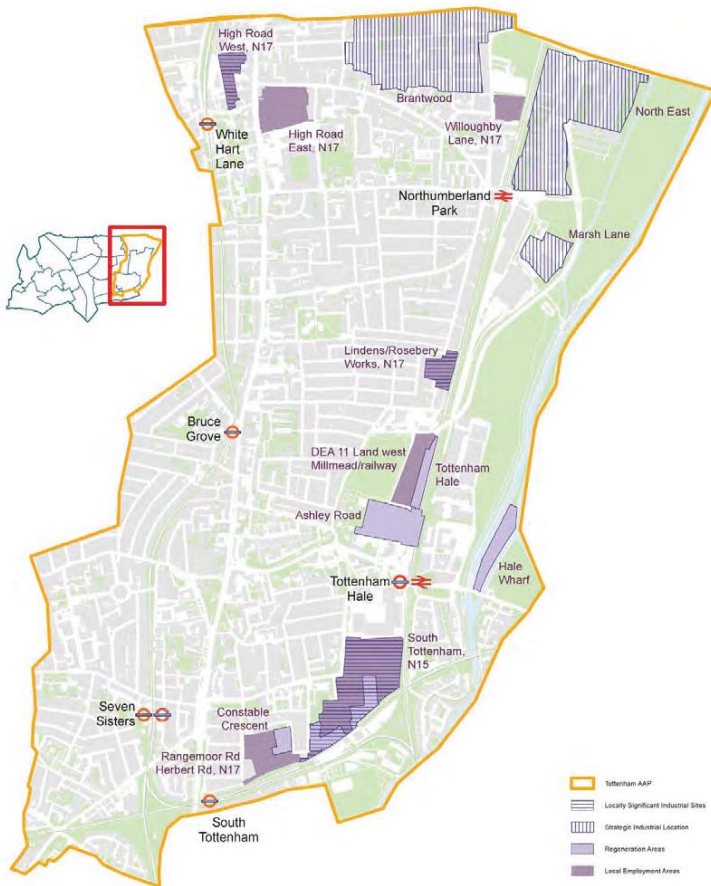
B The Council will support local residents to access local and London-wide jobs through the ongoing collection of planning contributions towards providing training courses in line with SP9.

C Employment Areas within Tottenham are designated as follows:

**TABLE 3: Designated Employment Areas**

Name of Site/Area	Level of Designation
Brantwood Rd, N17	Strategic Industrial Land
North East Tottenham, N17	Strategic Industrial Land
Marsh Lane, N17	Strategic Industrial Land
Willoughby Lane, N17	Local Strategic Industrial Land
Lindens/Roseberry Works	Local Strategic Industrial Land
Millmead & Lockwood, N17	Strategic Industrial Land
Ashley Rd South	Local Employment Area: Regeneration Area
Hale Wharf	Local Employment Area: Regeneration Area
South Tottenham, N15	Local Strategic Industrial Land
Fountayne Rd	Local Employment Area: Regeneration Area
Rangemoor Rd/Herbert Rd, N15	Local Employment Area: Regeneration Area
Constable Crescent	Local Employment Area: Regeneration Area

FIGURE 4.1: Designated Employment Areas in Tottenham



- 4.16 Whilst it is necessary and appropriate that some of Tottenham's employment land is safeguarded, it is imperative that the Council proactively facilitates a step-change in the local employment offer, particularly to expedite economic development. The policy includes interventions to ensure that employment land is fully maximised and that sites are appropriately positioned to support the existing and emerging business sectors which are vital to supporting area regeneration and improving job opportunities. The policy will ensure that development brings forward new employment floorspace for new firms to start, grow, and move into the area.
- 4.17 One of the key mechanisms for achieving a step-change in employment is to re-classify some employment areas to allow a wider range of employment generating uses on sites, and to help facilitate regeneration led mixed use development, where required. To secure investment, an element of residential or another high value use will be required to enable new employment floorspace. Further details on site specific requirements are set out in the Neighbourhood Area chapter of this AAP.
- 4.18 The policy recognises and supports a future role for Tottenham Hale as a destination for higher value, purpose built B1 office development. This type of employment land use will complement regeneration in the area, driven by demand arising from the establishment of a new District Centre and Crossrail 2 stations, along with the uplift in housing development.
- 4.19 There are significant lower density employment designations in Tottenham, and these will be protected using this policy. These sites contain a significant number of jobs which require particular conditions to thrive. It is not considered that the introduction of residential use into these areas is compatible with safeguarding the types of industries present. These industries provide jobs of a type which are important to be retained to ensure that there continues to be a diverse range of jobs in Tottenham.
- 4.20 The High Road itself serves as an important centre for employment and enterprise. In addition to the wide range of retail and community facilities located on the High Road itself, there are a range of businesses located within close proximity to the High Road. These are formed in part of tertiary employment sectors to complement the residences and retail businesses in the area, but also of smaller manufacturing and workshop spaces behind the High Road. There is a presumption in favour of creating active ground floor uses on Tottenham High Road.

## POLICY AAP5: CONSERVATION AND HERITAGE

- A The Council will seek to strengthen the character and local identity of Tottenham by sustaining and enhancing heritage assets, their setting and the wider historic environment. Proposals for new development will be required to:
- a Reflect relevant character appraisals and management plans for the area;
  - b Identify and positively respond to the distinctive character and significance of heritage assets and their settings, whilst balancing the need to sensitively facilitate neighbourhood regeneration and renewal;
  - c Maximise opportunities for integrating heritage assets within new development and enhance connectivity between them;
  - d Put heritage assets to viable uses consistent with their conservation, including through the adaptive re-use of vacant historic buildings, reinstating street frontages and historic street patterns, wherever possible; and
  - e Reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries.
- B In line with the NPPF, paragraph 133, substantial or total loss of significance of designated heritage assets would only be considered where it satisfactorily justifies and demonstrates that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a the nature of the heritage asset prevents all reasonable uses of the site; and
  - b no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - c conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

- d the harm or loss is outweighed by the benefit of bringing the site back into use.

- C In line with the NPPF, paragraph 134, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- D In line with the NPPF, paragraph 135, the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

- 4.21 All development proposals should demonstrate an understanding of the local historic environment and clearly consider the proposal's physical and functional impact on this environment, as well as the wider area. The Council will seek to ensure that all proposals consider opportunities for adaptive re-use of existing assets, where viable, as well as the sensitive integration of new development within the existing urban and historic fabric.
- 4.22 In Tottenham, the historic environment forms an important part of the area's character and contributes to residents' sense of place and local identity. Continued economic deprivation of the area has led to some loss of architectural features and detailing that has compromised the significance of some assets. The above policy seeks to positively maximise the investment and regeneration opportunities in managing historic environment with particular emphasis on integrating assets with development schemes and bringing redundant buildings back into use. The policy recognises the need to balance continuity and the preservation of local distinctiveness and character with historic environments as active living spaces that respond to the needs of local communities.
- 4.23 All development proposals should demonstrate an understanding of the local historic environment and clearly consider the proposal's physical and functional impact on this environment, as well as the wider area. Where substantial harm to or total loss of significance of heritage assets is proposed, the Council must be satisfied that all opportunities to enhance the existing asset have been considered, and that there is significant public benefits which outweigh the substantial harm.

## **POLICY AAP6: URBAN DESIGN AND CHARACTER INCLUDING TALL BUILDINGS**

- A The significant change planned for Tottenham's Growth Areas provides the opportunity to establish a new urban character for these areas. The Council will prepare Design Code SPDs for each area to ensure consistency of design across the area, and that a framework for high quality design is achieved.
- B In line with DM6, Tottenham Hale and North Tottenham as growth areas, and the area directly adjacent to Seven Sisters Station have been identified as being potentially suitable for the delivery of tall buildings. Further details of these developments will be in accordance with the relevant Site Allocations, and proposals should follow the guidance set out in the Tall Buildings SPD, once adopted.
- C The appropriate height of development sites within Tottenham will be guided by the principles in Local Plan Policies DM1 and DM6, the reorientation of Tottenham Hale from an urban to a central area, the policy below, and the Site Allocations included in the Neighbourhood Areas Chapter.
- D The Council expects the highest density development to be located adjacent to public transport nodes, and in Growth Areas and Areas of Change. At their boundary, development is expected to transition between these areas and the suburban areas of the AAP through appropriate transition/scaling of heights.
- E The recommendations of the Urban Characterisation Study will ensure the height of new buildings respond and help to define the surrounding character, whilst optimising opportunities for intensification and regeneration in order to help create legible neighbourhoods.

- F Taller buildings will be appropriate along (parts of) Tottenham High Road, Park Lane, Lordship Lane, Northumberland Park, Broad Lane, Lawrence Road, West Green Road, Seven Sisters Road, Monument Way, Ferry Lane, and within existing mid-rise residential areas, responding to the prevailing mid-rise character, and in some cases promoting intensification, increasing heights from low-rise to mid-rise where appropriate.
- G Retained suburban areas will be protected from inappropriate development, with taller development only being permitted where it can be demonstrated that the existing character of the area will not be compromised.
- H The impact of new development, and particularly tall buildings should be considered against the requirements to protect Local Views as set out in DM5: Locally significant views and vistas.
- I Where proposals fall within 500m of a Special Protection Area/ RAMSAR areas, specific measures should be set out to ensure there is no adverse effect on ecological integrity. Applicants are encouraged to engage with Natural England during pre-application discussions.

FIGURE 4.2: Tall Buildings



- 4.24 The Urban Characterisation Study underpinning the preparation of the Local Plan together with local area based explorations suggest that within Tottenham, there are a number of areas that are suitable for taller buildings because of their characteristics and accessibility. Equally, other parts of the AAP area comprise established residential “suburbs” characterised by conventional 2 storey housing, which are proposed to be retained and protected. The transition between metropolitan and high street areas and the suburban hinterland needs to be carefully managed.
- 4.25 The ambitions and vision for Tottenham, planned and expected infrastructure investment and the need to optimise housing and employment outcomes in accessible locations, mean that the AAP includes provision for higher density and tall buildings on specific sites, and in specific locations. High quality tall buildings can make an important contribution to the delivery of employment and community space as well as homes, whilst also playing a part in place making and the creation of new urban form.
- 4.26 In line with Policy DM6 of the Development Management DPD, this policy establishes the principle that building heights need to respond to the existing street hierarchy. It asserts that buildings should be taller on main streets and within town centres and decrease gradually into the quieter hinterland areas. This is considered a key component in creating legible neighbourhoods and places which is a key objective of the Tottenham AAP.
- 4.27 The consistency of building heights is recognised as an important quality. Where height changes do occur on a large scale this change should occur gradually and retain consistency. With elements that are considerably taller than this consistent height such as at Seven Sisters station in the Apex House site allocation or at Northumberland Park station in the Northumberland Park site allocation, they should mark something or somewhere and have a reason for being taller. These by their very nature should be few in number.

## POLICY AAP7: TRANSPORT

- A The Council will support future improvements in the levels of public transport accessibility and capacity across the Tottenham AAP area. The Council expects development proposals to:
  - a Seek improvements to connectivity and permeability for pedestrians whilst minimising the likelihood of conflicts with vehicular traffic.
  - b Consider opportunities for improving walking and cycling across the AAP area, which could include the introduction of a wider cycling and walking network; and
  - c Promote where appropriate, traffic calming, pedestrian accessibility enhancements, road safety measures and cycle facilities such as on street cycle parking;
- B Developments proposed within 1km of a proposed Crossrail 2 station should show how they meet the requirements of Policy SA1.
- C Parking provision will be expected to be delivered in accordance with Policy DM32 of the Development Management DPD; and
- D In line with Haringey's Local Plan policies, the London Plan, the Local Implementation Plan (LIP) and the Mayor's Transport Strategy, the Council will work with its partners to promote and support the delivery of key infrastructure proposals to support the regeneration of Tottenham which are set out in the Neighbourhood Area wide section of this AAP.
- E The Council will support applications which enhance the transport interchange between Tube, train bus, and pedestrian/cycling modes at Tottenham's transport interchanges.

- F Sites required for the construction of Crossrail 2 safeguarding will be protected as necessary. The Department for Transport and TfL should be consulted with regards planning applications on any formalised Crossrail alignment.
- G In order to maximise the utility of Seven Sisters station, development which can enhance pedestrian and cycling routes to and from the station will be supported.
- H The Council supports the addition of a Cycle Superhighway that runs from Tottenham Hotspur FC to the City, and this will be required to be produced in a manner that adds legibility to the urban realm in this area.



**4.28** In accordance with Haringey's 2011-2031 Local Implementation Plan, a major objective of the AAP is to ensure Haringey's transport network can accommodate increases in travel demand by tackling congestion, increasing sustainable transport capacity, encouraging modal shift and reducing the need to travel. This includes facilitating an increase in walking and cycling to improve the health and term wellbeing of Haringey's residents.

**4.29** As part of the AAP production process a Transport Modelling and Analysis was undertaken in 2014 in order to assess the level of growth proposed in Tottenham in the context of the objective above. The report emphasised that a suite of transport mitigation measures are needed if the level of proposed growth within Tottenham is to be accommodated sustainably. The findings of this Analysis reflected both the TfL commissioned transport study in 2012 to support the development of the Upper Lea Valley Opportunity Area Planning Framework and Haringey's 2011-2031 Local Implementation Plan. These studies indicated that interventions should be based on:

- The support for more walking and cycling;
- A better interchange at Tottenham Hale;
- Improving bus capacity through a package of new routes, extensions and increased service frequency for existing routes;
- Managing and improving the capacity of the road network; and
- Increased local rail services on the West Anglia Main Line and in the longer term, the implementation of Crossrail.

## **POLICY AAP8: DEVELOPMENT ALONG TOTTENHAM HIGH RD**

- A Development on Tottenham High Rd will be supported where it is demonstrated to positively enhance the overall character and setting of Tottenham High Road.
- B The High Road has a number of District and Local Centres along its length, and uses within these will be in line with DM42 and DM43.
- C Development will be expected to provide active frontages onto the High Road between designated centres to provide activity along its length. A wide range of non-A1 or C class uses will be supported here.
- D Due to the excellent public transport connections, and in order to manage flow on the High Road, car-free development will be supported. Developments that help to optimize the benefits of Cycle Superhighway 1, including through the design of the site, and the incorporation of cycle parking facilities, will be supported.
- E Development which positively enhances the distinctive character and setting of neighbouring and nearby buildings, and produces improved views along the High Road, including long views from other parts of the High Road, and from adjacent streets, will be supported.
- F Opportunities to create new space for enterprise and commercial uses to the rear properties fronting the High Road will be permitted. Where a site with a back of High Road frontage is redeveloped, an employment ground floor use will be sought.

**4.30** Tottenham High Road is a major arterial route which has historically supported ribbon development along its length. The existing earliest buildings date from the eighteenth century including grand Georgian houses. The High Road became infilled with houses, shopping parades and municipal buildings with the advent of mass transit in the nineteenth century. Today, the High Road is dominated by Victorian and Edwardian terraces interspersed with some modern development. The predominant character of the area is that of a busy high street, dominated often by a heavy traffic flow. The length of the High Road from the Borough's northern boundary with Enfield to its southern boundary with Hackney is part of the Tottenham High Road Historic Corridor – a sequence of six adjoining conservation areas. There are a large number of statutory listed buildings and locally listed buildings and many non-designated buildings that contribute positively to its unique character.

**4.31** The northern section of the High Road between the Borough boundary and Bruce Grove is characterised by tightly knit terraces with shop fronts at street level, creating an enclosed urban environment. The North Tottenham Conservation area and Scotland Green Conservation Area have a mix of smaller two and three storey buildings of various ages and styles ranging from the handsome Georgian townhouses set behind generous front gardens to later Victorian and Edwardian terraces built right up to the pavement, or occasionally set behind small forecourts.

**4.32** In the area around Bruce Grove, the predominant urban character is that of three-storey buildings with shops at the ground floor. Buildings are mostly Victorian, Edwardian with a few modern buildings. All buildings have active frontages which are set immediately behind the pavement. It is an important and busy shopping area and district centre.

**4.33** Tottenham Green and the area between High Cross and Chestnut Road were extensively redeveloped at the turn of the century and have a different character. While still 2-4 storeys in height, buildings are much larger in scale. There are individual large buildings which are generally set back behind forecourts. Grand Edwardian municipal buildings around the Green mark out Tottenham's old civic centre, around an open space with mature trees. There is a mix of municipal and community uses in this area with some residential, retail and offices.

**4.34** South of Tottenham Green the predominant urban form is 2-3 storey Victorian suburban blocks. There is a mix of late nineteenth century shopping parades, Victorian terraced houses and more modern housing estates and offices. Buildings are generally set back from the pavement line creating a more suburban feel with space for mature street trees, though some of the street frontages are flush with the pavement.

## POLICY AAP9: TOTTENHAM GREEN GRID

- A In areas identified as deficient in access to open space and nature, a high priority will be afforded to opportunities to enhance access through on-site provision or contributions to the implementation of relevant Tottenham Green Grid projects.
- B Development proposals for sites adjoining the Green Grid will need to take account of the route and ensure that opportunities are taken to provide new developments which address the route along its built edges.
- C The principles included in the Council's Green & Open Spaces Strategy should be adhered to in the creation of the Green Grid.

- 4.35 Due to the significant need for new housing and employment in Haringey, and Tottenham, delivering new open spaces of a significant scale is not considered realistic. Tottenham does have a range of excellent open spaces within it, and on its doorstep. Additionally, development contributions have the potential to be collected and spent on improving, and improving access to existing open spaces. Together, these aims will form a green grid of networked, high quality open spaces.
- 4.36 Tottenham's Green Grid will form a part of the Haringey and London wide integrated network of green infrastructure. A network of accessible open spaces linked by footpaths, cycleway and tree-lined avenues is planned. The more built-up character of many of the areas identified as being deficient in access to nature make the education of deficiency all the more challenging. Policy AAP9 seeks to ensure that through a combination of more substantial enhancements, as part of major development, and off-site investment, this will ensure a valuable environmental legacy for future residents.
- 4.37 Key routes within Tottenham include the connecting of the High Road with the Lee Valley Regional Park through the key growth areas in Tottenham Hale and Northumberland Park. Links to the collection of parks to the west of the AAP area (Lordship Rec, Downhills Park, and Chestnuts Park) will also be improved.
- 4.38 The impact of new routes on existing open spaces will be closely managed. The aim of the link, while being as direct as possible, is to enhance and link together existing open space assets. Any developments should be able to clearly demonstrate how they meet this aim, including how any affected assets in the Park will be reprovided and improved if necessary.
- 4.39 To complement the delivery of development and ensure that new development and existing residents are able to access high quality amenity space there will be a generous, accessible, legible and safe pedestrian/cycle friendly network linking open spaces, town centres, and public transport nodes in Tottenham. New residents will access the commercial and cultural amenities of the High Road more directly and comfortably, and existing residents around the High Road will access the recreational amenities of the Lee Valley Regional Park.
- 4.40 A key project in the development of the Green Grid will be a new axial east-west route between Tottenham High Road and the Lee Valley Regional Park through the Tottenham Hale area. The new route will pass across the northern section of the new Tottenham Hale district centre on a straight path which extends east the axis of Chesnut Road.
- 4.41 A second new axial east-west route that creates new public spaces in north Tottenham will be delivered. The delivery of this high quality public space network will effectively link up and connect the major physical assets in the area, namely: the new White Hart Lane Station, the High Road West regeneration area, the THFC-led Northumberland Development Project, the Northumberland Park regeneration scheme, Northumberland Park station and the Lee Valley Regional Park.

FIGURE 4.3: Green Grid



## POLICY AAP10: MEANWHILE USES

The Council will support, through the granting of temporary planning consents, and where appropriate, time-limited Local Development Orders, “meanwhile” uses on allocated development sites which are not expected to come forward in the short term. Such uses will be required to demonstrate how they contribute to the vibrancy of the immediate area and support the delivery of the development outcomes and vision as set out in this Plan.

- 4.42 In order to deliver the desired regeneration outcomes and successfully co-ordinate development schemes, the Council recognises that some developments may not come forward until the later part of the plan (2020-2026). The Council believes that there are many opportunities for sites to continue to offer an active use throughout the early stages of redevelopment.
- 4.43 Where there are functioning buildings on sites which are scheduled for redevelopment, the Council will support applications that keep the buildings in active use in the short term. Where demolition has occurred, but the new development may be a few years away, a suitable temporary meanwhile use of the space will be encouraged. Such uses should ensure that they have no negative impact on the immediate area and that they continue to complement the vibrancy and distinctiveness of the neighbourhood.

## POLICY AAP11: INFRASTRUCTURE

- A The Council will plan positively to introduce improved facilities in Tottenham which meets the overall needs of the population, including meeting existing deficits, as well as the needs of new developments.
- B The Council will actively seek to introduce tertiary employment operators into the Tottenham area to ensure local residents have excellent options to gain skills to access the London jobs market.
- C New primary and secondary provision to match growth will be created in the growth areas of Tottenham Hale and North Tottenham. This will principally be at the new Harris Academy on Ashley Rd in Tottenham Hale, and within the Northumberland Park masterplan regeneration area in North Tottenham.
- D The Council will work with developers and construction companies to create local employment opportunities through:
  - a Ensuring local labour can access construction jobs;
  - b Creating apprenticeships; and
  - c Ensuring contributions towards local skills regeneration are gained when employment floorspace is lost on a site.

- 4.44 The Council has published an Infrastructure Delivery Plan for the Borough which identifies the current and forecast levels of need for new school places in the borough. This will be kept under review throughout the Plan period to ensure that there is adequate provision to meet a changing population. At present the Harris Academy in Tottenham Hale is forecast to have the capacity to meet local need in this area over the plan period. There is currently an unmet need for approximately 100 new primary school places in North Tottenham over the Plan period. The Northumberland Park regeneration programme, and future masterplanned change, will be required to include provision for this.
- 4.45 An increase in the number of jobs in Tottenham will be complemented by an increase in the level of early years provision, to enable local parents to make the choice about how they access jobs with a young family. It is considered that town centres, with their generally high public transport accessibility, and higher job densities, are the most appropriate location for these uses to be supported, subject to them not compromising the primary concentration of retail at the heart of the centre.
- 4.46 Part of the economic strategy for the Borough is to seek to encourage tertiary education providers to locate in Tottenham. This could be through the addition of a new university, or through the introduction of a college that will support local resident's ability to secure new skills that will help them access new jobs both locally and across London. Similarly, increasing of CHENEL's capacity to offer a tertiary education facility will be supported by the Council. These should be located in highly accessible areas.

# Neighbourhood Areas and Opportunity Sites

CHAPTER

05

## Chapter 5

# NEIGHBOURHOOD AREAS AND OPPORTUNITY SITES

### Introduction to Neighbourhood Areas

**5.1** The AAP acknowledges that the Tottenham area comprises a complex mosaic of areas, all differing in character from one to another. To better understand the potential for change within the different parts of Tottenham, three neighbourhood areas have been identified which reflect the varied character and functions of the place. The neighbourhood areas are identified in Figure 5.1 and comprise:

- Tottenham High Rd Area of Change, including
  - Seven Sisters/West Green Rd,
  - Tottenham Green, and
  - Bruce Grove;
- North Tottenham Growth Area;
- Tottenham Hale Growth Area.

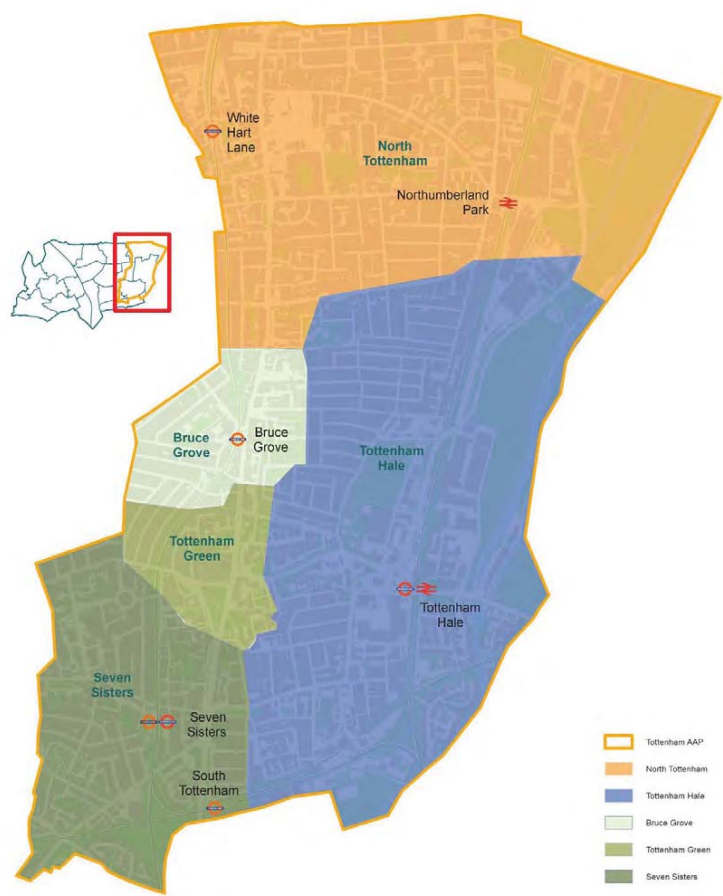
**5.2** Each neighbourhood area has its own challenges and opportunities in meeting the wider AAP objectives, especially with respect to housing and employment targets. The neighbourhood areas reinforce and bring together the AAP wide policies and the opportunity sites to guide improvements and development in each area.

**5.3** This following section establishes the contribution each neighbourhood area will make towards the delivery of the overall objectives and development strategy set out for Tottenham. It shows the associated infrastructure in support of the neighbourhood area as a whole, as well as transport and public realm enhancements specific to each neighbourhood area that are needed to maintain or create a distinctive sense of place.

**5.4** Within each neighbourhood area, sites which offer opportunities for strategic development and change are allocated. Each site represents land that is suitable for development over the plan period, including key sites to achieve regeneration objectives or necessary to deliver infrastructure improvements. For each site, expectations are set out relating to land use, design, infrastructure, and delivery. Where appropriate indicative capacity estimates for net additional new homes, employment floorspace, town centre, and other uses are provided. For an explanation of how these numbers were arrived at, please see Appendix A.



FIGURE 5.1: Tottenham Neighbourhood Areas



- 5.5 Sites with significant opportunities for development and change have been allocated, including key sites that have an extant but unimplemented planning permission. Each site represents brownfield land that is suitable and available for redevelopment over the plan period, including sites key to achieving wider regeneration objectives or necessary to deliver infrastructure improvements.
- 5.6 For each site, expectations are set out relating to land use, urban design, infrastructure and delivery in the Policy Box. There is then a list of “Site Requirements”, which should be read as part of the policy concerning what is required to be delivered on a site to be a policy-compliant proposal. Following this there are “Development Guidelines” which offer further guidance on the most appropriate development on each of the sites.
- 5.7 A leading use(s) and supporting uses are specified to direct the nature of the acceptable mix of uses for the site. Leading uses are those that make an essential contribution to delivering the objectives of this Plan and should form principal components of proposals for each site. Supporting uses are uses compatible with the leading use(s) that may form ancillary components of the overall mix of uses proposed on a site. Where appropriate, details of the mix of uses for the site are accompanied by further guidance on options and dependencies, including site assembly and phasing.

## TOTTENHAM HIGH ROAD NEIGHBOURHOOD AREA

5.8 This neighbourhood area is formed of three sub areas:

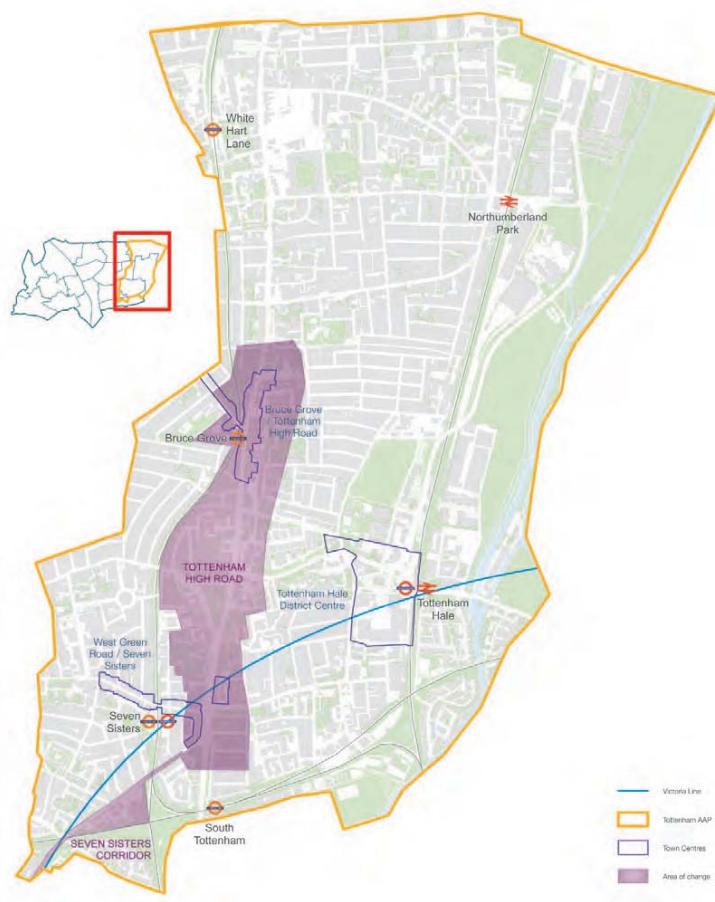
- Seven Sisters/ West Green Road
- Tottenham Green
- Bruce Grove

5.9 These areas are addressed separately below, including the Site Allocations in each section. Their capacities are set out together below.

TABLE 4: Seven Sisters/ Tottenham Green/ Bruce Grove site capacity

Site		Net residential units	Commercial m <sup>2</sup>	Town Centre m <sup>2</sup>	Other m <sup>2</sup>
SS2: Lawrence Road	HGY/2012/1983	264	500	0	0
	Phase 2	178	1,390	0	0
SS3: Brunel Walk and Turner Avenue		0	0	0	0
SS4: Gourley Triangle		191	6,600	0	0
SS5: Wards Corner		163	0	3,700	0
SS6: Apex House & Seacole Court		63	0	1,600	0
TG3: Tottenham Chances & Nicholson Court		34	0	0	2,400
TG4: Tottenham Police Station & Reynardson Court		30	1,200	500	0
BG2: Bruce Grove Station		11	100	100	0
BG3: Bruce Grove Snooker Hall and Banqueting Suite		49	0	900	0
BG4: Tottenham Delivery Office		48	370	0	0
Total		1,031	10,160	6,800	2,400

FIGURE 5.2: Tottenham High Road Area of Change



## SEVEN SISTERS/ WEST GREEN ROAD SUB AREA

### Vision

- 5.10** *Enhancement of the urban realm and transport interchange at Seven Sisters Station, including development of a landmark building, to create a fitting gateway to Tottenham. Improvements to West Green Road shops to enable a more varied mix of uses.*

### Key neighbourhood sub area objectives

- Refocusing of retail floorspace within Seven Sisters/West Green Road District Centre at Seven Sisters end of West Green Road to enhance its retail characteristics;
- Redevelopment of key sites including Wards Corner, Apex House, Lawrence Road and Gourley Triangle;
- Targeted streetscape and environmental improvements along West Green Road, Tottenham High Road and Seven Sisters Road including paving, signage, landscaping and street furniture;
- New affordable employment/workspace suitable for new enterprises and medium sized businesses as part of mixed use redevelopment at Gourley Place and Lawrence Road;
- A landmark tall building at Apex House providing significant new mixed tenure homes and ground floor space for employment/commercial space to complement development on the Wards Corner site;
- Targeted building and shop front/signage improvements consistent with the enhancement of the character, heritage and townscape attributes of the area alongside new development.

FIGURE 5.3: Seven Sisters Neighbourhood Area



## Neighbourhood Character

- 5.11** The Urban Characterisation Study suggests that the area is predominantly residential but of contrasting qualities, densities, periods and types. Houses generally consist of compact and consistent terraces in majority of the area to the south-east and north. There are large number of elegant villas and townhouses north of West Green Road and around Page Green Terrace.
- 5.12** The neighbourhood is fairly dense and urban- comprised largely of urban blocks with a small number of small parks. Larger open spaces can be found outside this neighbourhood area to the west in the form of Lordship Recreation Ground, Downhills Park, and Chestnut Park.
- 5.13** There are employment areas at Gourley triangle on Seven Sisters Road, Lawrence Road, and in the Rangemoor Road area (covered in the Tottenham Hale section). Housing estates are generally more prevalent south and west of Seven Sisters Road.
- 5.14** Tottenham High Road and Seven Sisters Road both function as the spines through the neighbourhood to which other streets connect. West Green Road, Phillip Lane, Bruce Grove, Lordship Lane and St. Ann's Road provide secondary connections to adjacent neighbourhoods. Surface railway lines divide the area both east west throughout the area, and north south in the Seven Sisters area.

## Urban realm improvements:

- 5.15** The urban realm improvements for the neighbourhood sub area are:
- The redevelopment of key sites on the high road should lead to improvements to footway and public realm/station entrances in the vicinity of Sevens Sisters Road and Tottenham High Road.
  - New way finding/signage as part of wider Tottenham branding and route finding
  - Significant buildings and spaces along with heritage assets that contribute positively to the area's character should be conserved and enhanced and their settings and viewing corridors improved, notably St Ignatius Church, St Ann's Church and wider setting, and Page Green.
  - Targeted streetscape and environmental improvements including an enhanced urban realm between Seven Sisters and Tottenham Green and recognition/redesign of the street to encourage use of the proposed "Green Link" through Tottenham Hale towards Lee Valley Regional Park.
  - Public realm improvements and transport projects which facilitate improved pedestrian circulation and movement including improvements to permeability.

## Management of heritage assets in the area

- 5.16** The area contains the southern part of the Tottenham Historic Corridor. The earliest settlement within the area was Page Green lying just off the High Road. The name Seven Sisters was recorded as a settlement within the area known as Page Green. It derives its name from seven sisters planting seven Elm trees encircling a Walnut tree which became an identifiable local feature.
- 5.17** The area developed rapidly following the construction of Seven Sisters Road connecting Holloway to Tottenham. Further development was facilitated by opening of railways and tram services that made the area popular among workers to live and commute to London. The area transformed from a quiet and affluent suburb to a working class area with excellent transport connections to London.
- 5.18** In the post war era, a number of Victorian terraces were replaced with large housing estates. These terraces were either damaged during the war or deemed as slums.

**5.19 IMPROVEMENT SITES:** Existing buildings / sites that need repair, enhancement, major intervention:

- The neighbourhood essentially forms a gateway to the Historic Corridor and key opportunity sites such as Apex House and Wards Corner would play a crucial role in defining this important node. Development schemes should respond the character of the adjacent area and positively enhance the setting of the Historic Corridor.
- Within the Seven Sisters/West Green Neighbourhood Area, there are several non designated heritage assets i.e. buildings that are not listed or locally listed, that contribute positively to the area. These should be targeted for improvement in groups, as they enhance the historic character of the area. These buildings could be improved by improvements to shopfronts, removal of inappropriate signage, street and facade clutter, replacement of inappropriate uPVC windows, and removal of satellite dishes. In doing so, innovative and creative designs for shop fronts would be encouraged to reinstate and celebrate the area's multi-cultural and unique identity.

**5.20 OPPORTUNITY SITES:** Major sites where redevelopment is likely/desirable

- Key design principles for each site allocation that would have an impact on heritage assets have been discussed under the respective allocation.

**5.21 PROTECTION OF VIEWS:** consolidating and enhancing views into the High Road and strengthening the sense of character and place

- The view east, from Seven Sisters Road
- The view along West Green Road
- Threshold views at the junction with main roads such as West Green Road, Seven Sisters Road and Broad Lane providing a sense of arrival via a 'secondary route' to a 'primary route'

**Local Strategic Policies in this area govern**

- SS1: Seven Sisters/West Green Road District Centre

**Site Allocations in this neighbourhood sub area**

**5.22** The site allocations in this neighbourhood sub area are:

- SS2: Lawrence Road
- SS3: Turner Avenue and Brunel Walk
- SS4: Gourley Triangle
- SS5: Wards Corner
- SS6: Apex House & Seacole Court

## Infrastructure

**5.23** The infrastructure projects for the neighbourhood sub area are:

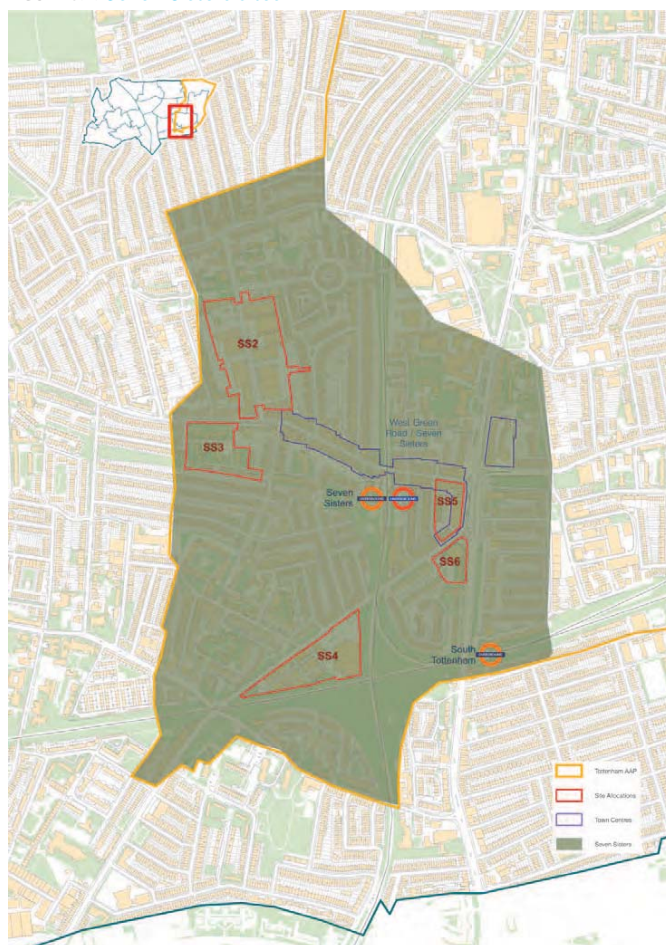
- The site is expected to be served by new Crossrail 2 station infrastructure at Seven Sisters.
- Transfer of the Enfield East/Enfield line to London Overground will lead to service frequency improvements at Seven Sisters Overground station
- New improved SLOL at Lawrence Road

## POLICY SS1:

### 1 SEVEN SISTERS AND WEST GREEN ROAD DISTRICT CENTRE

- A The Council will support planning applications for development within the Seven Sisters and West Green Road District Centre as indicated in Figure 5.4 to promote the positive regeneration of the area.
- B Development proposals will be resisted where they involve the amalgamation of individual shop units, in order to preserve the historical streetscape rhythm and to preserve opportunities for independent traders.
- C To retain the viability of the shopping area, the primary retail frontages will be adjusted as follows:
  - a 2 The primary frontage will be transferred to secondary shopping frontage between 70 to 126a (even) and 51-95 (odd) West Green Road to support the consolidation and intensification of the town centre uses.
- D Active town centre uses including retail, restaurant/café, leisure, commercial or community facilities will be required on all ground floor street frontages;
- E Small floor plate units near the underground station are appropriate to create activity, vibrancy and security;
- 3 The Council will require the retention of the Seven Sisters Market in the area.
- G The Council will support retention, repair and reinstatement of historic shop fronts and facades, including innovative and creative branding opportunities to celebrate the area's independent and multi cultural shops;
- H A high quality urban realm will be created around Seven Sisters station.
- I Unauthorised and incorrectly implemented planning consents in the centre will be a focus for enforcement action to ensure that a high quality of design is maintained.

FIGURE 5.4: Seven Sisters sites








# Summary of Comments on Tottenham\_AAP\_Our Tottenham comments details.pdf

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-  Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 13:38:06  
Much of this District Centre is situated in the Clyde Circus and Tottenham High Road/ Page Green Conservation Areas. This should be included in this policy as it is an important factor in planning the positive regeneration of the area.
-  Number: 2 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 13:37:45  
This proposal should be discussed with Tottenham Traders and the Federation of Small Businesses (North East London) before it is adopted.
-  Number: 3 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 13:32:05  
We welcome positive references to the need to protect independent traders by preventing amalgamation of units and reference to the retention of the market. However, the wording of sentence F 'The Council will require the retention of the Seven Sisters Market in the area', p. 58, is ambiguous, as it implies it may be relocated elsewhere in the area. There is widespread support by local residents and businesses to maintain the market where it is now (Wards Corner) and a viable community-led planning application for the site has been approved.

Reword sentence F (p. 58): 'The Council will require the retention of the Seven Sisters Market ~~in the area~~ **on-site**, preserving the existing building'.



## Reasoned Justification

- 5.24** Seven Sisters station is the focal point of the District Centre and the key location from which many visitors access Tottenham. This situation is forecast to continue, and increase further, with the potential addition of Crossrail 2 and therefore makes the area a suitable location for housing and employment growth. **There are proposals for comprehensive redevelopment at Wards Corner (including a community-led refurbishment plan) and Apex House. The retention of a market in this area is seen as important to ensuring that the existing multicultural feel of the area is sustained in the future.** This policy therefore seeks to retain this part of the centre as the retail heart of the District Centre, with a particular focus on encouraging additional comparison retail uses in the area.
- 5.25** It is recognised that West Green Road provides an important local shopping destination, particularly to residents west of the High Road. There is an opportunity to improve the quality of many of the shops within the centre, with much of the buildings and shop fronts suffering from poor maintenance due to lack of investment. This policy supports opportunities for refreshing the shopping frontage while also retaining the generally small floorplate shops, which enable small independent traders to operate in the area. Additionally, greater flexibility for a wider range of town centre uses to be introduced into the West Green Road frontage will be supported. This is seen as crucial to supporting small businesses to set up in Tottenham.

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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 13:38:31

Residents and market traders are very concerned that the Council's plan to retain the indoor market will only include some of the current market traders. The plan should specify that all current market traders can remain in the Seven Sisters Market.

## SS2: LAWRENCE ROAD



Site Allocation

Address	Zenith House, 69 Lawrence Road; Sterling House 67 Lawrence Road; Mono House, 50-56 Lawrence Road and 45-49 Lawrence Road		
Site Size (Ha)	3.7	PTAL Rating	3
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Offices (B1)		
Ownership	Mix of private and public freeholds and leaseholds		
How site was identified	Strategic Housing Land Availability Assessment		
Planning designations	Adjacent to Clyde Circus Conservation Area		
Indicative Development Capacity	HGY/2012/1983		Site Allocation (Phase 2)
	Net residential units	Commercial m <sup>2</sup>	Net residential units      Commercial m <sup>2</sup>
	264	500	178      1,390

## Extant Planning Permission (HGY/2012/1983)

- 5.26 Demolition of existing buildings and erection of seven buildings extending up to seven storeys to provide 264 new residential dwellings, 500 sqm of flexible commercial/retail floorspace (A1/A2/A3/D2 uses) with associated car parking, landscaping and infrastructure works

## Site Allocation (Remainder of the site):

- 5.27 Mixed use development with commercial uses at ground floor level and residential above.

## Commentary

- 5.28 Following on from the recent development at the southern end of Lawrence Road, development to create a consistent medium density, mixed use precinct will be encouraged. There are a number of existing buildings that should be retained, notably 28 Lawrence Road.

## Site Requirements

- Development proposals will be required to be accompanied by a site-wide masterplan showing how the land included meets this policy and does not compromise coordinated development on the other land parcels within the allocation.
- Re-provision of employment floorspace at ground floor level along Lawrence Road, with residential development above.
- This site is suitable for taller buildings facing both sides of Lawrence Road with mews-type streets behind containing family housing. Proposals responding to the scale of the terraced housing prevailing in the Clyde Circus Conservation Area to the east and west will be supported, in line with the extant planning permission on the southern section of the site.
- The junction adjacent to the existing linear park to the north of the site should be reconfigured to reflect Clyde Road as part of the Mayor of London's Quietway cycle network.
- 2** Development must be designed in a way that responds to the SLOL designation at the land linking Elizabeth Place and Clyde Circus to the north of the site.
- An assessment of the impact on the existing traveler site on Clyde Road should be undertaken for any adjacent or closely proximate development proposals.

## Development Guidelines

- Existing good quality stock, notably 28 Lawrence Road, which can continue to meet the needs of contemporary commercial uses, should be preserved as part of a more comprehensive development.
- Development at the northern edge of the site should face the existing linear park as well as Lawrence Road, and should step down in height to respect the existing terraced housing to the west.
- The existing street trees are a strong asset to the streetscape and should be preserved.
- Approaches to ensuring the retention of the commercial use remains affordable in perpetuity will be supported in line with Policy DM38.
- While taller development is suitable on the Lawrence Road frontage due to the deep set backs from the street, consideration should be given to avoid new development creating a canyon-like effect on this street.
- Thames Water should be consulted with regard to the capacity of existing drains to move waste water from the site. Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- This site lies in a groundwater Source Protection Zone and as such the Council will expect developments to demonstrate no adverse impact on water quality.
- The urban realm along, and linking to, Seven Sisters Road should be of a high quality so as to provide a pleasant approach to Seven Sisters station by foot.





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Number: 1 Author: Our Tottenham Subject: Sticky Note Date: 04/03/2016 13:34:19

Add a bullet point: All development to complement and enhance the surrounding Conservation Area.

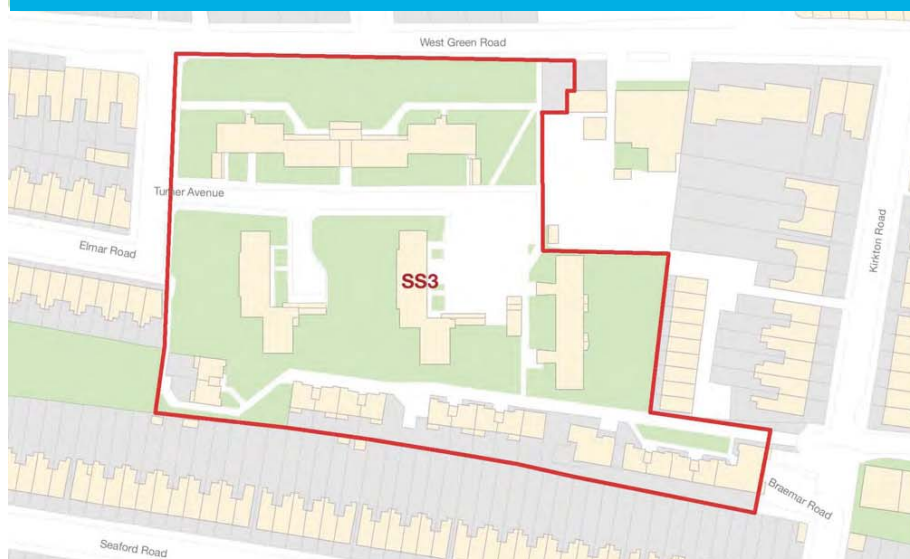


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Number: 2 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 13:34:03

Address Open Space deficiency by ensuring a major open green space is created at the northern end of the site.

## SS3: BRUNEL WALK AND TURNER AVENUE



Site Allocation

Address	Turner Avenue estate, and 1-36 Brunel Walk		
Site Size (Ha)	1.4	PTAL Rating	3
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Housing Estate		
Ownership	Public freehold, with leaseholder interests		
How site was identified	Housing estate renewal and investment programme		
Planning designations	Adjacent to Clyde Circus Conservation Area		
Indicative Development Capacity	Site Allocation		
	No net additional capacity		

## Site Allocation

5.29 **1** Potential masterplanned housing estate renewal opportunity to improve the quality and utility of the housing stock on the site.

## Commentary

5.30 **2** The Council will work with existing residents to bring forward a masterplanned development which improves the quality and mix of housing on this site to better meet local need.

## Site Requirements

- Development will be required to be in accordance with a masterplan, prepared with resident involvement.
- Existing buildings do not need to be retained, although refurbishment of the existing blocks with limited infill of the Turner Avenue part of the site should be considered.
- Design should take into account and positively respond to the Clyde Circus Conservation Area adjacent to the site.
- The use on this site will be residential.
- A new public open space should be provided on this site. The potential for this to link with the outside drinking area to the rear of the Fountain Pub should be considered.
- National Grid cables are identified as being present on site and need to be identified and built around to ensure appropriate access for contractors to maintain.

## Development Guidelines

- Developments along West Green Road should be consistent with those of the neighboring properties on West Green Road.
- Heights could increase towards the centre of the site, but would need to be reduced to the south, east and west to respect the amenity of neighboring residential buildings.
- Due to the good, and improving, public transport connections, parking should be limited on this site. The parking needs of existing residents should be accessed through future site masterplanning.
- Improved site permeability to enhance connection to the local road network. A through route may be acceptable if sensitively integrated and designed to restrict through traffic, including traffic calming measures.
- This site lies in a groundwater Source Protection Zone and as such the Council will expect developments to demonstrate no adverse impact on water quality.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.

 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:02:30

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We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents. Instead landlords, including the Council, must fulfil their duties to maintain existing homes in good repair and to ensure a good estate environment.

 Number: 2 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:03:18

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We want a clear rewording on p. 63 to clarify the principles of the 'renewal process':

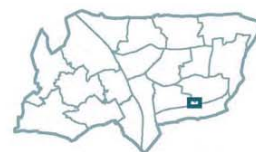
No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes.

Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.

There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area.



## SS4: GOURLEY TRIANGLE



Site Allocation

Address	Land South of Seven Sisters Road extending west of the Mainline Railway and East to the junction of Seven Sisters Road and St. Ann's Road		
Site Size (Ha)	2.0	PTAL Rating	5
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Mix of B1/B3/B8 and Residential		
Ownership	Public and Private		
How site was identified	Strategic Land Availability Assessment (SHLAA)		
Planning designations	Adjacent to: <ul style="list-style-type: none"> <li>SINC borough grade II: Tottenham Railsides</li> <li>Ecological corridor</li> </ul>		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	
	191	6,600	

## Site Allocation

- 5.31** Comprehensive mixed use redevelopment in accordance with a site wide masterplan providing new employment space and residential use.

## Commentary

- 5.32** The Council is seeking to encourage redevelopment of the area to introduce a range of higher density employment uses to exploit the excellent access provided by Seven Sisters Station. Residential uses will be permitted to cross-subsidise renewed employment uses which will be aimed at creating flexible workspace for businesses in the knowledge-driven economy.

## Site Requirements

- Development proposals will be required to be accompanied by a site-wide masterplan showing how the land included meets this policy and does not compromise coordinated development on the other land parcels within the allocation.
- An active frontage onto Seven Sisters Road will be created, with employment uses located here.
- The employment use should be of a typology that is compatible with the neighbouring residential use.
- Development will preserve and enhance the SINC and ecological corridor to the south and east of the site.
- There is potential for some taller buildings along Seven Sisters Road.

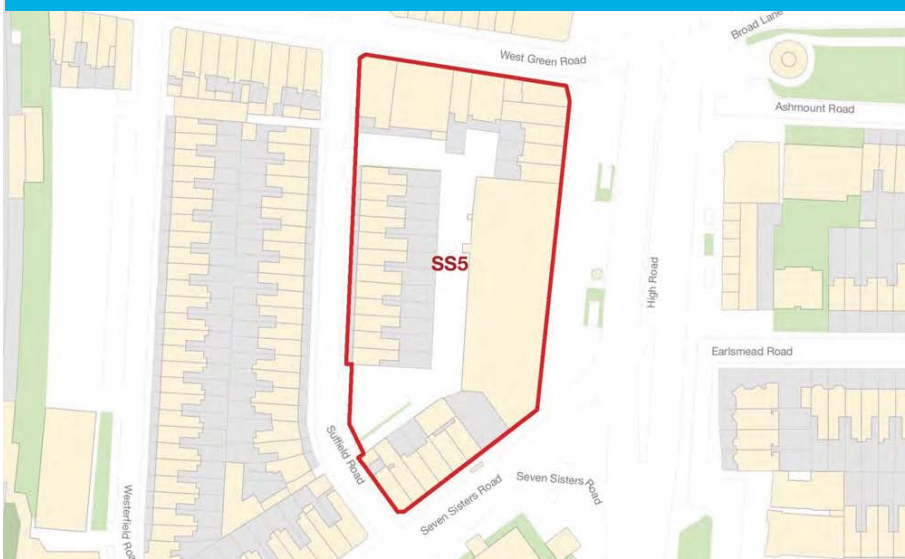
## Development Guidelines

- The layout of new development should provide for adequate servicing of the employment floorspace on the site. This should not be from Seven Sisters Road, rather the servicing of buildings fronting Seven Sisters Road should be provided from the rear.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Approaches to ensuring the retention of the commercial use remains affordable in perpetuity will be supported in line with Policy DM38.
- The potential for a pedestrian crossing of the rail line to the south of the site should be considered.
- Parking should be minimised on this site due to the excellent local public transport connections.
- The Stone Bridge Brook runs in a culvert under the site. Development proposals should explore opportunities to de-culvert the Brook, with clear and robust justification provided if considered unachievable.
- A Flood Risk Assessment will be required on this site.
- This site lies in a groundwater Source Protection Zone and as such the Council will expect developments to demonstrate no adverse impact on water quality.



p. 65, under 'Site requirements', add a bullet point stating 'there should be no loss of existing businesses'.

## SS5: 1 WARDS CORNER



Site Allocation

Address	Wards Corner Site, High Road London N15		
Site Size (Ha)	0.7	PTAL Rating	6a
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Retail and residential		
Ownership	Public and private freeholds and leaseholds		
How site was identified	Strategic Housing Land Availability Assessment and extant planning permissions		
Planning designations	Seven Sisters / Page Green Conservation Area Tottenham High Road Corridor West Green Road / Seven Sisters District Centre Primary shopping area Primary frontage Locally listed buildings: High Road west side		
Indicative Development Capacity	HGY/2012/0915		HGY/2011/1275
	Net residential units	Town Centre m <sup>2</sup>	Net residential units
	264	500	178
			Town Centre m <sup>2</sup>
			1,390



## Site Allocation

- 5.33 Mixed use development providing town centre uses at ground floor level, including a replacement market, with residential use above.

## Commentary

- 5.34 The site's prominent location at the heart of the Seven Sisters/West Green Road District Centre, and above the Seven Sisters London Underground station, make it a suitable location for a mixed use development which improves the public realm around the Seven Sisters station entrance and reflects the site's gateway location into Tottenham and the High Road. The Seven Sisters Market should be re-provided on this site, and the size and cost of stalls should be controlled to ensure they are accessible to local independent traders. The site has also been identified as having capacity to contribute to the supply of new housing in the Borough.

## Existing Planning Permissions

- 5.35 HGY/2012/0915 - Demolition of existing buildings and erection of mixed use development comprising Class C3 residential and Class A1/A2/A3/A4 with access parking and associated landscaping and public realm improvements.
- 5.36 HGY/2011/1275 - External alterations to front and rear elevation including new shop fronts, angled bay windows and dormers, and reinstatement of rear upper floor windows and formation of new windows.

## Site Requirements

- Comprehensive masterplanned development is required to ensure that this site delivers a high quality and coordinated development appropriate for the location, which is a key gateway into Tottenham, and maximises the regeneration benefits for the area.
- A site-wide masterplan will be required to be provided alongside any planning application to demonstrate how the proposed development complements the remainder of the site.
- Proposals should ensure re-provision of the existing market will be on site and arrangements should be made for the temporary housing of the market whilst the proposal is being built out.

- The new market will be required to provide a range of small and affordable retail units suitable for independent traders.
- Retail and other town centre uses will be required at ground floor level frontages onto the West Green Road, High Road and Seven Sisters Road frontages to ensure this site contributes towards strengthening and reinvigorating the town centre.
- The future implications arising from Crossrail 2 into this site will need to be considered as part of any application.

## 2 Development Guidelines

- Adjacent to this site is the Apex House site allocation, which is projected to come forward during the same time period as Wards Corner. The building at Wards Corner should be designed with an understanding of how it will relate to the strategic vision for Tottenham and particularly, the type and scale of development which is outlined in the site allocation for Apex House.
- Development must ensure a high quality public realm is secured on all frontages and that it is designed appropriately to demarcate an important arrival point into Tottenham. The scale of change for the public realm must ensure a positive transformational outcome for the area, in line with public realm and highways improvements at Tottenham Hale Gyratory and in anticipation of further transformational public realm projects throughout Tottenham, including at West Green Road.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Car free development is suitable for this site.
- This site is on the route of Cycle Superhighway 1, and cycle parking should be provided as part of any scheme.
- This site is within the Seven Sisters/ Page Green Conservation Area and any development should enhance its setting and appearance.



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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 13:39:09

This states that the Seven Sisters Market should be reprovided on this site and cost of stalls should be controlled to ensure they are accessible to local independent traders. Residents and market traders are very concerned that the Council's plan to retain the indoor market will only include some of the current market traders. The plan should specify that all current market traders can remain in the Seven Sisters Market.

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 Number: 2 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 17:32:22

Wards Corner is a locally listed building in the Conservation Area and the ground floor is registered as an Asset of Community Value. The Seven Sisters/West Green Road Development Trust was granted planning permission for The Wards Corner Community Plan in 2014. This permission to restore and retrofit the historic former department store should take precedence over the subsequent Apex House Site Allocation statement that it is a suitable location for a tall building. Government Guidance sets out a presumption in favour of preserving buildings that make a positive contribution to the character and appearance of Conservation Areas. Development on the Apex House site should therefore be in keeping with the height and appearance of the existing Wards Department Store building.

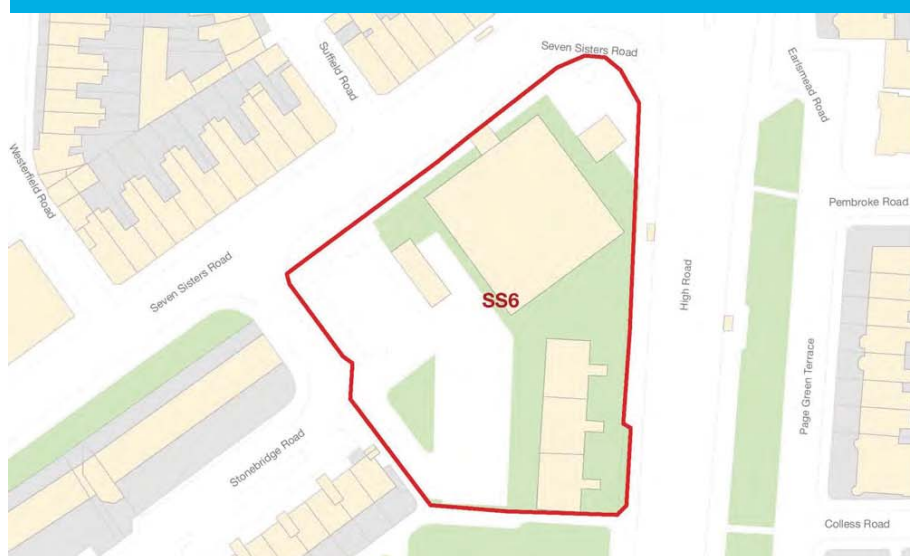
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 Number: 3 Author: Our Tottenham Subject: Sticky Note Date: 04/03/2016 15:07:54

re-integrate what was mentioned in the previous iteration of the draft AAP:

The site lies within the Seven Sisters Conservation Area and development should preserve or enhance its appearance as per the statutory requirements. This should explicitly mention locally listed buildings and refer to the Council's broader policies and approach to securing the refurbishment of heritage assets along the High Road and more generally.

## SS6: 1 APEX HOUSE & SEACOLE COURT



Address	Apex House, 820 Seven Sisters Rd, and Seacole Court, Tottenham High Road		
Site Size (Ha)	0.5	PTAL Rating	6
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Offices & residential		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Strategic Housing Land Availability Assessment (SHLAA)		
Planning designations	Seven Sisters / Page Green Conservation Area Tottenham High Road Corridor		
Indicative Development Capacity	Net residential units	Town Centre m <sup>2</sup>	
	63	1,600	



Site Allocation

### Site Allocation

5.37 Mixed use development with town centre uses at ground floor level and residential above.

### Commentary

5.38 This site's strategic location at a key point at the confluence of Seven Sisters and Tottenham High Roads, and additionally, in proximity to Seven Sisters station, make it a suitable location for a landmark building marking the location of Seven Sisters Station in Tottenham. The distinct and prominent location, along with unexceptional existing buildings that do not contribute to the conservation area, justify redevelopment for mixed use buildings that define and identify the location at a key node on Tottenham High Road.



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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:11:24

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

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

Need for the highest environmental standards to be achieved

Need to ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable)

Need to reflect and support the culture and diversity of the area

Need to deliver affordable workspace, space for small shops, space for cultural and creative uses

Need to enhance the public realm

Need to ensure safety

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

## Site Requirements

- Development will be required to be in accordance with a site-wide masterplan demonstrating how a comprehensive development can be brought forward, including in phases if necessary.
- Any proposed tall building must meet the requirements set out in policy DM6.
- This is a suitable location for a high quality tall building marking the location of the public transport interchange of train, tube, bus and Overground rail, and the junction of Seven Sisters Road and Tottenham High Road. Consideration should be given to the long views of this building, including the linear view along the High Road and Seven Sisters Road, as well as the effect on the microclimate.
- The tallest element of development will need to have regard to properties to the rear of the site, as well as to its relationship to other buildings along Seven Sisters and Tottenham High Road.
- Where necessary, the development should step down towards the lower density building to the south and south-west of the site.
- Any development proposal will be required to consider its relationship to the proposals for the Wards Corner site, as well as the provision of public space and public realm improvements to support access, both for arrival to Seven Sisters Station and for moving between this site and Wards Corner.
- Development should provide high quality public realm outside its active frontages.
- An active use on the ground floor of the Seven Sisters Road and High Road frontages is required.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Car free development is suitable for this site.
- This site is in a Critical Drainage Area and proposals should therefore refer to the Local Flood Risk Management Strategy.
- The existing mature trees along Tottenham High Road must be retained, and incorporated into the masterplan for this site.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- If the site is to come forward in phases, each phase must not compromise the other.
- The servicing of the development should be provided from Stonebridge Road.
- This site is on the route of Cycle Superhighway 1, and cycle parking should be provided as part of any scheme.

## Development Guidelines

- To help facilitate a coordinated approach towards development along the High Road and in particular Wards Corner, these two sites should combine to create a high quality public realm and positively enhance the significance of this important location within the conservation area.
- The Council will consider a range of town centre uses along the High Road frontage which could include small scale A1 retail located close to the apex with Seven Sisters Road. However along Seven Sisters Road, the Council will only permit secondary town centre uses such as use classes A2, A3, A4, A5, D1 or B1.



## TOTTENHAM GREEN SUB AREA

### Vision

**5.39** Consolidation of community facilities into the area surrounding Tottenham Green, including improvements to the Green to maximise community use, and ensure it remains the civic heart of Tottenham.

### Key neighbourhood sub area objectives

**5.40** The key objectives for the neighbourhood sub area are:

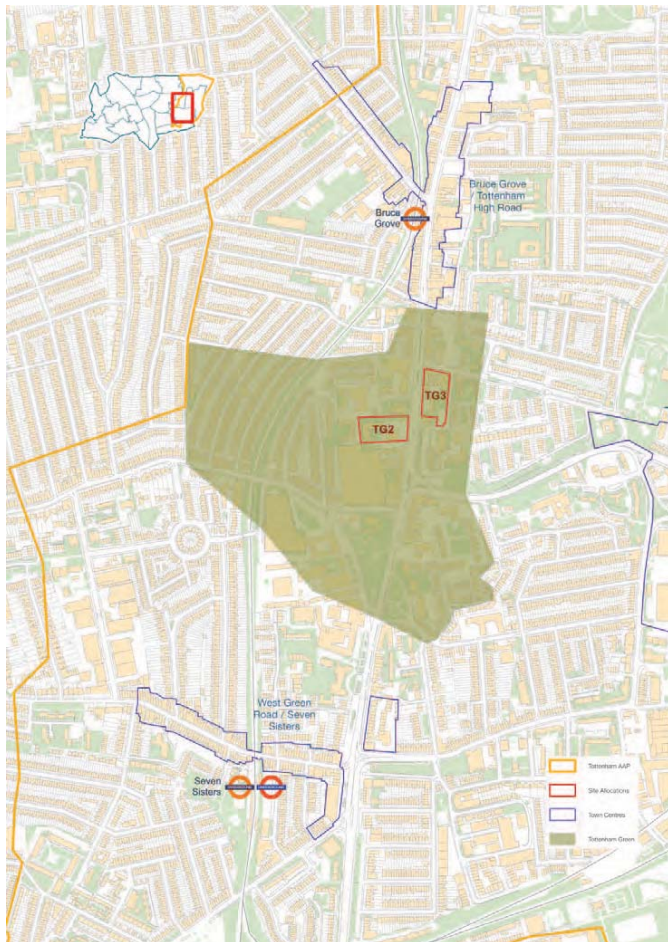
- Development should support Tottenham Green as the civic and cultural heart of Tottenham, with a range of offers such as Tottenham Green Market area, restaurant, cafe and other cultural uses that complement historic and civic setting of the Green.
- Redevelopment of underused sites that detract from the significance of the conservation area as well as its wider setting.
- Public realm enhancements between the buildings on the Green to create more attractive and accessible public squares, including spaces to the rear of the Green, such as adjacent to Bernie Grants Arts Centre.
- Promotion of the provision of workspace to support the successful and emerging SME community around Tottenham Green.



**FIGURE 5.5:** Tottenham Green Neighbourhood Area



FIGURE 5.6: Tottenham Green Sites



### Urban Character of the Area

- 5.41 Tottenham Green is a large historic green space, well planted with mature trees, encircled by a range of handsome and imposing municipal and domestic buildings in the heart of Tottenham. The area's unique character stems from the open nature of the Green lined with imposing historic buildings in comparison to the much more tightly developed High Road.
- 5.42 It is well served by buses thanks in part to the bus garage located north of the Green on Phillip Lane. The High Rd is heavily trafficked along this stretch, with the Monument Way junction in close proximity. Phillip Lane provides the principal route to West Green/ Harringay/Wood Green to the West. North-south connectivity, other than the High Road, is quite poor.
- 5.43 The area has a range of community uses surrounding Tottenham Green, with town centre uses on the High Road and to a lesser extent on Phillip Lane. The prevailing uses are well established residential terrace streets, laid out during the mid-late 19<sup>th</sup> Century, which still characterise a good deal of the area. These are popular and desirable areas, providing compact, yet well sized family houses with back gardens.

### Management of Heritage Assets in the area

- 5.44 The present day Tottenham Green was the original main settlement in the medieval parish of Tottenham marked by Tottenham High Cross, which is thought to date from Roman times when it served as a survey marker. By 1580 a wooden cross with four projecting spurs formed a landmark on this elevated section of the High Road and the surrounding area subsequently adopted the name Tottenham High Cross. By the 16<sup>th</sup> Century several affluent Londoners had developed country retreats in Tottenham, including Awfield Farm adjacent to the Church and Reynardson's House on Philip Lane, overlooking Tottenham Green.
- 5.45 The growth of the population of Tottenham provided a market for new shops and a demand for public buildings, many of which were developed between 1850 and 1900 on Tottenham High Road. By the turn of the century, several other public buildings were built on the Green including Tottenham Town Hall (1904-05) and Tottenham Fire Station (1905).

**5.46** Today, the ancient green space provides the area with a sense of openness rarely experienced elsewhere within the Tottenham High Road Historic Corridor. The eastern section of the Green is overlooked by a series of grand neo-Georgian buildings associated with the former Tottenham Hospital, whilst on its western side it is flanked by larger institutional Edwardian buildings, including the old Fire Station, Tottenham Town Hall, and the College of North East London. To the north and south of the Green, the buildings lining the High Road are of considerable diversity, varying significantly in terms of scale, appearance and use. The area includes several clusters of larger institutional and religious buildings and is less dominated by commercial premises than the majority of the High Road. Consequently, this area is more open in nature than the surrounding areas and is characterised by the Green with its mature London plane trees surrounded by imposing and distinctive historic buildings.

**5.47 IMPROVEMENT SITES:** Existing buildings / sites that need repair, enhancement, major intervention

- Within the area, there is a large concentration of high quality Civic buildings that are statutorily listed around the Green. Whilst large scale development within this part of the area is not anticipated, any new development should seek to reinstate the civic centre of the area or provide uses that complement it.
- Vacant or partly vacant listed and non-listed buildings that contribute positively to the High Road should be targeted. This includes buildings such as the Palace Cathedral (included in Historic England's 'At Risk Register') currently only occupied on the ground floor, and Monument Way public toilets (locally listed and currently disused). Opportunities for their repair and sustainable future use should be sought.
- The setting of these heritage assets should be preserved and enhanced through regular repair and maintenance programmes. Where necessary, funding would be sought from grant bodies or section 106 contributions to achieve this.
- Public realm improvements, including the creation of public squares by assembling rear and ancillary spaces, such as that adjacent to the Bernie Grants Arts Centre, should be explored. There is an opportunity to incorporate the brick chimney and create a significant but quiet public square at this location. Improvement and maintenance of Tottenham Green and landscaping within it should be continued.

**5.48 PROTECTION OF VIEWS:** consolidating and enhancing views into the High Road and strengthening the sense of character and place

- The view along Town Hall Approach Road and from the Green towards the listed buildings.
- The view along High Road looking at key buildings such as Palace Cathedral, Police Station Monument Way Toilet, Holy Trinity Church and the 'village well'.
- Threshold views at the junction with main roads such as Philip Lane and Monument Way providing a sense of arrival via a 'secondary route' to a 'primary route'.

**Local Strategic Policies in this area govern**

- TG1: Tottenham Green Civic Heart

**Site Allocations in this neighbourhood sub area**

**5.49** The site allocations in this neighbourhood sub area are:

- TG2: Tottenham Chances & Nicholson Court
- TG3: Tottenham Police Station & Reynardson Court

## Infrastructure

**5.50** The infrastructure projects for the neighbourhood sub area are:

- Investment in Bruce Grove Station will take place as part of the transfer of the station assets to Transport for London and introduction of London Overground services in 2015.
- Transfer of the Enfield East/Enfield line to London Overground will lead to service frequency improvements at Bruce Grove Overground station.
- Cycle Superhighway 1 will pass through this area.
- Potential improvement to facility currently located at Tottenham Chances.



FIGURE 5.7: Tottenham Green Sites with SOL



## POLICY TG1: TOTTENHAM GREEN'S CIVIC HEART

- A Development which serves to consolidate and improve access to community facilities in the Tottenham Green area will be supported.
- B Permissible uses on sites surrounding the Green will include community facilities, and secondary town centre uses such as restaurant and café use.
- C Developments will positively enhance the setting of the listed buildings, including Holy Trinity Church, and that of Tottenham Green as an open space, closing street frontages where appropriate; improve footfall and activity along Town Hall Approach Road; and be of a scale consistent with the existing buildings in the area.
- D Tottenham Green itself will be enhanced, with opportunities to use the Green for public events, such as markets and fetes, supported.

### Reasoned Justification

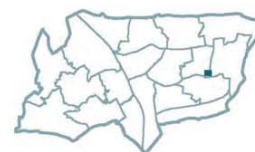
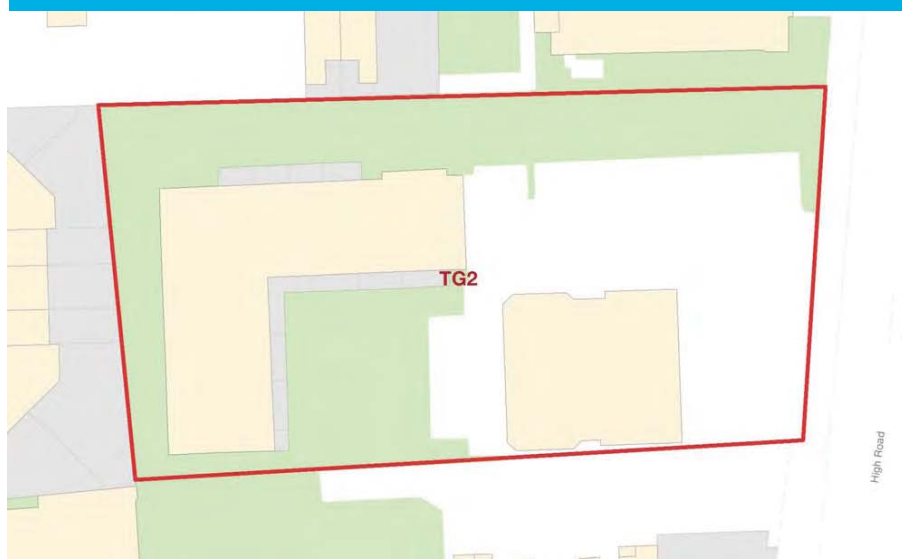


- 5.51 Tottenham Green represents an existing centre for community uses in Tottenham. It is a key destination and “go-to” place for civic facilities. The Green boasts many local assets including the former Tottenham Town Hall building, Old Fire Station, Tottenham Leisure Centre, the Bernie Grants Arts Centre, the College of North East London, Marcus Garvey Library, and Holy Trinity Church.
- 5.52 Improved pedestrian and cycle routes to and through this area, including the introduction of Cycle Superhighway 1, along with the introduction of complementary uses (such as additional workspace, community facilities, and restaurant or café uses) will further increase the utility of this area for local residents. Support for a wide range of services to be located in close proximity to one another will also better enable Tottenham Green to become a “one stop shop” for a wider range of functions, reinforcing its role in supporting the local community. By encouraging more trips by sustainable transport modes, including walking and cycling, there will be additional benefits to the local road and bus network.
- 5.53 Tottenham Green is already a location that regularly supports events such as markets, and the Council will support the continuation and growth of this use, where appropriate, in the future.

 Number: 1 Author: Our Tottenham Subject: Sticky Note Date: 04/03/2016 15:15:35

In the previous draft of the AAP the Leisure Centre car park was identified as a site for built development, which we opposed. There is no reference to the car park here any longer. We argue that this site should be reintegrated into the AAP and designated to be retained as open space -- particularly to provide facilities for outdoor physical activity, which are almost completely lacking in the already densely built up central Tottenham area. There is a lack of other open space large enough to provide this. The site's location -- adjacent to both the Sports Centre and Tottenham Green -- make it a strategic location for this. It is usual for sports centres to be located adjacent to playing fields and outdoor courts, which extend and supplement their important public health role.

## TG2: TOTTENHAM CHANCES & NICHOLSON COURT



Site Allocation

Address	399 High Road, N17		
Site Size (Ha)	0.5	PTAL Rating	6a
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Community venue, residential		
Ownership	Multiple private/charitable freeholds		
How site was identified	Planning Application		
Planning designations	Tottenham Green Conservation Area Tottenham High Road Corridor Archaeological priority area Listed building: The British Legion Club Adjacent to locally listed buildings		
Indicative Development Capacity	Net residential units	Community Use m <sup>2</sup>	
	34	2,400	



## Site Allocation

5.54 Mixed use development which creates an enhanced community use, with residential infill.

## Commentary

5.55 Subject to ensuring an appropriate venue for the existing community use, development will be permitted where it improves the site's addressing of the High Road frontage. The current building at the front of the site is listed. Proposals will need to show how the design enhances the setting of this building and the wider conservation area, prior to any development proceeding. The redevelopment of Nicholson Court will be permitted subject to a comprehensive approach to the site being agreed.

## Site Requirements

- The development should be sensitively designed to include the retention of the listed building; an extension to the rear and northern side are acceptable. A more comprehensive scheme would need to justify the loss of the existing listed building.
- If demolition of the listed building is justified:
  - New development should continue the building line established by 391 and 413 High Road.
  - Development should respect the setting of neighbouring locally listed buildings.
  - Views to the former High Cross School from the High Road should be maintained and enhanced as appropriate.
  - The community use should be located on the High Road frontage, with residential uses above and behind.

## Development Guidelines

- Particular care for the amenity of 413 High Road should be taken into account through any potential redevelopment proposal.
- Due to the high PTAL of the area, a car-free development should be pursued.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Detailed assessment of how any new development would positively enhance the conservation area and listed buildings and their setting should be provided.
- This site lies in a groundwater Source Protection Zone and as such the Council will expect developments to demonstrate no adverse impact on water quality.

 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:16:52

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Make explicit the protection of community use (T-Chances), a very valuable asset for the area.

T-Chances, is a very important community centre providing key services and facilities for Tottenham's youth. The protection of T-Chances needs to be explicitly included in the site requirements.

 Number: 2 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:18:28

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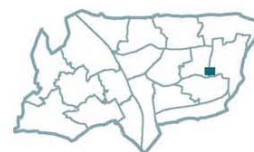
Nicholson Ct is a recently-constructed low rise residential building and should be retained.

 Number: 3 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:17:37

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REMOVE reference to the Option that "A more comprehensive scheme would need to justify the loss of the existing listed building".

## TG3: TOTTENHAM POLICE STATION AND REYNARDSON COURT



Site Allocation

Address	398 High Road and Reynardson Court, N17		
Site Size (Ha)	0.5	PTAL Rating	6a
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Police station, town centre uses, residential, car park		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Strategic Housing Land Availability Assessment (SHLAA)		
Planning designations	Tottenham Green Conservation Area Tottenham High Road Corridor Archaeological priority area Adjacent to locally listed buildings		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	Town Centre m <sup>2</sup>
	30	1,230	490

## Site Allocation

- 5.56 Subject to re-provision of the Police Station locally, conversion of the existing police station to include commercial space for SME and start up businesses. **Redevelopment of Reynardson Court** and the car park to the rear, for improved housing stock and improved/enhanced open space.

## Commentary

- 5.57 The Police Station building is a prominent locally listed building on Tottenham High Road and should be retained. This site represents an opportunity to create new workspace in the existing Police Station building. The redevelopment of Reynardson Court, the 1980's extension of the Police Station building, and underutilised land to the rear can create a more consistent frontage to the High Road, improve housing stock and create a new open space in the High Road area. Additionally, this site marks the start of a Green Grid connection towards Tottenham Hale and the Lee Valley Regional Park, and the urban realm should signal how this link connects to Tottenham Green.

## Site Requirements

- There is a proposed Green Grid connection running along the northern edge of the site, and proposals should facilitate development of and enhanced access to this new route.
- The existing original Police Station building should be retained, and a suitable town centre use found for it. There is potential for redevelopment of the 1980s extension and ancillary buildings to the rear.
- There is a presumption for retention of the 372-376 High Road. However, these properties could be considered as part of a master planned development where it is demonstrated that the significance of the conservation area can be significantly enhanced through the extension and/or change of use of these buildings. The rear of these buildings is suitable for redevelopment.
- Building heights will be limited to respect the scale of existing buildings to be retained on this site.

- The site lies within the Tottenham Green Conservation Area and development should demonstrate how it positively enhances its significance.
- Re-provision of the police facility within Tottenham must be identified prior to redevelopment taking place.
- Any redevelopment of Reynardson Court will be master planned in consultation with existing residents, with the overall aim of increasing affordable housing provision.
- The existing mature trees along Tottenham High Road must be retained, and incorporated into the design for this site.

## Development Guidelines

- The High Road building line should be continued, with designs taking account of the line of the existing Police Station and 372-376 Tottenham High Road.
- Due to the high PTAL of the area, a car-free development should be pursued.
- Development at the northern and southern edges of the site should positively respond to the existing heritage assets and wider historic environment.
- The existing trees to the front of Reynardson Court should be retained. Those to the rear may be removed however with an equivalent number of trees, at a minimum, replaced as part of public realm enhancements in proximity to the site. This will be secured via planning obligation.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.

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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:20:29

Remove Reynaldson Court from the brief for development. We contest the red lining of housing estates for future demolition/redevelopment if the buildings are structurally sound, or this includes net loss of social housing units and displacement of existing residents.

## BRUCE GROVE SUB AREA

### Vision for the neighbourhood sub area

**5.58** Revitalisation of Tottenham High Road/Bruce Grove District Centre through developments creating targeted and visible developments, in some cases using innovative architecture, to cement the role of the District Centre at the heart of a vibrant urban community within Tottenham, and provide a balance to large scale change in other parts of Tottenham.

### Key neighbourhood sub area objectives

**5.59** The key objectives for the neighbourhood sub area are:

- Limited growth through complementary mixed-use development on allocated sites consistent with the existing scale and character of the conservation area and town centre.
- Improvements to shop fronts and signage.
- Protection of family housing stock complementing wider change in other parts of Tottenham.
- Managing the impact of “negative clusters” of betting shops and takeaways.
- Improvement of Bruce Grove Station and forecourt through redevelopment and the re-branding to London Overground network.
- The promotion of a range of new high quality town centre uses along Bruce Grove.
- Two new residential led development sites capitalising on opportunities from the improvement of Bruce Grove Station.
- The enhancement and legibility of Bruce Grove’s heritage assets which complement the town centre’s character and function as a place for smaller floor plate commercial and community uses, celebrating the area’s heritage, such as Bruce Castle.
- Public realm improvements and transport projects which facilitate improved pedestrian circulation and movement, including improvements to permeability.

**FIGURE 5.8:** Bruce Grove Neighbourhood Area



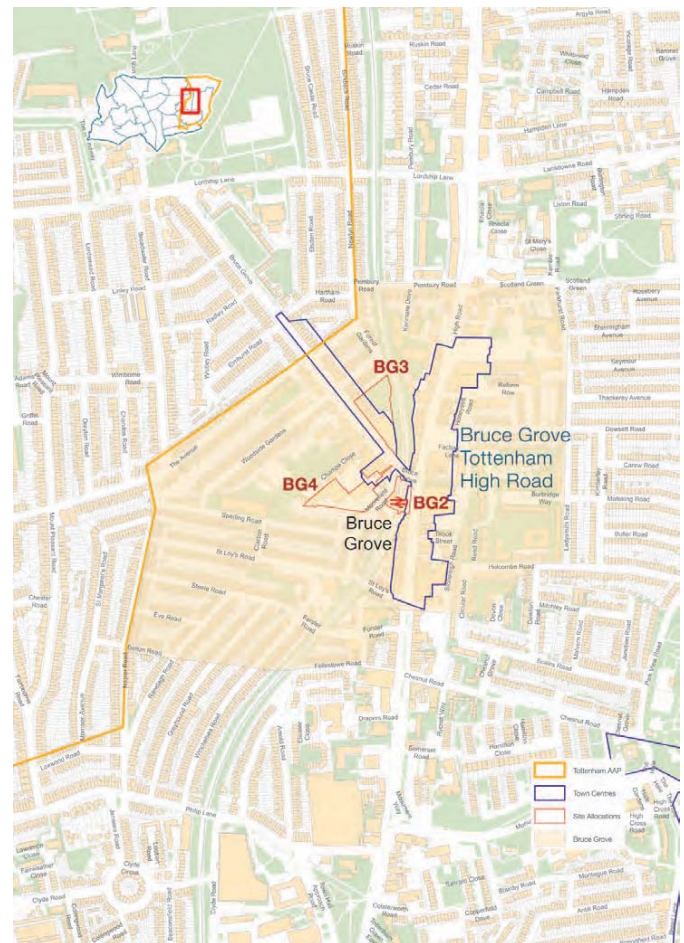
## Urban Character of the Area

- 5.60** In contrast to the other Neighbourhood Areas in Tottenham, Bruce Grove will experience more moderate change based on enhancing its existing and distinctive retail, heritage and residential assets.
- 5.61** Bruce Grove's primary retail frontage and core shopping area is along the High Road while the town centre boundary (along with a significant secondary portion of retail frontage) continues along the A10 (Bruce Grove). In general the commercial units in this part of the town centre are of poor quality and dilute the commercial offer along the High Road which should be the functional and physical axis to which the adjoining areas respond.
- 5.62** In general the quality of the streetscape within Bruce Grove is varied with some Victorian period properties interspersed with more modern development. However, the quality of the built environment is often detracted from by unauthorised and poor building alterations and street clutter from signage and street furniture. This situation is worsened by the high volumes of traffic and on the High Road which reduces the pedestrian experience and impedes pedestrian and cycle movement. East-west movement to the Lee Valley Park and Lordship Rec/Downhills Park should be improved. Bruce Grove station which serves this area is well located, but is inaccessible to people with limited mobility, parking standards.



Bruce Grove

FIGURE 5.9: Bruce Grove Sites



## Urban realm improvements:

**5.63** The urban realm improvements for the neighbourhood sub area are:

- The enhancement and improvement of way finding and legibility of the area's heritage assets such as Bruce Castle.
- The enhancement and legibility of Bruce Grove's heritage assets which compliment the town centre's character and function as a place for smaller floor plate commercial units.
- Improved/widened footways along Bruce Grove to improve movement and bus passenger waiting facilities.
- Redevelopment and environmental improvements to Bruce Grove Station Forecourt.

### Local Strategic Policies in this area govern

- BG1: Tottenham High Road/Bruce Grove District Centre

### Site Allocations in this Sub Area

**5.64** The site allocations in this neighbourhood sub area are:

- BG2: Bruce Grove Station
- BG3: Bruce Grove Snooker Hall and Banqueting Suite
- BG4: Tottenham Delivery Office

## Management of Heritage Assets in the area

**5.65** The Bruce Grove section of the High Road is fronted directly by a range of buildings of varying scale, origin and design, which provide the area with a diverse and vibrant urban character and a strong sense of enclosure. The area's enclosed urban nature is enhanced by the elevated railway line, which comes in close proximity to the High Road in the vicinity of Bruce Grove Station.

**5.66** This section of the High Road is primarily fronted by three and four storey Victorian buildings, which in many cases have been significantly altered and include unsympathetic retail units at ground floor level. The area also includes several modern infill properties, whilst the streets flanking the western side of the High Road are lined with residential properties and are more domestic in character and scale. In addition, a series of passages and alleyways provides access to buildings and yards situated to the rear of the buildings fronting this section of the High Road.

**5.67 IMPROVEMENT SITES:** Existing buildings / sites that need repair, enhancement, major intervention

- Bruce Grove Station forms a gateway into the High Road and this site along with the disused Bruce Grove toilets, the bridge and the snooker hall provides an important node. These sites should be carefully considered and should positively enhance the setting of the conservation and the listed and locally listed buildings within their vicinity.
- Within the area, there are several locally listed buildings that contribute positively to the area. These should be targeted for improvement in groups, as they enhance the historic character of the area. These buildings could be improved by improvements to shopfronts, removal of inappropriate signage, street and facade clutter, replacement of inappropriate uPVC windows, and removal of satellite dishes. In doing so, innovative and creative designs for shop fronts would be encouraged to reinstate and celebrate the area's multi-cultural and unique identity.

**5.68 OPPORTUNITY SITES:** Major sites where redevelopment is likely/desirable

- Key design principles for each site allocation that would have an impact on heritage assets have been discussed under the respective allocation.

**5.69 PROTECTION OF VIEWS:** consolidating and enhancing views into the High Road and strengthening the sense of character and place

- The view east, from Bruce Grove Road interrupted by the bridge but still giving a sense of 'anticipation' of the busy town centre
- The view along High Road of long continuous terraces



## Infrastructure

**5.70** The infrastructure projects for the neighbourhood sub area are:

- Investment in Bruce Grove Station will take place as part of the transfer of the station assets to TfL and introduction of London Overground services in 2015.
- Transfer of the Enfield East/Enfield line to London Overground will lead to service frequency improvements at Bruce Grove Overground station.
- Cycle Superhighway 1 will pass through this area.
- New improved SLOL at Bruce Grove Wood.

### **POLICY BG1: BRUCE GROVE AND TOTTENHAM HIGH ROAD DISTRICT CENTRE**

- A The Council will adjust the designated retail frontages to ensure that there is a consolidation of retail uses on Tottenham High Rd;
- B For the Bruce Grove area frontage, uses will be permitted that enable a character area that promotes a cafe and restaurant type environment.
- C An improved public realm to encourage pedestrian activity, including where possible, pavement widening measures.
- D Residential units behind ground floor could be acceptable provided they are carefully designed to allow overlooking onto the public realm without compromising the use of the town centre unit.
- E The Council will enhance this District Centre along the High Road as the principal high street shopping area, reinforcing its historic and diverse character.
- F Opportunities to improve shop fronts, including enforcing against unauthorised development which adversely affects the overall appearance of the area.

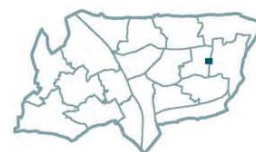
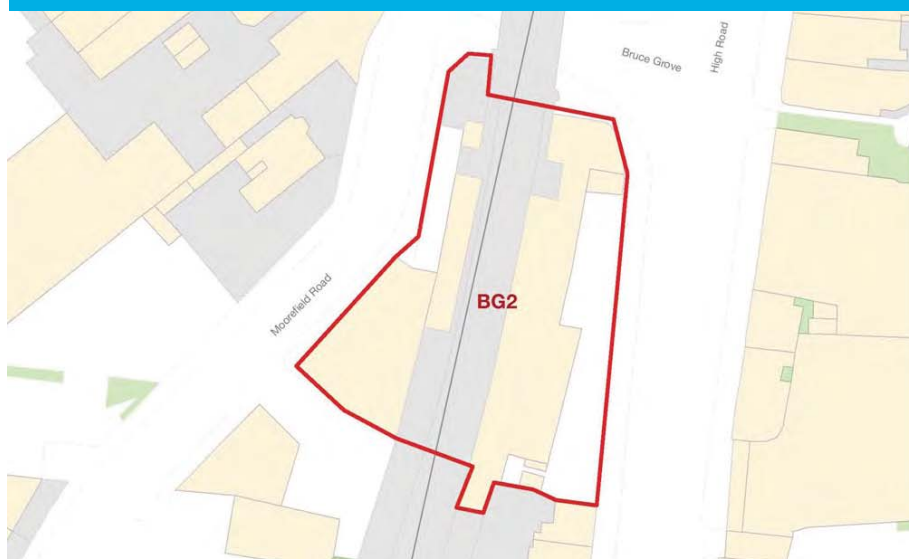
## Reasoned Justification

**5.71** Concentrating the retail use around the Tottenham High Rd frontages core will have the dual effect of providing a focus for retail use and enabling a wider range of non-retail town centre uses to come forward on the north side of Bruce Grove. The Council will focus on improving the pedestrian experience by promoting environmental enhancements at Bruce Grove Station. New streetscape furniture and materials, improvements to shop frontages and new public spaces will enable a range of commercial and community uses.

**5.72** Development which complements improvements to Bruce Grove Station, and the service improvements courtesy of the transfer to London Overground, will be supported. This includes improvements to the layout of the station buildings and forecourts. A positive urban realm which supports enhanced pedestrian access to the station, intermodal transfer with buses and bicycles and new opportunities for retail provision around the station will be supported.

**5.73** The enforcement of unauthorised and unattractive advertisements and shop fronts will benefit the area by improving the quality of experience for visitors to the centre.


## BG2: BRUCE GROVE STATION COURT



Site Allocation

Address	Bruce Grove Station, and 22-24 Moorefield Rd, N17		
Site Size (Ha)		PTAL Rating	5
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Train station, builders' yard.		
Ownership	Mix of public and private freeholds		
How site was identified	Ongoing station improvement works		
Planning designations	Bruce Castle Conservation Area Tottenham High Road Corridor Bruce Grove / Tottenham High Road District Centre Listed building: Public Toilet Bruce Grove Adjacent to locally listed buildings		
Indicative Development Capacity	Net residential units	Town Centre m <sup>2</sup>	Employment m <sup>2</sup>
	11	100	100

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This site includes what was previously referred to as BG4 (Moorefield Road) in the previous Fe. 2015 draft of the Tottenham AAP. For this part of the site, occupied by a building merchant, we demand NO NET LOSS OF EMPLOYMENT LAND AND FACILITIES. This site is occupied by MEMS, building merchants, a successful local business and therefore should not be subject to site allocation.

## Site Allocation

**5.74** Improvements to Bruce Grove Station and forecourt including creation of new A3 use on Tottenham High Rd, and mixed use employment and residential on Moorefield Road.

## Site Requirements

- An extension for high quality retail or restaurant use facing the High Road.
- Proposals will be required to demonstrate how the development:
  - Enhances the locally listed station building and the conservation area, highlighting this important location;
  - Improves the public realm outside of the station; and
  - Identifies methods to make the station more accessible.
- An innovative and high quality design single storey extension on the existing forecourt, linked to the arched openings within the station, for retail or restaurant use.
- Space for a landscaped court at the northern end of the existing forecourt, with a potential that it could in future be connected to the station and used as an outdoor area to a restaurant unit.
- Widening the pavement on Tottenham High Road.
- An active, lively frontage onto the High Road that complements the existing station will be required.
- Creation of new retail/restaurant units with a larger single unit preferable to introduce a greater variety of floor plate sizes onto a high street with a high proportion of smaller floor plate units.
- Mixed-use residential and employment development replacing the existing Builder's Merchants will be permitted.
- Improvements to the locally listed station building and public realm outside of the station will serve to reinforce the mutually beneficial relationship between the station and the town centre.
- Development should respond to the existing High Road shop frontage as well as complement the existing locally listed Bruce Grove Station.
- The form & massing of any development should enhance the character & appearance of the listed buildings on Bruce Grove.
- This site may be in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network

## Development Guidelines

- Network Rail and Transport for London are in the process of commissioning works to upgrade the public realm in the Tottenham High Road and Bruce Grove area.
- Additionally, Bruce Grove is part of the Strategic Route Network and any development will need to ensure traffic flow is consummate with this function.



Bruce Grove Station

## BG3: BRUCE GROVE SNOOKER HALL AND BANQUETING SUITE



Site Allocation

Address	110-119 Bruce Grove and Public Convenience building, Bruce Grove N17		
Site Size (Ha)	0.4	PTAL Rating	5
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Partially vacant, retail and community uses.		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Strategic Housing Land Availability Assessment (SHLAA)		
Planning designations	Bruce Castle Conservation Area Tottenham High Road Corridor Bruce Grove / Tottenham High Road District Centre Listed building: Public Toilet Bruce Grove Adjacent to locally listed buildings		
Indicative Development Capacity	Net residential units	Town Centre Use m <sup>2</sup>	
	49	850	

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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:21:34

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

## Site Allocation

- 5.75** Masterplanned redevelopment including the retention of existing Banqueting Suite building, entrance to the former cinema building, and former public toilets building, with redevelopment of the remainder of the former cinema, and land behind, for town centre uses at ground floor level (fronting Bruce Grove) with residential above and behind.

## Commentary

- 5.76** Bruce Grove has a significant cluster of heritage assets at its southern end, and additionally forms part of the Tottenham High Road/ Bruce Grove District Centre. The aim on this site allocation is to remove the existing blank façade, which is of detriment to the area, and replace it with a new frontage which complements assets to the north, south and across the road. This will ensure that the Bruce Grove centre itself is strengthened through the reintroduction of a range of town centre uses. Residential uses above and behind will be permitted to ensure a viable scheme can be delivered.

## Site Requirements

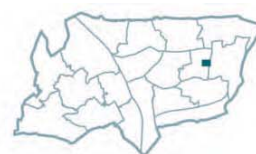
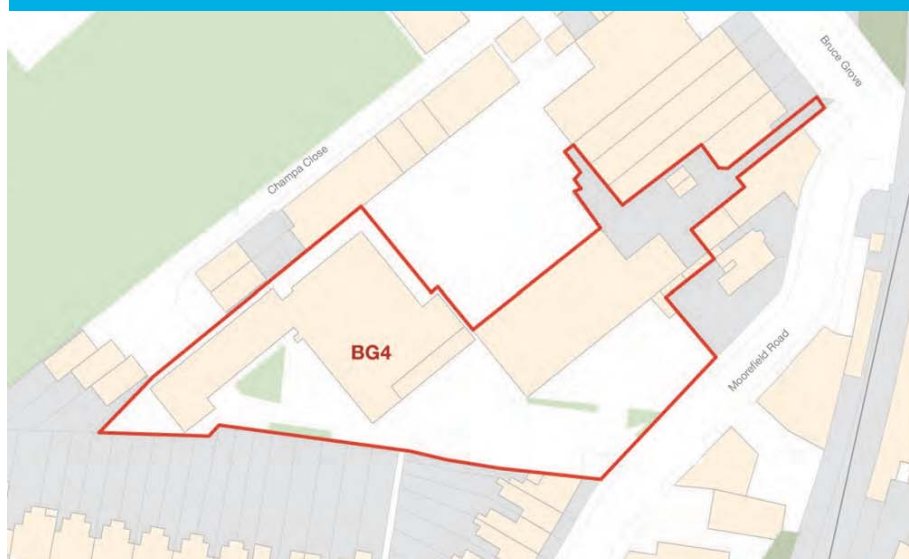
- Proposals will be required to demonstrate through the submission of a site-wide masterplan how the scheme will complement development of the remainder of the site including reference to:
  - Retained buildings;
  - Extant permissions; and
  - Future development potential.

- The public toilets, entrance to the former cinema, and the Banqueting Suite frontage are significant heritage assets, and will be retained and brought back into active use.
- An alternative use for the former public toilets building (listed at Grade II) will be found, including its restoration and improvements to the surrounding public realm.
- Retention of the secondary town centre frontage on this site, and creation of new frontage on the former cinema site will be required.
- The site lies within the Bruce Grove Conservation Area and development should positively enhance its character and setting along with the setting of the listed buildings opposite.

## Development Guidelines

- A sensitive additional storey extension to the Banqueting Suite will be acceptable where it can be demonstrated that it enhances the setting and character of the building, and the wider conservation area.
- Due to the high PTAL of the area, a car-free development should be pursued.
- This site lies in a groundwater Source Protection Zone and as such the Council will expect developments to demonstrate no adverse impact on water quality.
- This site may be in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.

## BG4: **TOTTENHAM DELIVERY OFFICE**



Site Allocation

Address	Rear of 5 Bruce Grove and Delivery Office and builder's yard on Moorefield Rd.		
Site Size (Ha)	0.6	PTAL Rating	5
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Employment and Community Uses		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Existing Planning Permissions and Strategic Housing Land Availability Assessment (SHLAA)		
Planning designations	Bruce Castle Conservation Area Tottenham High Road Corridor Bruce Grove / Tottenham High Road District Centre Adjacent to listed buildings: x3		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	
	48	370	



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

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

## Existing Planning Permissions

- 5.77 5 Bruce Grove (HGY/2014/1041):** Demolition of side and rear extensions. Conversion of part ground, first and second floors into four flats (3 x 1 bed and 1 x 2 bed). Erection of 10 Houses (8 x 3 bed and 2 x 4 bed) at the rear of the site with associated access road, parking spaces and landscaping.
- 5.78 7 Bruce Grove (HGY/2012/0563):** Conversion of Grade II listed building to provide 9 residential units and erection of a new building to the rear to accommodate 4 self contained flats.

## Site Allocation

- 5.79** Residential-led development incorporating replacement employment space, and creation of a new public route from Moorefield Road through the site to the southern end of Champa Close to increase permeability within the area and improve access to an improved Bruce Grove wood.

## Commentary

- 5.80** The delivery office site has been identified as deliverable, and combined with the builders site could combine to create a new pedestrian connection through to Champa Close from Moorefield Road. It is expected that the employment floorspace will be replaced and that the number of jobs on the site will be increased.

## Site Requirements

- Development should seek to enhance the setting of all heritage assets along Bruce Grove, especially those fronting the site.
- A new route through the site should allow the possibility of a connection between Champa Close and Moorefield Road. This should allow access to the properties along it, but not a through-route. The new route should have properties facing it to ensure passive surveillance.
- A contribution towards improvement of public realm along Bruce Grove, especially No. 1-5 will be sought. Any development should improve the forecourt of these buildings onto Bruce Grove.

## Development Guidelines

- Development should positively respond to the adjacent heritage assets in terms of scale, form and massing.
- This site lies in a groundwater Source Protection Zone and as such the Council will expect developments to demonstrate no adverse impact on water quality.
- Where the site interfaces with existing residential properties, back gardens of new units should meet the back gardens of existing properties.
- This site may be in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.

## 1 NORTH TOTTENHAM NEIGHBOURHOOD AREA

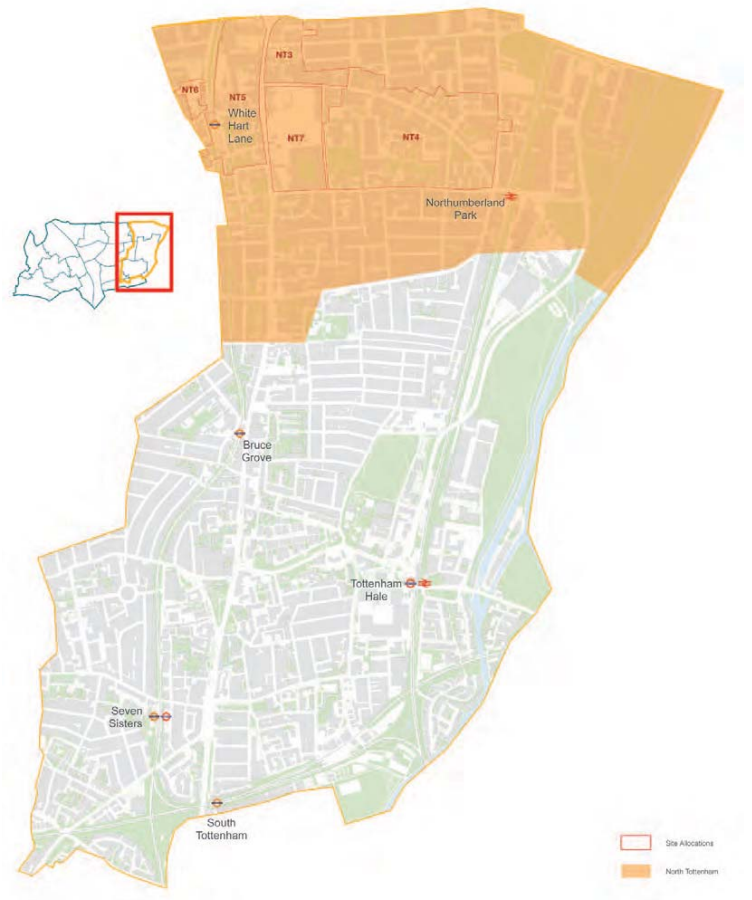
### Vision for the neighbourhood area

**5.81** North Tottenham will be transformed into a mixed and sustainable community and new leisure destination for London- a place where people want to live, work and visit. It will retain its diverse north London character and have a strengthened community identity. The neighbourhood will be known for its mix of urban and landscape settings, with improved access to both a busy London high street and the abundant open spaces of the Lee Valley Park. With the Tottenham Hotspur FC development scheme serving as a catalyst for wider area change, there will be a substantially improved local centre with a balanced mix of high quality homes, jobs, community and leisure facilities.

### Key neighbourhood area objectives

- 5.82** The North Tottenham Neighbourhood Area consists of three major regeneration and development schemes that will transform an area that currently experiences fundamental social and economic disadvantage (where, for example, male life expectancy is seven years lower than the Borough average) and which is dominated by poorly designed and fragmented housing estates and industrial land, into a new leisure and residential destination for London.
- 5.83** High Road West and Northumberland Park are focused on delivering transformative housing estate renewal, whilst the substantial private investment coming forward from Tottenham Hotspur Football Club (THFC) in the Northumberland Development Project provides an opportunity to create a scheme at the heart of the place making ambitions for north Tottenham.

FIGURE 5.10: North Tottenham Neighbourhood Area



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Our Tottenham regards the plans set out in NT1 to NT5 in their entirety as plans for wholesale demolition of council housing and its replacement with mainly private housing. See the overall arguments and representations we have made about this issue in our generic response to the Tottenham AAP and in our separate response to the *Alterations to Strategic Policies*.

We note in this connection the Council's plans as set out in the Northumberland Park Masterplan of February 2015 which envisages three scenarios for the NT4 Northumberland Park area, all of which involve the demolition of the majority of the council housing in the area. The scenarios 9.2-9.5 all specify only a small number of council homes to be 'retained' with the others in the area clearly on a demolition list. We believe the Masterplan reflects the Council's current thinking on the desirability of demolitions. If the Council has changed its mind on this issue it should state so publicly and unequivocally. If the Council has changed its mind about the Masterplan proposals then there is no need for the Site Allocations NT3-5 as it is not necessary to include areas as site allocations if refurbishment not demolition is what is needed.

We believe that these plans are inappropriate and unsound as they will reduce the quantity of social housing in Haringey and they are discriminatory as they will have a worse adverse impact on Black and Ethnic Minority (BME) groups when compared to other groups. We propose that improvement to the existing homes rather than demolition is the most appropriate course of action. We believe this can be achieved by removing the 'red zone' site allocations from areas in NT3, NT4 and NT5 and improving buildings in these areas, not demolishing them. The material below is the evidence we wish to cite in support of our objections to policies NT1-5 and the site allocations in NT3, NT4 and NT5 as well as evidence for our alternative.


**5.84** The key objectives for the neighbourhood are:

- To deliver comprehensive physical, social and economic regeneration, focused around an estate regeneration programme that transforms outcomes for local communities.
- To deliver at least 3600 new high quality homes and create a high quality residential neighbourhood with a distinct and coherent identity.
- To ensure that new development complements and enhances the Historic Corridor and the designated and non-designated heritage assets within it, bringing vacant assets back to use as appropriate.
- To support the creation of a sustainable, mixed and balanced community through the provision of a range of housing types, tenures and sizes.
- To preserve and enhance existing good quality homes.
- To create a new leisure and sports destination for London, with the provision of complementary commercial, cultural and community uses across the neighbourhood area whilst celebrating the High Road's rich heritage.
- To create new work, leisure, and retail space to encourage new businesses and enterprise growth within the area, and allow for the relocation of some existing businesses into new purpose built retail and leisure units and workspaces;
- To protect, enhance and intensify the reservoir of industrial land in the north and east of the Neighbourhood Area;
- To create a high quality public space network including new squares, parks, landscaped routes and bridges, connecting the regeneration schemes with the open spaces and waterways of the Lee Valley Park;
- To realise a clear network of pedestrian and cycle friendly routes through the area, connecting the neighbourhood with other local areas such as Bruce Grove, Bruce Castle, Tottenham Cemetery, Tottenham Hale, the Lee Valley Regional Park, and to wider employment opportunities
- To substantially improve the quality of the local environment through the creation of legible street patterns with a high quality public realm which creates safe, modern and high quality places.
- To deliver appropriate development densities throughout the area. Typically this will be mid-rise development with high density development located in the most suitable locations, including close to the redeveloped Tottenham Hotspur FC stadium, and key transport links such as Northumberland Park Station and Tottenham High Road.
- To realise improvements to rail services at Northumberland Park and White Hart Lane Stations, with improvements in links to the stations that reflects the transport improvements on the West Anglia Main Line and potential designation as a Crossrail 2 station and which improves security, safety and the experience of arriving by rail.
- To realise new and improved bus services, particularly along Northumberland Park and Tottenham High Road, serving the new neighbourhood and providing a more effective inter modal connection with local rail stations.
- To provide enhanced educational, health and community facilities to meet the needs of a growing population.


## Character of the neighbourhood area

- 5.85** North Tottenham area covers the area from the Hertford East/Enfield line to the Lee Valley Park at the northern edge of the Borough. It includes part of Tottenham Historic Corridor, THFC stadium, the Brantwood Road and North East Tottenham/Leeside Trading Estates, and large residential housing estates in the form of Northumberland Park and Love Lane Estates.
- 5.86** Tottenham High Road, Northumberland Park and Park Lane are the principal routes through the area, with White Hart Lane/Creighton Road providing a key link towards Wood Green. The West Anglia main line and Watermead Way create barriers to east-west permeability in the east of the Neighbourhood.
- 5.87** Density and intensity rises to its greatest heights along the north-south axis of the High Road and the parallel Liverpool Street – Enfield Town Overground line in the west of the Neighbourhood Area. A significant recent development is the Brook House development adjacent to the Rail line. This, along with the introduction of the new Spurs stadium, will create precedents for taller development in the area which new development will need to respond to. Further guidance on this will be set out in the Haringey Tall Buildings and Views SPD.
- 5.88** The High Road itself is formed by a continuous parade of Victorian and Edwardian buildings with a large concentration of early Georgian buildings along the east side of High Road. New development should respect the scale and grain of the existing historic corridor, retaining wherever possible all assets that make positive contribution to the conservation area.
- 5.89** The area is close to the Lee Valley Regional Park which provides opportunities for new access points and landscaping strategies that encourage access to the park and waterways. This is juxtaposed by the presence of the borough's two largest industrial areas which lie adjacent. The relationship between industrial assets and the Lee Valley Regional Park is managed in Neighbourhood Policy NT3.
- 5.90** The Northumberland Park Estate part of the Neighbourhood Area (as addressed in NT4 and NT5) was developed in the 1960's and 1970's through a non-comprehensive, piecemeal approach. There are a large number of terraced houses in private ownership in the centre of the area, as well as larger Council owned estates. There are also a large number of cul-de-sacs in the area and the network of streets is generally quite illegible. Generally, the east-west roads (Northumberland Park, Park Lane, and Lansdowne Road) provide good east-west access and legibility, but there are a lack of north-south links within the Estate, contributing to the area being fragmented and suffering from a lack of clear focal points for activity.
- 5.91** **1** The area suffers from poorly defined and underutilised public and private spaces that are not always well looked after. Entrances do not address the street and many frontages are inactive, leaving streets ill-defined and not well overlooked. There is some **2** recent housing stock that could be retained and improved however the majority of the post-war developments have led to unclear network of streets and undefined spaces. There is a predominance of social housing and smaller homes in the area.
- 5.92** The west side of Tottenham High Road is characterised by a fragmented urban form which is dominated by three building types: taller 1960s housing set in large areas of open space, industrial sheds and three storey terraced buildings fronting the High Road and White Hart Lane. **3** The southern part of the area is predominantly characterised by local authority housing estates which were built in the 1960s. These have very poor street and block layouts, with a lack of connections and fragmented networks. The northern part of the area is predominantly occupied by a number of local businesses such as timber merchants, car mechanics and metalwork fabrication, which also includes a safeguarded waste facility. The northern end of the area is characterised by a now vacant superstore and the new twenty-two storey Brook House development.
- 5.93** Smaller properties typically front the High Road and White Hart Lane and provide local parades of shops that are in need of investment. The local parade is predominantly characterised by narrow plot widths which extend deeply behind the High Road. The retail units are typically occupied by independent operators, and there is a high proportion of hot food takeaway and convenience stores. The regular scale, form and rhythm of the urban form along the High Road is broken only by the existing football stadium.


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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 14:16:15  
If public spaces are not well-looked after, then the Council should improve its custodianship of these areas. The scenarios set out in the Northumberland Park Masterplan for the demolition of over a thousand council properties (tenanted and leasehold) is a grossly disproportionate response to this problem. The demolition is also a grossly disproportionate response to the issue of North-South road links.

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 Number: 2 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 14:16:27

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 Number: 3 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 14:16:27  
Mass demolition is a totally disproportionate response to a problem that is not described with any specificity here. High density developments produce much worse spatial problems with narrow pedestrianized areas without sunlight between very closely built blocks as in Hale Village. But NT3-5 envisages a huge increase in housing density in terms of increases in net residential units.

## Urban realm improvements:

5.94 The urban realm improvements proposed for the neighbourhood area are:

- The creation of a high quality public space network (including new squares, parks, landscaped routes and bridges) connecting the regeneration schemes with the open spaces and waterways of the Lee Valley Park, as well as Bruce Castle Park and Tottenham Cemetery.
- The creation of new, legible street networks (east-west and north-south) with a high quality public realm which creates safe, modern and high quality places.
- Creation of a new bridge at Northumberland Park Station that forms a key part of new public realm and a landscaped route between the High Road and the Lee Valley Regional Park.
- A mix of commercial uses, including new and affordable workspaces, leisure, and retail that revitalises and activates local streets.
- An improved Northumberland Park Station that reflects the transport improvements on the West Anglia Main Line and potential designation as a Crossrail 2 station. These improvements should also improve security, safety and the experience of arriving by rail in the area.
- In High Road West, a new public square which will:
  - Serve as the heart of the High Road West area and a welcoming gateway into North Tottenham from the west, including White Hart Lane station;
  - Include a new library, community facilities and learning/education hub;
  - Provide space for public activities including screening sports events and shows;
  - Become a destination for shops, restaurants and cafes with development focused around the new entrance to White Hart Lane Station;
- Link with, and form a key part of, the proposed public space network within north Tottenham;
- Preserve or enhance existing heritage assets and residential typologies; and
- Provide a clear route for visitors to match and event days at Tottenham Hotspur Football Club stadium, arriving at a new White Hart Lane Station entrance.
- In Northumberland Park, provide new public spaces which will:
  - Better connect the area with transport links and the commercial historic, cultural and leisure opportunities to the west, as well as the open spaces of the Lee Valley Regional Park to the east;
  - Serve as recreational spaces and provide focal points for community life;
  - Provide suitable 'arrival' space to the eastern side of the new THFC stadium; and
  - Support attractive, new residential typologies.
- Enhance Tottenham High Road by:
  - Creating an attractive leisure, shopping and community destination for local people and visitors; and
  - Enhancing the heritage assets that contribute positively to the conservation area by a programme of improvements to refurbish and reuse the existing buildings, including facade and public realm improvements and increased safety.



## Management of Heritage Assets in the area

- 5.95** The Tottenham High Road Historic Corridor, consisting of a sequence of six conservation areas, stretches from the boundary with Enfield in the north to Stamford Hill in the south. The North Tottenham neighbourhood is at the northern end of the historic corridor; it is, therefore, a threshold or point of entry to the historic corridor as a whole.
- 5.96** Tottenham High Road is now, and has been for many centuries, an important route into and out of London. Its history can be understood through the existing buildings, dating from the 18th to the 21st centuries, which line its edges. The High Road within the North Tottenham neighbourhood is focused on the 18th century village core clustered around the junctions of Northumberland Park and White Hart Lane, and is comprised of groups of statutorily listed Grade 2 or 2\* Georgian buildings, interspersed with later Victorian locally listed buildings. The non listed buildings generally make a positive contribution to the neighbourhood. Despite the groups of high quality statutorily and locally listed buildings in the area, its general condition is fragile. There is an immediate, ongoing, short term danger that historic fabric will continue to deteriorate and be lost due to poor development and repair, and continued neglect.
- 5.97** North Tottenham has high levels of deprivation, and this economic fragility has led to physical fragility of historic buildings. The current value of these buildings is low, with many buildings effectively carrying a large 'conservation deficit' which means that the potential cost of refurbishing the buildings would be higher than any returns. Historic England has designated the North Tottenham Conservation Area as a "Conservation Area at Risk".
- 5.98** With the current transformation vision of the neighbourhood there is great opportunity to maximize major public and private investment for improvements to infrastructure, housing, employment and public spaces. These major developments are both a challenge to and an opportunity for the fragile historic fabric of Tottenham High Road. The approach to the process should be that of "well managed change", balancing continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces, which can respond to the needs of local communities. The historic fabric of the neighbourhood should be considered an asset, which can anchor the character of the proposed new quarter and regeneration schemes in deep historical roots, add precious cultural capital, and avoid the bland homogeneity of many large scale regeneration projects.
- 5.99** The built heritage of North Tottenham should be considered to be as much a part of the vision for the future as it is the story of the past. If damaged as a result of rapid or insensitive development, its unique value, sense of continuity, and contribution to local identity, are irreplaceable. There is a need to strengthen the understanding of the significance of the heritage assets and their potential to add value to regeneration. This needs to be integrated holistically so that Tottenham's historic buildings are perceived as adding unique value to the regeneration of the wider area.

**5.100 IMPROVEMENT SITES:** Existing buildings / sites that need repair, enhancement, major intervention

- Within the North Tottenham section of the High Road there are high quality statutorily listed buildings. Development schemes should ensure their retention and restoration for viable uses, and where possible, section 106 funding should be secured to achieve this. The Council will use its statutory powers such as Urgent Works Notices and Repairs Notices to ensure that deteriorating buildings, especially those included in the 'At Risk Register' are protected from further neglect.
- The setting of Heritage Assets should be preserved and enhanced. Particular attention should be given to the situations where Georgian buildings are set back from the pavement edge (No.808), or behind railings and walls. (Nos. 818, 792 - 802, 808 - 810). All appropriate efforts should be made to ensure that repairs to railings and walls are carried out to a high standard. Signage on brick piers (e.g. at No.808) should be removed.
- The non designated heritage assets (i.e. buildings that are not listed or locally listed) should be targeted for improvement in groups, as they enhance the historic character of the area. The groups are significant as they demarcate the junction of the ancient routes. These buildings could be improved by improvements to shopfronts, removal of inappropriate signage, replacement of inappropriate uPVC windows, and removal of satellite dishes.


**5.101 OPPORTUNITY SITES:** Major sites where redevelopment is likely/desirable

- Ensure that the design of any future development is sensitive to the historic context of the High Road. In particular, the design, form and layout should be sympathetic to the historic fabric of the High Road and respect the scale and rhythm of the adjoining buildings.
- Proposals should have a frontage onto the High Road, maintain the rhythm and grain of the High Road and avoid an excessively large monolithic elevation.
- Large scale development such as the Stadium should ensure that the linearity of the High Road is maintained and that the setting of heritage assets is enhanced. Public realm improvements such as lighting, signage, hard and soft landscaping should be sensitive to the context and appropriate in scale.

**5.102 PROTECTION OF VIEWS:** Consolidating the threshold views into the neighbourhood area along the High Road and strengthening the sense of character and place

The view south, into North Tottenham High Road from Enfield  
The view north, into North Tottenham coming from Bruce Grove  
Threshold view at the junction with Northumberland Park and White Hart Lane

**Local Strategic Policies in this area govern:**

-  T1: Northumberland Park Station
- NT2: SIL in North/East Tottenham

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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 14:18:51

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A large amount of social housing lies within a ten minute walk of Northumberland Park including Kenneth Robbins House and the surrounding small blocks, Robert Burns House, Charles Bradlaugh House, Haynes Close, Waverley Road, Rothbury Walk, Scotswood Walk, Blaydon Close and Trulock Court. It is true that many but certainly not all of the people who live in these blocks have below average incomes. However, putting their homes in Site allocations which will enable developers to demolish their homes will not benefit them at all. It is highly unlikely (see below) that most of them will be re-housed in the area. This means they will not benefit from the advantages of easy access to central London from the new Crossrail link in terms of work opportunities. Allowing these tenants to remain in the area with the Crossrail link will be a much better alternative to including their homes in Site Allocations NT3 and NT4. The only way to make this policy sound is to prevent demolitions and remove the council estates from Site Allocations.

FIGURE 5.11: North Tottenham Sites



Site Allocations in this Neighbourhood Area

5.103 The site allocations in this neighbourhood area are:

- NT3: Northumberland Park North
- NT4: Northumberland Park
- NT5: High Road West
- NT6: North of White Hart Lane
- NT7: Tottenham Hotspur Stadium

TABLE 5: North Tottenham Sites Capacity

Site	Net residential units	Commercial m <sup>2</sup>	Town Centre m <sup>2</sup>	Other m <sup>2</sup>
1 NT3: Northumberland Park North	472	340	340	-
NT4: Northumberland Park	1,929	1,550	1,550	-
NT5: High Road West	1,200	4,350	11,740	6,500
NT6: North of White Hart Lane	100	-	1,000	2,000
NT7: Tottenham Hotspur Stadium	285	730	36,600	-
Total	3,986	6,970	51,230	8,500

Infrastructure

5.104 The infrastructure projects in the neighbourhood area are:

- New pedestrian and cycling bridge at Northumberland Station.
- New and enhanced education facilities commensurate with the growth in forecast population in Northumberland Park.
- New health facility to be delivered as part of the redevelopment of Tottenham Hotspur Football Club.

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#### **Northumberland Park Joint Venture**

We are very concerned that the proposal to build new housing in Northumberland Park on the site of existing estates in fact bears no relation to local people's aspirations but could actually facilitate wholesale demolition and rebuilding. We find evidence of this in the proposed *Alterations to Haringey's Adopted Strategic Policies 2011-2026*. Alteration 53 sets out an initial list of housing estates to be 'regenerated'. Northumberland Park is one of the estates set out here. The reason box for Alteration 53 states that the alteration: 'Recognises the Council's commitment to improving its existing housing stock and the limitations of the Decent Homes Programme for a significant number of Council-owned homes.'

The Council has stated clearly their desire for the 'regeneration' of Northumberland Park to take place through a 'Development Vehicle'. Now according to Haringey Council's September 2015 *Future of Housing Review* the Development Vehicle the Council wishes to set up: 'is unlikely to be a refurbishment vehicle, and transfer would most likely be on the basis of decanting tenants and potentially offering them the opportunity to return.'

The clear implication here is that estates on the regeneration list, including Northumberland Park may well be knocked down. The idea of right to return is only stated as a possibility not a guarantee. Given reductions in government grants for new social housing build, it is very unlikely that Haringey Council could demolish the total number of council homes it is considering for demolition in Northumberland Park and re-provision anything but a small proportion of the homes at social rent. So-called 'Affordable Rented' housing and Shared Ownership are outside the income ranges of most Broadwater Farm residents and most Tottenham residents. Moreover, there are clear indications that all new housing built by Joint Ventures will be private not social in any case.

In this connection we must note the report of Julian Wain, the Independent Adviser to the *London Borough of Haringey Future of Housing Review*. In his report of September 2015 he writes that: 'At present local authority controlled companies can hold property exempt from the right to buy, but the government has signalled its intention to remove this exemption. This will leave joint venture vehicles, part owned by the private sector as the only mechanism whereby properties can be protected for social use. These will however, not be secure tenancies; but rather private rented properties let at secure or affordable rents.'

The Haringey Council Cabinet approved the establishment of a 'Development Vehicle' on 10/11/2015 on a Joint Venture model and tendering is now taking place. Therefore if there is new development on the estates, the tenants will only be given the option of return if they want to swap a secure, council tenancy for an insecure private tenancy. Given that virtually no tenants will want to do that, our only real option will be to accept a move onto another housing estate in Haringey. The existing residents of Northumberland Park will gain nothing from such a policy.

In this connection we must also mention the Council's proposed *Estate Renewal and Rehousing and Payments Policy*. This policy which is intended to determine how council tenants will be rehoused when their homes are demolished states: 'The Council will aim to offer secure tenants the option of returning to a new permanent home on their estate where possible, on a scheme by scheme basis.'

There is absolutely no guarantee that council tenants will be rehoused in the new homes on Northumberland Park. It is likely that they will just be put on the list to be transferred to other council estates in Haringey as seems to be happening to most of the Love Lane tenants (see below.) It is therefore clear that most of the council tenants in Northumberland Park have no real interest in the demolition of their homes and refurbishment not demolition should occur.

The only way to retain affordable housing in the area is not to knock down council estates in the first place. As the Our Tottenham Guiding Principles state, sites consisting of mostly viable buildings should not be earmarked for demolition. The council estates in Northumberland Park are viable and the provision of new high density estates with much less social housing will be disastrous, not an improvement. **Refurbishment does not require inclusion of areas NT3-5 on a site allocation therefore all council estates should be removed from the site allocations included in the Tottenham Area Plan.**

- New rail and station facilities at Northumberland Park associated with the delivery of increased rail connectivity, as well as Crossrail 2.
- New and enhanced bus routes reflecting the area's role as a key regional growth hub.
- Improvements to community infrastructure provision, including a crèche, a new library and education hub, a new healthcare centre including a pharmacy and new leisure facilities associated with the redevelopment of Tottenham Hotspur Stadium.
- Improvements to White Hart Lane Station and a new entrance to the station to align with the new public square and the new clear route provided by the square from the station to the new football stadium.

## **POLICY NT1: NORTHUMBERLAND PARK STATION**

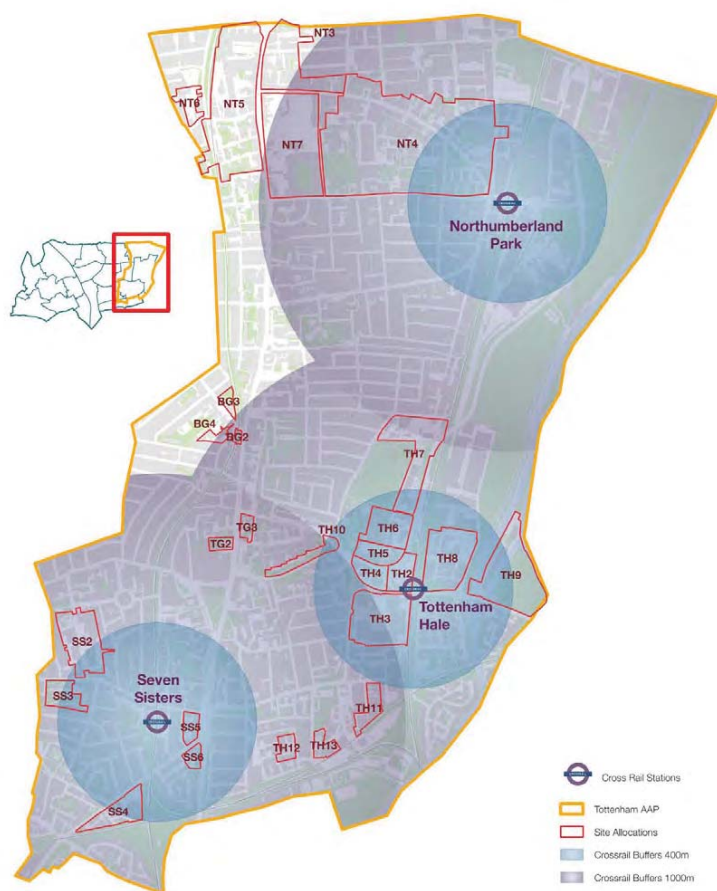
(Crossrail implications)

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

**5.105** The improvement of services through Northumberland Park Station will spur significant growth in the area. Currently, there are one to two stopping trains per hour. This will increase to four trains per hour by 2018 with the delivery of the Stratford, Tottenham and Angel Road (STAR) scheme. The STAR scheme also provides passive and active provision for future four tracking of the West Anglia Main Line, which would see further frequency improvements as well as the potential introduction of Crossrail 2 (where 16 trains per hour could stop at Northumberland Park). These improvements will mean that Northumberland Park will be connected to the City and the West end via frequent services, in less than half an hour.

**5.106** The area surrounding the Station can broadly be split into four quadrants, segregated by Park Lane and the rail line. The northwestern quadrant is included within the regeneration plans for the Northumberland Park estate (NT5). There are no detailed plans for any of the other land parcels surrounding the station at this time, but the Council considers a policy that ensures any nearby development is optimised with regards the improving services from this station is warranted.

FIGURE 5.12: Crossrail 2 Proposal



## POLICY NT2: STRATEGIC INDUSTRIAL LAND IN NORTH EAST TOTTENHAM

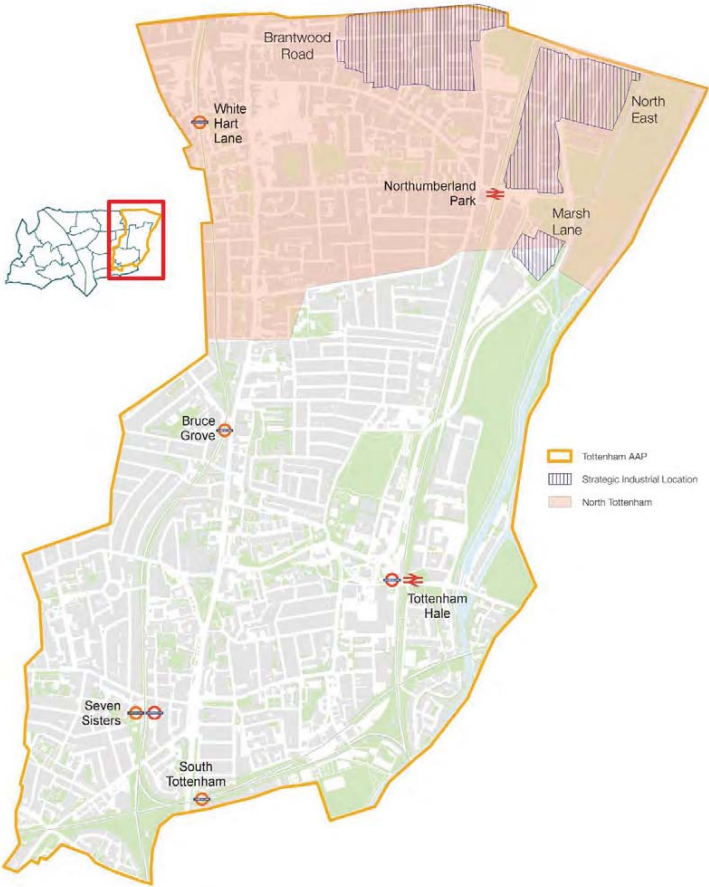
The Council will support development which:

- A Increases job density and therefore helps to meet the employment needs of the Borough;
- B Enables small firms to start up, and grow, in flexible industrial space;
- C Improves the interface of the industrial area and the Lee Valley Regional Park;
- D The Council will not encourage warehouse living or residential encroachment in this area.

**5.107** The reservoir of industrial land in the north east of Haringey is by some way the largest in the Borough. It is home numerous employers and jobs which have an important role in providing a range of types of jobs in sectors that, in many cases, are not suitable for co-location with residential areas. The products they produce, store, and provide a location for onward movement of, are crucial in keeping London's wider economy functioning. Additionally, it is these areas in which products will be created and developed for export, thereby contributing to the national economy.

**5.108** Tottenham has a strongly entrepreneurial population. There is a strong record of business births, but the record of these firms becoming larger firms which employ workforces is more mixed. It is essential that industrial areas such as the North East Tottenham area are preserved for this purpose. These locations are special due to their ability to provide a range of spaces, at relatively affordable rates, in close proximity to local populations and amenities. With the population and amenity set to grow, these areas will become even more valuable in providing a place for innovation to be translated into skills, jobs and economic benefit.

FIGURE 5.13: North Tottenham Strategic Industrial Land



5.109 It is therefore appropriate that in addition to simply protecting these assets, the Council will aim to support business growth, whilst improving the amenity of employment locations, so that they can adapt to meet the ever changing needs of emerging economic sectors. This could take the form of an intensification of uses, but this cannot happen at the expense of the area's ability to fulfil its overall function. In particular, heavy goods vehicle access will need to be provided. However, alongside this aim, the Council will seek to ensure that opportunities for increasing job densities are fully considered and exploited, wherever possible.



## NT3: NORTHUMBERLAND PARK NORTH



Site Allocation

Address	1-71 Northumberland Park, Roebuck, Altair, Bennetts, and Cooperage Closes, the Lindales, 7-27 Brantwood Rd, Tottenham N17		
Site Size (Ha)	4.9	PTAL Rating	4
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Mix of housing and local shopping centre uses		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham Physical Development Framework; Housing Investment and Estate Renewal Strategy		
Planning designations	North Tottenham High Road Conservation area North Tottenham Growth Area Local shopping centre Locally listed buildings: High Road Tottenham east side Listed buildings: 816 & 818, 820 and 822 High Road Tottenham Archaeological priority area		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	Town Centre m <sup>2</sup>
	472	340	340

## Site Allocation

**5.110** Comprehensive masterplanned improvement of the area to improve existing, and create new, residential neighbourhoods through the delivery of a major estate regeneration programme that will include: the provision of additional high quality housing with an increased range of types, sizes, and tenures; improvements to existing housing stock; new public spaces; and new community infrastructure. Town Centre uses will be encouraged on the High Road and Northumberland Park.

## Commentary

**5.111** The Northumberland Park North area will benefit from public transport improvements at both White Hart Lane and Northumberland Park stations, along with the redevelopment of the Tottenham Hotspur FC stadium. At present the estate suffers problems linked to low socioeconomic levels, lack of site permeability, and an unbalanced housing stock with an overbalance of small, socially rented stock. Due to the layout of the estate, there is an opportunity to make a more efficient use of space, which within the context of improving accessibility creates opportunities for increasing housing stock across the area.

**5.112** The introduction of Crossrail 2 to Northumberland Park Station in the future could produce a particularly significant uplift in accessibility within the area. Higher densities will be considered here once the introduction of Crossrail 2 is confirmed.

**5.113** Improvements to the internal road and street layout will improve legibility and permeability, along with optimising routes to Northumberland Park and White Hart Lane Stations. This will yield benefits in terms of residents' ability to reach the new urban squares and jobs created in the THFC stadium and High Road West developments, employment in the Brantwood Rd and Lee Valley employment areas, the Lee Valley Regional Park and the rest of London.

## Site Requirements

- Development will be required to be in accordance with a masterplan, prepared with resident involvement.
- The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
- Development will be in conformity with any future adopted masterplan for the area.

- Development will respond to the substantial adjacent changes in the High Road West, Tottenham Hotspur FC and Northumberland Park schemes.
- Redevelopment will create more, new, and better housing with greater diversity of scale, size, tenure and type.
- Generally mid-rise (3-10 storey as determined through detailed design) development will be appropriate.
- New east-west and north-south routes will be created, and existing routes enhanced. This includes enhancing Northumberland Park as a key bus route through the area, linking with Northumberland Park Station.
- Retention of good housing stock where appropriate.
- The High Road frontage should be enhanced including through the retention of buildings that make a positive contribution to the conservation area and the improvement of public realm on Tottenham High Road.

## Development Guidelines

- New high quality public spaces should be created within the site, with a net increase in the amount of publically accessible open space.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Development should complement the amenity provided by Florence Hayes Rec (in the borough of Enfield).
- Where development is likely to impact heritage assets, a detailed assessment of their significance and their contribution to the wider conservation area should be undertaken, and new development should respond to it accordingly.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Approaches to mitigation of and improvement to local air quality and noise pollution should be undertaken on this site.

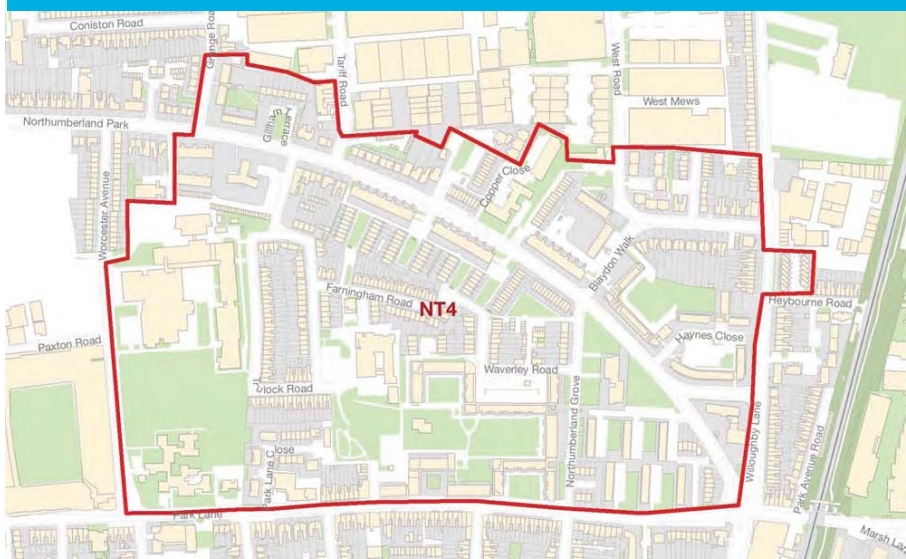
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In the context of the Northumberland Park Masterplan's scenarios for mass demolitions of council housing it is obvious that the large amount of social housing or 'unbalanced housing stock with an overbalance of small, socially rented stock' is seen as a problem by the Council rather than a reasonable response to the level of housing need in the area.

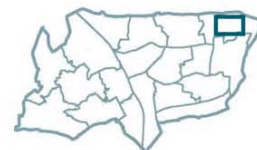
The Council's response to this alleged problem is: 'Redevelopment will create more, new, and better housing with greater diversity of scale, size, tenure and type.'

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

## NT4: NORTHUMBERLAND PARK



Address	Northumberland Park Estate Area, Tottenham, N17		
Site Size (Ha)	27.6	PTAL Rating	2-4
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Predominantly housing with ancillary commercial and community uses.		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham Physical Development Framework; Housing Investment and Estate Renewal Strategy		
Planning designations	North Tottenham Growth Area Locally listed buildings: Northwood Road Archaeological priority area		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	Town Centre m <sup>2</sup>
	1929	1,550	1,550



Site Allocation

### Site Allocation

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

### Commentary

**5.115** The Northumberland Park area will undergo significant change through benefiting from public transport improvements at Northumberland Park Station, the opportunities resulting from the redevelopment of the land to the West of the High Rd (NT6) and the Tottenham Hotspur FC stadium (NT7).

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We believe that the Council will not be able to reprovide genuinely affordable housing in the Northumberland Park area if its plans for mass demolitions go ahead. The *Northumberland Park Strategic Framework Report* (i.e. the 'Masterplan') only provides for the preservation of a very small percentage of the existing council homes in any of the scenarios. Even in the 'Minimal Intervention' scenario only 183 council homes are preserved with 1154 council homes (909 tenanted and 245 leasehold) being demolished. It is therefore dishonest to argue that good quality homes will be preserved when actually the emphasis is on mass demolition and new provision of mainly high density non-social housing. Nowhere in the *Northumberland Park Strategic Framework Consultation Report* does it indicate that the residents of Northumberland Park were told by any representative of the Council that the Council's plans would mean the mass demolition of council housing. It is grossly unacceptable to consult about a regeneration plan without informing residents of the scale of demolitions contemplated. Our Tottenham therefore believes that a lawful consultation into the demolition of such a large quantity of council housing has not taken place. The Site Allocations NT3-5 are therefore unsound and all council housing should be removed from them. Instead the refurbishment of council estates should be carried out which does not require inclusion in Site Allocations in the Local Plan.

- 5.116** At present the estate experiences conditions linked to high levels of socio-economic disadvantage, lack of site permeability and an unbalanced housing stock with an overbalance of small, socially rented stock. Due to the layout of the estate, there is an opportunity to make a more efficient use of space, which within the context of improving accessibility creates opportunities for increasing housing stock across the area.
- 5.117** The introduction of Crossrail 2 to Northumberland Park Station will create a significant uplift in accessibility within the area, and the Council is therefore planning for higher development densities.
- 5.118** Improvements to the internal road and street layout will improve legibility and permeability, along with optimising routes to Northumberland Park and White Hart Lane Stations. This will yield benefits in terms of residents' ability to reach the new urban squares and jobs created in the THFC and High Road West developments, employment in the Brantwood Rd and Lee Valley employment areas, the Lee Valley Regional Park and the rest of London.

## Site Requirements

**1** Development will be required to be in accordance with a masterplan, prepared with resident involvement.

- The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
- Development will be in conformity with any future adopted masterplan for the area.
- Redevelopment will create more, new, and better housing with greater diversity of scale and tenure and type, and will contribute to the creation of a family housing area.
- Development will support and enable the creation of a high quality public space network including new squares, parks, landscaped routes and bridges, connecting the regeneration schemes with the open spaces and waterways of the Lee Valley Park.
- Existing east-west routes will be enhanced, including utilising Park Lane as a pedestrian and cycle friendly route linking Tottenham High Road, the existing Park Lane Local Centre, Northumberland Park Station and the Lee Valley Regional Park.

- Work in conjunction with Transport for London to investigate opportunities for improving bus routes through the area and links with Northumberland Park Station.
- Changes to the road network in the area will be created with the aim of increasing permeability. There will be a strong focus on creating new north-south streets. New streets must connect to existing streets to the north and south of the area, and to new spaces proposed around the new stadium development to the west.
- Retention of good housing stock where appropriate, any future Council-approved masterplans will identify how new and existing stock can be utilised.
- Taller buildings will be located at the south east corner of the site as part of the proposed Northumberland Park tall buildings cluster, and in the west and south west of the site adjacent to the larger scale stadium development.
- Small scale commercial development will be created along Park Lane and in close proximity to Northumberland Park Station. Any commercial uses should not detract from the main aim of concentrating town centre uses on the High Road.
- New health infrastructure will be provided within the area to meet the needs of this location.
- Education infrastructure will be enhanced including the provision of new schools to meet the overall need of the neighbourhood on this site.

## Development Guidelines

- New high public spaces should be created within the site, with a net increase in the amount of publically accessible urban realm.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- The potential for new employment opportunities to be developed along Park Lane should be explored, in line with the Council's ambitions to revitalise this key Local Centre.
- Generally mid-rise development (3-10 storeys) will be appropriate, dependant on detailed design considerations, with greater height and density near to Northumberland Park station and the Tottenham Hotspur FC development
- Development should complement the ongoing operational requirements of THFC.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

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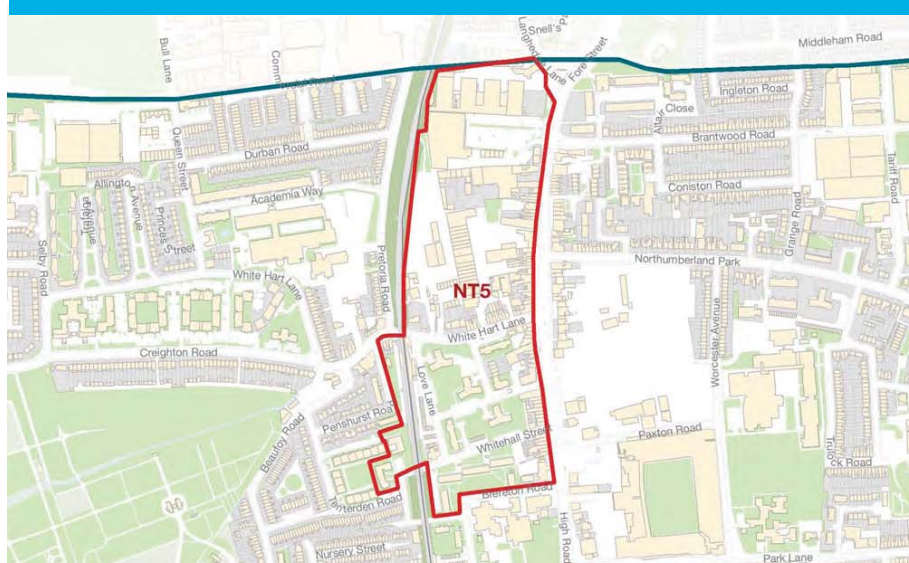
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**Height of Housing Proposed in Regenerated Area and Gardens.**

The Northumberland Park Masterplan- the *Northumberland Park Strategic Framework Report* states that new homes in the area will be between 3-10 stories. Our Tottenham believes that Tottenham's existing pattern of low-rise housing (2-3 stories) in residential suburban development should be respected. The high-density plans for Northumberland Park sound nightmarish. It is clear that the whole process of developing the plan for Northumberland Park has used very misleading language. The *Northumberland Park Strategic Framework Consultation Report* suggests that respondents wanted homes with gardens to be built. The 'traditional street pattern principle here seems to relate to such aspirations. The high-density plans, however, are clearly about housing most residents in blocks not houses (see the plan for the new blocks on page 97 of the Strategic Framework Report.) The gardens referred to are therefore communal which is not what most residents imagined when they agreed with an aspiration for homes with gardens. Existing council estates have communal gardens. The 'home with a garden' promise appears to have been used to deceive residents into supporting Council demolition plans. Again it is clear that the alleged consent of local residents to the Council's regeneration plans is not informed consent.

## NT5: HIGH ROAD WEST



Site Allocation

### Site Allocation

**5.119** Masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London. The residential-led mixed-use development will include a new high quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.

### Commentary

**5.120** This site will deliver a new residential neighbourhood, which will provide high quality new homes for existing secure Council tenants living on the Love Lane Estate and provide better housing choice for existing and future residents. The development will build on the redevelopment of Tottenham Hotspur Football Club stadium and create a new vibrant leisure destination for London.


**5.121** A new public space will create a new route from White Hart Lane Station to the High Road and stadium, bring improved town centre and leisure uses to the North Tottenham area and provide space for new community and leisure uses, creating a year round focus for the area.

**5.122** New employment opportunities will be created from the expanded local centre, leisure destination and delivery of new high quality workspace.

Address	High Road West regeneration area, High Rd, Tottenham N17		
Site Size (Ha)	11.8	PTAL Rating	4
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Mix of housing estates, industrial estate, high street buildings, and other uses.		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	High Rd West Masterplan		
Planning designations	North Tottenham Growth Area Listed buildings: 7, 32, 34 & 34a White Hart Lane and 797 & 799, 819 & 821 and 867 & 869 High Road Tottenham North Tottenham Conservation Area (part of Tottenham Historic corridor) Locally listed buildings: Whittington Road Blue ribbon network Archaeological priority area Adjacent to the ecological corridor		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	Town Centre units
	1,200	4,353	11,740
			Other m <sup>2</sup>
			1,200



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We support the representation separately made by the Tottenham Business Group with regard to NT5.

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A sound plan should be positively prepared. The statutory examination of the Allocations DPD and Area Action Plans for Tottenham must consider that this scheme is the "most appropriate when considered against more reasonable alternatives based on proportionate evidence". The evidence now out for consultation does not support a strategy based on a stadium scheme. The scheme was found by the Inspectors Report on the Archway Metal Company to deliver little or no benefit against tremendous adverse effects for established local business. The documents out for consultation are flawed in many ways. The Scoping Reports for both the Allocations DPD and The Area Action Plan provided no information as 'to reasonable alternatives' to the present proposed plan.

The proposal for NT5 was prepared on the back of the existing Tottenham Hotspurs FC scheme for a sports and leisure destination. The concept that the area should be a major sport and leisure area was adopted as set in stone. It was not tested through consultation. The Master plan for NT5 was presented ahead of the AAP and DPD documentation. The Council has commented that it was able to set objective strategies but this does not hold true in the evidence. Six plans were drawn up by ARUP, one of which would have retained the existing local businesses. This or a variation of this was not presented as a reasonable alternative to the community. Strong representations by the Tottenham Business Group representing the threatened local sites to redress this by incorporating some of its features to the Council selected Option. At the initial Consultation each version of the plan presented had no alternative to the demolition of local shops and businesses. These demolitions can only be directly attributable to the needs of the Stadium Development NT7.

The needs of the Stadium Development were allowed to prejudice the NT5 plans. No reasonable alternatives were given. NT5 is inherently linked to the Stadium. It is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. To that end discussion of local proposals for modest changes to retain the local business base was not tolerated.

NT5 is unsound because the question remains whether in accordance with paragraph 182 of the NPPF it is 'justified' in the sense that is the most appropriate when considered against the more reasonable alternatives, based on proportionate evidence. The Stadium Scheme has been acknowledged publicly as delivering paltry benefits" against the tremendous adverse effects for established businesses. This has been intensified by the new plans for a more intensively developed site.

There is no evidence and no information in any of the documents, which have been out for consultation during this process as to "reasonable alternatives' to the present proposed scheme. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that 'sustainability which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment.

The exclusion of the community from the initial stages of the formulation of the Plan, their continued pressure for an alternative to save established local business and the failure of Haringey to address this issue is a huge omission. The plan cannot be claimed to be robust unless there is a resolution.

Haringey Council has an obligation to understand and provide support for its existing economy. The Locally significant employment sites in High Road West NT5 have been removed despite their strengths and against evidence in the Employment Land Study 2015 where paragraph 2,26 pledges to safeguard the best sites. They fulfill all the economic and land use criteria in particular with regard to the provision of SMEs and are part of a larger cluster of existing industrial activity. Their removal would inhibit the operations of the nearby industrial uses with which they interconnect. In the Employment Land Study March 2015 Consultation High Road West was described as "a locally significant site providing a range of B2 uses. It was viewed as important to safeguard B2/B8 uses and recommended as vital that any B class jobs affected are either relocated to suitable premises or to existing employment sites.

## Site Requirements

- The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
- Development should accord with the principles set out in the most up-to-date Council-approved masterplan.
- **1 Creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).**
- Creation of a new public square, connecting an enhanced White Hart Lane Station, and Tottenham High Road, to complement the redeveloped football stadium.
- New retail provision to enlarge the existing shopping parade, creating a new local centre opposite the new stadium, including the new public square. This should complement not compete with Bruce Grove District Centre.
- Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity.
- Improve east-west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Regional Park.
- The site lies within the North Tottenham Conservation Area, and includes listed and locally listed buildings. Development should follow the principles under the 'Management of Heritage Assets' section of this document.
- The regeneration of heritage assets should be considered where the benefits of change and sympathetic development can enhance the overall feasibility and benefit of the future investment into the future of heritage buildings in the area.
- Deliver new high quality workspace.
- Increase and enhance the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area, including:
  - A new Learning Centre including library and community centre;
  - Provision of a range of leisure uses that support 7 day a week activity and visitation; and
  - Provision of a new and enhanced public open space, including a large new community park and high quality public square along with a defined hierarchy of interconnected pedestrian routes.

## Development Guidelines

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

 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 14:52:09

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

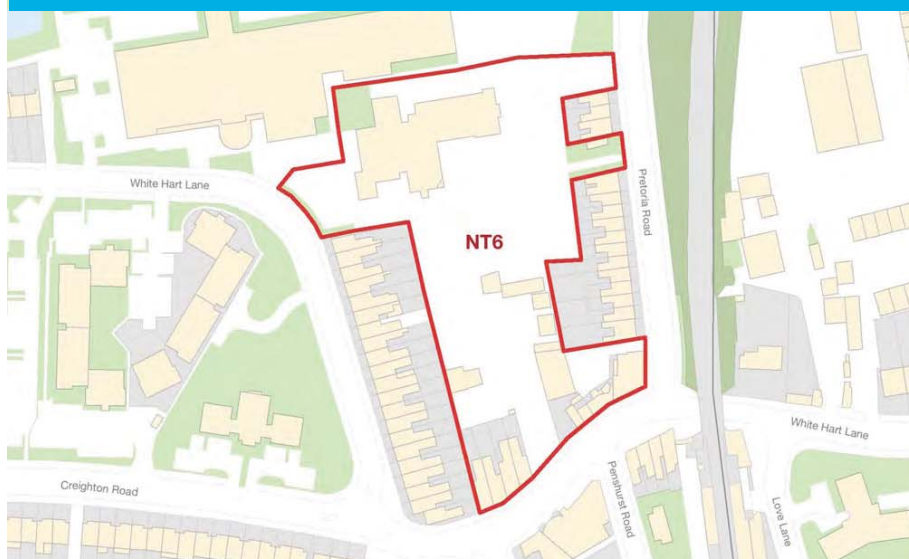
The *High Road West Consultation Feedback* states clearly that Love Lane residents wanted to remain as Council tenants. No scheme has ever been identified by the council that might have allowed all Love Lane residents to come back into new properties on the existing site as council tenants. Indeed policy towards rehousing Council tenants has always been the opposite. After the Love Lane consultation the Council made the following policy statement: '...re-provision of low quality existing council housing with an equal quantum (on a habitable rooms basis) of higher quality modern social housing is not a financially viable option. The building of higher density mixed tenure developments, which increase the quality and range of the affordable housing options for local people is likely to be the only realistic options [sic], and even then, will require significant public subsidy may require flexible application of normal planning policy expectations for affordable housing provision.'

We accept that this statement is missing from the new version of this document. However, the new proposal for Northumberland Park is for the building of new housing by a Joint Venture. As noted in our response to the 'Key Objectives for Northumberland Park section (above) the Joint Venture scheme being proposed for Northumberland Park will provide private tenancies not Council tenancies.

In addition we must note that still in 2016, 4 years after consultation with the residents of Love Lane began, no concrete plans are in place to re-house Love Lane residents in newly built homes on the Love Lane site. We cite in evidence for this the result of a Freedom of Information request made by Jacob Secker regarding this issue (see Appendix for a copy of the full correspondence.) As of 23/02/2016 the Council does not have a list of those who want to be re-housed on the site of the existing Love Lane estate. This indicates that there is no clear plan for rehousing tenants in the new housing. We believe that without such a plan demolition should not go ahead. This is because the alleged agreement of Love Lane residents to demolition was predicated on promises that they would be re-housed in the new housing.

The Council should never have let the residents of Love Lane believe that new council homes would be built on the Love Lane site if they went along with the demolition of existing homes. Consulting on something that the Council was never going to let happen without making this clear to residents was dishonest and invalidates the results of the consultation. We believe this was unlawful. It is clearly inappropriate and was a fairly underhand way of convincing the residents that the alternative of refurbishment not demolition for the Council homes on this site was not something that needed to be considered as they would all be getting new, homes with better facilities anyway. Given that the latter is not true the whole basis for demolition and including the Love Lane estate as a site allocation is fatally undermined and the Love Lane should therefore not be included in this site allocation. Plans for refurbishment should be advanced rather than demolition. The Council should be honest about the chances of Love Lane residents being re-housed in proposed new buildings on the site and be honest about whether they will have Council, permanent secure tenancies and their rent levels if they do move to the new housing. Once honest information has been given residents of the estate could have been balloted on whether they want refurbishment or demolition.

## NT6: NORTH OF WHITE HART LANE



Site Allocation

Address	1-6 White Hart Terrace, 74-80 White Hart Lane Haringey Irish Cultural & Community Centre, Pretoria Road, Tottenham, London N17		
Site Size (Ha)	1.0	PTAL Rating	4
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Community facility, employment land		
Ownership	Mix of public and private freeholds		
How site was identified	SHLAA 2013		
Planning designations	Flood Zone 2 Archaeological priority area		
Indicative Development Capacity	Net residential units	Town Centre m <sup>2</sup>	Community m <sup>2</sup>
	100	1,000	2,000

## Site Allocation

**5.123** Masterplanned comprehensive residential-led mixed-use development with the potential to accommodate community uses, improve accessibility, and enhance the White Hart Lane retail frontage.

## Commentary

**5.124** There is an opportunity to improve the standard of the local retail offer in this area. Subject to the needs of the occupants of the Irish Centre being suitably met, and increases in employment numbers and density on this site, residential use will be permitted.

## Site Requirements

- The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
- Development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets this policy and does not compromise co-ordinated development on the other land parcels within the allocation.
- A new east-west route across the northern part of the site, linking White Hart Lane and Pretoria Road, and enhancement to north/south access to improve permeability.
- White Hart Lane retail premises should be enhanced through any development and retained for town centre uses.
- The existing community use should be re-provided before any redevelopment occurs.

## Development Guidelines

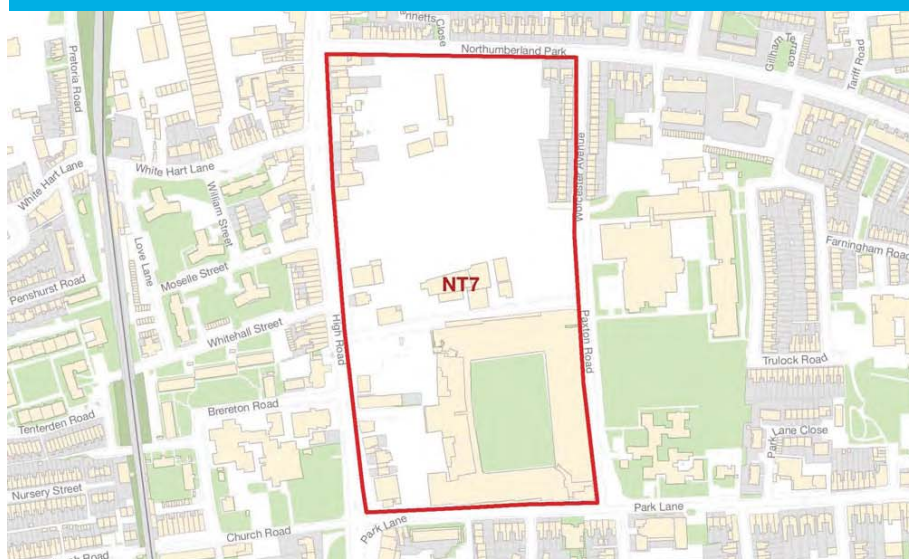
- The potential for a new north-south route linking the new east-west route to White Hart Lane at the south of the site should be considered.
- The height of development should respect neighbouring buildings, particularly adjacent to the properties on Pretoria Road.
- This site is identified as being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

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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:28:50

We strongly oppose the loss or displacement of a community facility and employment land. The continuous existence of the Irish Centre needs to be guaranteed in the site requirements, not 'the potential to accommodate community uses'. Specify that the existing community use should be re-provided **ONSITE** before any redevelopment occurs.

## NT7: TOTTENHAM HOTSPUR STADIUM



Site Allocation

### Existing Planning Permission (HGY/2010/1000)

**5.125** Demolition and comprehensive redevelopment of a stadium (Class D2) with hotel (Class C1), retail (Class A1 and/or A2 and/or A3 and/or A4 and/or A5), museum (Class D1) offices (Class B1) and housing (Class C3); together with associated facilities including the construction of new and altered roads, footways, public and private open spaces; landscaping and related works. Details of "appearance" and "scale" are reserved in relation to the proposed residential and hotel buildings



Address	748 High Road, Tottenham, London N17 0AP			
Site Size (Ha)	9.2	PTAL Rating	3	
Timeframe for delivery	2011-2015	2015-2020	2020 onwards	
Current/Previous use	Football Stadium (Leisure), Technical College and Sainsbury's (as a result of the extent of planning permission)			
Ownership	Multiple private freeholders and leaseholders			
How site was identified	Existing planning permission			
Planning designations	North Tottenham High Road conservation area North Tottenham Growth Area Local shopping centre: 34 Locally listed buildings High Road Tottenham east side Listed buildings: 744 (Warrington House), 774 (Fletcher House), 790 (Dial House), 792, 794, 796 (Percy House), 798-802, 808 & 810 High Road Tottenham N17			
Indicative Development Capacity (HGY/2010/1000)	Net residential units	Town Centre m <sup>2</sup>	Community m <sup>2</sup>	Commercial m <sup>2</sup>
	285	36,600	570	730

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 Number: 1 Author: Our Tottenham Subject: Sticky Note Date: 04/03/2016 15:30:07

The Tottenham AAP DPD does not consider research on stadium led development and regeneration, which finds very little contribution to the local economy – jobs provided are generally small scale and part time and arguments about local multiplier effects do not take place in practice. Therefore, the new Spurs stadium should not be presented as a driver of economic development in Tottenham. See response submitted in the March 2015 Local Plan consultation by Mark Panton, Birkbeck University, on this point for more information, and the recent London Assembly Regeneration Committee report on this topic.



## 1 Site Allocation

- A Redevelopment of existing football stadium to increase match day capacity, with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site.
- B The Council will support a mix of leisure uses around Tottenham Stadium to ensure it is a destination on match and non-match days;
- C Development will contribute to creating a wider commercial and visitor destination for the area;
- D Walking and cycling are important modes of transport around the Stadium, and links will be encouraged, particularly between nearby stations at White Hart Lane and Northumberland Park, and the Stadium;
- E New health uses will be incorporated into the Stadium

## Commentary

5.126 The London Borough of Haringey is proud of its long association with Tottenham Hotspur Football Club. It is a major employer in the Borough and important for Haringey's economic success. **The Council will, where appropriate, continue to work with the Football Club** to ensure appropriate nearby developments capitalise on the opportunities presented by the existing and proposed stadium, which enhance the investment in the stadium and surrounding areas and respect the operational needs of the Football Club. Leisure uses around the stadium will encourage a wider audience on non-match days to ensure a viable and vibrant location throughout the year, creating an attractive environment for residents and non-residents to visit.

## Site Requirements

- Development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets this policy and does not compromise co-ordinated development on the other land parcels within the allocation.
- Comprehensive stadium-led development will be required across the site.
- High quality design that responds positively to the heritage context and provides active frontages to the High Road and Park Lane.
- Improved permeability across the site, linking High Road West and Northumberland Park regeneration areas.

- Improved physical and operational interface across Worcester Avenue to the Northumberland Park regeneration area to the east, and the High Road to the High Road West regeneration area to the west, in order to support regeneration objectives for those area.
- High quality, publicly accessible and activated spaces within the site on non-match days that complement other public realm/spaces in the area and link with key existing and future walking and cycling routes in the locality.
- The leisure/commercial uses should be complementary and not compete with the uses proposed on the expanded Local Centre on the western side of the High Road within the High Road West area.
- **The site lies within the North Tottenham Conservation Area and includes listed and locally listed buildings. Development should follow the principles under the 'Management of Heritage Assets' section of this document.**
- To address the statutory presumption in favour of retaining heritage assets unless justifiable.
- **An increase in residential on the site.**
- Comprehensive approach to delivering physical improvements to the Northern Terrace, including the identification of viable, long term uses for vacant buildings.
- An Event Management Strategy will be required.

## Development Guidelines

- New high quality public spaces should be created within the site, with a net increase in the amount of publically accessible urban realm.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- The Council will seek to maximise local employment outcomes on this site.
- Where development is likely to impact heritage assets, a detailed assessment of their significance and contribution to the wider conservation area should be undertaken and new development should respond to it accordingly.

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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:33:46

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We support the representation separately made by the Tottenham Business Group with regard to NT7.

The Draft site NT7 was based on the NDP scheme promoted by THFC. Original permissions were granted on the basis of planning policies contained in the UDP, which were withdrawn. The developments were perpetuated based on a former planning regime when new sustainable policies had been prepared that could have secured more sustainable planning outcomes. There were a number of schemes/alternatives that were better than the NDP scheme but the site application was not flexible enough to have captured these benefits from different options. The proposed scheme does not significantly improve the economic and social wellbeing of the area, which was confirmed by the Inspectors report on the CPO inquiry into Archway Metals company. It was made clear that converting the NDP scheme to a site allocation would depend on public sector funding which could be more effectively invested in a more appropriate regeneration and environmental purposes.

This position has been exacerbated by the new Stadium application, which allows a massively increased stadium size and huge elevations for additional development on the South side.

The site was originally allocated to reflect approved planning application when it was in fact the subject of a prolonged CPO inquiry, it should have been selected on the basis of a legally compliant SEA and Sustainability Appraisal. This is surely unsound unlawful practice.

The Draft Site Allocation did not consider the merits of alternative schemes and is solely based on a scheme promoted by THFC. It shows a profoundly flawed methodology which is not a sound basis for established land use allocations within a Site Allocation DPD under Part 2 of the Planning and Compulsory Purchase Act 2004(as amended) the regulations and the NPPF.

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 Number: 2 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:32:14

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Heritage buildings should be retained.

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 Number: 3 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:32:18

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All housing development at this site should be genuinely affordable social housing and matching the scale of the nearby terraced housing.

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 Number: 4 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 15:33:39

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S.106 obligations should be restored.

## 1 TOTTENHAM HALE NEIGHBOURHOOD AREA

### Vision

**5.127** The Vision, as expressed within the Strategic Regeneration Framework, and District Centre Framework:

**5.128** *London's next great new neighbourhood, Tottenham Hale will be a destination where people can easily access the open spaces and waterways of the Lee Valley Park whilst enjoying a range of retail, leisure and business opportunities. The Hale will feel like a new town centre with an attractive network of streets and public spaces. Through transport improvements, master planning and targeted promotion, key sites will be made ready for major new investment.*

### Key Neighbourhood Area Objectives

**5.129** The key objectives for this neighbourhood area are:

- A revitalised heart, through the creation of a distinctive new mixed use district centre incorporating higher density development. The boundary and uses to be delivered are set out in TH1. The development of a new district centre will require management of the impacts of new development on retained residential, employment and open space assets.
- A well connected centre, with a quality, attractive public realm which stitches the neighbourhood together, including key links to an enhanced Tottenham Hale Station.
- A network of green and open spaces, with an emphasis on improving the quality of links to existing open spaces, including Down Lane Park, and to and through the Lee Valley Regional Park. There will be a need to enhance existing green open spaces and infrastructure in response to the proposed level of development. General principles are set out in AAP8, and will be complemented by the Site Allocations in this Neighbourhood Area.
- An affordable 21st century neighbourhood of choice, with a range of housing tenures and types. This includes the improvement of community facilities including a new health and education facilities to meet the need of an expanding population.

- A working centre, with a variety of economic and employment opportunities. The existing employment stock in the area will be enhanced in response to established trends (e.g. emerging creative businesses to complement an innovative warehouse living community in the South Tottenham Employment Area), or to support emerging drivers, such as a potential Tech Hub centred on the Ashley Road area. The District Centre will provide a mix of retail, leisure and office jobs.

### The Character of the Neighbourhood Area

- 5.130** Tottenham Hale has a unique position on the River Lee, and itself is a mixture of Victorian and Edwardian streets, and industrial stock forming part of the Lee Valley area. Beyond the industrial to the East lies the Lee Valley Regional Park, including Tottenham Marshes, and Walthamstow Wetlands. This interface, along with its position a distance away from Tottenham High Road, can make Tottenham Hale feel distinct from the rest of Tottenham.
- 5.131** Tottenham Hale is well connected in that it is easy to reach; Tottenham Hale Station offers direct and fast routes to the City of London, the West End, Stansted Airport and Stratford. It does, however, suffer from extreme severance in the form of a number of busy through routes, heavy rail infrastructure, and large inward looking, post-war development.
- 5.132** The convergence of a number of routes (Monument Way, Hale Road, Ferry Lane and Watermead Way) combines to frame the centre of Tottenham Hale. Historically, this formed the medieval village of Hale, from where the area derives its present name. The original village centre is designated as an Area of Archaeological Priority. The later industrial development is evident in the myriad of Victorian and Edwardian warehouses and factory buildings such as those along Fountayne Road and Ashley Road, adding to the vibrancy of the area's character.
- 5.133** Currently the principal land use in this area is the Tottenham Retail Park, offering car-borne retail opportunities. In addition to this there are employment areas to the north along Ashley Road, and in the South Tottenham employment area. The gyratory works to reintroduce two-way roads in the area are the first step in regenerating Tottenham Hale from a road, to a rail and pedestrian dominated area.
- 5.134** There are several open spaces in the area; in addition to the Lee Valley Regional Park, Down Lane and Markfield Parks offer excellent recreation opportunities. Linkages between and through these spaces can be improved however. Some parts of the network are less successful as opportunities for residents or wildlife and will benefit from further investment as the area grows.

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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 14:02:26

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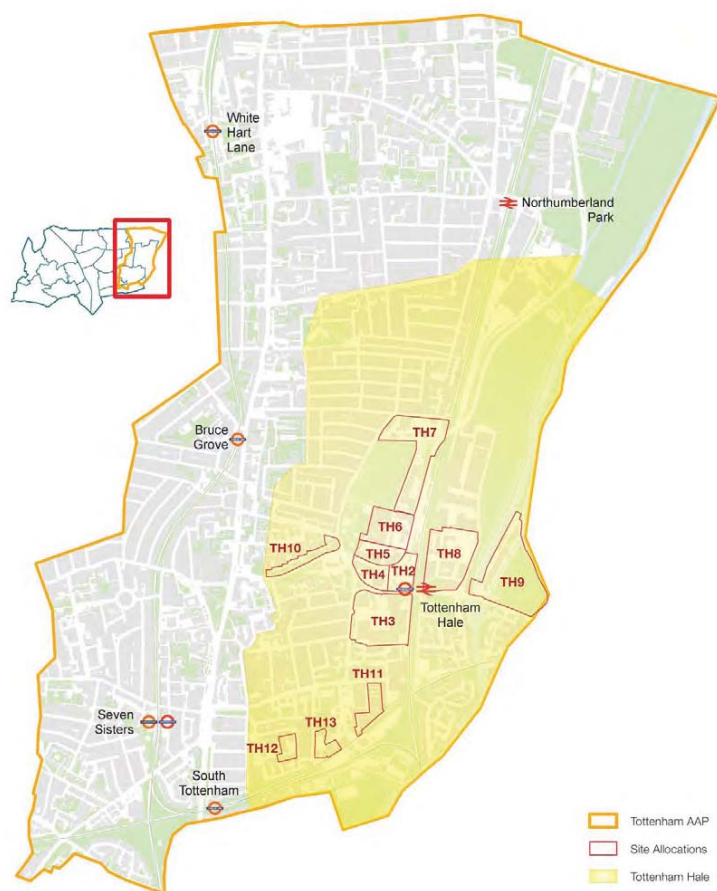
One of the implementation considerations set out as an introduction to the plans for Tottenham Hale TH1 – TH13 *states* that this is an area where '*targeted investment can best accelerate the delivery of substantial volumes of new homes and jobs*'. It suggests that for 5000 homes and 4000 jobs to be created, there is a need for 'early infrastructure planning' with reference to utility providers. Yet, the infrastructure is more than utilities; scant and superficial mention is made of the need for a health infrastructure for example, which even now, before 5000 people move in, is entirely inadequate for the local population. People moving into Hale Village find it difficult to register with a GP for example and things have not yet improved. One GP surgery in some type of temporary building is due to opening April 2016, but this is only after a very long campaign. It does not bode well for future infrastructure developments especially for health services.

The housing proposed in the plans is largely high rise tower blocks. These are likely to be one and two bedroom flats. Para 5.143 states that 'higher levels of family housing will be concentrated on sites less proximate to the centre...' Where will these be, and will they be genuinely affordable social housing for the hundreds of families in housing need in Tottenham? Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise.

The entire thrust of these plans is to create a forest of tower blocks which will impact on our local physical environment; our park; and on local families who need proper affordable homes. Little account is taken of these matters in these proposals which give a green light to developers to build over 15 storeys and with high densities. We oppose this approach since it will change the character of the area, pays no regard to the quality of life of existing residents and has very scant provision for social housing.

Tottenham Hale has a very high proportion of families living in private rented and temporary accommodation. The AAP for Tottenham Hale does not mention tenants yet the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments

FIGURE 5.14: Tottenham Hale Neighbourhood Area



## Urban realm improvements

5.135 The urban realm improvements for the neighbourhood area are:

- A new high quality, more permeable street layout for the District Centre will be established.
- A network of green and open spaces will be established through the Haringey Green Grid to link open spaces in Tottenham Hale with other spaces in Tottenham and beyond.
- A Meanwhile Strategy will set out how opportunities for interim and creative uses can be brought forward as the area undergoes significant development.
- Ashley Road will be the key north-south route, linking education and employment facilities with the District Centre, and then through to the South Tottenham employment area, primarily by foot.
- Active frontages within the new District Centre will improve the feeling of safety all day and into the evening.
- There will be a generous, accessible, legible and safe pedestrian/cycle friendly network linking Tottenham High Road into the Lee Valley Regional Park system, this is described in more detail in the Council's emerging Green and Open Spaces Strategy for Tottenham Hale; the Tottenham Hale Green Grid. The strategy is part of the Haringey Green Grid, part of the London Green Grid.
- At the Retail Park site, the incorporation of a public square will be a focal point for the community.
- The River Lee's role for amenity and leisure will be strengthened; including improved riverside routes through new developments, and enhanced links to The Paddock and the proposed Wetlands Centre.
- The proposed Green Grid will see a number of green infrastructure interventions with the aim of improving public accessibility to the open landscapes of the Lee Valley Regional Park in line with the Lee Valley Regional Park Plan. The Green Grid will also aim to address the quality of existing green and open spaces, in response to the development set out in this Plan.

- An early phase of the Green Grid will be an improved route along Chesnut Road to Down Lane Park and over new bridges connecting Ashley Road to Hale Village and then to The Paddocks. A new route through Ashley Road South will be created with a new bridge over the railway lines into Hale Village as per the existing design code, and then to Tottenham Hale.
- Sites where the proposed alignment crosses over privately owned land area are included in this AAP as site allocations. Development proposals that come forward on these sites must facilitate the delivery of this new route. Any development proposals which would hinder the delivery of this new route, or require land which is necessary to deliver the proposal will be resisted.

## Implementation Considerations

**5.136** This area is allocated for transformational change as part of a planned process.

Respect will need to be had for neighbouring uses, both in the form of existing residential, and biodiversity in the case of the Lee Valley Regional Park. A District Centre Framework has been prepared by the Council, in consultation with landowners to establish a set of principles that can accommodate the growth envisioned in the area.

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

**5.138** The Council and the Mayor of London have agreed a package of investments for Tottenham, focusing on Tottenham Hale under the Housing Zone scheme. This investment will see the accelerated delivery of an initial 2,000 homes, primarily within the District Centre. The Housing Zone will help to ensure the delivery of a mix of affordable homes to rent and to buy.

**5.139** Through these interventions, including improved public realm, pedestrian links and new bridges over railway lines and waterways, Tottenham Hale will become a destination where people can easily access the open spaces and waterways of the Lee Valley Park. Removing the barriers to the Lee Valley Park and creating a sustainable network of cycle and pedestrian routes is a key objective of the Upper Lee Valley Opportunity Area Planning Framework and is now reflected in the aims of the Area Action Plan and Tottenham's Housing Zone.

**5.140** In recognition of Tottenham's housing potential, it is important to create expanded infrastructure facilities in the local area. The establishment of Tottenham Hale as a highly accessible District Centre make it the ideal location to accommodate new infrastructure, including the Harris Academy, and a new health facility.

**5.141** The introduction of Crossrail 2 to Tottenham Hale will create opportunities, but will also require land. This project is currently anticipated to undergo construction in the 2020-26 period of the plan, and may require land to be made available for its construction. This will be managed using policy TH1.

**5.142** Due to the changing nature of the area, a different approach to calculating capacity development in this area has been taken. As recommended in the Council's Urban Characterisation Study, this area is forecast to transition from an "Urban" to a "Central" area as public transport connections are continued to improve, and the District Centre is established.

**5.143** Tottenham Hale will provide a range of housing with a mix of affordable and private units, and a range of sizes of unit. The delivery of one and two bed units will be prioritised within close proximity to the Station, to support the developing District Centre. Higher levels of family housing will be concentrated on sites less proximate to the centre, in areas with good access to open space and social infrastructure provision.

**5.144** Employment land in this area will be retained and intensified in order to create a greater job density, whilst recognising that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives. New higher density employment and education uses will be sought in the Ashley Road area in the short term. These will require high quality urban realm, with swift and safe access to the District Centre to be created via Ashley Road to draw businesses to the area. Additionally, in line with our Telecommunications Policy DM54, super fast internet will be prioritised for delivery in this area to enable technology-based businesses to locate here.

**5.145** The South Tottenham employment area is establishing itself as a creative node with a reputation that is becoming known across London. There is the opportunity to build on this success by retaining existing industrial buildings and converting them to viable uses such as flexible work spaces and creative workshops. This in turn will create opportunities for start up firms to grow in this area, complemented by an emerging warehouse living area.

## Infrastructure

**5.146** The infrastructure projects for the Neighbourhood Area are listed below. A full list of projects across the Borough is set out in the Infrastructure Delivery Plan.

- Harris Academy (education, under construction)
- Improvements to Victoria Line
- STAR Scheme,
- Potential Crossrail 2
- New GP Clinic of 1,500 – 2,000m<sup>2</sup> in size to accommodate in the short to medium term, existing and increased demand as the population grows
- Decentralised energy hub for the District Centre, forming part of a wider decentralised energy network

## Area-Wide Policies

- TH1: Tottenham Hale District Centre
- TH2: Tottenham Hale Station



## Site Allocations

**5.147** The key sites for the neighbourhood area are:

- TH3: Tottenham Hale Retail Park
- TH4: Station Square West
- TH5: Station Square North
- TH6: Ashley Road South Employment Area
- TH7: Ashley Road North
- TH8: Hale Village
- TH9: Hale Wharf
- TH10: Welbourne Centre & Monument Way
- TH11: Fountayne Road
- TH12: Herbert Road
- TH13: Constable Crescent

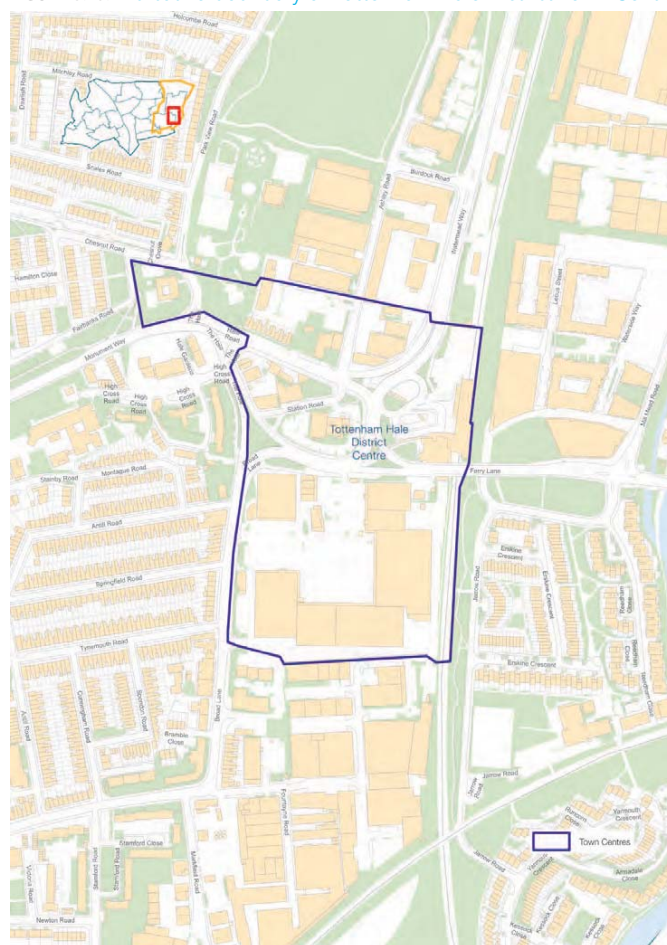
**TABLE 6:** Tottenham Hale Sites Capacity

Site	Net residential units	Commercial m <sup>2</sup>	Town Centre m <sup>2</sup>	Other m <sup>2</sup>
TH2: Over station development at Tottenham Hale Station	138	0	2,400	12,000
TH3: Tottenham Hale Retail Park	992	13,900	13,900	2,780
TH4: Station Square West	297	0	5,200	0
TH5: Station Square North	213	0	7,300	0
TH6: Ashley Road South Employment Area	444	15,300	0	0
TH7: Ashley Road North	147	0	0	5,100
TH8: Hale Village	2,175	4,000	4,300	0
Hale Tower	253	0	2,500	0
TH9: Hale Wharf	405	1,570	0	0
TH10: Welbourne Centre & Monument Way	298	0	0	2,300
TH11: Fountayne Road	113	3,900	0	0
TH12: Herbert Road	66	2,300	0	0
TH13: Constable Crescent	66	2,300	0	0
<b>Total</b>	<b>5,607</b>	<b>43,270</b>	<b>35,600</b>	<b>22,180</b>

## **POLICY TH1:** DISTRICT CENTRE IN TOTTENHAM HALE

- A The Council will support planning applications for development within the Tottenham Hale District Centre as indicated in Map 5.15 to promote the positive regeneration of Tottenham Hale.
- B Comprehensive development will be required to meet the overarching aims of this policy, and principles set out in any future masterplanning document to provide:
  - a A substantially improved public realm that unifies the streets and spaces around the former gyratory, improves access to Tottenham Hale Station, and prioritises pedestrian and cyclist circulation and safety;
  - b A new urban form – consistent with the area’s status and accessibility;
  - c Attractive and functional public spaces located around the gyratory;
  - d Incorporate permeable surfaces, green space and trees.
- C A range of retail, leisure or community facilities on ground floor frontages, with residential or office above;
- D Small-scale units and kiosks near the underground station, to create activity and vibrancy and security;
- E Uses which are considered appropriate for Tottenham Hale are consistent with National Planning Policy Framework town centre uses.

**FIGURE 5.15:** Indicative boundary of Tottenham Hale District Town Centre





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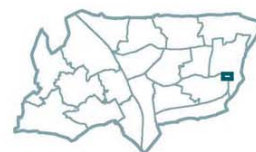
There are serious concerns about Tottenham Hale being designated a district centre. The proposals for development do not mention the impact of a night time economy which can be detrimental to a community's quality of life. This is largely a residential area and consideration should be given as to how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

- 5.148** A new District Centre will be created at Tottenham Hale. The area will become a distinctive, high quality, diverse and vibrant commercial destination. The environmental quality of the area will be transformed through coordinated public and private investment, with complementary improvements to neighbouring residential areas, including significant investment in the open space and transport infrastructure around the station and the main roads to support the proposed level of development, improve access to the station create good quality public open space, reduce traffic impacts and improve interchange between bus, train and tube.
- 5.149** Development is required to be in conformity with the findings of the District Centre Framework, and Site Allocations TH4, TH5, and TH8. Development proposals will incorporate the creation of a new legible link (See AAP8: Tottenham Green Grid) bisecting Ashley Road and linking the Lee Valley Regional Park (LVRP) to Tottenham High Road, encourage walking and improve sight lines to the LVRP.
- 5.150** All new development will be expected to contain a mix of uses within the District Centre boundary. This will include town centre uses at ground floor level, maximising the opportunities for active frontages on pedestrian through routes. Residential and/or office space will be acceptable above ground floor. A high quality, pedestrian oriented, and increasingly permeable urban realm will be created through new developments.
- 5.151** An increasingly permeable streetscape will be created, as coordinated through the District Centre Framework. New high quality urban realm will be created, to attract retail businesses to the Centre and new and existing employers to the locality more generally. Ashley Road will be the principal north-south route, linking the Centre to the Harris Academy and the Ashley Road employment area to the north, and creating a legible route through the District Centre.

**FIGURE 5.16:** Tottenham Hale Sites and District Centre



## TH2: TOTTENHAM HALE STATION



Site Allocation

Address	Tottenham Hale rail and bus station, N17		
Site Size (Ha)	4.8	PTAL Rating	4-6
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Rail/underground station, bus station		
Ownership	Public		
How site was identified	Tottenham District Centre Framework		
Planning designations	Flood Zone 2 Tottenham Hale Growth Area Tottenham Hale District Centre		
Indicative Development Capacity	Net residential units	Town Centre m <sup>2</sup>	Other m <sup>2</sup>
	138	2400	12,000

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

The station has just undergone extensive re-modelling at significant public cost. The new station interchange and new 'urban square' will create further disruption.

**5.152** Creation of a new station interchange, with:

- A A station environment which supports excellent and efficient public transport facilities.
- B New residential and/or commercial development above the station, creating the centre of a new District Centre at Tottenham Hale.
- C Enabling over the longer term of sites to be developed for the creating of new rail projects linked to the STAR and/or Crossrail 2 schemes.
- D Creation of a new urban square enclosed by activities which help to attract people and increase dwell times, act as a new high quality point of arrival, departure and interchange, and act as a focus for Tottenham Hale District Centre.
- E Links into routes which are easy, safe and pleasant for people to move through, as set out in the District Centre Framework and Streets & Spaces Strategy, and support east-west and north-south movement.

### Current Planning Permission (HGY/2013/2610)

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

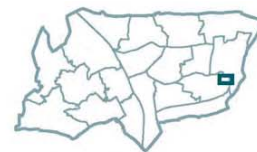
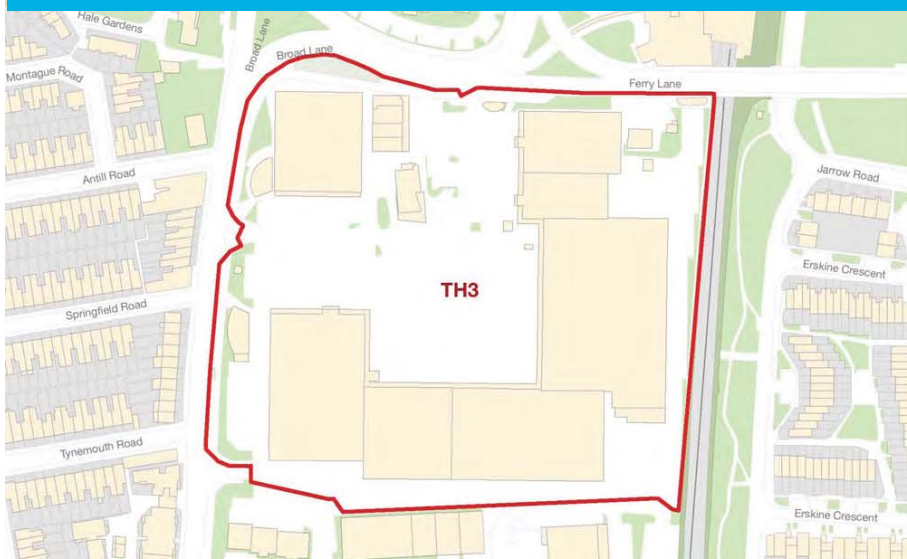
### Commentary

**5.154** Planning consent has already been granted for the extension of the station, including the provision of over station development. The Council will support amendments to this permission, to improve access to and from the station, and facilitate the creation of Tottenham Hale as a District Centre.

### Site Requirements

- Development will be required to be accompanied by a District Centre-wide masterplan showing how it will complement:
  - Existing/retained parts of the site;
  - Existing extant permissions;
  - The requirements of this, and other District Centre policies; and
  - The recommendations of the District Centre Framework, or other adopted masterplans for the District Centre.
- The bus interchange outside the Station will be part of a new urban square at the heart of Tottenham Hale District Centre.
- Tottenham Hale Station is on the preferred alignment of Crossrail 2. Planning tools, including compulsory purchase powers, may be required to ensure that the optimal arrangement of the route, and development to complement it, are produced over the plan period.
- New town centre uses to enclose the station square area which will be a pick up/drop off bus interchange point.
- New residential development will be introduced above the rail station.
- Reconfiguration of the bus station to reduce the impact of parked busses on the public realm.
- New meanwhile uses will be acceptable that serve local residents and travellers. These will be supported around the bus forecourt areas prior to a permanent use being introduced.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.

### TH3: TOTTENHAM HALE RETAIL PARK



Site Allocation

Address	Corner of Broad Lane and Ferry Lane, N17		
Site Size (Ha)	4.8	PTAL Rating	4-6
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Retail Park		
Ownership	Private		
How site was identified	Tottenham District Centre Framework		
Planning designations	Flood Zone 2 Tottenham Hale Growth Area Archaeological priority area Tottenham Hale District Centre		
Indicative Development Capacity	Net residential units	Town Centre m <sup>2</sup>	Commercial m <sup>2</sup>
	992	13,900	13,900
			Other m <sup>2</sup>
			2,800

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

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

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

## Site Allocation

**5.155** Comprehensive redevelopment to form part of the new Tottenham Hale District Centre along with adjoining sites to the north. New road layout, including a fine graining of the street layout, creating town centre uses at ground and first floor levels, with residential and commercial uses above.

## Commentary

**5.156** Tottenham Hale Retail Park is synonymous with Tottenham Hale being a car-centric location in North London. Its redevelopment will create a finer grained, legible streetscape focused on walking, cycling, and public transport via Tottenham Hale station. This site will make an important contribution to creating a new District Centre in Tottenham Hale, as well as meeting employment and housing needs through developing above street level. Ashley Road will extend into this site, and a new urban square will be created to complement the shops and facilities of the Centre.

## Site Requirements

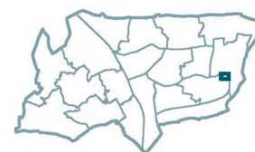
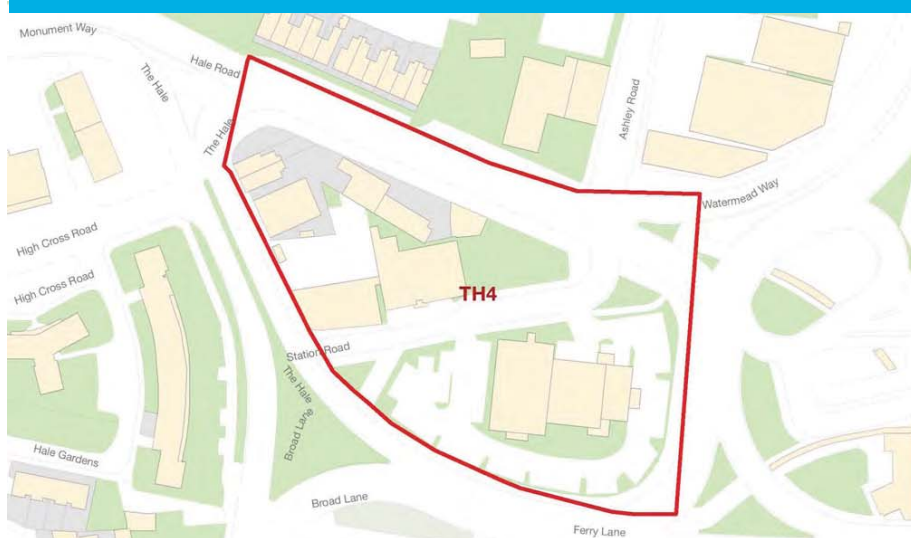
- Development will be required to be accompanied by a District Centre-wide masterplan showing how it will complement:
  - Existing/retained parts of the site;
  - Existing extant permissions;
  - The requirements of this, and other District Centre policies; and
  - The recommendations of the District Centre Framework, or other adopted masterplans for the District Centre.
- Ashley Road will be extended through this site creating a town centre spine linking the Station Square area to the South Tottenham employment area to the south through this site.
- A significant new urban square should be provided at the heart of the development.
- Ground and parts of first floors will be town centre uses. Residential or office uses will be permitted above.
- Development of the eastern side of the site will not proceed until the requirements of Crossrail 2 have been established.
- A transport assessment will be required to identify the appropriate level of parking to facilitate functioning on the District Centre. Parking should be minimised due to the excellent public transport in the area.

## Design Guidelines

- New streets created within the site will have a town centre typology with active frontages at ground floor level and provision for servicing from the street.
- New streets should be created which connect into the surrounding area.
- A new grid structure based on the three blocks present to the south should be created.
- East-west streets should align with roads to the west of Broad Lane, notably Tynemouth Road.
- The Ferry Lane edge of the site currently provides a negative relationship with the core of the District Centre. Development will enhance the quality of this edge by creating a positive frontage to Ferry Lane and to the proposed Station Square.
- Broad Lane is a key interface with the existing built environment. Development on this edge will need to take this relationship into account. This edge will suit smaller ground floor units, which will suit local services.
- The new square will form the heart of the development and forms an important part of the wider network of streets and spaces at Tottenham Hale. This space will allow for a mix of potential uses, including markets and events. This environment will be pedestrian friendly.
- The centre of the retail park will have a mix of uses and will have units with a range of sizes, but with an emphasis on larger units suitable with a focus on comparison shopping.
- Introducing a new pedestrian link between this site and the station.
- Opportunities to “green” the existing SINC adjoining the railway line should be considered.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Parking should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a decentralized energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.



## TH4: STATION SQUARE WEST



Site Allocation

Address	29-51 The Hale, 1-21 Hale Road, 1-25 Ashley Road, Station Road		
Site Size (Ha)	2.7	PTAL Rating	6a
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Retail, restaurants, employment land and garage		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		
Planning designations	Flood Zone 2 Tottenham Hale Growth Area Tottenham Hale District Centre Local employment area: Tottenham Hale strategic industrial location Adjacent to archaeological priority area		
Indicative Development Capacity	Net residential units	Town Centre m <sup>2</sup>	
	297	5,200	

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The petrol station is a very useful local service which is located at the confluence of many roads. We wish it to be retained. Building a 15 storey tower on the adjacent site at the corner of Ashley Road is entirely unnecessary and out of keeping with this side of Tottenham Hale. This proposal from the planning service seems more aligned to the financial interests of developers to have highest densities on every piece of land in our locality.

**5.157 Existing Permission HGY/2014/0498:** A 96 bed hotel (Class C1) including a 146sqm restaurant/bar, 3 disabled car parking spaces and 6 dedicated cycle spaces.

### Site Allocation

**5.158** Comprehensive redevelopment incorporating new District Centre uses at ground and first floor levels, including a hotel use, with residential and commercial above. Creation of a high quality public realm including the extension of Ashley Road as the primary route through the site.

### Commentary

**5.159** The parcel of land between Hale Road, the Hale, and Ferry Lane, and Tottenham Hale Station is at the heart of the new Tottenham Hale District Centre. A new road/pedestrian network, linked to routes to the north and south and the bus and rail interchange and the introduction of a range of town centre uses at ground and first floor level, will inject vibrancy into the area (which is currently segregated by car routes). Development will be expected to create a more human scale to the pedestrian experience and reduce the dominance and impact of road traffic on the area along this route. This will contribute to the creation of a new urban square with development on all sides, including an improved entrance to Tottenham Hale Station.

### Site Requirements

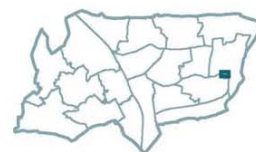
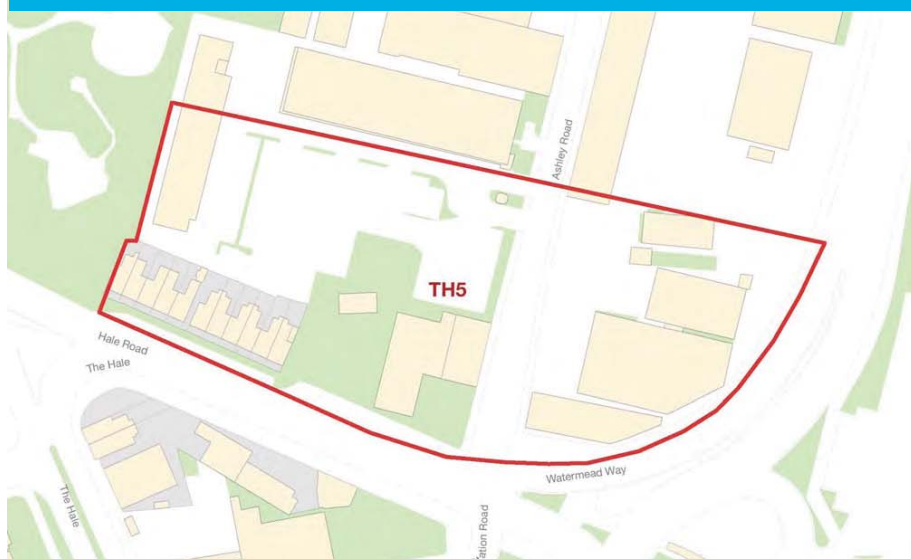
- Development will be required to be accompanied by a District Centre-wide masterplan showing how it will complement:
  - Existing/retained parts of the site;
  - Existing extant permissions;
  - The requirements of this, and other District Centre policies; and
  - The recommendations of the District Centre Framework, or other adopted masterplans for the District Centre.
- A new active use facing the bus station will be created.
- A new, legible, north-south connection linking the Ashley Road area to the north, through the heart of the District Centre, and to the Tottenham Hale Retail Park site to the south will be created.

- Developments must contribute to the creation of a new urban square serving as the key bus interchange with Tottenham Hale Station. This will incorporate active frontages facing into the new square.
- Tall buildings marking the key transport node at Tottenham Hale Station and the emerging District Centre may be acceptable on this site.
- Ground floor uses on this site must be town centre uses, with residential and office uses permissible above and must avoid presenting blank facades to the streets.

### Development Guidelines

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

## TH5: STATION SQUARE NORTH



Site Allocation

Address	Land at Ashley Road South of Burdock Road		
Site Size (Ha)	2.5	PTAL Rating	6a
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Former Factory, Employment.		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		
Planning designations	Flood Zone 2 Tottenham Hale Growth Area Tottenham Hale District Centre Local employment area: Tottenham Hale Adjacent to locally listed building Adjacent to significant open land: Down Lane Recreation Ground		
Indicative Development Capacity	Net residential units	Town Centre m <sup>2</sup>	
	213	7,300	

## Site Allocation

**5.160** Comprehensive redevelopment of the southern end of Ashley Road for ground floor town centre uses with a mix of residential and employment above, forming part of the new District Centre.

## Commentary

**5.161** To the north of the Hale, this site will form the northern section of the new Tottenham Hale District Centre. Comprehensive redevelopment will include a range of town centre uses and new homes and commercial space. Public realm improvements to Ashley Road, and the establishing of a new east-west route linking Down Lane Park and Tottenham Hale Station, will make this area a pedestrian focused precinct which is well connected to the rest of Tottenham and London.

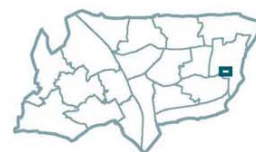
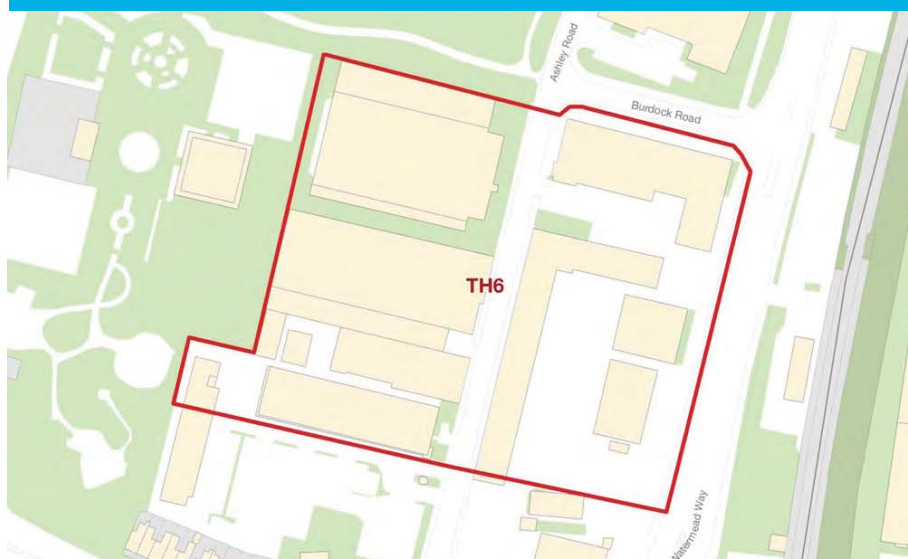
## Site Requirements

- Development will be required to be accompanied by a District Centre-wide masterplan showing how it will complement:
  - Existing/retained parts of the site;
  - Existing extant permissions;
  - The requirements of this, and other District Centre policies; and
  - The recommendations of the District Centre Framework, or other adopted masterplans for the District Centre.
- This site will form part of the Tottenham Hale District Centre.
- This site forms part of a new, legible, north-south connection linking the Ashley Road area to the north, through the heart of the District Centre, and to the Tottenham Hale Retail Park site to the south.
- The site has a key role to play in laying out the Green Grid. Along the northern edge of the site a new east-west link will be provided to connect into Down Lane Park to the west and to the Lee Valley in the west. Developments should positively benefit this route by providing active frontages along its length.
- Town Centre uses will be required on all frontages to Ashley Road.
- An active frontage, potentially employment, should be provided on the Hale Road/Watermead Way frontage.
- A comprehensive approach to uses will be required. There is a case for a greater proportion of employment use to be provided to the east of Ashley Road and a higher proportion of residential to the west. Where individual land parcels come forward individually, outside of an agreed comprehensive approach (DCF and/or masterplan), each site will be required to provide the maximum amount of employment floorspace achievable on this site.

## Development Guidelines

- The interface with Down Lane Park should be treated with care to ensure the park's amenity is improved.
- Development should form a consistent building line, and complement Berol House to the north.
- Ashley Road should be retained as a key movement spine.
- The Victoria Line runs in a shallow tunnel beneath part of this site.
- This site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning permission.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Parking should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a decentralized energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- It is anticipated that the redevelopment of this site will create a net increase in employment floor space and will result in a substantial increase in jobs.
- Each development will be expected to contribute to the aims of a comprehensive public realm strategy.


## TH6: ASHLEY ROAD SOUTH EMPLOYMENT AREA



Site Allocation

Address	Land at Ashley Road South of Burdock Road		
Site Size (Ha)	2.5	PTAL Rating	6a
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Former Factory, Employment.		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		
Planning designations	Flood Zone 2 Tottenham Hale Growth Area Local employment area: Tottenham Hale Locally listed buildings: Ashley Road		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	
	444	15,300	

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 Number: 1 Author: Our Tottenham Subject: Highlight Date: 04/03/2016 14:04:59

The model of the new Tottenham Hale which was used in earlier consultation sessions included tower blocks along Watermead Way. It is not clear from the map in the AAP if these are still proposed. The accompanying text is unclear stating only that 'the proximity of the new Harris Academy to the north and Down Lane Park to the north and west make the area particularly suitable for larger units along those edges'. What does this actually mean? If it means 22 storey tower blocks (as indicated in the model) then it is likely that they will impact on the view people have from the Park View Road side of Tottenham Hale. We wish to retain that view as that enhances our quality of life and enjoyment of the park. No regard is given in these proposals to the impact on existing residents in this part of Tottenham Hale.

## Site Allocation

**5.162** Creation of an employment-led mixed-use quarter north of a new District Centre, creation of a new east-west route linking Down Lane Park and Hale Village, and enhanced Ashley Road public realm. Residential use will be permitted to cross subsidise improvements to employment stock.

## Commentary

**5.163** This area has the potential to become a mixed-use precinct to the north of the new Tottenham Hale District Centre. New development should complement the range of business uses already operating from Berol House, and create new commercial floorspace for knowledge-based firms to operate from. The introduction of a tertiary education provider linked to the IT sector is a key intervention that the Council is looking at bringing into this area. This site will also form one edge of an east-west route linking Down Lane Park and Tottenham Hale Station.

## Site Requirements

- This site will hold a Designated Employment Area: Regeneration Area status to recognise the contribution to the local economy that this site can make. It is anticipated that the redevelopment of this site will not create a net reduction in employment floor space.
- The introduction of a tertiary education provider providing education in the technology sector will be supported on this site.
- Residential development will only be acceptable for the purpose of cross subsidising the re-provision of employment floor space.
- The proximity of the new Harris Academy to the north and Down Lane Park to the north and west make the area particularly suitable for larger units along those edges.
- Ashley Road will form the key public and movement spine, with pedestrian access to Tottenham Hale District Centre from enhanced workspaces optimised.
- Active frontages will be expected on both sides of the Ashley Road frontage at ground floor level.
- Good quality buildings, including, but not limited to Berol House and 16 Ashley Rd should be retained and adapted for flexible, and affordable employment use. Further employment will be supported, with cross subsidization from residential.

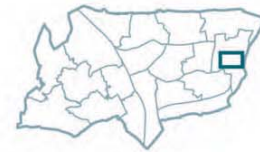
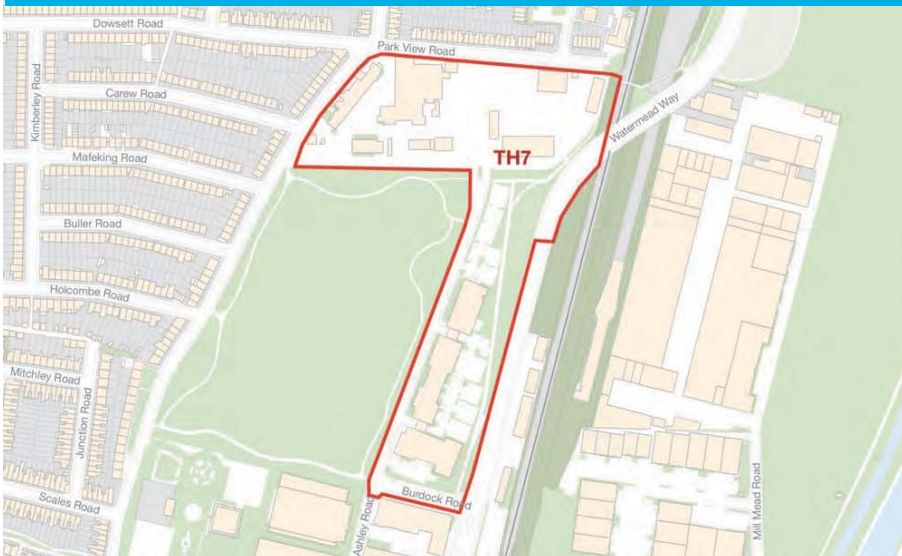
- The site has a key role to play in laying out the Green Grid. Along the southern edge of the site and east-west link will be provided to connect into Down Lane Park to the west and to the Lee Valley in the west. Developments should positively benefit this route by providing active frontages along its length.
- The delivery of superfast broadband to the employment area will be supported.

## Development Guidelines

- The most suitable use on the Watermead Way frontage is considered to be employment use, which may include an educational use.
- Development should utilise the amenity, and respect the character of Down Lane Park with a street edging the park, with buildings providing an edge to that street and fronting the park to the west and north-west.
- This site forms a transition site between the generally more dense District Centre, and the surrounding residential environment.
- The existing industrial character on Ashley Road should be maintained and enhanced, encouraging new businesses to come into the area.
- Ashley Road itself should be pedestrian and cycle friendly, and provide a legible route to the new District Centre to the south. Measures to improve the activity onto Ashley Road will be supported on this site, including the orientation of sites to open onto Ashley Road with frequent front doors.
- Additional permeability should be provided through the addition of pedestrian and local access routes passing east-west through the site.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Parking should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a decentralized energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.



## TH7: ASHLEY ROAD NORTH



Site Allocation

Address	100-399 Ashley Road including Council Depot		
Site Size (Ha)	2.2	PTAL Rating	2-5
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Lee Valley Technopark (becoming Harris Academy), Council Depot, Ashley Rd, N17		
Ownership	Mix of public and private freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		
Planning designations	Flood Zone 2 Adjacent to SINC local: Down Lane Recreation Ground Adjacent SINC borough grade II: Tottenham Hale to Northumberland Park Railsides Tottenham Hale Growth Area		
Indicative Development Capacity	Net residential units	Other m <sup>2</sup>	
	147	5,100	

## Site Allocation

**5.164** New residential development complementing the amenity of Down Lane Park, and the extension of Ashley Road as a pedestrian and cycling connection north through to Park View Road. Creation of new educational facility.

## Commentary

**5.165** The introduction of Harris Academy into the former Technopark buildings on Ashley Road will create new education provision for the children of Tottenham, and in particular Tottenham Hale. This site will accommodate that use, and subject to the reprovision of the licensed waste capacity at the Ashley Road Depot site, new housing and an improved edge to Down Lane Park.

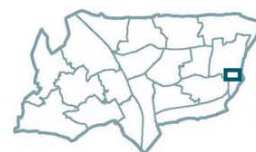
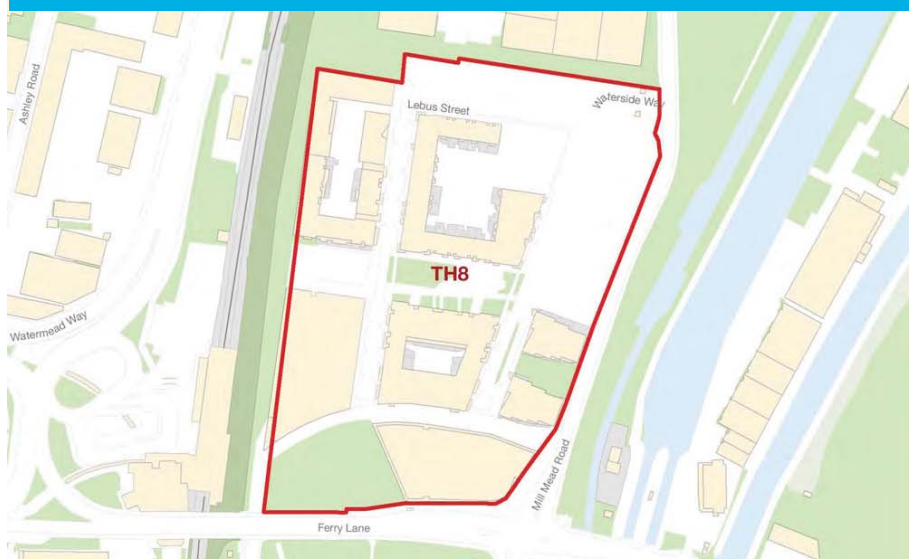
## Site Requirements

- A new pedestrian and cycle route will be created extending the line of Ashley Road north between to Park View Rd, and through an improved foot tunnel, improving access into the Lee Valley Regional Park.
- Vehicular access to the site will be from Ashley Road/Burdock Road or Park View Road, but there will not be a link from one to the other.
- This site will contain part of the Harris Academy. Residential will be the primary use on the remainder of the site.
- Vehicular access to the site will be from Ashley Road or Park View Road, but there will not be a link from one to the other.
- The site's existing licensed waste capacity will be replaced prior to any redevelopment taking place.

## Design Guidelines

- Paths connecting Watermead Way, Ashley Road and Park View Road should be rationalised, and made safer and more welcoming to resolve local safety concerns, and make the routes more direct, and thus better used.
- The mature trees on the site, and in the park, should be protected and incorporated into any future design.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.

## TH8: HALE VILLAGE



Site Allocation

Address	Hale Village, Ferry Lane, N17					
Site Size (Ha)	4.5		PTAL Rating		6a	
Timeframe for delivery	2011-2015		2015-2020		2020 onwards	
Current/Previous use	Currently under construction for residential-led mixed use development.					
Ownership	Private					
How site was identified	Existing planning permission					
Planning designations	SINC Borough Grade II: Tottenham Hale to Northumberland Park Railsides Flood zone 2 Tottenham Hale Growth Area Archaeological priority area					
Indicative Development Capacity	Net residential units		Commercial m <sup>2</sup>		Town Centre m <sup>2</sup>	
	Permitted	Tower	Permitted	Tower	Permitted	Tower
	2,175	253	4,000	0	4,300	1,800

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Permission for this was already granted for 18 storeys and for a hotel. It now appears that this site is to be developed as residential flats at even greater heights. This would constitute glaring over-development in this already congested site full of tower blocks.

## Site Allocation

**5.166** Completion of Hale Village reflecting the current planning permission and masterplan, with a new mixed use tower consisting of town centre uses at ground floor, with residential, and potentially a hotel above.

## Commentary

**5.167** The majority of Hale Village was constructed in the early part of the Plan period. The most significant remaining development is the Hale Village Tower, which is permitted within the outline planning permission HGY/2006/1177. The tower element of the site will be adjacent to Tottenham Hale station, and will act as a marker for the entrance to the station from Ferry Lane.

## Existing Planning Permission HGY/2006/1177

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

## Site requirements

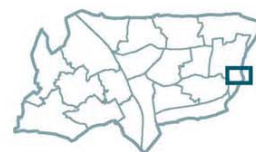
- The outline planning permission permits a tall building (18 storeys).
- Ground floor uses should contribute to the vitality of the existing urban streets within the site, and provide amenities for local residents.
- Development proposals will be required to be accompanied by a site-wide masterplan showing how the land included meets this policy and does not compromise coordinated development on the other land parcels within the allocation.

- Development will engage with the Ferry Lane frontage, including creating an appropriate frontage for part of the Green Grid network connecting Tottenham Hale to the Lee Valley Regional Park.
- The connection to Tottenham Hale station will be optimised, and a high quality public realm will be created through this site.
- Development will need to provide for limited car parking to serve accessible residential units, taking account of the usage of existing spaces in Hale Village.
- Proposals for development that provide additional units beyond outline planning permission extent will need to provide details of infrastructure impacts arising from additional units/occupants.

## Development Guidelines

- Proposals for a tall building over 18 stories will require justification and will need to satisfy Policy DM6 on tall buildings.
- Design should respect and respond to the wider site and should engage with the approved Tottenham Hale Station scheme (HGY/2013/2610) which includes a bridge landing in the urban realm outside this site, and any design on this site should respond positively to this.
- Any development should demonstrate how it has an acceptable relationship with neighbouring land uses by virtue of microclimate and daylight/sunlight.
- Development will need to engage with the existing design code for Hale Village.
- Development should connect to the decentralised energy hub, as a customer and consider how the network can be extended.

## TH9: HALE WHARF



Site Allocation

### Site Allocation

**5.169** Comprehensive redevelopment to provide a mix of uses, with replacement employment, new residential and a leisure destination linked to the Lee Valley Regional Park.

### Commentary

**5.170** Hale Wharf is a collection of generally low-density employment buildings on the edge of the Lee Valley Regional Park, surrounded by the River Lea and Pymmes Brook. There is an exciting opportunity to create distinctive riverside development on this site, including an element of replacement employment floorspace, and a new link to the currently underused Paddocks and wider Lee Valley Regional Park from Tottenham Hale District Centre. Appropriate development of the garage site has the potential to enable enhanced access to and use of the Paddocks.

Address	Land north of Ferry Lane from Pymmes Brook to the River Lea, including Hale Wharf and "The Paddock" N17.		
Site Size (Ha)	6.3	PTAL Rating	4-5
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Employment, petrol filling station, the Paddock Community Nature Park		
Ownership	Mix of private and public freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		
Planning designations	Ecological corridor Blue ribbon network Green belt (part) Lee Valley Regional Park Flood zone 2 and surrounded by FZ 3 SINC Metropolitan: Lee Valley Tottenham Hale Growth Area Local employment area: Hale Wharf regeneration area Archaeological priority area		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	
	405	3,200	



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The plans for Hale Wharf are now being made public, including a tower up to 21 storeys and other very tall buildings. This is totally inappropriate for an area fringing the Tottenham Marshes/green belt. High buildings at this point would create the reverse of openness, and create a canyon feel, with Hale Village at 12 storeys on one side and new high buildings on the other. How can such a development do anything other than damage and spoil a beautiful natural environment? There are also implications for the Paddock, for the residents of Ferry Lane and those of Hale Village. Para 5.170 states 'there is an exciting opportunity to create distinctive riverside development on this site...'  
This seems to be code for allowing tower blocks which will do nothing to enhance the riverside at all.

## Site Requirements

- Development will be required to be accompanied by a site-wide masterplan showing how it will complement:
  - Existing/retained parts of the site;
  - Extant permissions; and
  - The requirements of this document.
- This site will hold a Designated Employment Area: Regeneration Area status to recognise the contribution to the local economy that this site can make.
- Part of the site (Hale Wharf) is in employment use and will need to reflect the Council's aspiration to create a mix of uses on this site through the replacement of existing employment levels with new employment space, and complementary leisure uses that provide amenities for the users of the Regional Park.
- Improve connections to, and the use and utility of, the Paddocks open space and ensure redevelopment of the former petrol station site to create high quality waterside development.
- The Development will need to accommodate part of the Green Grid, which will pass through this site linking Tottenham High Road to the Walthamstow Wetlands and Lee Valley Regional Park following the alignment developed through the Hale Village scheme.
- Redevelopment of the Hale Wharf site will need to ensure continued facilities for the house boat community north of the Hale Wharf site, and explore the potential provision of moorings on the western side of the site to accommodate employment barges/temporary moorings.
- The redevelopment of the garage site, within the Green Belt, will need to be included as part of a comprehensive plan for the overall site and demonstrate compliance with Green Belt objectives. Consideration will be given to previously developed land on this site within the Green Belt in accordance with the guidance in the National Planning Policy Framework.
- Development should be delivered in a coordinated manner. Comprehensive redevelopment for the site is required. The garage site across the Lea Navigation, and the Lock Keepers Cottage to the east should be developed as part of a comprehensive proposal.
- The design of the new development will need to have regard to environmental, ecological interests in the locality, particularly relating to the water environment and habitat of the Lee Valley Regional Park.

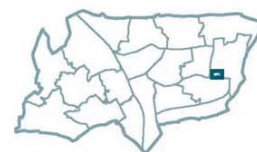
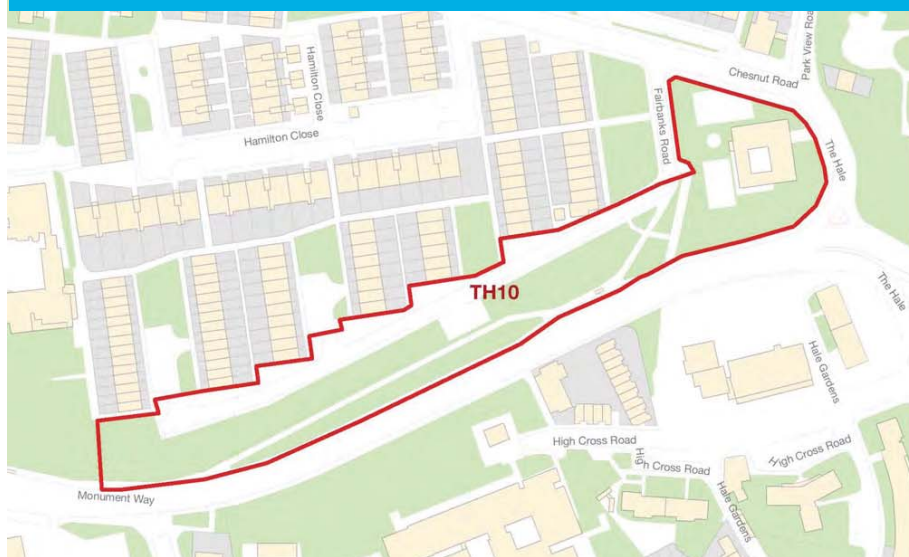
- Any building on the garage part of the site should demonstrate compliance with Green Belt policy and complement this designation by improving appearance from openness within, and access to the Green Belt.

## Development Guidelines

- New development should enable the ongoing operation and maintenance of the lock gates.
- New development should not adversely impact on the ecological assets in the area.
- The development shall include a range of unit sizes and types and take advantage of the site's suitability for family housing.
- The Environment Agency will be a key stakeholder in agreeing any new development proposals as the site is just outside of a high flood risk area. The site is in close proximity to the Walthamstow Marshes SSSI, Lee Valley Ramsar Site and Special Protection Areas.
- Building heights will have to respond to the proximity and 'openness' of the Green Belt.
- Buildings should be orientated to allow a continuous sight line from the Green Link into the Lee Valley Regional Park. The design and form of the development on the eastern side of the Wharf site (and on the former garage site) should be responsive to the natural environment of the park and river.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- The Lee Valley Regional Park Plan seeks to ensure improvement of the paddocks area and any proposal should have consideration of this plan.
- Improvement of the access into the Hale Wharf site is required.
- The development will need to be designed having regard to risks of flooding and in accordance with the Flood Risk Assessment.
- The site is surrounded by a network of main rivers (Pymmes Brook, Lee Navigation and Lee Cut). Development should ensure opportunities to enhance the ecological status of the rivers, reduce flood risk and ensure access for future maintenance and replacement of the river walls is realised. The condition of the flood defence must be commensurate with the lifetime of the development. A condition survey will need to be undertaken and any repair works identified carried out.



## TH10: VELBOURNE CENTRE & MONUMENT WAY



Site Allocation

Address	Land North of Monument Way, South Fairbanks Road, South of Chesnut Road and West of Park View Road		
Site Size (Ha)	1.3	PTAL Rating	6a
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Former Welbourne Centre, vacant land.		
Ownership	Public freehold		
How site was identified	Tottenham District Centre Framework		
Planning designations	Tottenham Hale District Centre Tottenham Hale Growth Area Adjacent to archaeological priority area		
Indicative Development Capacity	Net residential units	Other m <sup>2</sup>	
	298	2,300	

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

The Welbourne site is surrounded by a four and one five storey block. A tower would be entirely out of keeping with the estate and with Park View Road. Would this be allowed or even considered in other parts of Haringey? The Welbourne centre site is not in the proposed Tottenham Hale District Centre, it is in a quiet residential neighbourhood comprising residential streets of terraced housing and a low rise estate. Building a tower block on this site, which in these plans would stand almost opposite another tower block would destroy the character of our neighbourhood and be entirely out of keeping with the rest of the area's layout.

Monument Way is a main road which is greened, provides protection for the nearby houses from air and noise pollution through high walls and through an earth bund and high willow fencing. It is preferable for the area to remain as it is. If there is further housing on this road there must be very strong measures to prevent air contamination and pollution which could seriously harm peoples' health.

## Site Allocation

**5.171** Comprehensive redevelopment of the Welbourne Centre for secondary town centre uses (which could include a health centre) at ground floor level, and residential above. Limited new residential development to the south of Chesnut Estate.

## Commentary

**5.172** The former Welbourne Centre site at the eastern end of this site marks the westernmost point of the new Tottenham Hale District Centre. This site will provide new town centre uses at ground/first floor level, with the potential for a new healthcare facility to serve the residents of Tottenham Hale. There is ongoing masterplanning work to create complementary residential development along Monument Way.

## Site Requirements

- The site of the former Welbourne Centre forms part of the District Centre and should include uses that complement the Centre. The site has been identified as suitable for the location of a district health centre.
- Residential development will be permitted above.
- The site of the former Welbourne centre is considered a suitable location for a taller building marking the edge an enhanced Chesnut Road.
- A development complementing the end properties on the Chestnuts Estates will be acceptable, with new homes opening onto the existing (undesignated) open land to the south providing passive surveillance.
- Parking should be minimised on the former Welbourne Centre part of the site due to the excellent local public transport connections.

## Design Guidelines

- Opportunities to address air quality issues and to create an improved access to the road network from the Chesnut Estate should be included
- Development on the Monument Way section of the site should respond to established heights within the Chesnut Estate. This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- A flood risk assessment is required. The Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.
- Development at the corner of Chesnut Road and the Hale will improve passive surveillance at this location.
- Development of this site should create a public realm which enables a safe connection between the Green Grid, the new District Centre, and Down Lane Park. This should include retention and improvements to the trees planted along Chesnut Road.
- Development will need to ensure that noise and air quality issues arising from Monument Way are not increased for existing residents, and are appropriately mitigated for new residents.

## TH11: FOUNTAYNE ROAD



Site Allocation

Address	Unit 3 High Cross Centre, 1-7 Fountayne Rd, N15		
Site Size (Ha)	2.1	PTAL Rating	4
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Employment land		
Ownership	Mix of private and public freeholds and leaseholds		
How site was identified	Warehouse Living Area.0		
Planning designations	Local employment area: South Tottenham LSIS Tottenham Hale growth area Vale Road/Tewkesbury Road locally significant industrial site Flood Zone 2 Archaeological priority area		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	
	113	3,900	

## Site Allocation

**5.173** Potential development to increase accessibility and provide increased employment floorspace and warehouse living accommodation.

## Commentary

**5.174** A number of these employment buildings have been subject to unlawful occupation and conversion to residential uses. Where these uses demonstrably support new/existing employment floorspace within mixed use premises, the Council is seeking to expand and coordinate such uses through Policies DM38 and DM39. The recognition and improvement of buildings identified in accordance with Policy DM39 will support the AAP objectives and create a new point of interest within Tottenham Hale where people can live, work and visit.

## Site Requirements

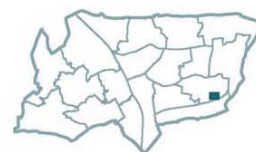
- All applications will be required to be in accordance with the principles set out in the Council's Warehouse Living policy (DM39).
- The site will be given a Designated Employment Area: Regeneration Area status to reflect the Council's aspiration to create a mix of uses on this site through the re-introduction of creative employment uses.
- Employment generating uses should be maximised subject to the other aims of the policy being met. These may be created at ground floor level as part of a mixed-use development, or in purpose-built blocks.
- Redevelopment should look at the feasibility of connection up to the quietways network between the new Tottenham Hale District Centre and Markfield Park and the River Lea via a combination of Ashley Road, Fountayne Road and Markfield Road, which should be enabled through development in this area. Connections should also be considered between key heritage assets such as Bruce Castle and Markfield Beam Engine and Museum along with the open spaces along Lee Valley.
- Capped commercial rents will be expected in this area in line with the Draft Development Management DPD.

- The potential for the creation of a destination to exhibit the work of the creative communities in the area should be considered through any future masterplanning work.
- Development should not prejudice the ongoing commercial use of adjacent employment areas.

## Development Guidelines

- A thorough review of Fountayne Road's industrial heritage value will be required before any development is permitted
- The quantum of dedicated employment floor space on the site should be maximised.
- The principles of the Warehouse Living policy (DM39) apply to this site.
- Provision of suitable accommodation that meets acceptable standards will be required.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- A flood risk assessment is required. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.
- The site lies in a Source Protection Zone. Sites will need to consider this receptor in any studies undertaken.
- New development should demonstrate how it meets the requirement for appropriate outdoor amenity space. This could be shared between sites where an appropriate communal design and planning agreement can be secured.

## TH12: HERBERT ROAD



Site Allocation

Address	5-18 Herbert Road, land on Norman Road and Bernard Road to the West of Ashby Road.		
Site Size (Ha)	0.7	PTAL Rating	6a
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Employment and vacant land		
Ownership	Mix of private and public freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		
Planning designations	Local employment area: Rangemoor/ Herbert roads Tottenham Hale growth area		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	
	66	2,300	

## Site Allocation

**5.175** Potential redevelopment of the sites for commercial-led mixed-use development with residential.

## Commentary

**5.176** This area has a number of buildings that produce unsuitable neighbours for the residential uses, parallel access roads which do not provide an appropriate street layout, and several disused and derelict buildings in need of redevelopment. By introducing new employment floorspace and homes into the area, this site can make a positive contribution to meeting the Borough's housing and employment needs.

## Site Requirements

- The site will be given a Designated Employment Area: Regeneration Area status to reflect the Council's aspiration to create a mix of uses on this site through the re-introduction of creative employment uses.
- The quantum of dedicated employment floorspace on the site should be maximised through any development. Residential will be permitted to cross subsidise new employment stock, and should be located adjacent to the existing residential uses adjoining the site.
- Capped commercial rents may be expected in this area in line with the Draft Development Management DPD.

## Development Guidelines

- Rationalisation of the "parallel access roads" on Ashby/Bernard/Herbert Roads.
- Reintroducing employment-generating uses is the key aim of this policy.
- Improved streetscape with the existing homes on Ashby Road is required.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Pedestrian access from the site to Page Green Road should be retained.

## TH13: CONSTABLE CRESCENT



Site Allocation

Address	1-7 Constable Crescent, and 52 to 68 Stamford Road.		
Site Size (Ha)	0.7	PTAL Rating	5
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Residential, employment and vacant land		
Ownership	Mix of private and public freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		
Planning designations	Flood Zone 2 Local employment area: South Tottenham Tottenham Hale Growth Area Locally significant industrial site Adjacent to ecological corridor		
Indicative Development Capacity	Net residential units	Commercial m <sup>2</sup>	
	66	2,300	



## Site Allocation

**5.177** Potential development to increase accessibility, provide increased employment floorspace and warehouse living accommodation.

## Commentary

**5.178** This area has a range of buildings of variable quality which has the potential to accommodate a mix of employment and warehouse living accommodation in the South Tottenham area.

## Site Requirements

- The site will be given a Designated Employment Area: Regeneration Area status to reflect the Council's aspiration to create a mix of uses on this site through the re-introduction of creative employment uses.
- The quantum of dedicated employment floorspace on the site should be maximised through any development. Residential uses will be permitted only on the Stamford Road frontage to cross-subsidise new employment stock, and should be located adjacent to the existing residential uses adjoining the site.
- Capped commercial rents may be expected in this area in line with Policy DM38.
- An element of Warehouse Living will be accepted on this site. This will be required to be in conformity with the requirements of Policy DM39.

## Development Guidelines

- Reintroducing suitable employment generating uses is the key aim of this policy.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Development along the edge of the retained South Tottenham LSIS area should be employment only, to avoid the creation of unsuitable neighbouring uses.
- The creation of development which overlooks the park on Stamford Road will be supported to improve passive surveillance.



# Implementation, Delivery and Monitoring

CHAPTER

06

## Chapter 6

# IMPLEMENTATION, DELIVERY AND MONITORING

- 6.1 Each of the opportunity sites identified in this document will play a role in delivering the vision for the area and it is imperative that the Council does as much as possible to aid their delivery.
- 6.2 The Council will take the lead on project managing the implementation and delivery of the Tottenham AAP. Dedicated resources will be put to managing and coordinating delivery of both sites and supporting infrastructure.
- 6.3 A key mechanism for delivering the Tottenham AAP will be the Council's decisions on planning applications. The policies in the Strategic Policies Local Plan, along with those in this AAP and the Development Management DPD, once adopted, will provide the framework for such decisions. Planning decisions will be crucial to ensuring that new development appropriately responds to the Plan's objectives and policies. The Council will also take account of its supplementary planning documents and guidance when determining planning applications.

### Working in partnership

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

### Stalled developments or sites

- 6.5 Where appropriate the Council will prepare, in consultation with landowners, developers and the community, more detailed masterplans where this aids in accelerating delivery.
- 6.6 Further, as set out in Policy AAP1, the Council will also use its compulsory purchase order powers to facilitate site assembly where this is required to enable comprehensive, timely and coordinated development to come forward.
- 6.7 In certain circumstances, the Council may look to utilise its strategic acquisition fund to acquire sites, but such an approach will require robust assessment in terms of value for money.

### Council as a landowner and developer

- 6.8 The Council has substantial landholdings across the AAP area, much of which has been allocated for redevelopment. The Council is committed to bring its sites forward in a timely manner and will, if appropriate, enter into joint ventures or other such arrangements, to facilitate this.
- 6.9 Any procurement exercise will be undertaken in an open and transparent manner.

## Infrastructure delivery

- 6.10** An overall commitment to improving the pedestrian realm, delivering a range of new public open spaces and strengthening public transport and movement generally underpins the entire approach to the successful delivery of the AAP. The intention is to provide a strong setting and encouragement for new homes and jobs.
- 6.11** An Infrastructure Delivery Plan will be prepared for the AAP, setting out key responsibilities and timeframes, recognising the many partners that will assist in implementing the AAP over its lifetime. This Delivery Plan will align with the Borough-wide Infrastructure Delivery Plan for the Strategic Policies, which is currently being updated, and provide further information specific to the Tottenham area.
- 6.12** Given market values there is a demonstrable prospect of raising funding through private developer contributions as indicated by the Borough's existing planning evidence base. The following funding structure identifies broad potential contributions from a variety of sources.
- Well-structured Regeneration Programme prepared by LBH, with staff, plans, studies, and initiatives focusing on delivery against ten strategic themes;
  - A prospectus of potential transport investments prepared by Transport for London (TfL) to support growth and regeneration in Tottenham;
  - A comprehensive redevelopment proposal for the Tottenham Hotspur Football Club (THFC) Stadium, with its associated new superstore and University Technical College, as well as new leisure, retail, residential and hotel uses;
  - A major improvement, master planning and estate renewal package being developed for the 'High Road West' area of north Tottenham;
  - A £41 million public sector funding and investment package for Tottenham;
  - A new Hosing Zone designation for Tottenham Hale, initially, then rolling out over the rest of the AAP area; and
  - A central government-backed £500 million borrowing guarantee for housing and transport improvements

## Monitoring

- 6.13** The Council will regularly review and monitor performance towards delivery of the AAP vision and strategic objectives (set out in Section 3), and the delivery of individual opportunity sites and policy initiatives, using the Strategic Policies indicators, where relevant, as well as through a bespoke set of monitoring indicators for the AAP as set out below. Progress and performance outcomes will be published annually in the Authority Monitoring Report.
- 6.14** The Council will also monitor government and London wide policy and changes in legislation to make sure that the AAP continues to be consistent with relevant national, regional and local planning policies, and to identify any the need to review or reassess the approach taken in this Plan.

**TABLE 7: AAP Objectives**

AAP Objective			
Indicator Ref	Indicator	Target	Action/contingency
AAPobj1	World class education and training	Ensure there are enough school places to meet current and future demand, up to a rolling 10 year horizon.  Delivery of at least one major education institution over plan period.	The Council will use its School Place Planning Reports in preparing and updating Delivery Plans for the AAP. These will inform whether targeted policy responses / site allocations are needed, particularly to address any projected shortfall of spaces.
AAPobj2	A prosperous hub for business and local employment	Accommodate 5,000 new jobs  No net loss of employment floorspace over the plan period	The Council will monitor proposals involving industrial and commercial development, and town centre uses, through the Authority Monitoring Report process.
AAPobj3	A safe, secure and attractive place to live	As per Strategic Policies Local Plan monitoring framework.	Monitor through the Authority Monitoring Report process.
AAPobj4	A different kind of housing market	Accommodate a minimum of 10,000 net new homes  40% of all new residential development delivering ten or more units as affordable housing  For affordable housing requirement, deliver 40% as affordable rented housing (including social rented housing) and 60% as Intermediate housing.	The Council will monitor delivery of housing development through the Authority Monitoring Report process. Future Strategic Housing Market Assessments will be reviewed. Pending outcomes, consideration may be given to amending policy targets.
AAPobj5	A fully connected place with even better transport links	Delivery of strategic transport infrastructure including: new intermodal station at Tottenham Hale, 3 Tracking West Anglia rail, Crossrail 2 at Tottenham Hale /  Northumberland Park, London Overground at Edmonton Green.	The Council will prepare and maintain an Infrastructure Delivery Plan for the AAP, and monitor delivery of strategic transport infrastructure through the Authority Monitoring Report process. The Council will engage with key delivery partners to ensure that infrastructure appropriately supports growth.
AAPobj6	A high quality public realm network	As per Strategic Policies Local Plan monitoring framework.	Monitor through the Authority Monitoring Report process.
AAPobj7	A strong and healthy community	As per Strategic Policies Local Plan monitoring framework.	Monitor through the Authority Monitoring Report process.

**TABLE 8: AAP Opportunity Sites**

AAP Objective			
Indicator Ref	Indicator	Target	Action/contingency
AAPsites1	Number of Allocated Sites with Planning Permission	100% by 2026	Where less than 30% of the allocated sites have planning permission by 2018/19 the Council will engage with landowners and developers as to ascertain why planning permission is not being sought. Consideration will then be given to a review of the allocations or to further site allocations if necessary.
AAPsites2	Number of Allocated Sites developed	100% by 2026	Where less than 20% of the allocated sites have not been completed by 2018/19, Council will discuss with owners/ developers why sites are not being developed out, and will consider amendments to extant planning permissions or to CIL/s106 requirements if appropriate.
AAPsites3	Sites delivered in accordance with parameters of the Allocation	100% by 2026	If two or more applications, not in accordance with the Opportunity Site allocations, are granted at appeal, the Council will review the appeal decisions and review the AAP policies or allocations to strengthen these as appropriate.
AAPsites4	Spatial distribution of Allocated Sites with Planning Permission	Even distribution across all sites	Where one or more AAP neighbourhoods is showing Allocated sites with 50% or more planning permission above that experienced across the other AAP Neighbourhoods, the Council will discuss with Developers/ Agents/ Viability & Place Making specialists why this is and consider means to incentivise development in poorer performing AAP neighbourhoods





# Appendices

CHAPTER 07

## Chapter 7

# APPENDICES

### APPENDIX A: METHODOLOGY FOR ASSESSING THE CAPACITY OF ALLOCATED SITES

- 7.1** On sites where planning permission has already been granted for major development (10+ Units or 1,000m<sup>2</sup>), but where material works have not commenced, the site has been allocated in this Development Plan Document with the corresponding number of homes and/or floorspace that has been approved.
- 7.2** Where details of pre-application proposals are available and considered reasonable, the relevant housing capacity and employment floorspace have also been used to inform the site allocation. Likewise, where sites have been the subject of a detailed master planning exercise, the site allocation capacity will reflect the findings of the masterplans.
- 7.3** For all other sites, the potential development capacity of the site has been estimated in accordance with the methodology described below. It should be noted that the development capacity attributed to each site is indicative, not prescriptive. The number of dwellings and floorspace that may be achieved on site will be determined by many considerations such as design and layout, the size and type of the homes/commercial units to be provided, relevant development management policy requirements, site constraints, scheme viability, the site area available for development and any change in the public transport accessibility level (PTAL) of the site.

#### Assumptions

- Residential unit size is assumed to be 70m<sup>2</sup> per unit;
- Town centre uses as part of a mixed use development are assumed to be 10% of floorspace;
- Employment floorspace is as stated in a site allocation; or
- PTAL is taken at the centre point of the site;
- GLA density assumptions are taken from Table 3A.2 of the London Plan.

**7.4** The following worked examples illustrate how the methodology has been applied.

#### Example Site 1: Ashley Rd South Employment Area

Site Area: 2.5 hectares  
PTAL: 4  
Setting: Central  
LP density matrix mid range: 265 dwellings per hectare  
Total floorspace (GIA) = 70m<sup>2</sup> x 265 x 2.5 = 46,375m<sup>2</sup>  
Mix: 33% commercial, 67% residential  
Therefore estimated capacity of site is **15,304m<sup>2</sup> commercial (gross), and 444 new homes.**

#### Example 2: Tottenham Police Station & Reynardson Court

Site Area: 0.5 hectares  
PTAL: 6a  
Setting: Urban  
LP density matrix ranges: 140 dwellings per hectare  
Total floorspace (GIA) = 70m<sup>2</sup> x 140 x 0.5 = 4,900 m<sup>2</sup>  
Mix: 25% commercial, 10% town centre, 65% residential  
Total estimated capacity of site is 490m<sup>2</sup> town centre uses (gross), 1,225m<sup>2</sup> commercial floorspace (gross), and 46 gross residential units.  
**But Existing homes = 16**  
Therefore the total estimated capacity of site is **490m<sup>2</sup> town centre uses (gross), 1,225m<sup>2</sup> commercial floorspace (gross), and 30 net residential units.**

**TABLE 9: Site Allocation Capacity**

Site Ref	Site Name	mix (emp)	mix (TC)	mix (other)	mix resi
SS2	Lawrence Rd Phase 2	0.1	0	0	0.9
SS3	Brunel Walk & Turner Avenue	0	0	0	1
SS4	Gourley Triangle	0.33	0	0	0.67
SS5	Wards Corner	As per planning consent HGY/2012/0915			
SS6	Apex House & Seacole Court	0	0.1	0	0.9
TG2	Tottenham Chances & Nicholson Court	0	0	0.5	0.5
TG3	Tottenham Police Station & Reynardson Court	0.25	0.1	0	0.65
BG2	Bruce Grove Station	0.1	0.1	0	0.8
BG3	Bruce Grove Snooker Hall & Banqueting Suite	0	0.2	0	0.8
BG4	Tottenham Delivery Office	0.1	0	0	0.9
NT3	Northumberland Park North	0.01	0.01	0	0.98
NT4	High Road West				
NT5	Northumberland Park Estate Renewal	0.01	0.01	0	0.98
NT6	North of White Hart lane	0	0.1	0.2	0.7
NT7	Tottenham Hotspur Stadium	As per planning consent HGY/2010/1000			
TH2	Station Interchange	0	0.1	0.5	0.4
TH3	Tottenham Hale Retail Park	0.1	0.1	0.02	0.78
TH4	Station Square West	0	0.2	0	0.8
TH5	Station Square North	0.33	0	0	0.67
TH6	Ashley Road South	0.33	0	0	0.67
TH7	Ashley Road North	0	0	0.33	0.67
TH8	Hale Village	As per planning consent HGY/2006/1177			
	Hale Village Tower	0	0.1	0	0.9
TH9	Hale Wharf	0.1	0	0	0.9
TH10	Welbourne Centre & Monument Way	0	0	0.1	0.9
TH11	Fountayne Rd	0.33	0	0	0.67
TH12	Herbert Rd	0.33	0	0	0.67
TH13	Constable Crescent	0.33	0	0	0.67

## Housing Schedule

**7.5** Haringey's Strategic Policy SP1 (as revised) provides a commitment to deliver at least 19,802 net additional homes in the borough over the fifteen year period from 2011/12 to 2025/26.

**7.6** The Tottenham Area is forecast to deliver 10,624 new homes between 2011 and 2026.

**7.7** Whilst this represents a substantial proportion of the borough's housing target, this still leaves a balance of a minimum of 9,178 homes to be delivered on land outside of the Tottenham area. In the period 2011-2014, 707 net additional units were created in the borough, outside of Tottenham. This leaves 8,471 net units required to be built outside of Tottenham. Detail on where that growth is allocated can be found in the Appendix to the Site Allocations DPD.

**7.8** This Appendix demonstrates how the sites in this document meet the Tottenham Area apportionment of housing supply in the borough. It is important to note that the floorspaces and residential unit numbers below are indicative capacities intended to show that the land allocated has the potential to deliver the housing target as set out in the Strategic Policies DPD. These numbers should not be considered maximums or minimums when considering a site's potential. The final capacity of a site will be determined through a detailed design-led process as part of a planning permission.

**7.9** In addition to these identified sites, development is expected to come forward on unallocated sites at an average rate of 200 net units per annum across the borough. While these are not being counted against the target in this document, they are expected to supplement the delivery against housing targets over the plan period.

**TABLE 10: Delivery Summary 2011/12 to 2025/26**

Area		M² Employment	M² Town Centre	Net resi units
Tottenham High Rd Area of change	Seven Sisters	8,460	5,300	859
	Tottenham Green	1,230	490	64
	Bruce Grove	370	1,000	108
North Tottenham		6,970	51,230	3,986
Tottenham Hale		52,200	25,800	5,607
Total		69,230	83,820	10,624

Ref	Site Name		M <sup>2</sup> Emp	M <sup>2</sup> TC	Net Resi
Tottenham High Rd Corridor Area of Change					
Seven Sisters sub-area					
SS2	Lawrence Rd	(HGY/2012/1983)	500	-	264
		Remainder of the site	1,390	-	178
SS3	Brunel Walk & Turner Avenue		-	-	-
SS4	Gourley Triangle		6,570	-	191
SS5	Ward's Corner (HGY/2012/0915)		-	3,700	163
SS6	Apex House & Seacole Court		-	1,600	63
Tottenham Green Sub-Area					
TG2	Tottenham Chances & Nicholson Court		-	-	34
TG3	Tottenham Police Station & Reynardson Court		1,230	490	30
Bruce Grove Sub-Area					
BG2	Bruce Grove Station		100	100	11
BG3	Bruce Grove Snooker Hall & Banqueting Suite		-	850	49
BG4	Tottenham Delivery Office		370	-	48
North Tottenham Growth Area					
NT3	Northumberland Park North		340	340	472
NT4	Northumberland Park Estate Renewal		1,550	1,550	1,929
NT5	High Road West		4,350	11,740	1,200
NT6	North of White Hart Lane		-	1,000	100
NT7	Tottenham Hotspur Stadium (HGY/2010/1000)		730	36,600	285

Ref	Site Name		M² Emp	M² TC	Net Resi
Tottenham Hale Growth Area					
TH2	Station Interchange		-	2,400	138
TH3	Tottenham Hale Retail Park		13,900	13,900	992
TH4	Station Square West		-	5,200	297
TH5	Station Square North		7,350	-	213
TH6	Ashley Road South Employment Area		15,300	-	444
TH7	Ashley Road North		-	-	147
TH8	Hale Village	Hale Village (under construction/complete)	4,000	4,300	2,175
		Hale Village Tower	-	1,800	253
TH9	Hale Wharf		3,200	-	405
TH10	Welbourne Centre & Monument Way		-	-	298
TH11	Fountayne Rd		3,900	-	113
TH12	Herbert Rd (TH10)		2,300	-	66
TH13	Constable Crescent		2,300	-	66

APPENDIX B: PROPOSED DELETED POLICIES AND PROPOSAL SITES OF THE HARINGEY UNITARY DEVELOPMENT PLAN (2006)

- 7.10 The table below identifies the Part 2 policies and proposal sites of the Haringey Unitary Development Plan (2006) that will be deleted upon adoption of Haringey's Development Management DPD.
- 7.11 A full list of the policies that were deleted by the Secretary of State on 15th July 2009 and those deleted upon the adoption of the Haringey Local Plan: Strategic Policies on 18th March 2013 are contained in Appendix 1 of the Haringey Local Plan: Strategic Policies.

TABLE 11: Proposed Deleted Policies and Propsal Sites

UDP Proposal Sites		
UDP Site ref No.	Address	Date of deletion
13	White Hart Lane Stadium	2016
18	Tottenham Green Baths	2016
19	Land adjacent to railway line White Hart Lane Station	2016
20	Tottenham International including Tottenham Hale Station, the retail park, Hale Wharf and Tottenham Marshes	2016
21	Wards Corner and Council Offices at Apex House	2016
27	Lawrence Road	2016
28	Seven Sisters, Road / Durnford, Street/ Gourley Place	2016

APPENDIX C: SUPERSEDED SUPPLEMENTARY PLANNING DOCUMENTS AND GUIDANCE

- 7.12 This AAP proposes a new policy framework for Tottenham. As a result, a number of existing Supplementary Planning Documents (SPDs) and Guidance (SPGs) will be out of step with the new spatial strategy and the Tottenham policies and site allocations which give effect to this. The SPDs and SPGs listed below are therefore proposed for deletion.
- Tottenham Hale Urban Centre Masterplan, 2006
  - Lawrence Road Planning Brief SPD, October 2007
  - Tottenham High Rd Shopfront Policy (draft 2006);
- 7.13 Upon adoption of the suite of Haringey's Local Plan documents, including the Tottenham AAP, the Council will undertake a full analysis of the requirements for further supplementary guidance and will publish a proposed schedule of new SPDs to be prepared on its website.

## APPENDIX D: GLOSSARY

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

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

- **Culture:** A way of life including, but not limited to language, arts and science, thought, spiritual activity, social activity and interaction (the Roshan Cultural Heritage Institute).
- **Cultural Quarter:** Area where a critical mass of cultural activities and related uses are emerging, usually in historic or interesting environment.
- **Decent Homes Standard:** A Government standard for housing which requires both Councils and Registered Social Landlords (RSLs) to bring up their property standards to a defined minimum by 2010.
- **Density:** The number of habitable rooms per hectare.
- **Designated Views:** views which focus on architecturally and culturally important groups of buildings that can be enjoyed from well managed public spaces
- **Development Management Policies DPD (DMDPD):** These are the policies which are required to ensure that all development in the borough meets the spatial vision and objectives set out in the Local Plan.
- **Development Plan Documents (DPD):** Statutory planning documents that form part of the Local Development Framework including the Local Plan: Strategic Policies, Development Management Policies and Site Allocations Document.
- **District Centre:** District centres have traditionally provided convenience goods and services for more local communities and accessible by public transport, walking and cycling.
- **Ecological Corridor:** Ecological Corridors are relative areas of green space running through built up areas that allow the movement of plants and animals to other areas and habitats.
- **Emergency Services:** Includes Fire, Police and Ambulance services.
- **Employment Land Review (ELR):** A study providing evidence of the macroeconomic circumstances driving the need for provision of employment land in the borough.
- **Environmental Assessment:** A method or procedure for predicting the effects on the environment of a proposal, either for an individual project or a higher-level 'strategy' (a policy, plan or programme), with the aim of taking account of these effects in decision-making.
- **Fluvial:** Water in the Thames and other rivers.
- **Form:** The layout (structure and urban grain), density, scale (height and massing), appearance (materials and details) and landscaping of development.
- **General Development Order (GDO):** Identifies the certain types of usually minor development for which planning permission is not required and which therefore do not require a planning application to be submitted to the Council.
- **Greater London Authority (GLA):** The GLA is a strategic citywide government for London. It is made up of a directly elected Mayor and a separately elected Assembly.
- **Green Belt:** Green Belt is an area of land which has been given special status to restrict inappropriate development.
- **Green Chain/Link:** Linked green spaces composed of such elements as open land, footpaths, canals and rivers which provide public access, play valuable recreational, conservation, ecological and general amenity role. Green chains can also be Ecological Corridors.
- **Green Industries:** This business sector that produced goods or services, which compared to other more commonly used goods and services, are less harmful to the environment.
- **Green Infrastructure:** A network of connected, high quality, multi-functional open spaces, corridors and the links in between that provide multiple benefits for people and wildlife.
- **Green Roofs:** Planting on roofs to provide climate change, amenity and recreational benefits.
- **Growth Area:** Specific areas for new residential development to accommodate future population growth. In Haringey, there are two including Tottenham Hale, Opportunity Area, and Haringey Heartlands, Area of Intensification.
- **Gyratory:** A road junction at which traffic enters a one-way system around a central island.
- **Health Impact Assessment (HIA):** A process for ensuring that land use and planning decision making at all levels consider the potential impacts of decisions on health and health inequalities. It identifies actions that can enhance positive effects and reduce or eliminate negative effects.



- **Heritage Land:** Heritage Land is open land of strategic importance to London of significance for its landscape, historical and nature conservation interest. The only Heritage land at the present time is Highgate Golf Course which forms part of the wider area of Hampstead Heath.
- **Highway Authority:** An authority responsible for a highway, whether or not maintainable at public expenses.
- **Historic Parks and Gardens:** Parks and gardens containing historic features dating from 1939 or earlier registered by English Heritage. These parks and gardens are graded I, II or II\* in the same way as Listed Buildings. Only Alexandra Park and Finsbury Park are registered in Haringey.
- **Homes and Community Agency (HCA):** HCA is the national housing and regeneration agency for England.
- **House in Multiple Occupation (HMO):** Housing occupied by members of more than one household, such as student accommodation or bedsits.
- **Housing Association:** see Registered Provider.
- **Housing Trajectory:** Graph illustrating the supply of projected completion housing completions up to 2026.
- **Industrial Business Park (IBP):** Strategic industrial locations that are particularly suitable for activities that need better quality surroundings including research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and some small scale distribution. They can be accommodated next to environmentally sensitive areas.
- **Intermediate housing:** Homes that are for sale and/or rent, at a cost above social rent, but below private market level, subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable or socially rented housing.
- **Landmarks:** Buildings and structures, other than Strategically Important Landmarks, that are visually or culturally prominent in Designated Views
- **Landscape:** The character and appearance of land, including its shape, form, ecology, natural features, colours and elements and the way these elements combine.
- **Lifetime Home:** Ordinary homes designed to provide accessible and convenient homes for a large segment of the population.
- **Linear View:** A view seen through narrow gaps between buildings or landscaping
- **Listed Building:** Locally listed buildings are those which satisfy one or more of the following criteria: historic interest, architectural interest or environmental significance. Statutory listed buildings are buildings of special architectural or historic interest, they are graded as I, II\* or with grade I being the highest. English Heritage is responsible for designating buildings for statutory listing in England.
- **Local Development Documents (LDD):** The collective term for Development Plan Documents, Supplementary Planning Documents (does not form part of the statutory development plan) and other documents including the Statement of Community Involvement.
- **Local Development Framework (LDF):** The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current Local Plans or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan.
- **Local Development Scheme (LDS):** The LDS sets out the programme/timetable for preparing the LDD.
- **Local Implementation Plan (LIP):** Statutory transport plans produced by London boroughs bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.
- **Local Nature Reserve (LNR):** Sites which offer special opportunities for people to see and learn about wildlife in natural surroundings. LNRs are a statutory designation made under the National Parks and Access to the Countryside Act 1949.
- **Local Plan: Strategic Policies:** The Local Plan: Strategic Policies is a Development Plan Document setting out the vision and key policies for the future development of the borough up to 2026.
- **Local Shopping Centre:** The level of shopping centre below District Centre level, providing services for local communities.

- **Local Strategic Partnership (LSP):** A partnership of people that bring together organisations from the public, private, community and voluntary sector within a local authority area.
- **London Development Agency (LDA):** Organisation acting on behalf of the Mayor, whose aim is to further the economic development and regeneration of London.
- **London Plan (The Spatial Development Strategy):** The London Plan is the name given to the Mayor's spatial development strategy for London.
- **Market Housing:** Private housing for rent or for sale, where the price is set in the open market.
- **Metropolitan Open Land (MOL):** Strategic open land within the urban area that contributes to the structure of London.
- **Metropolitan Town Centre:** Metropolitan centres serve wide catchments areas and can cover several boroughs. Typically they contain at least 100,000sq.m of retail floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, leisure, service and civic functions.
- **Mixed tenure:** A mix of affordable and market housing.
- **Mixed Use Development:** Provision of a mix of complementary uses, such as residential, community and leisure uses on a site, within the same building or within a particular area.
- **National Planning Policy Framework (NPPF):** Sets out the Government's planning policies for England and how they are expected to be applied. The NPPF replaces 44 planning documents, primarily Planning Policy Statements (PPS) and Planning Policy Guidance (PPGs), which previously formed Government policy towards planning.
- **Neighbourhood and more local centres:** Typically serve a localised catchment often most accessible by walking and cycling. They include local parades and small cluster of shops, mostly for convenience goods and other services.
- **Open Space:** All land in London that is predominately undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.
- **Panorama:** A broad prospect seen from an elevated public viewing place
- **Planning Obligations Supplementary Planning Document:** A guidance document offering support in the implementation of planning obligations on planning applications subsequent to the adoption of the Haringey CIL.
- **Primary Care Trust (PCT):** PCTs decide what health services a local community needs, and they are responsible for providing them.
- **Public Realm:** This is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.
- **Public Transport Accessibility Level (PTAL):** Public Transport Accessibility Levels are a measure of the extent and ease of access to the public transport network.
- **Regeneration:** The economic, social and environmental renewal and improvement of a rural or urban area.
- **Registered Provider:** non-profit making organisations that provide low-cost housing for people in need of a home.
- **River Prospect:** Short and longer distance visual experiences of a rivers cape (in HGY case Lee, Moselle or New River)
- **Section 106 Agreements (S106)/Planning Obligations:** These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.
- **Secured by Design:** The planning and design of street layouts, open space, and buildings so as to reduce the likelihood or fear of crime.
- **Site Allocations Development Plan Document:** This will form part of Haringey's LDF and will guide land use and future development in the borough until 2026.
- **Sites of Importance for Nature Conservation (SINC):** SINC are areas protected through the planning process having been designated for their high biodiversity value.
- **Small and Medium Enterprises (SMEs):** Small and Medium Enterprises (SMEs) comprise businesses with more than 11 but less than 250 staff.

- **Social Infrastructure:** Facilities and services including health provision , early years provision , schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.
- **Social rented housing:** be owned by local authorities or private registered providers, for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above,
- **Spatial Vision:** A statement of long term shared goals for the spatial structure of an area.
- **Statement of Community Involvement (SCI):** The Council's policy for involving the community in the preparation, review and alteration of LDDs and planning applications. It includes who should be involved and the methods to be used.
- **Strategic Environmental Assessment (SEA):** Expression used by the European Union to describe environmental assessment as applied to policies, plans and programmes.
- **Strategic Housing Land Availability Assessment (SHLAA):** An assessment of land availability for housing which informs the London Plan and borough local development documents, as set out in section 48 of the NPPF
- **Strategic Housing Market Assessment (SHMA):** An assessment of housing need and demand which informs the London Plan and borough local development documents.
- **Strategic Industrial Location (SIL):** These comprise Preferred Industrial Locations (PILs) and Industrial Business Parks and exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including logistics, waste management, utilities, wholesale markets and some transport functions.
- **Supplementary Planning Document (SPD):** Provides supplementary information about the policies in DPDs. They do not form part of the development plan and are not subject to independent examination.
- **Supplementary Planning Guidance (SPG):** Additional advice, provided by the Council on particular topic or policy areas and related to and expanding upon statutory policies.
- **Sustainability Appraisal (SA):** This is a systematic and continuous assessment of the social, environmental and economic effects of strategies and policies contained in the DPDs, which complies with the EU Directive for Strategic Environmental Assessment.
- **Sustainable Urban Drainage Systems (SUDS):** An alternative approach from the traditional ways of managing runoff from buildings and hard standing. They can reduce the total amount, flow and rate of surface water that runs directly to rivers through storm water systems.
- **Tall Buildings:** The Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their neighbours, have a significant impact on the skyline, are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London.
- **Townscape View:** Unfolding close view of built up environment with spaces between and in each case views might or might not contain (but will be more significant if they do)
- **Tree Preservation Order (TPO):** Made under the Town and Country Planning Act 1990 by the local planning authority to protect trees of importance for amenity, landscape and nature conservation.
- **Urban Characterisation Study (UCS):** An appraisal of the character of the borough in terms of built urban form, topography, conservation and heritage value.
- **Use Classes Order:** The Town and Country Planning (Use Classes) Order 1987, as amended, lists 15 classes of use. A change of use within the same Class does not constitute development and thus does not require planning permission.
- **Unitary Development Plan (UDP):** A UDP is a land use plan that seeks to make the most efficient and effective use of land in the public interest. The LDF will eventually replace Haringey's UDP 2006.
- **View Corridor:** Strategic important views designated in the London Views Management Framework.
- **Warehouse Living:** Purpose built and genuine integrated working and living accommodation specifically targeted at the creative industries sectors.

## APPENDIX E: MAKING REPRESENTATIONS TO THE PLAN

### Introduction

**7.14** The Tottenham Area Action Plan development plan document (DPD), the 'Plan', is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when submitted to the Secretary of State for examination by an independent Planning Inspector. The Planning and Compulsory Purchase Act 2004 (as amended) (the 2004 Act) states that the purpose of the examination is to consider whether the Plan complies with the legal requirements and is 'sound'.

### Legal Compliance

**7.15** The Inspector will first check that the Plan meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness.

**7.16** Before making a representation please consider the following:

- The Plan in question should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Local Planning Authority (LPA), setting out the Local Development Documents it proposes to produce over a three year period. It will set out the key stages in the production of any DPDs which the LPA propose to bring forward for independent examination. If this DPD is not in the current LDS it should not have been published for representations. The LDS should be on the LPA's website and available at their main offices.

- The process of community involvement for the Plan in question should be in general accordance with the LPA's Statement of Community Involvement (where one exists). The Statement of Community Involvement (SCI) is a document which sets out a LPA's strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs) and the consideration of planning applications.
- The Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- On publication, the LPA must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The LPA must also place local advertisements and notify statutory bodies (as set out in the regulations) and any persons who have requested to be notified.
- The LPA is required to provide a Sustainability Appraisal Report when they publish a DPD. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The Plan should have regard to national policy and conform generally to the London Spatial Development Strategy, i.e. the London Plan. This sets out policies for the Greater London region in relation to development and use of land, and forms part of the development plan for LPAs.
- The Plan must have regard to any Sustainable Community Strategy (SCS) for its area. The SCS is usually prepared by the Local Strategic Partnership which is representative of a range of interests in the LPA's area.

## Soundness

- 7.17** Soundness is explained fully in the National Planning Policy Framework in paragraph 182.
- 7.18** The Inspector must be satisfied that the Plan has been positively prepared and is justified, effective and consistent with national policy. To be sound the Plan should be:

## Positively Prepared

- 7.19** The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

## Justified

- 7.20** This means that the Plan should be founded on a robust and credible evidence base involving:
- Evidence of participation of the local community and others having a stake in the area.
  - Research/fact finding: the choices made in the plan are backed up by facts
- 7.21** The Plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

## Effective

- 7.22** This means the Plan should be deliverable, embracing:
- Sound infrastructure delivery planning;
  - Having no regulatory or national planning barriers to delivery;
  - Delivery partners who are signed up to it; and
  - Coherence with the strategies of neighbouring authorities.
- 7.23** The Plan should also be flexible and able to be monitored.
- 7.24** The Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The Plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Plan should make clear that major changes may require a formal review including public consultation.
- 7.25** Any measures which the LPA has included to make sure that targets are met should be clearly linked to an Authority Monitoring Report.

## Consistent with national policy

- 7.26** The Plan should be consistent with national policy. Where there is a departure, LPAs must provide clear and convincing reasoning to justify their approach.
- 7.27** Conversely, respondents may feel the LPA should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are which justify a different policy approach to that in national or regional policy and support your assertion with evidence.
- 7.28** If you think the content of the Plan is not sound because it does not include a policy where it should, you should go through the following steps before making representations:
- Is the issue with which you are concerned already covered specifically by any national planning policy or in the London Plan (2015)? If so it does not need to be included.
  - Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other DPD in the Local Plan. There is no need for repetition between documents in the Local Plan.
  - If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
  - If the Plan is unsound without the policy, what should the policy say?

## General advice

- 7.29** If you wish to make a representation seeking a change to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to the legal compliance check and three tests set out above. You should try to support your representation by evidence showing why the Plan should be changed. It will be helpful if you also say precisely how you think the Plan should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.
- 7.30** Where there are groups who share a common view on how they wish to see the Plan changed, it would be helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to submit separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.



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