


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

<b>Site Allocations DPD</b>
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**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	<b>Mr</b>	<b>Miss</b>
First Name	<b>Alan</b>	<b>Tanya</b>
Last Name	<b>Nagle</b>	<b>Jordan</b>
Job Title (where relevant)		<b>Director</b>
Organisation (where relevant)	<b>Parkstock Ltd</b>	<b>RPS CgMs</b>
Address Line 1	<b>c/o Agent</b>	<b>140 London Wall</b>
Address Line 2		<b>London</b>
Address Line 3		
Post Code		<b>EC2Y 5DN</b>
Telephone Number		<b>020 7832 0255</b>
Email address		<b>tanya.jordan@cgms.co.uk</b>

<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:

RPS CgMs for and on behalf of Parkstock Ltd

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

Paragraph  Policy  Policies Map

4. 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

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.

### SA36: Finsbury Park Bowling Alley

Parkstock Ltd are the freeholders of both 10 Stroud Green Road and 269 – 271 Seven Sister's Road located within Finsbury Park. Overall we are supportive of SA36 which includes these sites.

We have the following comments:

- **Site Requirements:** the first bullet point includes the provision of a site wide masterplan to accompany development proposals, to demonstrate how proposals do not compromise other land parcels. Whilst we can understand the benefits of a masterplan approach and demonstrating how individual submissions would not compromise future proposals, it would not be appropriate for this policy to require one masterplan or submission to cover the whole site given the different land operations and ownership. Such an approach would hamper delivery and not be effective. The policy should make it clear that individual applications for different parcels of land are appropriate in order to ensure a sound and effective plan.
- **Site Requirements:** the sixth bullet point notes that an appropriate leisure / community facility use to replace the existing Rowan's bowling alley must be provided. In addition, the text within 2.105 under 'commentary' notes that a new leisure facility should be provided, but this text does not make reference to a community facility. It is important to ensure consistency so future requirements are clear. We consider policy should provide the flexibility to allow the provision of an appropriate leisure **or** community facility, depending on demand and commercial requirements. We therefore recommend that the text within 2.105 under 'commentary' is amended to state 'a new leisure **or** community use ...' to ensure the plan is sound and consistent.
- **Site Requirements:** the seventh bullet point notes that the existing cycle parking facility will be replaced and enhanced. However, the red line on page 92 now excludes the cycle facility (the previous version of the plan included the cycle facility within the red line). We

therefore question how the cycle facility can be effectively replaced and enhanced if it is not included within the site allocation. We therefore recommend that the red line is amended to include the cycle facility to ensure the effective delivery of the policy objectives.

- **Development Guidelines:** the 11<sup>th</sup> bullet point notes that new development should enhance the setting of the conservation area and the registered park. This is contrary to the Planning (Listed Buildings and Conservation Areas) Act 1900 which states that the character and appearance of conservation areas should be preserved or enhanced. The wording of the 11<sup>th</sup> bullet point should therefore be changed to note that development should 'preserve or enhance' the setting of the conservation area and registered park to ensure it is legally compliant.
- **Indicative Residential Capacity:** the indicative net residential capacity notes 71 units for the site in totality. Through design studies we are of the opinion that between 80 – 150 residential units could be delivered on the Stroud Green Road site and between 20 – 40 residential units on 269 – 271 Seven Sister's Road.

We have reviewed Appendix 4 A: Methodology for Assessing the Capacity of Allocated Sites and note that for sites without planning permission or which are not subject to pre-application discussions, a standard methodology has been applied which assesses the site capacity. We note that paragraph 4.4 on page 174 indicates that the development capacity attributed to each site using this methodology is an indicative minimum, and not prescriptive, and that the number of dwellings that may be achieved will be determined by many considerations such as design and layout, the size and type of the units, relevant development management policy requirements, site constraints, scheme viability, the site area and the PTAL.

Whilst we fully acknowledge the above we are concerned that the standard approach which has been applied could be misleading and ineffective, particularly since the text indicating that a standard approach has been taken, and that the targets are minimums, is included within an appendix. We are concerned that by only including minimum residential units within the site allocations, this will cause unrealistic expectations for future planning applications and the policies will not effectively maximise development or assist delivery.

If this standard methodology is applied we consider that at the very least, to ensure the plan is sound, the explanation contained within Appendix 4 in terms of this approach should be stressed at the front end of the document so all readers are clear on the approach.

In addition, a note should be added to the 'indicative development capacity' table on page 92 for SA36 which states that the development capacity, for both residential and town centre uses, is an indicative minimum to ensure consistency with Appendix 4 A.

(Continue on a separate sheet/ expand box if necessary)

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

Please see modifications outlined in Section 5 above.

(Continue on a separate sheet/ expand box if necessary)

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

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

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

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

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

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

There has been considerable public interest in SA36 during the plan process and therefore to ensure that the landowner is fully involved in any issues discussed at the examination it is important that they are able to actively participate.

*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

RPS CgMs for and on behalf of Parkstock Ltd

Date:

2/3/16