

London Borough of Haringey  
Planning Policy  
Level 6, River Park House  
225 High Road  
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London  
N22 8HQ

4<sup>th</sup> March 2016

Iceni ref. 15/070  
BY EMAIL

Dear Sir

**LONDON BOROUGH OF HARINGEY**

**LOCAL PLAN CONSULTATION REGULATION 19**

**REPRESENTATIONS ON BEHALF OF BERKELEY HOMES (NORTH EAST LONDON LTD)**

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On behalf of our client, Berkeley Homes (North East London Ltd), please find enclosed representations to the Council's current Local Plan consultation, which comprises:

- Alterations to Strategic Policies 2011-2026 Haringey's Local Plan Pre-Submission Version January 2016;
- Development Management Policies Pre-Submission Version January 2016.

There is much to be supported in the draft policy documents, such as the wholesale regeneration of Tottenham, increased housing targets to reflect the demographic growth of London, support for design-led approach to development and provision for taller, higher density developments in the AAP and town centres. There are also elements of the draft policies, which the Council should review in line with our comments and the requirements of emerging Government policy if it is to deliver its ambitious plans for growth and renewal.

These comments should be read in conjunction with our earlier representations made at Regulation 18 consultation stage (March 2015) as well as the representations made on behalf of Berkeley last year (in the January-March 2014 consultation).

**Background**

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Berkeley Homes recognises the development opportunities throughout the borough and would welcome the opportunity to work with the Council to help deliver its exciting vision. Berkeley Homes delivers award-winning regeneration projects across London, creating new exciting places where people want to live, work and visit.

Berkeley Homes (North East London) are currently working with the London Borough of Hackney to deliver a sustainable community as part of an estate renewal regeneration scheme with over 5,000 new homes, shops and community facilities at Woodberry Down. This division of Berkeley Homes are building over 950 new homes in the London Borough of Islington; and constructing Goodman's Fields in Tower Hamlets a unique mixed use, 7-acre development in the heart of the City which includes affordable housing, a health centre and a Local Training Centre.

## Alterations to Strategic Policies 2011-2026

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### Alt30 - Policy SP1

Berkeley Homes welcomes the amendments to Policy SP1 which seek to ensure the Council meet and exceed its strategic housing requirement of 19,802 homes over the plan period, achieved in part through the promotion of Tottenham as a key growth area but with recognition that development may also occur in other areas of the Borough.

### Alt 47-50 and 52 - Policy SP2

Berkeley Homes supports the reduction in the affordable housing target to 40% based on habitable rooms in accordance with the evidence of the Borough's latest viability assessment (Haringey Development Appraisals & Viability Testing, January 2015). It is critical to ensure that the provision of affordable housing does not harm the continual delivery of needed homes.

Berkeley Homes also support the proposed housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing in line with the London Plan and consistent with the Strategic Housing Market Assessment (SHMA) findings to deliver more balanced communities and to ensure scheme viability.

The proposed amendments to Policy SP2 (8) which states the preferred affordable housing mix, in terms of unit size and types of dwellings on individual schemes will be determined through negotiation, scheme viability assessments and driven by up-to-date assessments of local housing needs at the time of any application is also supported.

### Alt 56 - paragraph 3.27

It is considered that this policy is not consistent with national policy. Development proposals should be design-led. The key consideration for any development should not be density, (which is simply a mathematical calculation) but of the quality of the proposed development overall and the place it will create in its context. An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space. Policy SP2 should be amended to reflect this.

### Alt 70, 71 and 73 – Policy SP8

This policy should be amended to give consideration to the individual circumstances of a site when deciding what protection should be offered to non-designated employment sites.

Para 8.16 and 8.17 of Atkins Employment Land Study (2015) states (with our emphasis added) "Ensuring a supply of good quality, well located employment sites is maintained will help to support investment by existing and new businesses and growth in the local business base. Demand is likely to continue to be driven by small and medium sized businesses, primarily operating in B1 sectors. The trend-based forecasts suggest further decline in industrial and warehousing employment which is expected to result in some surplus employment land over the period to 2031. It is important that any surplus land is either re-used to meet B1a/b needs or released to other uses to contribute to Haringey's housing and regeneration objectives. At the same time, it will be important that fit-for-purpose, well occupied B2 and B8 sites that serve the needs of local businesses are safeguarded so that Haringey maintains a diverse range of business activities and employment opportunities."

"The NPPF requires local authorities to be responsive to market signals to ensure that there is adequate provision of the right type of employment land to meet the needs of the business community.

At the same time, there is little benefit in safeguarding employment sites that are not fit-for-purpose and could be used to relieve the Borough's housing and regeneration pressures."

The release of an employment site for an alternative use can lead to the regeneration of an area through the introduction of new investment. The potential for a site to be released from employment use should also be considered in relation to site location and circumstances, and the quantum of employment space that is generally available in the borough.

#### Alt 76 - paragraph 5.1.14

The proposed Alterations 70, 71 and 73 discussed above would seem to be in conflict with the Council's proposed amendment to paragraph 5.1.14 which seeks a more proactive and positive approach to planning for economic development. Draft paragraph 5.1.14 says that '*it will be important for a flexible approach to economic development to be taken on Local Employment Areas by not placing significant restrictions on carefully managing the type of ~~employment~~ use that is permitted on allocated sites*'. This would imply some flexibility for none employment uses to be accommodated in defined employment areas and it is suggested that the same flexibility be applied to other non-designated employment sites as a minimum.

## **Development Management Policies**

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### Policy DM1 - Delivering high quality design

Berkeley Homes support the proposed change to the policy (previous Policy DM3) which removes the arbitrary rule of 20m separation between properties which is restrictive, ineffective and is not justified in a central London context.

### Policy DM6 - Building heights

The policy continues to state that tall buildings will only be acceptable in areas identified on Figure 2.2. It is suggested that this policy should not put a ceiling on the appropriate height of buildings in the borough. Proposals for tall buildings should be considered on their individual merits and the Council should not rely on an arbitrary figure.

The policy should be amended so that building heights are not applied rigidly to each site within each area. The borough has an ambitious strategic housing target, which it rightly aims to meet and exceed. Applying onerous policies such as this will inevitably hinder the Council's delivery of housing.

### Policy DM11 - Housing Mix

As outlined for Policy SP2, this approach to density is not consistent with national policy. Development proposals should be design-led. The key consideration for any development should not be density but the quality of the proposed development and the place it will create.

The Haringey Urban Characterisation Study 2014 is helpful but should only be used in practice as an indicative baseline guide to development and the policy should be updated to reflect this. An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space. Para 3.9 of the supporting text suggests an approach such as this but the wording of the Policy itself should be relaxed, to allow easy application

### Policy DM13 - Affordable housing

Policy DM13 D, is not wholly supported. It states that viability assessments must be based on a standard residual valuation approach, with the benchmark existing use land value taken as the existing/alternative use value.

Viability and deliverability are key to securing national policy's aspiration of sustainable development, as outlined in Paragraph 173 of the National Planning Policy Framework (NPPF). Land or site value is central to the consideration of viability and the most appropriate way to assess this value can vary.

The CLG guidance on section 106 and affordable housing requirement states: 'Any purchase price used should be benchmarked against both market values and sales prices of comparable sites in the locality' (with our emphasis added)

The RICS Guidance (2012: pp.38) additionally explains that 'Competitive returns can only be achieved in a market context (i.e. Market value) not one which is hypothetically based with an arbitrary mark-up applied, as in the case of EUV.

As such, we request that this element of the policy is amended accordingly and we refer to our earlier representations at Regulation 18 stage in this respect.

### Policy DM40 – Loss of employment land and floor space

As stated in previous representation, in relation to draft Policy DM40 Ab), there is no evidence to suggest why a three-year marketing campaign is required. It is typical in other London boroughs to exercise periods of 12 months. The NPPF resists the long term protection of sites, where there is no reasonable prospect of the site being used for that purpose, having consideration to market signals and relative need for different land uses. Given the nature of land acquisition and development process this length of time would hinder actual delivery of needed new homes.

### Policy DM41 – Town centre development

We suggest that the policy objective is changed to consider the important supporting role housing can play in sustaining vibrant and vital town centres, in light of changing shopping habits, the evidence from the Outer London Commission (third report) and the Experian consumer expenditure survey.

Similarly, the policy should make specific reference to encourage a greater density of development within town centre locations which are also often hubs for public transport and sustainable travel in order to ensure the policy is compatible with emerging changes to the National Planning Policy Framework NPPF.

## **Government planning amendments**

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As the Council are aware, the Government have recently published a number of planning documents for consultation. These include changes to the NPPF as well as a technical consultation on the implementation of planning changes as part of the forthcoming Housing and Planning Bill.

Given the Councils Development Plan Documents (DPD) were prepared and published in draft before these Government documents were released, we would recommend that the Council review their DPD's for consistency and compatibility prior to the EIP and trust our comments on individual policies above are helpful in this respect.

## Summary

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Thank you for providing us with the opportunity to comment on the draft policy documents, we look forward to being involved further and reserve our right to provide additional representations and evidence at the Examination in Public if necessary.

We trust that the comments are helpful and clear, however if you require further clarity on any of the comments made please do not hesitate to contact either Rebecca Fieldhouse [rfieldhouse@iceniprojects.com](mailto:rfieldhouse@iceniprojects.com) or Kieron Hodgson [khodgson@iceniprojects.com](mailto:khodgson@iceniprojects.com) of this office.

Yours faithfully,

A handwritten signature in black ink that reads "Iceniprojects Ltd." in a cursive, slightly slanted font.

ICENI PROJECTS LIMITED

cc. Miss L Bird, Berkeley Homes (North East) London