

Haringey Planning Policy
Haringey Council
River Park House
225 High Road
N22 8HQ

24 March 2015

By Email

Dear Sir/Madam

TOTTENHAM AREA ACTION PLAN: PREFERRED OPTIONS

On behalf of Hermes and Argent, I am pleased to enclose representations on the Tottenham Area Action Plan Preferred Options.

Please do not hesitate to contact me or my colleague Hannah Blunstone if you have any queries or would like to discuss our comments.

Yours faithfully

RICHARD LEMON
ASSOCIATE DIRECTOR – PLANNING

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BACKGROUND

1. CBRE Planning acts for Hermes Investment Management, who manage the BT Pension Scheme's UK real estate portfolio. This portfolio includes Tottenham Hale Retail Park. Hermes' development partner at Tottenham Hale is Argent.
2. These representations on the Tottenham Area Action Plan (Preferred Options) (February 2015) are submitted on behalf of both Hermes and Argent.
3. Hermes and Argent broadly welcome the Preferred Options document, but have a number of detailed comments, which we set out below. Where we recommend the addition of new text we have shown it with an underline. Where we propose the deletion of text we have shown it ~~struck through~~.

REPRESENTATIONS

Overall approach to proposed Tottenham Hale district centre

4. Policy AAP3 deals with the proposed Tottenham Hale District Centre. It says:

The Council will support planning applications for development within the Tottenham Hale District Centre as indicated in Map 4.1 to promote the positive regeneration of Tottenham Hale.
5. This unhelpfully suggests that **any** planning application will be approved. We recommend the addition of further text to make clear that applications **which are consistent with the district centre designation** will be approved.
6. We suggest:

The Council will support planning applications for appropriate development within the Tottenham Hale District Centre as indicated in Map 4.1 (that is, development consistent with the district centre designation) to promote the positive regeneration of Tottenham Hale.

Summary of recommendation: Add further text to make clear that applications which are consistent with the district centre designation will be approved

Extent of proposed Tottenham Hale district centre

7. Map 4.1 illustrates the proposed boundary of the district centre. The boundary is very widely drawn, encompassing sites such as Ashley Road South which are not intended to accommodate a significant quantum of 'town centre uses'. This may encourage speculative proposals for, say, retail development, at the expense of other sites on which the Council is particularly keen to see retail uses.
8. Whilst, therefore, we recommend that the proposed district centre boundary is retained, we also recommend that the Council defines a 'core district centre' within which the majority of retail and other key town centre uses should be focussed. Notwithstanding, some retail and other key town centre uses should be encouraged outside the core where, for example, they help to create a genuine sense of place.

Summary of recommendation: Retain proposed district centre boundary but add a new 'core district centre'

Number of jobs

9. Whilst we welcome the ambition in the document, we are keen that the job targets are realistic. We therefore recommend that any references to the number of new jobs should make clear that they are simply overall targets.

Summary of recommendation: Make clear that references to numbers of jobs are simply overall targets

Housing mix (by size and type)

10. Paragraph 5.34 notes that:
- The delivery of one and two bed units will be prioritised in keeping with Tottenham Hale’s urban character
 - High quality family housing will be concentrated on sites that best accommodate this use through access to open space or relate to increased social infrastructure provision
 - There is an opportunity to introduce a quality, managed institutional private rented sector at scale in the heart of the new district centre
11. We welcome this text and recommend that bullets one and two above are upgraded to policy status rather than supporting text.

Summary of recommendation: Upgrade text on preferred unit type and size to policy status

Affordable housing

12. Policy AAP2 (part B) says that:
- a. *Allocated sites within the Tottenham Hale AAP Neighbourhood area (the Housing Zone) will be expected to deliver 50% market housing and 50% affordable housing; and*
 - b. *The affordable tenure split ... which in the case of development in the Tottenham AAP area will result in an overall tenure mix of 60% intermediate accommodation and 40% affordable rented accommodation.*
13. We recommend that the Council adds further text to make clear that the delivery of affordable housing is dependent on viability, and that schemes should include the ‘maximum reasonable proportion’ of affordable housing, up to 50% of the total, informed in each case by viability analysis. This is consistent with the approach set out at Policy SP2 of the Local Plan Strategic Policies.

Summary of recommendation: Add further text to Policy AAP2 to make clear that delivery of 50% affordable housing is subject to viability

Built to Rent

- 14. The Built to Rent fund¹ could make a useful contribution to housing delivery in Tottenham. We recommend that a new policy is included in the AAP which offers specific support for Built to Rent on appropriate sites, as well as making clear that homes built under Built to Rent should (a) meet the Mayor’s kite mark standard and (b) be treated as neutral for affordable housing purposes.

Summary of recommendation: Add new policy endorsing the Built to Rent fund, making clear that homes built under this initiative should (a) meet the Mayor’s kite mark standard and (b) be treated as neutral for affordable housing

Employment (B uses) land

- 15. Paragraph 5.35 says that:
Employment land in [the Tottenham Hale] 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.
- 16. Whilst we recognise the importance of maintaining a supply of employment land, there is a significant requirement for new homes in the area. We recommend that this is reflected in the policy.
- 17. We suggest:

Employment land in [the Tottenham Hale] 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 and meeting housing as well as employment targets.

Summary of recommendation: Add new text to paragraph 5.35 which reflects the fact that mixed use development will help to meet housing as well as employment targets

Proposed site allocations

Proposed site allocation: TH1 – Station Square West

- 18. The proposed allocation is set out on page 95, but is very vague. We therefore recommend that the proposed allocation is clarified, simply by drawing out some of the supporting text from pages 96 to 98.

Summary of recommendation: Clarify proposed allocation for site TH1

- 19. In terms of site requirements, bullet 1 says that any development ‘must accord’ with the emerging masterplan. However, decision-makers will not be able to attach the same weight to the masterplan as the AAP, as it will not have been subject to the same scrutiny and nor will it form part of the development plan.

¹ See <https://www.gov.uk/government/collections/build-to-rent-guidance-and-allocations> Access date: 20 March 2015

20. We therefore recommend that bullet 1 is amended to say that development should be 'informed by' the emerging masterplan.

Summary of recommendation: Amend site allocation TH1 to make clear that any development should be 'informed by' the masterplan

Proposed site allocation: TH5 – Tottenham Hale Retail Park

21. In terms of site requirements, bullet 1 says that:
Any [presumably 'a'] Council-approved District Centre Framework will be prepared for this site, and development should be in accordance with it.
22. However, decision-makers will not be able to attach the same weight to the District Centre Framework as the AAP, as it will not have been subject to the same scrutiny and nor will it form part of the development plan.
23. We therefore recommend that bullet 1 is amended to say that development should be 'informed by' the District Centre Framework.

Summary of recommendation: Amend site allocation TH5 to make clear that any development should be 'informed by' the District Centre Framework

24. In terms of design guidelines for the retail park site, the draft AAP suggests that parking should be minimised. However, parking requirements are likely to be driven by the type of retail offer, and policy should reflect this.

Summary of recommendation: Revise text to require that the amount of parking sought should reflect the type and role of the proposed retail floorspace

Capacity of proposed site allocations

25. Appendix A of the draft AAP sets out an estimate for the number of residential units which might be accommodated on allocated sites, albeit a footnote suggests that the unit numbers are simply estimates. There may be a case for the estimated capacities to be increased and we therefore recommend that the footnote is revised to explain more clearly that the residential capacities are simply estimates.

Summary of recommendation: Revise footnote to make clear that the numbers of units allocated to each site are simply estimates, and that they may be exceeded

Community Infrastructure Levy/planning obligations

26. The DPD refers to pooled section 106 contributions in dealing with Station Square West (site ref TH1, pages 95-98), suggesting that they will fund improvements to the public realm. That is an entirely reasonable approach, but seeking additional section 106 contributions may have a bearing on, for example, the level of affordable housing that the sites might bear. We recommend that this is noted in the supporting text.

Summary of recommendation: Add text making clear that additional section 106 contributions may have a bearing on the ability to deliver affordable housing

27. The absence of any other reference to pooling of section 106 contributions suggests that the Council will otherwise rely on CIL to fund new infrastructure which serves more than one site.
28. We recommend that a new sub-section is included in the DPD which summarises the overall strategy for developer contributions. This should make clear that pooled section 106 contributions will only be sought where they are specified in the DPD in specific site allocations, and that where pooled contributions are sought the Council recognises that it may have a bearing on the extent to which developments can bear site-specific section 106 contributions (including affordable housing).
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Summary of recommendation: Include a new sub-section in the DPD which summarises the overall strategy for developer contributions, including the approach to pooled contributions

29. In addition, the DPD should recognise the funds available for infrastructure as part of the now confirmed Housing Zone, reducing the likely requirement for developers' contributions.
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Summary of recommendation: Include additional text reflecting the designation of Tottenham Hale as a Housing Zone and the reduction in the developers' contributions which are likely to be required

CONCLUSIONS AND CONTACTS

30. We trust that these comments are helpful. We would be pleased to discuss them further if that would be helpful.

Richard Lemon

Hannah Blunstone

CBRE Planning, 24 March 2015