



Our Ref: TJ/19292

Local Plan Consultation  
Planning Policy  
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26<sup>th</sup> March 2015

Dear Sirs,

**HARINGEY'S LOCAL PLAN  
DEVELOPMENT MANAGEMENT POLICIES PREFERRED OPTIONS  
CONSULTATION DOCUMENT  
REPRESENTATIONS ON BEHALF OF PARKSTOCK LTD**

On behalf of our client, Parkstock Ltd, we submit the following representations in relation to the Development Management Policies Preferred Options consultation.

**Policy DM3: Privacy and Protection from Overlooking**

Although we acknowledge the requirement to provide a 20m separation distance between facing 1<sup>st</sup> floor habitable room windows, we strongly question the requirements within supporting para. 2.20.

Para. 2.20 requires an additional distance of 10m for each additional floor i.e. a minimum of 30m between facing 2<sup>nd</sup> floor habitable room windows etc. We are of the opinion that such additional requirements are both onerous and unnecessary to protect privacy and overlooking. Such distances will render a number of development sites within an urban context undeliverable and will also adversely impact on the delivery of appropriate high density schemes.

A general rule of 18m – 20m between facing habitable rooms is appropriate to protect existing residents and overlooking and any other requirements are considered to be onerous and excessive.

**Policy DM5: Siting and Design of Tall Buildings  
Map 2.2: Location Suitable of Tall Buildings**

As a general point, we would suggest that Map 2.2 is provided at a better quality to ensure the key and precise location of tall buildings is clear and accurate.

In relation to Finsbury Park Bowling Alley (site SA 40 in the Site Allocations Development Plan Document Preferred Options Consultation Document), we note that this is shown partially red (approximately 11 plus storeys) and partially

orange (approximately 6 to 11 storeys). Although this is quite blurry on Map 2.2 we have confirmed this with the policy officers.

We are supportive of the building height ranges proposed for Finsbury Park Bowling Alley and note that the above ranges are reflective of the heights proposed within the Site Allocations Development Plan Document Preferred Options Consultation Document.

However, para. 2.29 notes that that only places suitable for tall buildings in the Borough are Haringey Heartlands / Wood Green and Tottenham Hale. This statement is therefore at odds with Map 2.2 (and the Site Allocations Development Plan Document Preferred Options Consultation Document) and should be amended to accurately reflect Map 2.2.

### **Policy DM52: Loss of Employment Land and Floorspace**

The suggested criteria against which the loss of employment floorspace will be considered includes documented evidence of an unsuccessful marketing campaign over a period of 3 years.

It is considered that a marketing period of 3 years is overly restrictive and does not allow sufficient flexibility to respond to particular circumstances or site characteristics. A blanket marketing period of 3 years before alternative uses are permitted will go further to hamper development.

It is recommended that the policy is revised to allow marketing requirements to be agreed with the Council on a site by site basis once the nature of the site and specific issues are fully understood during pre-application discussions.

### **Policy DM58: Managing the Provision of Community Infrastructure**

Supporting para. 6.11 notes that whilst an Asset of Community Value (ACV) designation is important, it is not an objective assessment of community value and the value of an ACV still needs to be assessed objectively on a case-by-case basis.

However, Policy DM58 relates to all ACV and therefore does not take into account the requirements contained within para. 6.11 which notes that the value of an ACV needs to be assessed on a case-by-case basis. In order to ensure consistency with para. 6.11 we therefore recommend that Policy DM58 does not contain a blanket requirement relating to all ACV but instead requires the assessment of the community value of each ACV on a site-by-site basis, before the requirements of Policy DM58 are applied.

### **Appendix C: Town Centre Primary and Secondary Frontages**

Appendix C confirms the primary frontage and secondary frontages within the proposed Finsbury Park District Centre. We are very supportive of the primary designation from the corner of Seven Sisters Road (no. 263) to 10 Stroud Green Road. We also note that a secondary frontage is proposed along 263 to 271 Seven Sisters Road and along the new route proposed through the Finsbury Park Bowling Alley site to the Park. We welcome these frontage designations although question why 263 to 271 is a secondary, rather than primary, frontage given the

level of activity and footfall along this part of Seven Sisters Road. Further explanation for this rationale would be welcomed.

We trust that the above comments will be considered in full. If there are any queries or if additional information is required please do not hesitate to contact Tanya Jordan on the above details.

Yours faithfully



**CgMs**

For and on behalf of Parkstock Ltd