

11th January 2017

LB Haringey Local Plan Team,
River Park House,
225 High Road,
Wood Green, London N22 8HQ.

Dear Sir,

REPRESENTATIONS ON BEHALF OF PROVEWELL LIMITED TO MAIN MODIFICATIONS FOR SITE ALLOCATIONS DPD, DEVELOPMENT MANAGEMENT DPD AND STRATEGIC POLICIES

I write on behalf of my client ProveWell Limited in relation to the proposed main modifications to:

- Development Management DPD;
- Site Allocations DPD;
- Strategic Policies.

This follows previous representations to these plans at draft stages and representation at the Examination in Public.

Development Management Policies Modifications

Modification DMMod63

The modification removes requirement 'a' of the revised policy to ~~Suitably demonstrate that for reasons of viability a mixed use scheme is necessary to facilitate the delivery of employment floorspace.~~

ProveWell support the removal of this requirement.

Modification DMMod68

The modification removes requirement 'd' of the policy d. ~~Investigate the site's potential to contribute to meeting the Borough's identified gypsy and traveller accommodation needs;~~

ProveWell support the removal of this requirement.

Modification DMMod76

The modification proposes to define warehouse living with an additional section 'A'. *Warehouse living is a specific type of land use that has emerged over time in certain employment locations within Haringey, and lends particular support to the creative industries sector. It does not fall within a specific use class – and is not live/work development – and as such is considered a Sui Generis use.*

ProveWell support the clarification of this definition, and suggest the definition in the glossary is changed to reflect this.

Modification 82 DMod82

This modification requires in preparing proposals and site masterplans, the applicants to have engaged with and sought the views of Hackney Council, particularly on sites which adjoin the Borough boundary.

ProveWell object to this requirement. This requirement was not discussed at the Examination in Public nor was it consulted on in previous consultations. LB Hackney has considerably different planning policies particularly around live/work uses which the borough does not support. Indeed it does not recognise or plan for warehouse living, and therefore there is no justification for them to be consulted on sites within LB Haringey that relate to warehouse living. This requirement has the potential to delay development coming forward and the potential to negatively impact the delivery of warehouse living. It is therefore considered this is a requirement that is unjustified and should be removed.

Additional Comment on Policy DM39

ProveWell are concerned there is no modification to Policy DM39 relating to how individual applications are to be determined that come forward outside of a masterplan process. Whilst ProveWell support the preparation of a masterplan for their sites, there may be circumstances that in the interim that ProveWell will want to improve, extend or reconfigure existing warehouses or build temporary structures.

This issue was discussed at the Examination in Public and it was agreed there would be appropriate wording inserted to allow individual applications to come forward without the need for a full masterplan.

It is therefore requested the following wording is included to allow this within the policy text:

In the case of small applications for improvements or extensions to existing buildings or temporary structures the applicant will not be required to complete a full masterplan, but will be required to demonstrate it does not compromise the wider sites from coming forward for redevelopment and these applications will be determined against the other policy requirements of Policy DM39.

Without the additional wording smaller individual applications will be restricted from coming forward. It is therefore essential this wording is included to add clarity that smaller individual applications will be considered in the absence of a masterplan for the wider site.

Site Allocations Modifications

SAMod58 – Indicative Capacities

The modification states, '*Due to the inherent uncertainty regarding the existing nonconventional housing on these sites, it is not possible to assign an indicative capacity for each site in this area. For monitoring purposes, the indicative capacity for the area is considered to be 386 net additional residential units, and approx. 13,300m² of gross new commercial floorspace.*'

ProveWell welcome the omission of indicative capacities for each site given the different levels of lawful uses on each site and site circumstances.

ProveWell however consider the indicative capacities for the area for monitoring purposes are incorrect. These figures were derived through a methodology that assumed an incorrect site area for site SA34 Overbury Road & Eade Roads, and incorrect assumptions for site SA30 Arena Design Centre. The corrected methodology is set out at appendix J of ProveWell's representations to Proposed Alterations to Development Management DPD and Site Allocations DPD, and further set out below.

SA30 Arena Design Centre

Current Presumption

Site Area: 1 hectare

PTAL: 1

Setting: Urban

LP density matrix ranges: 60 units/hectare

Mix: 33% commercial, 67% residential

Total developable floorspace: 4,200sqm

Therefore the estimated residential capacity of the site is: 40 new homes

However, the PTAL output on the TfL website (at appendix J of representations to Proposed Alterations to Development Management DPD and Site Allocations DPD) shows that the site PTAL rating is 1a-3, with the centre point being 3. Therefore the density of the site should be calculated using PTAL rating 3. As detailed below, the residential development capacity for this site is 67 new homes:

Corrected Presumption

Site Area: 1 hectare

PTAL: 3

Setting: Urban

LP density matrix ranges: 100 units/hectare

Mix: 33% commercial, 67% residential

Total developable floorspace: 7,000sqm

Therefore the estimated residential capacity of the site is: **67 new homes**

Sa34 Eade Road and Overbury Road

The Site Allocations DPD states that the site area for SA34: Eade and Overbury Roads is 1.5 hectares; this is inaccurate. Measuring the area set out by the red line boundary in the Site Allocations DPD calculates that the area is in fact 2.3 hectares result in the following:

Site Area: 2.3 hectares

PTAL: 4

Setting: Urban

LP density matrix ranges: 140 units/hectare

Mix: 33% commercial, 66% residential

Total developable floorspace: 22,540sqm

Net residential units: 216

The following modification is therefore proposed to change the indicative capacity of the site from 386 to 551, as proposed below.

*Due to the inherent uncertainty regarding the existing nonconventional housing on these sites, it is not possible to assign an indicative capacity for each site in this area. For monitoring purposes, the indicative capacity for the area is considered to be ~~386~~ **551** net additional residential units, and approx. 13,300m² of gross new commercial floorspace*

SAMod60

The modification proposes amendment of 'site requirement' for SA30, SA32 and SA34 to read as follows:

A site-wide ~~management plan~~ masterplan will be required as part of any planning application in accordance with Policy DM39 and having regard to site circumstances.

ProveWell welcome the addition here for each site masterplan to come forward in accordance with Policy DM39 and also having regard to site circumstances, given the significant variations in site circumstances.

ProveWell however also suggests a modification to reflect opportunities where smaller stand alone applications may come forward on these sites, e.g. improvements or extensions to existing units or temporary

buildings, where it would be onerous for these to include a site wide masterplan as agreed at the EiP. It is suggested the following wording is added:

A site-wide ~~management plan~~ masterplan will be required as part of any **major** planning application in accordance with Policy DM39 and having regard to site circumstances. In the case of small applications for improvements or extensions to existing buildings or temporary structures the application will not be required to complete a full masterplan, but will be required to demonstrate it does not compromise the wider sites from coming forward for redevelopment and these applications will be determined against the other requirements of Policy DM39.

SAMod61

The modification proposes to amend site allocation SA30 at paragraph 2.88 as follows:

'Potential development to increase accessibility, providing increased ~~employment~~ mixed use floorspace ~~and provide~~ including warehouse living accommodation.'

ProveWell support the changes to the policy wording here.

ProveWell however consider this modification should also be made for site SA34 Eade Road and Overbury Road, for consistency given it has the same allocation and same wording for the 'proposed site allocation'.

SAMod 62 and 67

This modification has changed the wording of site requirement 2 (Site SA30) and site requirement 8 (site SA34) to *'The development should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability which must be assessed looking at the mix of uses and the scheme as a whole'*.

ProveWell welcome this proposed wording however recommend additional wording is added to reflect consideration of the lawful existing uses on the site. The following wording is suggested:

'The development should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability which must be assessed looking at the existing lawful uses, mix of uses and the scheme as a whole'

Strategic Policies

It is proposed to insert Table 3.1 Housing Trajectory Table at Appendix 2.

The table includes indicative capacities for Site SA30 Arena Design Centre and Site SA34 Overbury and Eade Roads. For Arena Design Centre (SA30) it includes 40 units and for Overbury and Eade Road (SA34) 141 units.

The figures need updating to reflect that the Site Allocations DPD will be updated to remove single site capacities and instead give the warehouse district area a combined indicative figure for monitoring purposes.

The indicative capacity will need updating reflect the inaccuracies in how the original figure was derived as set out earlier in this letter under SAMod58.

Conclusion

It is considered minor amendments as discussed at the EiP and set out in this letter are required to make the plan justified and sound and request these minor amendments are included with the final Local Plan.

Please do not hesitate to contact me if you would like to discuss further.

Yours faithfully,



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