

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

27 March 2015

Iceni ref. 15/070  
BY EMAIL

Dear Sir/Madam,

## **LONDON BOROUGH OF HARINGEY**

### **REPRESENTATIONS TO LOCAL PLAN CONSULTATION FEBRUARY TO MARCH 2015**

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

- Alterations to Strategic Policies 2011-2026 (formerly Core Strategy), February 2015;
- Development Management Policies – Preferred Option, February 2015;
- Sites Allocation Development Plan Document (DPD) – Preferred Option, February 2015; and
- Tottenham Area Action Plan (AAP) – Preferred Option Consultation, February 2015.

There is much to be supported in the draft policy documents, such as the wholesale regeneration of Tottenham, increased housing targets, 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 if it is to deliver its ambitious plans for growth and renewal.

A detailed review of the Alteration to Strategic Policies and Development Management Policies, is outlined in the table appended to this letter. Representations to the Sites Allocation DPD and AAP are included within this letter, and build on 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 high quality places where people want to live, work and visit.

Berkeley Homes (North East London) (NEL) are currently working with the London Borough of Hackney to deliver a sustainable community as part of a comprehensive regeneration scheme and estate renewal programme which will deliver over 5,000 new homes, retail and community facilities as well as 3 new parks at Woodberry Down. NEL, have started building 930 new homes in the London Borough of Islington, after permission was secured last year as well as moving towards building the last phase of the Goodman's Fields development in the London Borough of Tower

Hamlets, which will provide 1,038 new homes, a health centre, Local Training Centre, commercial floorspace and over two acres of public space in the City Fringe Area.

Within Haringey, St James (part of Berkeley Group) with Sainsbury's, are developing the former Hornsey Depot site (now Smithfield Square) and have started to release the 270 new homes, for sale, this year.

## **Sites Allocation DPD**

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Berkeley Homes welcomes the Site Allocations DPD, which aims to allocate strategic sites which will make a significant contribution to meeting the growth aspirations in the Local Plan. They also support the recognition that the draft DPD does not set out all the sites that will be developed in the borough over the plan period.

## **General Comment**

As per our comments on draft Policies SP2, DM3 and DM5, the Council should not set arbitrary limits/ceilings on building heights or densities in the borough. Whilst it is acknowledged that some indication of suitable building ranges can be helpful, the most successful places are created through a design-led approach. The Council has an ambitious strategic housing target, which it rightly aims to meet and exceed. Having maximum height and density thresholds in the DPD will inevitably hinder the Council's delivery of housing. This draft DPD should be amended to acknowledge that each scheme should be considered within its context and on its own merits.

## **Draft Policy SA3 (Change to town centre boundaries)**

The Council do not appear to have provided any evidence to support the increase in frontages, as such this Policy is unjustified and cannot be considered sound. The increase in frontages should be reconsidered, in light of the desperate need for housing and to support the Council's aspirations for mixed use, sustainable regeneration.

## **Tottenham AAP**

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Tottenham is one of the capital's big growth opportunities. There are ambitious regeneration plans supported by a Housing Zone will see 10,000 new homes built and 5,000 new jobs created by 2025. The Zone will offer opportunities to build almost 2,000 new homes around and on top of a redeveloped Tottenham Hale station and open up the Lee Valley Regional Park with two new bridges. Berkeley Homes supports the regeneration of Tottenham and the exciting vision the AAP sets out.

## **Draft Policy AAP2 (Housing)**

Draft Policy AAP2 Ba, requires allocated sites within Tottenham Hale AAP Neighbourhood area (the Housing Zone) to meet an affordable housing target of 50%, this exceeds the target of 40% set out in Policy SP2 and DM19. The Site Viability Assessment Final Report (prepared by GVA), February 2015, does not advocate this approach. Therefore, it is unclear how the Council are justifying this differentiation in policy. This draft Policy should be amended to bring it in line with draft Policies SP2, DM19 and the Mayor's approach to affordable housing and viability, as set out in the published Further Alterations to the London Plan (March 2015). It is important that there is flexibility on affordable housing requirements, subject to viability, to ensure delivery of sustainable communities, which will really encourage long-term positive change.

Berkeley Homes supports draft Policy APP2Bb and the 60:40 tenure split as per the Further Alterations to the London Plan (March 2015).

Berkeley Homes suggest that an additional point is added to draft Policy AAP2 B, as per draft Policy SP2 and Para.3.2.19 of the Strategic Policies, to explain that the preferred affordable housing mix, in terms of unit size and type of dwelling, will be determined through negotiation, scheme viability and will agreed on a site by site basis.

### **Draft Policy AAP3 (Tottenham Hale District Centre)**

Berkeley Homes suggest that the draft Policy is amended to place further emphasis on the important role commercial spaces have in the delivery of successful mixed use developments. This approach to development and regeneration will help support growth/delivery, create new sustainable communities as well as support the function of the District Centre.

### **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, particularly as the regeneration proposals progress.

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 me on [rdewey@iceniprojects.com](mailto:rdewey@iceniprojects.com) or 020 3640 8508.

Yours faithfully,



Rebecca Dewey  
SENIOR PLANNER

cc. Miss L Bird, Berkeley Homes (North East) London  
enc. Written Representations Table, prepared by Icen Projects Limited