

DJR/DPNF HRW

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Dear Sirs,

**HARINGEY LOCAL PLAN PREFERRED OPTIONS CONSULTATION:
TOTTENHAM AREA ACTION PLAN,
HARINGEY LOCAL PLAN, SITE ALLOCATIONS; AND
HARINGEY LOCAL PLAN, DEVELOPMENT MANAGEMENT POLICIES.**

1. We write on behalf our client to submit written representations in response to the following documents that form part of the Haringey Local Plan comprising:
 - Tottenham Area Action Plan, February 2015; and
 - Development Management Policies, February 2015;
 - Site Allocations DPD, February 2015.
2. Due to commercial sensitivity we cannot publically identify our client, however, this information can be shared confidentially with the Council if required.

TOTTENHAM AREA ACTION PLAN, PREFERRED OPTION CONSULTATION

Tottenham's Vision (Page 23)

3. Our client supports the future vision for Tottenham, which envisages transformational change unlocking Tottenham's potential as an increasingly attractive place to live, work, study and visit, and a neighbourhood that fully benefits from London's growth and position as a world city.

Policy AAP1 Regeneration (Page 32)

4. Our client supports the thrust of the overarching regeneration policy, and the requirement for development to be brought forward as part of wider comprehensive redevelopment. The proposed use of CPO powers to assemble land, as outlined in part (G) of the policy, will be fundamental to the success of achieving the vision for Tottenham in terms of delivering integrated and comprehensive redevelopment and regeneration, and the private sector will be encouraged that the Council has stated its commitment in this way.



Policy AAP2 Housing (Page 34)

5. Our client supports the policy to deliver 10,000 new homes across Tottenham. However, it is requested that Policy AAP2 (A) is amended to state that “the Council will seek the delivery of a minimum of 10,000 homes...”. This will be consistent with the AAP Objective 4 set out in Section 6 and the Government’s requirement to maximise housing delivery.
6. Our client supports Policy AAP2 (C) that supports higher density housing in locations close to town centres, in areas with good local facilities and amenities and in areas well served by public transport.
7. Our client also supports part (E) of the policy and believes that it is important that the policy supports higher density development as a means to secure a wider choice and better quality and range of housing opportunities in Tottenham.

High Road West Key Objectives (Page 66)

8. Our client supports the ‘key objectives’ outlined for High Road West in terms of creating an attractive and sustainable neighbourhood, with the addition of a minimum of 1,400 new homes.
9. However, fundamental to the success of creating a sustainable neighbourhood will be ensuring that the increased residential community is well served by services and facilities, including retail and leisure uses, to reduce the need for residents to have to travel elsewhere. An increase in the town centre uses to serve the neighbourhood is envisaged in the Masterplan Framework, with uses to be focused around the proposed Moselle Square. To this end, the expansion of the local shopping centre is set out as a key objective for High Road West, which is fully supported by Our client; however, the objective should be amended to provide for expansion of the centre to take place more generally in the area and not confined to only along the High Road as currently drafted. The key objective should be revised as follows :

“Expand the local shopping centre ~~along~~ around the High Road ~~fronting the new football stadium,~~ including the new public square.

10. Amending the objective as proposed would ensure that it is consistent with Masterplan Framework and the urban realm improvements objective for a new public square to become a destination for shops.

NT3: High Road West (Page 73)

11. The Proposed Site Allocation for High Road West set out at Policy NT3 needs to be amended to allow for the expansion of the shopping centre to occur in a wider area than just the High Road, for the reasons outlined in paragraphs 9 and 10 above. The site allocation should be amended as follows:

“Masterplanned comprehensive development creating residential led mixed use neighbourhood including a new public realm linking White Hart Lane Station and a redeveloped football stadium and an expanded local shopping centre ~~on~~ around the High Road ~~opposite the football stadium~~ including the new public square.”

Site Requirements – Masterplan Framework



12. The policy requires development to conform to the Masterplan Framework agreed by the Council's cabinet in December 2014. This requirement is too vague, and indeed the Masterplan Framework is in parts overly prescriptive and identifies only one way in which the regeneration vision for High Road West can be delivered.
13. It is essential to delivering the regeneration of High Road West that there is flexibility for development to be brought forward in a form that may not be envisaged by the Masterplan Framework. The Masterplan Framework provides for a form and layout of development that defines a series of streets and spaces and scale and mass of development. Given that the Masterplan is to be developed out over a 15 year timeframe, there needs to be a recognition that if the regeneration of High Road West is to be successful it will need to respond to changing market and economic forces. This therefore requires flexibility in the application of the Masterplan Framework.
14. The AAP policy should identify those key principles within the Masterplan Framework that should be delivered and recognise that the Masterplan is simply a framework and not a set of detailed design codes.
15. For these reasons, the requirement should be amended as follows:

~~“Development will need to conform to~~ *should accord with the principles of* the Masterplan Framework agreed by the Council's Cabinet in December 2014.”

Site Requirements – New Retail Provision

16. The key policy objectives for High Road West and the site specific policies contained within policy NT3 envisage new retail and commercial leisure provision as part of an expansion to the local centre. This is consistent with the Masterplan Framework, which also envisages the High Road West area becoming an attractive shopping destination for local people and visitors, with a broader mix of shops including small independent chains and larger High Street chains.
17. Many of the evidence base documents and regeneration strategies regarding the regeneration of Tottenham, including but not limited to the Tottenham Strategic Development Framework; the Tottenham Physical Development Framework; and the High Road West Masterplan Framework all recognise the importance of strengthening the High Road and High Road West as a focus for town centre leisure and sports activities, as well as a centre to serve the needs of the growing population.
18. Our client fully supports the increased focus of new and expanded town centre uses as part of a regenerated High Road West, which will ensure that the new enlarged residential community will be better and more sustainably served. However, despite the AAP policy supporting the expansion of the shopping centre, it does not seek to elevate the role and function of the centre in retail hierarchy terms.
19. It is our client's view that there are unique circumstances at High Road West that provide the opportunity to reassess the role and function of the existing town centre focussed on the High Road and to elevate its role to deliver the transformational change of the High Road West area envisaged through the various policy and regeneration strategy documents in a sustainable manner that complements rather than competes with surrounding centres.
20. The delivery of Tottenham Hotspur Football Club's plans for a world class new football stadium and associated development on the site of the existing stadium will act as a catalyst for the area, changing the way the area is both perceived and used by residents and visitors. Indeed, this is



the project that sits at the heart of the Council's policy aspirations for the High Road West area to become a sports and leisure hub.

21. The delivery of the new sports stadium and associated facilities and the footfall it will generate, combined with the significant increase in residential population envisaged within Tottenham over the coming years, will radically change and improve the economic context of the area.
22. It is our client's view that there is a real opportunity to positively plan for the expansion of the town centre to provide for a destination retailing and leisure focussed centre that responds to the unique circumstances of High Road West and complements the other town centres within Haringey. The supporting "High Road West Retail Assessment" report prepared by GL Hearn Ltd, which is enclosed with this representation provides a full and robust technical justification for the expansion of the town centre to deliver a destination retailing and leisure centre that strengthens the leisure and sport-led regeneration of this part of Tottenham as envisaged by the Council's wider regeneration policy framework.
23. On the basis of the findings of the enclosed Retail Assessment, it is requested that the evidence presented with this submission is used as the basis to amend the emerging policy for the site specific allocation for High Road West at Policy NT3 to allow for a greater scale and quantum of town centre uses to be delivered within High Road West. The evidence presented demonstrates that retailing and leisure floorspace in the region of 30,000 sqm could be supported within High Road West in a sustainable manner that would complement the surrounding network of established centres and would not result in any significant harm to the vitality.

Site Requirements – Tall Buildings

24. Our client supports the policy site requirement for tall buildings within High Road West. However, there needs to be greater flexibility regarding the location where tall buildings will be acceptable, and it should not be restricted to along the railway corridor.
25. Furthermore, the policy should not constrain the height of tall buildings to be lower than Brook House. There appears to be no justification for this requirement. The site requirement should be redrafted to support taller buildings in High Road West that comply with part (B) of Policy DM5 in the Development Management Policies document. The site requirement should be amended as follows:

"Tall buildings will be supported where they comply with part (B) of Policy DM5 in the Development Management Policies document be placed along the railway corridor to create a legible tall building spine. The buildings should use Brook House as a reference point and Buildings should descend in height as they approach the North Tottenham Conservation Area."

HARINGEY'S LOCAL PLAN, SITE ALLOCATIONS DPD

Safeguarded Waste Sites – SA4

26. One of the key sites to be redeveloped within the High Road West regeneration area, as set out in the draft Tottenham Area Action policy site designation NT3, is the vehicle dismantling business at No.44 White Hart Lane. This site is proposed to be identified as a safeguarded waste site under policy SA4, which allows for the redevelopment of the site for alternative non-waste uses once the existing waste use has been reprovided elsewhere.



27. As identified in the draft AAP and the supporting Masterplan Framework adopted by Council, this site is envisaged to provide much needed high density mixed tenure housing, and is a strategic site that will help to improve connectivity and permeability with the surrounding communities and the upgraded White Hart Lane railway station.
28. Our client understands from the site's landowners, Tottenham Hotspur Football Club, that as part of its planning for the regeneration and redevelopment of the site in accordance with the Council's emerging policy, the existing operator of the vehicle dismantling business is relocating its business to another site within Tottenham, which will occur before the end of 2015. Therefore, the site's waste use will be relocated prior to the adoption of this draft policy, and will result in no net loss to waste capacity on the basis that the current operator is relocating its business on a like-for-like basis.
29. To facilitate the comprehensive regeneration of the High Road West regeneration area in a timely manner, it is requested that No.44 White Hart Lane be removed from the safeguarded waste site list in draft Policy SA4, on the basis that the existing use will not be in effect by the time the development plan policy is formally adopted.

HARINGEY'S LOCAL PLAN, DEVELOPMENT MANAGEMENT DPD

Policy DM3: Privacy and protection from overlooking

30. The requirement for no less than 20m between facing 1st floor habitable room windows of neighbouring homes is too onerous in high density and urban locations. It is possible to secure high quality development that provides acceptable privacy and protection from overlooking at first floor level, at a shorter distance than 20m. The policy should be amended to provide a degree of flexibility that allows schemes to respond to their context, rather than setting a single standard to be applied mechanistically irrespective of setting and context.
31. The wording of the policy should be amended to state "...including a distance of no less than 16m - 20m between facing 1st floor habitable room windows of neighbouring homes, subject to site context."

Policy DM5: Siting and design of tall buildings

32. Our client supports the general thrust of the tall buildings policy, which identifies the High Road West area as an appropriate location to accommodate taller buildings. However, Map 2.2 that forms part of the policy and identifies the areas where taller buildings are to be located is too definitive. The plan should be amended to show less clearly defined locations where taller buildings are acceptable. The policy and Map should provide sufficient flexibility to enable the exact location of taller buildings to be defined through site analysis and careful design, in accordance with the policy requirements set out in part (B) of the policy.
33. Our client supports the broad locations shown on Map 2.2 at which taller buildings will be acceptable, but requests that the Map be amended to be less definitive on the boundaries of the policy designations.



Policy DM17: Housing Mix

34. Our client supports the broad approach to housing mix and density set out in DM17, particularly part (B) that expects housing potential of sites to be optimised, with density to be justified through a rigorous design-led approach. To deliver the regeneration envisaged for Tottenham and High Road West in particular, it will be essential that developers and investors are able to maximise the development value of site potential in order to fund and facilitate the delivery of the wider social and community benefits, including affordable housing, health and education facilities and open space and public realm.

Policy DM28 Allowable solutions

35. The requirement in Policy DM28 part A (b) to provide financial contributions through a section 106 agreement in-lieu of achieving the required on-site carbon reductions targets should itself be subject to a viability test, as is the affordable housing policy requirement in Policy DM19.

Policy DM50 Facilitating Site Regeneration and Renewal

The general approach to Policy DM50 that seeks to protect and maximise the redevelopment potential of employment land is recognised, however, to be effective and allow for wider regeneration and development aspirations of the Haringey Local Plan to be realised, the policy needs to adopt a more flexible approach than currently prescribed.

As drafted, the mixed use redevelopment of employment land can only be supported where each and every policy test in parts (a) to (e) are met. The policy should provide more flexibility to allow for the redevelopment of employment sites as part of mixed use schemes that do not comply with every criteria where it can be demonstrated that the redevelopment proposals accord with the wider regeneration objectives outlined adopted development plan policy, such as the Tottenham Area Action Plan. In order to support wider regeneration, the overall policy should be amended to allow for the mixed use redevelopment of employment sites that may not satisfy all of the tests as follows:

“A. The Council will support proposals for mixed-use redevelopment on sites where this is necessary to facilitate renewal and regeneration (including intensification) of existing employment land and floorspace. Such mixed use proposals will only be acceptable where the meet all of the following criteria, *unless it can be demonstrated that it will result in regeneration benefits supported by other development policies in accordance with Policy DM52(c):....*”

36. The first criterion at part A (a) only allows for redevelopment of non-designated employment sites with high levels of public transport accessibility. The supporting text to the policy at paragraph 5.17 states that for the purposes of implementing the policy, a site will be defined as highly accessible if it achieves a PTAL rating for 4 or higher.
37. This requirement is too onerous and would prevent the much needed regeneration of underperforming employment sites that fall within areas of a PTAL rating of 3. For small employment sites in areas of PTAL rating of 3 it would be wholly appropriate for the mixed use redevelopment of the sites to include residential uses, particularly where these sites are already located within predominantly residential neighbourhoods.
38. Part A criterion (a) should be amended as follows:



“(a). They are located within designated Local Employment Area: Regeneration Areas or non-allocated employment sites with high levels of public transport accessibility or within established residential neighbourhoods;”

39. Furthermore, part (c) requires that ‘the maximum amount of employment floorspace is re-provided within the mixed use scheme, with no net loss of existing employment floorspace’. The policy as currently drafted only seeks to protect the floorspace as a quantum. This fails to recognise that employment uses are becoming increasingly efficient and new modern employment requires less land than previously.
40. The policy should be amended to allow for more flexibility in the regeneration of employment uses and rather than seeking to protect a quantum of employment floorspace, the policy should be seeking to protect employment job density. This would allow for a more efficient and productive economy to be established within the Borough and ensure that there is no net loss of jobs. It is requested that Part A (c) of the policy be amended as follows:

“(c) The maximum amount of employment floorspace is re-provided within the mixed use scheme, with no net loss of existing ~~employment floorspace~~ job density;”

CONCLUSION

41. These representations provide our client’s comments on the various draft Haringey Local Plan and Tottenham Area Action Plan documents. Our client is fully supportive of the Council’s focus on regenerating Tottenham and the recognition that the area can accommodate transformational change over the coming years. In particular, our client is encouraged that the Council is seeking to establish a strong planning policy framework to work in partnership with private sector partners to deliver the comprehensive regeneration and redevelopment envisaged in the emerging policy documents.
42. However, to facilitate this transformational change, our client is requesting that a number of minor amendments are made to the draft policy documents, as outlined above, that will provide adequate flexibility for the vision and aspiration for the regeneration of Tottenham to be realised.
43. Our client and its advisors would be keen to maintain an open dialogue with Officers during the next stage of policy formulation, and would be willing to provide any necessary information to further support the representations set out in this letter as Officers deem necessary. Please contact David Roach at this office in this regard.

Yours faithfully,

DP9 Ltd on behalf of a confidential client

Enc. High Road West Retail Assessment (March 2015), GL Hearn