

PD6657/SM

27 March 2015

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Dear Sirs

TOTTENHAM AREA ACTION PLAN – PREFERRED OPTIONS CONSULTATION – FEBRUARY 2015

Introduction

We write on behalf of our clients Hale Village Properties, who are the freehold owners of the Hale Village Tower site, identified as allocation TH6 within the Tottenham Area Action Plan (February 2015).

We wish to outline our support for this review of regeneration opportunities within Tottenham and that the Hale Village Tower has been identified as a key site in terms of this. However, we have a number of observations to make in respect of site allocation TH6:Hale Village Tower, these are set out below.

General Observations on the TH6:Hale Village Tower Allocation

As currently drafted, the TH6 allocation fails to maximise the opportunities available to the Council in respect of the Site. The allocation as currently drafted only suggests support for an 18 storey building and makes no comment as to whether the principle of a building above 18 storeys could be acceptable.

Taking into consideration the strategic planning policy context for this area which due to:

- a) the recently adopted Further Alterations to the London Plan (2015) requires LB Haringey to deliver a minimum of 1,502 per annum over the Plan period, which equates to an additional 682 dwellings per annum compared with the London Plan (2011); and
- b) recent confirmation of the Tottenham Housing Zone, whereby 2,000 new homes are required to be delivered around Tottenham Hale Station

the purpose of the AAP must be to ensure that development sites within Tottenham are fully optimized.

In this context and as a key purpose of planning policy is to provide certainty for the development industry, we recommend that the following amendments are made to the draft allocation.

TH6: Development Guidelines

It our opinion bullet point 1 of the Development Guidelines section is negatively worded as the policy suggests that a building of over 18 storeys will require justification and no commentary is provided in terms of potential support of a building above this height.

It is our position that this part of the policy as drafted is unsound as it has not been positively prepared. Paragraph 182 of the National Planning Policy Framework requires Plans to be positively prepared to meet objectively assessed development requirements.

In our opinion this part of the policy has not been positively prepared in light of the regeneration/housing growth context set out above, and the Council's own evidence base, in the form of the Urban Characterisation Study, which at page 108 states that the Hale Village Tower could reach 20 – 25 storeys.

In order to make this part of the policy sound we recommend that the first bullet point is reworded as follows:

“Proposals for a tall building over 18 storeys should be explored in line with the Urban Characterisation Study which suggests a building of between 20 – 25 storeys could be appropriate. Any proposal for a tall building within or above these parameters will need to be of exceptional architectural quality in accordance with the DMDPD tall building policy.”

Should you wish to discuss this matter further, please do not hesitate to contact Simon Marks of this office.

Yours sincerely

MONTAGU EVANS LLP

cc. Chris Shellard – Lee Valley Estates