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

Dear Sir/Madam,

LB HARINGEY REGULATION 19 CONSULTATION: DEVELOPMENT PLAN DOCUMENTS (DPD'S) PRE-SUBMISSION VERSIONS

We are instructed by the developers of the Hale Wharf site (Muse Developments and the Canal and River Trust (CRT) to submit the enclosed representations on the pre-submission versions of the following Development Plan Documents (DPD's):

- The Tottenham Area Action Plan DPD (Tottenham AAP);
- Proposed Alterations to Haringey's Adopted Strategic Policies; and
- The Development Management DPD.

We note that consultation is also being undertaken on the Site Allocations DPD. It concerns sites outside the growth area of Tottenham which is covered by the Tottenham AAP. Accordingly, Muse Developments and CRT have not comment to make on that document.

Response forms have also been completed and accompany this submission.

a) Background

Hale Wharf (the "site") comprises a strip of land approximately 300m long, ranging from 25m to 60m in width, bounded by the River Lea Navigation to the west and the Lea Flood Relief Channel to the east. Its southern end is bounded by Ferry Lane and its northern end continues in a strip of land between two watercourses.

The site includes a late twentieth century five storey office building at its southern end, a number of industrial/warehouse buildings, and areas of hardstanding. Three barges are permanently moored on the western quayside.

To the west of the southern end of the site is Tottenham Lock, and the associated lock keepers cottage. To the east lies an area of Green Belt, known as 'The Paddock', including a garage site in its southwest corner, with Lee Valley Reservoirs further to the east. To the west are the recently constructed buildings of Hale Village, generally of up to ten storeys.



The site is located within one of London's first Housing Zones, which has a target of approximately 2,000 new homes, and the Upper Lee Valley Opportunity Area which identifies the Opportunity Area as being capable of accommodating at least 20,100 homes up to 2031 and a mixed and intensive use of land.

The developers are currently in discussions with the Local Planning Authority (LPA) to progress proposals to redevelop the site including a mixed use scheme with residential and commercial uses

b) Tottenham Area Action Plan DPD

Overall, Muse Developments and CRT welcome the generally positive approach taken in the Area Action Plan which identifies the site, at its outset, in the Tottenham Growth Area (Figure 1.4) and the requirement to maximise site opportunities in that location.

i) Employment

Draft Policy AAP4 'Employment' identifies the site a Designated Employment Area with supporting Table 3 further clarifying the site designation as a Local Employment Area: Regeneration Area. Policy AAP4 indicates that the Council will re-classify some of the area's Designated Employment Areas in due course, albeit there are no specific timescales or a strategy on how it intends to do so. Clear guidance on the re-classification of those sites should be set out in the AAP.

This is particularly the case because proposed alterations to paragraph 5.1.7 of the Strategic Policies (the consultation for which runs concurrently with the AAP) states that the hierarchy of employment land will be reviewed and revised as necessary taking into account economic circumstances and further guidance from, amongst other things, the Tottenham AAP.

The site specific requirements of the site allocation (TH9) on page 129 also appears to contradict the idea that the designation would be removed and states the following in relation to Hale Wharf:

“The site will hold a Designated Employment Area: Regeneration Status to recognise the contribution to the local economy that this site can make”.

Whilst Muse and the CRT support a mixed use development on the site (to include a proportion of employment uses), this requirement is superfluous when paragraph 5.170 simply states that replacement employment is needed.

The current employment floorspace within the site is underutilised and generally low density, whilst the quality of the buildings are deteriorating and are considered to have little, if any, potential for re-use.

It is also recognised under paragraph 5.144 that a limited amount of employment land is appropriate for more mixed use development in order to promote strategic regeneration initiatives such as the site which has been identified as being located within the Tottenham Hale Housing Zone.

Given such policy aspirations within the draft AAP for a mix of uses on the site, it needs to be made clear that it is not necessary for the redevelopment of the site to provide “replacement floorspace” because the type of employment uses that are compatible with mixed use schemes (which include residential uses) may result in less floorspace but retain if not increase the employment density of the site. There should therefore be

consistency between terminology (whether “replacement employment” or “replacement floorspace”) and a clear definition included within the AAP to provide clear guidance to developers on the policy test for development proposals.

There are also inconsistencies in the site allocation overview at Table 6 (Tottenham Hale Sites Capacity) which provides an indicative development capacity of 1,570m² of commercial floorspace for Hale Wharf and the Hale Wharf site specific designation (TH9) that suggests an indicative development capacity of 3,200m². We also note that, in any event, the development capacity attributed to the site is indicative, not prescriptive, as confirmed at paragraph 7.3 of Appendix A (*Methodology for Assessing the Capacity of Allocated Sites*). It is clear therefore that the indicative capacity figures comprise estimations only and it is crucial for any policy to provide sufficient flexibility to consider real development proposals, taking into account other considerations such as design and layout, the size, type and mix of homes/commercial floorspace, site constraints, scheme viability and other planning policy requirements.

ii) Comprehensiveness

Whilst Muse Developments and the CRT welcome the need for development proposals in the AAP area to come forward comprehensively (draft Policy AAP1), it is critical that the application of this policy allows sufficient flexibility for the development aspirations of the component parts of sites to be realised.

Paragraph 4.7 requires developments to demonstrate, in relation to sites such as Hale Wharf, that:

“Larger sites on which there are multiple landowners in order to ensure that proposals are not prejudicing development of the remaining parcels....”

Site Allocation TH9 identifies the site as incorporating the garage site across the Lea Navigation, the Paddock and the Lock Keepers Cottage to the east. The site specific requirements set out on page 129 goes on to explain that the comprehensive redevelopment for the site is required and that the component sites should be developed as part of a comprehensive proposal.

Whilst Muse and the CRT are committed to the development of the site in a co-ordinated manner, this should not create a barrier that could otherwise prejudice the redevelopment of part of the site allocation that could act as a catalyst for further investment in the other development parcels.

The application of this policy needs to consider other crucial planning considerations such as individual development proposals, site constraints, scheme viability and other planning policy requirements

Site Allocation TH9 (and its site specific requirements) should therefore make clear that this does not necessarily mean that that proposals for the entire site allocation need to come forward as a single development proposal, so long as such proposals can demonstrate that it meets the requirements of draft Policy AAP1 and supporting text contained at paragraph 4.7 i.e. that they do not prejudice the development of the remaining parcels. For example, the development of one development parcel could include the provision of significant infrastructure that could unlock the development potential of the remaining site allocation sites.

iii) Urban Design and Character including Tall Buildings

Muse Developments and the CRT support Policy AAP6 that directs the highest density development to Growth Areas and the taller buildings within the AAP area towards, amongst others, Ferry Lane.

We note that Policy AAP6 is supported by the Urban Characterisation Study (2015) that ensures that the height of new buildings respond and help to define the surrounding character, whilst optimising opportunities for intensification and regeneration in order to help create legible neighbourhoods.

However, we note that the site specific 'Development Guidelines' on page 129 states that *"Building heights will have to respond to the proximity and 'openness' of the Green Belt"*.

The National Planning Policy Framework (NPPF) is clear that the essential characteristics of Green Belt is its openness and permanence (paragraph 79). However, the same paragraph of the NPPF also states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping the land open. There is no specific policy requirement in the NPPF in relation to the setting of the Green Belt, and in this respect the NPPF itself does not provide guidance in respect of sites adjoining the Green Belt.

It needs to be made clear therefore that only the garage site (which currently lies within the Green Belt) should respond to the openness of the Green Belt. All other proposals will need to respond to Policy DM5 'Locally Significant Views and Vistas' and DM6 'Building Heights' that collectively set out a detailed criteria for assessing proposals for taller buildings. We make further comments on those policies in (d) below.

c) Alterations to Strategic Policies (2011 – 2026)

Muse Developments and CRT generally support the alterations being proposed to Strategic Policies and make the following comments:

- Alteration 6, Section 1.2, paragraph 1.2.16 should make clear that the housing targets set out in the London Plan are minimum targets, reflecting the pressing need for more homes in London;
- Alteration 9, Section 1.3, paragraph 1.3.11 should be amended to correct a typographical error in the second line (delete "to be");
- Alteration 35, paragraph 3.1, paragraph 3.1.16 should be amended as follows because it is not appropriate for all existing employment sites to provide more intensive employment/business uses, particularly mixed use schemes and sites with significant site constraints whilst also taking into account scheme viability:

"...New jobs will be delivered through the reconfiguration of a number of the existing employment sites away from industrial & warehousing uses to mixed use providing more intensive employment / business uses (where appropriate), through further growth in the retail and leisure provision, and through increased community facilities..."

Proposed Quod Alteration

This is particularly the case because Chapter 5 confirms the site as being located within the Regeneration Area being the most flexible of employment categories that can include uses appropriate in a mixed use development, such as small scale “walk-to” retail, community and residential uses. We also note that Policy SP8 is proposed to be amended to specifically include the Hale Wharf site in the Regeneration Area category, which is welcomed.

- Paragraph 3.1.18 of the adopted Strategic Policies (March 2013) identifies the Hale Wharf site within the Tottenham Hale Growth Area and states:

“A mini-masterplan is being devised to underpin a comprehensive, residential-led development for the entire Hale Waterside site, which could provide a significant number of new homes as well as commercial uses. This plan will take account of the Regional Park Authority’s objectives, as Hale Wharf is within the Lee Valley Regional Park. A proposed pedestrian footbridge across the River Lee will form an integral part of the scheme, and one element of the east-west pedestrian ‘green link’”.

Whilst Muse and CRT are supportive of the general approach to improving pedestrian links within the ‘green link’, the inclusion of a number of bridges as part of a scheme should be informed by detailed development proposals and scheme viability.

Since the adoption of the Strategic Policies in March 2013, LB Haringey published the Planning Obligations Supplementary Planning Document (SPD) (October 2014) that set out the relationship between planning obligations and the Community Infrastructure Levy (CIL) (LB Haringey adopted its CIL Charging Schedule in July 2014). This confirms that Open Space and Public Realm Infrastructure requirements, such as public open space/public parks, including improvements to existing facilities will be funded through CIL.

Any development proposals for the site are likely to improve east/west connections in any event. It is inappropriate therefore for the supporting text to continue to require that such connections be included as part of detailed scheme proposals for Hale Wharf.

The paragraph should therefore be amended and the requirement to incorporate one element of the east-west pedestrian green link be removed. It is more appropriate that such proposals form part of detailed application proposals, the consideration of which can take into account site constraints, other development plan policies and scheme viability at the appropriate time.

- Alteration 54, Section 3.2, paragraph 3.2.4 should clarify that the Haringey target set out in the London Plan is a minimum target.
- Alteration 61, Section 3.2, paragraph 3.2.22 should be amended to reflect Policy SP2 with the words “*subject to viability*” inserted at the start of the paragraph.

d) Development Management DPD

Must Developments and the CRT welcome the generally positive approach taken in the Development Management DPD which further identifies the site in a Tall Building Growth Area.

It is important however that policies within the Development Management DPD does not conflict with other Development Plan Documents and Area Action Plans.

i) Tall Buildings

The Tottenham AAP already confirms that the application site is suitable for taller buildings based on the Urban Characterisation Study (2015). The Urban Characterisation Study (2015) recommends taller building heights along the Ferry Lane frontage of the site (circa 12-39m). Emerging planning policy however does not specify building heights, which is welcome, and sets out a number of more detailed criteria at Policies DM5 and DM6 for assessing proposals for tall buildings.

Policy DM5 (Part A (a-c)) requires proposals in the viewing corridors of the Locally Significant Views to demonstrate how the proposal enhances the viewers' ability to recognise and appreciate the landmark being viewed; makes a positive contribution to the composition of the local view; and meet the requirement of the Council's Tall Buildings and Views Supplementary Planning Document (which does not yet exist). It is considered that requirements (a-c) are too onerous for key development sites such as Hale Wharf and will not be effective, considering other development plan policies promote intensive development within these viewing corridors. We do not therefore consider this wording to be effective, and it should be removed or reworded.

We also note that the Tall Building and Views SPD (referenced under Policy DM5 (A)(c)) has not yet been issued for comment and therefore it is difficult to consider the appropriateness of this requirements. It may also be more appropriate for proposals to demonstrate how development proposals have been informed by that future document, rather than slavishly meet the requirements of a supplementary planning document.

ii) Affordable Housing

Policy DM13 should make clear that Part A (a-g) is not set out in any particular order or level of hierarchy to ensure that equal weight is given to each component part of the Policy.

iii) Open Space

Policy DM20 Part F requires that *"development adjacent to open space should seek to protect and enhance the value and visual character of the open land"*.

Figure 4.1 identifies The Paddock, located to the east of the site, as 'green space'.

Similar to our comments above (see (b) (iii)) relating to the Green Belt, development proposals should only be required to respond to Policy DM5 and DM6 that collectively set out a detailed criteria for assessing proposals for taller buildings. Only development proposals that comprise existing 'green space' should respond to the visual character of that open land.

iv) Employment

Muse Developments and the CRT welcome the requirements of Policy DM38 that provides guidance on mixed schemes on sites such as Hale Wharf that comprise a Local Employment Area: Regeneration Area.



Page 7

However, whilst Policy DM38 Part A (b) is welcomed in principle, providing the maximum amount of employment floorspace (based on scheme viability) should not undermine the ability to ensure the successful occupation of that floorspace.

Please do not hesitate to contact me should you require any further information or additional copies of the submission

Yours sincerely,

Steffan Rees

Associate

cc: Michael Orr – Muse
Andrew Chandler - CRT