

# APCAR SMITH PLANNING

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Haringey Planning Policy  
River Park House  
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25 March 2015

Dear Sirs

## **Local Plan Consultation**

I am instructed by the Wedge Investments Limited, freehold owners of land at the junction of White Hart Lane and Beaufoy Road, to submit representations on the current Consultation Draft Planning Policy Documents on their behalf. I am attaching an Ordnance Survey extract upon which I have marked the boundaries of their site. As you will see from this letter we are putting it forward as a proposed site allocation. We also have general comments on the emerging policy documents.

### **Proposed Alterations to Haringey's Adopted Strategic Policies**

The amendment to Policy SP1 to include North Tottenham as a housing growth area is supported. Similarly the reference to the Tottenham High Road Corridor as Area of Change where the Council will promote development is supported. However it is considered that the boundaries of the Growth Areas and Areas of Change, as shown on Figure 3.1, should not be considered as the specific boundaries of these defined areas. Either the text or Figure 3.1 itself should make it clear that the areas shown are indicative and they do not represent finite boundaries.

As regards Table 3.1 it is considered that the reference to the number of units in the Areas of Limited Change should be noted as being a minimum requirement. This is necessary as an acknowledgement of windfall sites outside the defined areas that may come forward for future residential development.

The deletion of White Hart Lane as a locally significant industrial site is supported.

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*Principal: Carolyn Apcar BA Hons. MRTPI*

### **Development Management Policies**

With regard to Policy DM16 it is considered that Part D should be amended to read:

Windfall development will be encouraged where this complies with all relevant policies of this Plan.

This is in recognition of The London Plan's reference to not just meeting but exceeding housing targets. It is considered to be more consistent with the reference to "exceed" to specifically **encourage** windfall development where appropriate.

Similarly it is considered that Para 3.3 should be amended to refer to the Borough's **minimum** strategic housing target within The London Plan.

It is considered that Policy DM17A(d) should be amended to delete the reference to allocated sites. Housing outputs should be optimised on all sites where residential development is proposed, whether or not these are allocated sites, to conform with The London Plan references to optimising housing potential.

It is considered that Policy DM17C should be amended since "mono-tenure" developments should be acceptable on small sites and other sites where it is not feasible or practical to have a mix of tenures. This should be acknowledged in the policy.

It is considered that Policy DM49 should be amended to enable mixed use development including residential on employment land and sites. This would be consistent with the encouragement for mixed use development in the NPPF and The London Plan. As it is acknowledged that the retention of jobs in the Borough are important it would be appropriate for the reference to mixed use development to include comment to the effect that the mixed use development should enable similar numbers of job opportunities on the site as that currently or last existing when the site was in operation. It is accepted that this should only be on sites within or on the edge of residential areas but this would, in any affect, be governed by the wording of Criterion (g) as it currently stands. It is considered that this would be consistent with your draft Policy DM50.

In conjunction with this it is considered that Policy DM52 should be similarly amended. There should be an additional criterion that should refer to the site being suitable for a mixed use development incorporating residential development in appropriate locations.

### **Site Allocations DPD**

Our client's site falls within what the document defines as "the East of the Borough", being just to the west of the land included within the Tottenham Action Area Plan. As is recognised on Page 149, this area is predominantly residential.

We are aware that our client's site, as shown on the attached Ordnance Survey extract, was specifically shown as a potential site allocation in an earlier version of the Site Allocation DPD. It is not known why the site has been deleted whilst other sites, not previously shown, are now put forward instead. The subject site is considered eminently suitable for a primarily residential development.

The surrounding area to the south comprises entirely two storey semi-detached and terraced housing as does the land to the west fronting Creighton Road. Buildings in the vicinity fronting White Hart Lane vary generally from one to three storeys generally with commercial use at ground floor level and residential on upper floors. Whilst the site has a White Hart Lane address it is more associated visually with the neighbouring two storey terraced housing on the adjoining Creighton Road.

The site itself currently contains a three storey office building (Wedge House) at the junction of White Hart Lane and Beaufoy Road – recessed from the boundaries and the back edge of the pavement with a small car park in front of the building right at the junction of the two roads. Wedge House is occupied as independent offices – currently by Alive Chapel International and by the administrative headquarters of Extra Mile Care Co.

Bird and Wedge occupy a separate three storey office building adjacent to 1 Creighton Road and continuing the terrace of which that forms a part. The Bird and Wedge office has the appearance of a domestic dwelling in keeping with the adjoining terrace but was constructed a number of years ago to demonstrate the loft conversions carried out by that business and is their loft conversion showroom/office space.

The remainder of the site, to the west of the Bird and Wedge office/showroom and Wedge House, is a builders yard/roofing centre which is accessed from Beaufoy Road – a residential side street. It is currently occupied by SIG Roofing whose hours of business are 7.00am until 4.30pm Mondays to Fridays and 7.00am until 11.00am on Saturdays. Their business involves significant movements of large goods vehicles bringing their deliveries and taking out their supplies to sites. There are also numerous smaller goods vehicle movements from builders etc visiting the site to collect materials. The existing use is thus one that gives rise to large numbers of heavy goods vehicle movements on Beaufoy Road with noise and disturbance to neighbouring residents from early in the morning six days a week. As the use is a historic one – with the builders yard/roofing centre use having been in existence since the 1930's – there is no planning control over hours of use.

Given the nature of the existing use, despite the site having an area of approximately 2573sqm it is not significant in terms of employment generation (job numbers). As the freehold owners no longer operate their own business from the site we do not know the precise number of people currently working from there.

The site is well served by public transport. It has a PTAL Rating of 4 being two minutes walk from White Hart Lane BR station as well as being within similar walking distance to bus stops serving 149, 259, 279, 318, 349 and W3 providing access to much of North London including Edmonton Green, Waltham Cross, Manor House, Stamford Hill and Finsbury Park, as well as to locations in Central London. Using the rail service from White Hart Lane Central London can be accessed in approximately 20 minutes.

The site is within a Controlled Parking Zone. Given its accessibility level there is the opportunity to maximise the development potential of the site with a car free development or with limited parking – where the rights of future residents to obtain parking permits are removed by way of a Legal Agreement (unless registered disabled). This would comply with adopted and emerging policies at London Plan and local levels.

The site has the potential to come forward for redevelopment from late 2015 onwards. All occupiers are due to have vacated by then according to the terms of their leases.

Part of the site is constructed over the Moselle Brook. Enquiries were made with the Environment Agency in 2011 regarding a proposed residential development on the site. They referred to the site being partly within Flood Zones 1 and 2 but did not rule out the principle of residential development on the site subject to the submission of an appropriate Flood Risk Assessment, buffer zones between the top of the bank and the obtaining of Flood Defence Consent.

The site is in a fairly prominent position when viewed from White Hart Lane to the north-east, being positioned where the road bends towards Creighton Road to the west and with it being visible in fairly distant views along White Hart Lane. Given this prominent corner position it is considered eminently suitable for a significant development.

Some early feasibility studies show the potential for in the region of 100 to 115 dwellings fronting both White Hart Lane and Beaufoy Road comprising from two storeys to up to nine at the junction of the two roads. These early studies show this potential in addition to a commercial/retail element at ground floor level on the White Hart Lane frontage, with amenity space and car parking for the remainder of the ground floor level with a larger area of amenity space on a raised deck at first floor level.

With the site having an area of 2,573sqm the current feasibility proposals give rise to a density in the region of 388 units per hectare/930 habitable rooms per hectare. It is acknowledged that these figures exceed the density ranges referred to in Table 3.2 of The London Plan but we are aware that at other developments where permission has been granted in recent years in the Tottenham Regeneration Area, higher

densities have been achieved. Clearly the current feasibility studies are no more than that – early indications of the maximum development the site is considered capable of bringing forward. It is recognised that the scale of development may need to be reduced to ensure a satisfactory relationship with neighbouring properties, the street scene and neighbours amenities.

Redevelopment of the site in the manner proposed would help regenerate this part of the Tottenham area. With so much regeneration taking place or proposed for other parts of Tottenham it is important that this area does not get neglected.

This initial assessment of the site's feasibility, location in a predominantly residential area, nature of existing use being harmful to neighbours amenities, good public transport accessibility, low intensity of employment on the site and its availability for development in the short to medium term, indicates that it is a perfect site for inclusion as one of the housing allocation sites in the Site Allocations DPD. On behalf of our clients we therefore object to the fact that this site has been deleted from the former consultation draft and would ask that it be reinstated. It is acknowledged that the Council may want to include within the designation reference to a commercial element at ground floor level fronting White Hart Lane so as to retain some employment on the site.

We would be grateful if you could please ensure that we are kept notified of the progress of these documents and be given the opportunity to submit further representations as and when the occasion arises as they progress towards adoption,

Yours faithfully

**Carolyn Apcar**

c.c      *J Wedge Esq.,  
A Bennett Esq.,*