



London Borough of Haringey's Local Plan Preferred Option Consultation on:

- **Proposed Alterations to Strategic Policies February 2015 (formerly the Core Strategy)**
- **The Development Management Development Plan Document (February 2015)**
- **The Site Allocations Development Plan Document (February 2015)**
- **The Tottenham Area Action Plan Preferred Option Consultation (February 2015)**

Representation by HTA Design LLP on behalf of the Woodgate Group

Date: 27 March 2015

Introduction

HTA Design LLP are submitting representations on behalf of the Woodgate Group as part of the consultation pursuant to Regulation 18 of the Planning and Compulsory Purchase Act 2004 Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012. The full public consultation seeks comments on four Local Plan Documents (February 2015) which will form the Local Development Plan for the London Borough of Haringey and includes:

- Proposed Alterations to Haringey's Adopted Strategic Policies (formerly the Core Strategy) February 2015 ;
- The Development Management Development Plan Document (DPD) February 2015;
- The Tottenham Site Allocations Development Plan Document (DPD) February 2015; and
- The Tottenham Area Action Plan Development Plan Document (AAP) February 2015.

The Woodgate Group's representation also review the Tottenham Hale District Centre Framework (DCF), dated October 2014 which constitutes the emerging Masterplan for the Tottenham Hale area. This document, produced by Allies and Morrison, is published as part of the evidence base of the Tottenham Hale Site Allocations DPD and aims to provide clarity and guidance in relation to a number of identified development parcels within Tottenham Hale. Paragraph 1.3 of the draft AAP (February 2015) does not state that the AAP builds on the conclusion and recommendations of the DCF (2014) however the emerging Site Allocations in the AAP refer to its content and requires compliance with it. The draft AAP (February 2015) states that the content of the emerging DPD (2015) builds on the Physical Development Framework for Tottenham (2012) and the Tottenham Strategic Regeneration Framework (2014); both of which are different to the emerging DCF for Tottenham Hale (2014).

This representation also makes reference to the Haringey Urban Characterisation Study (February 2015) and the Site Viability Assessment Final Report by GVA (February 2014). These are both important reports listed as the evidence base and the extent to which their findings have been adopted in the emerging policy documents listed above vary considerably.

The London Borough of Haringey has ambitions for Tottenham Hale to be a **District Centre by 2025**. The area has excellent transport connections and will become a **strategic transport hub in future** as a result of capacity increases proposed for the West Anglia trainline and Crossrail 2 proposed to stop at Tottenham Hale station, linking the London boroughs east to west. Tottenham Hale will be subject to **significant change** in the coming years and it is important at this point to ensure **that the planning policy basis proposed and emerging by the council can indeed support the ambitions to create a District Centre**. In the Mayor's formal announcement of the first Housing Zones in London on the 20th of February 2015, it stated the following about the Tottenham Housing Zone: *"This area of Haringey is one of the capital's big growth opportunities. 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..."*.

The Woodgate Group is a landowner within Tottenham Hale and a promotor of a scheme with the potential to deliver a significant number of residential units on a **key site within the recently announced Tottenham Hale District Centre and designated Housing Zone**. This site falls within the area described as Station Square West in the emerging Tottenham AAP(2015). As such, we have particular comments relating to **emerging site based planning policy relating to the approach to density and tall buildings in the emerging local plan as they affect our client's site and its development potential**.

TH1 Station Square West



This representation seeks to refine and review the emerging planning policy to support the growth Haringey Council and the Greater London Authority aspire to deliver at Tottenham Hale, strongly supported by landowners.

The Haringey's Local Plan: Alterations to Strategic Policies 2011-2026 (Formerly the Core Strategy) (February 2015)

The Housing Target (Paragraphs 1.2.16, 1.3.1)

The revisions to the Local Plan include a step up in the annual housing target from 820 homes per annum to 1,502 homes per annum. This target reflects the London Plan target for the borough rather than the target suggested by the Strategic Housing Market Assessment: *"Haringey's strategic housing requirement is higher than its objectively assessed*

housing need because it is the strategic role of the London Plan to reconcile, insofar as possible, requirements for and capacity to deliver new housing across the Capital".

The total target is 19,802 homes from 2011 to 2026 (820 homes for 2011-2014 and 1,502 from 2015 to 2026). The Haringey Strategic Housing Market Assessment 2014 concludes that the objectively assessed housing need for the Borough, across all tenures is 20,172 net new homes over the fifteen year period 2015/16 to 2030/31. This equates to a requirement of 1,345 net new homes per annum. **The London Plan (2015) sets a London-wide target of 490,000 additional homes from 2015 to 2025 and a Haringey target of 15,020 additional dwellings over the same period (increasing the annual target from 820 to 1,502 additional homes per annum). This is a minimum housing supply target.**

The Woodgate Group fully supports the urgent need for more homes in Haringey and in particular Tottenham Hale and they can deliver more homes before 2018. The Haringey Local Plan Monitoring Report 2012/13 (published July 2014) indicates that for the monitoring year 2012/13 the number of net housing completions in the borough was 1,285. However, this included 492 non-conventional units at Hale Village. Only **583 net conventional units were completed in this period. It is evident that housing delivery will have to assume a significant step change in the borough.**

The Affordable Housing Target

Paragraph 1.4.10 of the Local Plan states that affordable housing need outstrips supply, with a shortfall in provision of 11,757 homes over the period 2015 to 2031. As a proportion of the total net housing requirements for all tenures (20,172) over the same period, this equates to 59%. At an annual rate, this is 784 affordable homes out of 1,345.

The Haringey Local Plan Monitoring Report 2012/13 (published July 2014) indicates that **376 affordable housing units were completed in the last monitoring period 2012/13, accounting for over 60% of new conventional units.**

While it appears that there is a need for circa 50% affordable housing of the overall delivery target, viability of this coming forward would be problematic. Policy SP2 'Housing' proposes a revised affordable housing target of 40% rather than 50% and the delivery of an affordable housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing.

The **Site Allocation Viability Assessment by GVA (February 2015)** notes the following with regard to sites outside of the Housing Zone:

"5.3 Generally, across the majority of the 'policy compliant' notional schemes identified by Haringey Council, development does not generate a positive residual land value. As such they would be considered to be unviable when compared to the indicative benchmark land values required to incentivise landowners to bring forward development.

5.6 Our site specific assessment suggests that a reduction of the affordable housing requirement to the 40% range could result in a number of sites becoming more viable within the locations that have stronger existing value profiles. Our assessment would suggest that developments within the Finsbury Park, Highgate and Wood Green areas are likely to become more viable at if requirements were in the 40% range. It is worth noting that even at this rate some of the notional developments remain below the identified benchmark land value.

5.7 Whilst these areas become more viable, those in the north east and south east remain unviable even with a reduced contribution. A combination of modest value increases and tactical approaches to affordable housing requirements and mix of use may advance these sites towards viability".

While the affordable housing target is revised within the Strategic Policies, it remains set at 50% within the Housing Zone with no evidence as to why these sites would have the ability to deliver affordable housing at 50% if they are within private ownership.

The Haringey Housing Strategy's key priority is to meet housing need through mixed communities and one of the key actions are to **develop and promote a range of flexible intermediate housing products**. The 2015 Housing Strategy states: *"There is currently a particular imbalance in the housing market in Haringey between Tottenham, where 62% of the borough's social housing (council and registered provider) is located, and the west of the borough in places like Highgate and Muswell Hill which provide less than 20% of the social housing stock. As part of the council's ambition for mixed communities, we need to ensure a better balance of housing tenures across the borough, not least to support people on low and middle incomes to access the housing market in the right location for them. To achieve this, and improve the overall balance across Haringey, **the council will prioritise the delivery of new affordable rented homes in the centre and west of the borough while promoting more market and intermediate homes, including for affordable home ownership and private renting, in Tottenham**".*

The Woodgate Group fully supports the need for more affordable homes in the borough, the measures introduced by Policy SP2, and the aspiration to promote a range of flexible intermediate housing products.

Design Standards

Para 3.2.7 states: *"The Council will expect all new development to be built to the highest quality standards in line with the London Plan and the Mayor's Housing SPG (2012)".*

Densities in planning applications will be assessed in line with those set out the in London Plan *"while taking account of Haringey's urban, suburban and central density settings as set out in Haringey's Urban Characterisation Study 2015"*.

General recommendation 6 of the Haringey Urban Character Study (February 2015) states that **tall and taller buildings should be concentrated** in Wood Green, Finsbury Park, and **Tottenham, "reinforcing their strategic position and reflecting the regeneration potential"**. General recommendation 8 'Future Character Settings' of the Haringey Urban

Character Study (February 2015) classifies the Island Site as having a '**central**' urban character according to the London Density Matrix - the maximum density setting for London. Paragraph 3.19 of the London Plan (2015) supports high density residential led development in areas of high accessibility '*bringing forward areas with good public transport accessibility which will be particularly appropriate for high density development*' 'in order to make optimal use of the capacity of sites with high levels of public transport accessibility' (paragraph 7.25, London Plan 2015).

The Woodgate Group is fully supportive of an approach that recognises that Tottenham Hale requires taller buildings of high quality. **It is positive to see that the District Centre Framework proposes locations for 11+ storeys as it is evident that much higher density proposals will have to be delivered around the station to fulfil the housing delivery expectations related to the Housing Zone.** The Haringey Urban characterisation study clearly classifies this area as '**central**' - **the highest density setting for London.** Yet, the District Centre Framework at Paragraph 10.6 (page 87) indicates a shortfall of 40 dwellings and 290 jobs against a target for the 'Island Site' of 470 dwellings and 500 jobs. It seems unusual that a framework that is to demonstrate how challenging housing requirements are to be delivered concludes a shortfall of 40 homes. In our view, the DCF does not yet demonstrate the true capacity of the site in terms of the number of homes it could deliver. **The Woodgate Group is committed to working with Haringey and the GLA to illustrate how the site has the capacity in townscape and urban design terms to deliver a scheme suitable to the future character of the area, the policy requirements to deliver high quality high density housing, and able to deliver in the region of 320 homes alone on Site B of Station Square West.**

The Tottenham Area Action Plan (AAP) Preferred Option Consultation February – March 2015

The Woodgate Group fully supports the vision for Tottenham as set out in the AAP, and look forward to working with the Council to achieve this objective on the Island Site:

"Tottenham will be the next great area of London. It will build on its geographical, natural and cultural strengths and capitalise on the dynamics of neighbourhood improvement, the significant infrastructure investments being delivered in the area and the availability of large development sites. The combination of transformative actions and continuous incremental improvement will unlock Tottenham's potential as an increasingly attractive place to live, work, study and visit, a neighbourhood fully benefitting from London's growth and its position in a world city".

Our feedback on the contents of the Area Action Plan is summarised below:

Paragraph 1.22	<p>Paragraph 1.22 states that at this stage – the Preferred Options stage – the AAP will be a material consideration in the determination of planning applications. The Woodgate Group welcomes this statement as they are keen to engage with the Local Planning Authority in the pre-application process in relation to proposals on the Island Site as soon as possible.</p> <p>The proposed site allocations and policies of the AAP are said to build on the conclusions and recommendations following;</p> <ul style="list-style-type: none">- The Physical Development Framework for Tottenham (2012); and- The Strategic Regeneration Framework (March 2014). <p>The introduction of the AAP does not refer to the emerging District Centre Framework (DCF) however the emerging the neighbourhood area policies, and consequently the emerging site allocations, do. This is a contradiction.</p> <p>The content of the DCF (2014) does not form part of this formal consultation process. References to the DCF (2014) should not be a material consideration in the determination of planning application against these emerging planning policies as the DCF has not been through a formal consultation or adoption process.</p> <p>The current wording of the emerging site allocations contained in the AAP should be less prescriptive and enable high density residential-led development to come forward as supported in the accompanying Interim Sustainability Appraisal (URS, February 2015).</p> <p>The content of the DCF does not refer to the Haringey’s Urban Characterisation Study (2015) or the emerging polices of the Development Management Plan DPD on the ‘Siting and design of tall buildings’ (Policy DM5) or ‘Locally important views and vistas’ (Policy DM6).</p> <p>The Interim Sustainability Appraisal supporting the AAP (URS, February 2015) highlights policies on tall building in the AAP need to respond to, and where possible help to define, the surrounding character, as well as make the most of the opportunities for intensification and regeneration. This is not clear in the AAP or the emerging site allocations.</p> <p>Paragraph 7.4 in the emerging District Centre Framework sets out a number of building height scenarios which affect the Island Site, including 'node', 'ring' and 'strip'. The chosen</p>
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	<p>approach - the strip - one where 'taller buildings in the Tottenham Hale is one that reflects the prevailing east-west grain of the area" and where "the Wellbourne Centre sits at the threshold to the central area of Tottenham Hale and the core east-west axis that runs through the area" requires justification.</p> <p>The chosen approach seems to be in direct contradiction with the findings of the Urban Characterisation study which - based on the historical evolution of Tottenham Hale- .</p> <p>The Haringey Urban Characterisation Study includes a number of important recommendations regarding building heights and tall buildings not reflected in the AAP, including (see page 238 of the 'General Recommendations' of the Haringey Urban Characterisation study):</p> <ul style="list-style-type: none"> • <i>"It is important to consider building heights across a neighbourhood, a block and along a street not just a development site" : The Woodgate Group is in particular concerned that the AAP makes site specific recommendations on tall buildings based on the DCF (2014), whereas the DCF (2014) has not fully justified the approach taken to preferred siting of tall buildings or long distance view impact.</i> • <i>"Urban design principles - such as relating heights to urban grain, public transport, street hierarchy, nodes, creation of landmarks and wider townscape considerations": The Woodgate Group notes the importance of wider townscape considerations and are fully supportive of this.</i> • <i>"The development /intensification potential of an area now and in the future (through an understanding of Council regeneration projects, site allocations, masterplans and briefs)". The Woodgate Group is of the view that Tottenham Hale will undergo significant change in the coming years. The Group have been working with the Council and adjoining landowners to demonstrate how the Island Site could deliver three tall buildings making a substantial contribution to setting in place a new skyline for Tottenham Hale and the emerging District Centre. It is critical for the emerging masterplan of the area to reflect the true ambition and potential for growth.</i>
<p>Policy AAP1 Regeneration</p>	<p>It is positive that the Council will work with landowners to help deliver the changes needed in Tottenham (Emerging AAP1). Our client strongly supports our involvement in any masterplanning exercise which takes place. Our client has proactively been in discussion with the Council and adjoining landowners since June 2014.</p>

	<p>Following the recent designation of the Housing Zone in January 2015, the emerging site allocations, and consequently the housing capacity at Tottenham Hale, must now be reviewed to ensure that the development principles for each site allocation enable the most efficient use of land on Tottenham Hale Island. Emerging planning policy should not be restrictive and prevent Haringey meeting or exceeding its minimum housing supply targets of the London Plan (2015).</p> <p>Currently the massing and urban design strategies suggested for the emerging Site Allocation TH1 Station Square West(Area B) under-utilise the potential of the site and introduces restrictive requirements on landowners concerning future massing of the proposal. The emerging policy states that the Local Planning Authority will assess planning applications based on this emerging planning Policy TH1 Station Square West . This policy wording needs to be deleted as the emerging policy is too restrictive and is not based on a sound evidence base. The DCF (2014) is inconsistent with the Haringey Urban Characterisation Study (2015) and the emerging Development Management Policies DPD (2015).</p> <p>The accompanying DCF (2014) does not provide any supporting analysis as to why tall buildings cannot be accommodated on each corner of Area B of the emerging site allocation TH1 for Station Square West and therefore the proposed wording of the emerging Policy TH1 Station Square West is not ‘sound’ or ‘evidenced’.</p> <p>The current wording of the site allocation TH1 Station Square West will not harness the benefit of the Housing Zone investment and will not maximise the opportunity the Tottenham Hale Island presents.</p> <p>It is of concern that there are inconsistencies across the emerging AAP, the accompanying Interim Sustainability Appraisal, the Development Management DPD, the DCF and the borough’s characterisation study in relation to strategy for the preferred approach to tall buildings; all of which do not support this restrictive wording proposed for the site allocation.</p> <p>Given the significant increase in accessibility of this site and the surrounding area with Crossrail, the Council’s local plan should focus on optimising the Tottenham Hale Island sites for high density housing led schemes to increase delivery rather than constrain development opportunities as supported by the GLA.</p>
Policy AAP2 Housing	Policy AAP2 Part (B) (a) expects allocated sites within the Tottenham Hale AAP

Neighbourhood area (the Housing Zone) to deliver 50% market housing and 50% affordable housing. The Woodgate Group would like to see the **viability of delivering a 50% affordable housing target tested on sites within the Housing Zone that are brought forward by landowners without public subsidy**. The **Site Allocation Viability Assessment by GVA (February 2015)** notes the following with regard to sites outside of the Housing Zone, and at this stage it is **questionable** that the situation would be different within the Housing Zone:

"5.3 Generally, across the majority of the 'policy compliant' notional schemes identified by Haringey Council, development does not generate a positive residual land value. As such they would be considered to be unviable when compared to the indicative benchmark land values required to incentivise landowners to bring forward development.

5.6 Our site specific assessment suggests that a reduction of the affordable housing requirement to the 40% range could result in a number of sites becoming more viable within the locations that have stronger existing value profiles. Our assessment would suggest that developments within the Finsbury Park, Highgate and Wood Green areas are likely to become more viable at if requirements were in the 40% range. It is worth noting that even at this rate some of the notional developments remain below the identified benchmark land value.

5.7 Whilst these areas become more viable, those in the north east and south east remain unviable even with a reduced contribution. A combination of modest value increases and tactical approaches to affordable housing requirements and mix of use may advance these sites towards viability.

5.8 Haringey sits within London's dynamic residential value context. It can also be anticipated that private market values will increase in coming years in response to: market shifts from other areas resulting from value increases in those areas, significant upgrade of the Victoria Line, growth of employment at Kings Cross and focused regeneration strategies for Tottenham Hale and Tottenham more generally".

Part (C) of Policy AAP2 on Housing should **emphasise the link between high density, housing led redevelopment and the vitality of town centres**. At present it states that higher densities and capacities '**may**' be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities in areas well served by public transport. In the accompanying **Interim Sustainability Appraisal by URS (February 2015)**, high density housing performs well against all sustainability objectives, providing supporting infrastructure for health and community can be provided in the borough. The detailed **Sustainability Appraisal of the Development Management DPD (Appendix II, 2015)** states that land is restricted in Haringey and allowing higher density in some circumstances will help increase the amount of housing provision in the area.

It should be recognised that a significant quantum of development would be required in order to support and fund public realm improvements which would be essential to the vitality of a new district centre, and not publicly funded in all instances. The Development Guidelines within the AAP in relation to Site B, for example, suggests that: "...each development will be expected to contribute to a comprehensive public realm strategy,

	<p>through the use of pooled S106 contributions". It is not made clear, however, which specific portions of public realm is expected to be funded in each instance. Simultaneously, these contributions could also affect the amount of affordable housing that would be deliverable.</p>
<p>Policy AAP3 Tottenham Hale District Centre</p>	<p>The Woodgate Groups supports the Council's ambition to create new urban form within the Tottenham Hale District Centre, supporting navigation, permeability and legibility of streets (Policy AAP3). Urban form and massing of Tottenham Hale centre needs to be considered. In particular, how schemes coming forward will impact on a new skyline for the area. The impact of taller buildings on a three dimensional scale needs to be considered from close and far.</p>
<p>Policy APP4 Green link</p>	<p>The Woodgate Group is of the view that there is a significant opportunity to increase connections to the Lee Valley Regional Park and the wider green grid of Haringey (AAP4). The new east-west link along the axis of Chesnut Road will improve access.</p> <p>Haringey should also consider the east-west connection along Ferry Lane and how the new District Centre as a vibrant heart of activity will be viewed from the park as a destination.</p> <p>The Upper Lee Valley Opportunity Area Planning Framework (2013) highlights a number of links which need to be considered and reviewed as alternatives or secondary green links routes for the District Centre, linking to Waltham Forest Council's ambition for the restoration of the wetlands.</p> <p>The main entrance to the Wetlands will be from Forest Road south leading to the Marine Engine House Visitor Centre. The AAP green link should connect to the Walthamstow Wetland Project. This is absent from the AAP (2015) and DCF (2014).</p> <p>This is a missed opportunity to extend the green grid particularly as the DCF (2014) highlights Forest Road bridge may need to be widened as a result of Cross rail (Page 34, DCF, 2014). The works at the Ferry Lane Bridge could provide an ideal opportunity to create a primary green link to the Lee Valley Regional Park from Station Square West and Tottenham Hale.</p>
<p>Policy AAP5 Changes to Designated Employment Areas</p>	<p>The Woodgate Group strongly supports the de-allocation of the southern part of RA15 Tottenham Hale (TH1- Station Square West sites B & C) from its employment designation as it supports the Housing Zone vision for the area as the current level of development is inefficient given the proximity of the site to local facilities, the excellent accessibility and the wider strategic ambitions for the area.</p>

<p>Neighbourhood Area – Tottenham Hale</p>	<p>Chapter 5 of the AAP includes Site Allocations for the Neighbourhood Area of Tottenham Hale where there are significant opportunities for development and change. The chapter provides expectations for each site relating to land use, design, infrastructure and delivery.</p> <p>The emerging capacity studies the land owners have provided together have not been considered regarding the opportunities at Tottenham Hale. The Woodgate Group is keen to continue discussions with the Borough in this regard and review the amended wording of the site allocations of Tottenham Hale following this Regulation 18 consultation.</p> <p>The Physical Development Framework for Tottenham (2012) was conceived within a different planning policy framework and does not utilise the full potential of the area. The recent District Centre Framework (DCF, 2014) does not consider the Haringey Urban Characterisation Study. Neither does either report consider the site or area as a cross-section.</p> <p>The DCF which appears to have informed the area based policies of the AAP has not been consulted or reviewed against the emerging local plan and therefore should not solely inform the content of the AAP and development aspirations for Tottenham Hale as a new Housing Zone for London to boost the supply and delivery of new homes.</p>
<p>Paragraph 5.36 of the Tottenham AAP sets out Key Neighbourhood Area Objectives:</p> <ul style="list-style-type: none"> • <i>“A distinctive new mixed use district centre incorporating higher density development will be created at Tottenham Hale in accordance with Tottenham Hale District Centre Framework”</i> • <i>“Development within the wider Tottenham Hale area will be required to respond to the aspiration for a distinctive new walk able “place/destination”.</i> • “Given the fragmented site ownership, and the aspirations for a new, coherent centre with distinct but harmonious urban form, development on allocated sites shall be in accordance with coordinated masterplans.” <p>The Woodgate Group fully supports the above objectives, but would reiterate the importance of ongoing engagement with stakeholders on the content of the emerging Tottenham Hale District Centre Framework and consistency with other emerging development plan documents forming Haringey’s Local Plan.</p> <p>Allocated Sites in the Tottenham Hale Neighbourhood include ‘TH1 Station Square West’ – our client’s site. The site is broken down into three areas; Area A, Area B and Area C.</p>	
<p>‘TH1 Station Square West’</p>	<p>Site Requirements: Area B states that Area B <i>“will be comprehensively developed”</i> and</p>

must accord with the emerging Tottenham Hale District Centre Framework (DCF), including areas A and C of 'this policy'. At present the DCF has not been subject to sustainability appraisal or consultation. It has not been adopted as a formal planning policy guidance document. It does not refer to the Tottenham Urban Characterisation Study, published in February 2015. As such there is no justification for development to 'accord' with it. The chosen wording of the emerging planning policy that development should also accord with areas A and C of 'this policy' is also not correct. Site requirements and development guidelines do not constitute sound planning policy.

TH1 Station Square West



There is little justification for some of the statements within the '*site requirements*'. For example the last bullet point in relation to the site requirements for Area B states "*...the site cannot accommodate tall buildings on all corners*" whereas site requirements for Area C states "*(t)aller elements marking the key corners of the site will be considered, possibly of 11+ storeys*".

Area C is a similar triangular site to Area B. The emerging planning policy which restricts the provision of tall buildings on all corners of the Area B is completely unjustified (Policy TH1).

The DCF **does not consider locally protected views or vistas**. As a result the wording of the emerging **Site Allocation TH1 Station Square West has not been informed by a proportionate evidence base.**

	<p>The Interim Sustainability Appraisal (February 2015) for the Development Management DPD highlights that the emerging focused planning policy proposed on the siting and design of tall buildings (Option 1) may restrict the future supply of housing. The content of the emerging site allocations in the AAP needs to consider how tall buildings will help to define the surrounding character as well as make the most of the opportunities for intensification and regeneration, whilst delivering the housing needed in the Housing Zone and the wider borough</p> <p>The emerging site allocation (TH1, 2015) restricts the future supply of housing on this site by determining where height should go. As this site falls within a housing zone and has excellent accessibility, this limitation should be removed provided that comprehensive proposals comply with Policies DM2 'Design Standards and Quality of Life, Policy DM 5 'Siting and design of tall buildings (excluding Section A as the locations are not clear), and Policy DM6 'Locally Important views and vistas' of the emerging Development Management DPD.</p> <p>If Haringey Council intends that the emerging site allocation policy be supported by an urban design strategy to the site, then the accompanying DCF should be updated to reflect the Housing Zone status, the Borough's Characterisation Study, the protected local views and vistas, the emerging Development Management DPD, and consultation should take place with the landowners on capacity studies, before the site allocation can be considered 'sound'.</p> <p>The current massing and the supporting policy for the site allocation 'TH1' cannot be considered 'sound' as it does not appear to have been positively prepared, justified in a clear evidence base, effective in conveying how this will deliver the GLA's ambition to boost housing supply as part of a designated housing zone or consistent with national planning policy as the potential of the brownfield site is under-utilised.</p>
<p>Appendix B: Evidence Base Studies</p>	<p>It is notable that the emerging District Centre Framework is not listed under 'Studies' or 'Strategies' and does not form the evidence base of the consultation draft of the AAP (2015).</p>

Haringey's Local Plan: Preferred Option Development Management Policies Consultation Document (February 2015)

The Woodgate Group is supportive of the emerging Development Management Policies Document, but have reservations about the following emerging planning policies:

- **Policy DM3** Privacy and protection from overlooking sets a distance of no less than 20 m between facing 1st floor habitable room windows of neighbouring homes. **It is not clear if this policy refers to houses or is intended to include flatted development as well.** Paragraph 2.19 refers specifically to a 'house'. This needs to be clarified. Paragraph 2.20 states: *"Therefore new homes should be designed so they and neighbouring existing homes have 1st floor (2nd storey) windows to habitable rooms that do not face windows of habitable rooms of another dwelling that is less than 20 m away. Care should be taken to avoid any ground floor windows being overlooked although there will normally be natural screening (garden walls and fences) that mean this is not possible. There should be an additional 10m for each additional floor; a minimum of 30m between a 2nd floor window and any window that could be overlooked on the ground, 1st or 2nd floor, 40 m between a 3rd floor window and any window that could be overlooked on the ground, 1st, 2nd or 3rd floor and so on, up to a separation of 60 metres (no greater separation is considered necessary)".* These separation distances appear excessive for locations with a central classification such as Tottenham Hale.
- **Policy DM5 Siting and design of tall buildings - Section A** of this policy refers to locations acceptable for tall buildings. It should be noted that **Map 2.2 is not clear with regard to locations for tall buildings.** As noted before, **locations for tall buildings are contradictory in the various emerging policy documents and the supporting evidence.** **Section B of policy DM5** determines that proposals for tall buildings must be informed by a masterplanning exercise in consultation with the Council. The Woodgate Group supports this and would like to emphasise that future engagement with landowners on the development of the District Centre Framework for Tottenham Hale is essential. It should be noted, however, that a 'masterplan' does not translate into a single planning application.

Conclusion

The Woodgate Group fully supports the development of a planning policy framework to support the huge step change in housing delivery required within Tottenham Hale. However, there are a number of policy contradictions that requires further attention.