

25th March 2015
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Dear Sirs

Tottenham Area Action Plan: Preferred Option Consultation (February 2015)- Representations submitted on behalf of ISIS Waterside Regeneration & Newlon

On behalf of our client's ISIS Waterside Regeneration and Newlon we submit the following representations to the consultation draft of the above AAP document.

ISIS and Newlon own two of the key sites that form part of AAP Site TH7: Hale Wharf and are working with the Council to bring forward their land for development in line with the emerging AAP document.

In general terms both ISIS and Newlon welcome the AAP's focus upon delivery and implementation and to the positive and proactive stance taken to achieving timely delivery of development.

Both parties also welcome the fact that AAP Site TH7 is being promoted for comprehensive regeneration for mixed development, including housing.

Having said the above our clients are of the view that the text that supports the TH7 allocation introduces a level of prescription at a point in the development process where it is inappropriate and indeed unnecessary to do so and which, as a result has the potential to constrain and undermine our client's ability to deliver the overarching regeneration and delivery objectives established for TH7 by the AAP.

In addition and based on our review of the evidence base, which supports the AAP there does not appear to be the necessary technical work to endorse the level of prescription advanced in terms of issues including land use mix and quantum of development.

Based on the above we identify in the remainder of this letter our specific concerns and make suggestions as to how we would like to see the document amended.

Issue 1: Site requirements: Bullit point one: *'This site will be given a Designated Employment Area: Regeneration Status to recognise the contribution to the local economy that this site can make. It is anticipated that*

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the redevelopment of the site will not create a net reduction in employment floorspace’.

Our response: The Site currently support a mix of low-grade storage, building contractors and B1 light industrial/ office uses. Based on survey work we confirm that the Newlon/ ISIS sites support around 7,000sqm of floorspace and that this floorspace supports between 40 and 50 workers. Given the nature of the activities it is difficult to confirm whether such jobs are full or part time.

As part of the regeneration proposals both Sites will be cleared to enable redevelopment to take place. In the context of the objective to deliver a residential led mixed development ISIS’s feasibility exercise suggests that it will be possible to introduce some commercial uses into the ground floors fronting onto a new landscaped space associated with the proposed new east/west Green Link. It is envisaged that whilst east west movement across the Sites will be fairly limited they will experience some pedestrian footfall and hence there will be an opportunity to introduce a small amount of active commercial uses into buildings fronting onto the Green Link. In addition ISIS believe that there will be the potential to exploit the waterways and to introduce additional canal boats, which could support some commercial/leisure functions.

The ISIS Site, given the nature of the proposed development will also need to support concierge staff and general maintenance staff. As part of any future planning application and indeed as part of the pre-application process the applicants will be happy to work with their commercial agents in order to try and maximise the potential to deliver new commercial/ leisure activity on the TH7 Site. As will be appreciated, however ISIS and Newlon do not want to reserve space within their developments, as a result of some artificial and undeliverable planning requirement, for commercial uses that will never be taken up. Such commercial uses are likely to be best suited to the ground floors of the development. Such space is already at a premium in that it is providing for the operational needs of the scheme and the accommodation of high quality family accommodation with gardens and hence it is our view that any commercial provision should be capable of delivery and of sustaining itself and its provision should be weighed up against the other key objective for the site i.e. the delivery of high quality family accommodation

Suggested rewording: Delete bullit point one and modify bullit point 2 to read: *‘ Part of the site (Hale Wharf) is in employment use and will need to reflect the Council’s aspiration to create a mix of uses on this site through the introduction of a mix of new commercial and leisure uses, which take advantage of the site’s waterside location and which provide amenities for the users of the Regional Park’.*

Issue 2: Site requirements: Bullit points 5 and 7:

Bullit point 5: *‘In order to deliver the proposed new homes and jobs,*

comprehensive redevelopment of the site is required'.

Bullit point 7: *'Development should be delivered in a co-ordinated manner. Comprehensive re-development (of) (sic) the site is required. The garage site across the Lea navigation, and the Lock keepers Cottage to the east should be developed as part of a comprehensive proposal*'.

Our response: Given that the site is in multiple ownerships and that each landowner may have differing objectives for the future use of their site it would be inappropriate and in the context of the overarching objective in relation to timely delivery, unwise to 'require' a comprehensive proposal for the Site.

Such a requirement could fetter the ability of a willing landowner bringing forward development on one site, should another landowner choose not to bring forward his/ her land. In addition each landowner will be required to secure individual stand –alone planning consents on land in their ownership and will want to control the delivery of such a planning consent.

Each landowner, will however as part of any pre-application process be willing to demonstrate that their individual schemes would not fetter the ability of an adjacent landowner to bring forward his/ her site in the future.

Suggested rewording: Given this commentary we would suggest that bullit point 5 should be deleted and bullit point 6 be re-worded; *' Development should be delivered in a co-ordinated manner. The Council will work with landowners and developers to help secure the delivery of the comprehensive redevelopment of the Site*'.

Issue 3: Appendix A: Numbers of residential units. The tables in the appendix refer to the potential of the site to deliver 300 homes.

Commentary: ISIS/ Newlon's own feasibility work suggests that the site should deliver in excess of 500 units, which would equate to a density of approximately 229 units/ ha and 568 hrh, which is in line with the density ranges set by the London Plan for the area.

Based on this detailed work and in the absence of any viability evidence being produced as part of the Council's 'Evidence Base' we would suggest that it is inappropriate at this stage in the AAP process to come down on a specific number of units and that it may be more appropriate to specify a unit number range i.e. 400 to 600 units. This range would take in the density ranges expressed by the London Plan and would allow for the Council to work with developers to explore and test options in relation both design, unit mix and viability and come to a conclusion that balances all the issues and is capable of delivery.

Suggested rewording: Replace 300 units in the table to a range (i.e. 400 to 600) or up to 600 units.

Please do not hesitate to contact us should you wish to discuss any of the above comments further.

Yours sincerely

For Tibbalds Planning and Urban Design

Jennifer Ross
Director

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