

27th March 2015

Delivered by email

Planning Policy
6th Floor, River Park House
225 High Road
Wood Green
N22 8HQ

Dear Sir/Madam,

SUBMISSION OF REPRESENTATIONS TO HARINGEY'S LOCAL PLAN PREFERRED OPTIONS: DEVELOPMENT MANAGEMENT POLICIES

The Berkeley Group has recently signed a Joint Venture agreement with National Grid and established a new subsidiary company, St. William to work on relevant sites. It therefore has potential involvement in Clarendon Gasworks as it moves forward.

On behalf of our Client St William, we hereby submit representations to the Preferred Option version of the 'Development Management Policies Document' (DMPD) that was published for consultation as part of the Local Plan review in February 2015. We would like to highlight that this is an interim representation and that we may submit further representations in due course.

St James controls the site that is commonly referred to as Clarendon Square in Haringey Heartlands, N22. Our client is currently working with Haringey Council and other key stakeholders to bring forward major regeneration proposals for this site.

Summary

- The proposed policy revisions will require a comprehensive assessment of the viability implications of the Council's Developments Plan as a whole, especially in light of the recently adopted LB Haringey Community Infrastructure Levy (CIL).

Haringey's Local Plan, Preferred Option, Development Management Policies

We are generally supportive of the principles and comments set out in the Development Management Policies that are not highlighted below. Policy DM 2 'Design Standards and Quality of Life', DM 16 'Housing Supply' and DM 18 'Housing Design and Quality' are especially relevant and provide a good framework that is supportive of residential led developments, such as Clarendon Square.

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DM 1 'Delivering High Quality Design'

We generally support and agree with the principles set out in draft Policy DM 1 on Delivering High Quality Design. However, we consider that Part C of the Policy which states '*confidently address feedback from local consultation*' be revised to include the phrase 'where feasible'. Although we acknowledge the importance of feedback from the local community, it may be unviable to incorporate suggested amendments into future proposals. The rewording of this policy will provide applicants with sufficient flexibility in their approach to future development proposals that may come forward at the site.

DM 3 'Privacy and Protection From Overlooking'

Whilst we agree with the principles set out in Policy DM 3 regarding privacy and protection from overlooking, we consider that this policy should be revised to provide a sufficient amount of flexibility. We find the detailing of the policy to be too prescriptive that will limit development opportunities on constrained sites which are often found in urban areas. Developments should be assessed on a site by site basis.

One of the broader policies that this document seeks to address is '*ensuring that new developments have high-quality building design*'. This is reiterated in Policy DM 1 Part A which states that:

'the Council expects proposals to be design-led, and will support proposals for new development that: make a positive contribution to a place, improving the character and quality of an area'

We consider the approach detailed in the supporting text for Policy DM 3 to be contrary to this and has the potential to compromise design quality and standards. Proposals should be considered on their own merits on a case by case basis. This will allow developers to demonstrate through design led solutions, that privacy and protection from overlooking are maximised on site. Specifically, paragraphs 2.20 to 2.24 require minimum distances of 20 metres between habitable rooms facing each other where they are at the first floor level and 30 metres at the second floor level (with an additional 10 metres distance for each additional floor).

We consider that this approach will fail to optimise the development potential of sites in Haringey and is too restrictive and prescriptive. Residential development of 5-8 storeys is common in Haringey and we do not consider that such developments would need to be 50-80 metres apart from existing residential buildings, where 20-30 metres are more than adequate, even for tall buildings, where they are carefully designed. Therefore, we consider that the policy should be amended to allow sufficient flexibility for applicants.

DM 5 'Siting and Design of Tall Buildings'

Policy DM 5 'Siting and Design of Tall Buildings' seeks to regulate the delivery of tall buildings within the borough in accordance with site allocations and design standards. Whilst it is important to protect the existing built environment from harmful and inappropriate developments, we consider that the Council should retain some flexibility to negotiate the delivery of tall buildings in the borough. Part A of the Policy states that '*tall buildings will only be acceptable in areas identified on Map 2.2 as being suitable for tall buildings*'. We recommend the rewording of this policy to replace 'will only be acceptable' to '*are accepted and encouraged*' and that tall buildings outside of these areas should be acceptable if the applicant can provide sufficient justification.

In addition, we consider that a further point is incorporated into the Policy to include that the Council will consider proposals for tall buildings that are not within the identified areas shown on Map 2.2 where they can demonstrate that it will not have a harmful impact on their surroundings and that the highest

architectural quality is upheld. We find Map 2.2 to be too restrictive and limits the potential for tall buildings in the borough. Furthermore, it does not provide the council or developers with sufficient flexibility in their approach to the siting of tall buildings.

Wood Green is identified as the largest and busiest town centre in the Borough and is designated as one of the twelve Metropolitan Centres across London. The area has been identified in Haringey's Site Allocations Development Plan Document (DPD) and the supporting text of the Policy as being a suitable location for taller buildings. Furthermore, Haringey's Urban Character Study (2015) notes that Wood Green is an area that currently comprises mid to high rise buildings and can further accommodate tall buildings. This however, is not fully reflected in Map 2.2 as a suitable location for tall buildings. On this basis, we consider that Map 2.2 should be updated to identify the northern and western parts of Clarendon Square as being suitable for tall buildings.

The housing target for Haringey, in particular the Haringey Heartlands/Wood Green intensification area has increased within the Local Plan and The London Plan and currently has an indicative figure to provide 3,000 new homes (as stated in the Site Allocations DPD). With a finite source of land in Haringey and a rising housing target, we consider that a more flexible approach should be adopted in the Council's approach to tall buildings as this can significantly support the delivery of housing and aid in the regeneration and economic goals for both Haringey and London in accordance with the targets set out within the London Plan.

DM 17 'Housing Mix'

We acknowledge the general comments made in Policy DM 17: Housing Mix. We would like to highlight Part C of the policy which states that mono-tenure developments or proposals which contain a mix exclusively made up of 1 or 2 bedroom units is dependent on the size of the development proposal and the local context of the area. Mono-tenure developments should be welcomed in addressing existing housing imbalances in the area.

Wood Green is a predominantly residential area comprising of family housing in the form of townhouses and traditional terraced housing. In areas such as this, mono-tenure developments would contribute to the housing mix within the area as a whole and provide a wider range for various residents. As stated in Part A of the Policy, housing mix is subject to 'individual site circumstances, including location, character of its surrounds, site constraints and scale of development proposed'. This should remain at the forefront of the Council's decision making and would provide sufficient flexibility and viability for developers.

DM 19 'Affordable Housing'

We note the general comments in Policy DM 19 on Affordable Housing provision for residential developments. We agree and support Part C and Part F of the Policy which states that the Council will seek the maximum reasonable amount of affordable housing provision on sites that can achieve 10 or more dwellings having regard to '*the individual circumstances of the site*' and '*development viability*'. We acknowledge the importance of reviewing proposals on a case by case basis and support this approach. Furthermore, this policy is in accordance with The London Plan which recognises that the provision of affordable housing on site is subject to viability. This provides sufficient flexibility to both developers and the Council.

DM 42 'Sustainable Transport'

Policy DM 42 seeks to encourage sustainable transport through transit oriented developments and the provision of pedestrian and cycle facilities. Part A of the policy currently states that *'the Council will require that developments with high trip generating characteristics locate where public transport accessibility is high and car parking is minimised to mitigate generated car travel'*. We consider that the phrase 'where feasible' should be added as site location is subject to numerous matters and may not benefit high public transport accessibility levels.

DM 43 'Parking'

We generally agree with the Policy in principle as it supports the standards set out in the London Plan. However, we consider that an aspect of Saved UDP Policy M10 and Paragraph 4.152 of the DMP be integrated into DM 43 to include:

'For larger developments the parking requirement will be assessed on an individual basis as part of the Transport Assessment or Statement'

Whilst we acknowledge the sustainable approach to limiting car parking provision for new developments, we consider this to have significant impacts on development viability, particularly in Haringey. Car ownership outside zone 1 and 2 is common and this has been acknowledged in the recently adopted version of the London Plan and the provision for this should be incorporated in all developments.

The provision of higher provision of car parking on site will aid and reduce on-street parking stress and any associated congestion problems caused as a result of this. For mixed use developments, it is important to consider the various trips this will stimulate and the car parking impacts this will have. Therefore, we support the need for the council to assess the parking requirements for large developments on an individual basis so as to provide developers with sufficient flexibility to respond to site specific demands and circumstances.

We trust that you will be able to incorporate our comments into the revised policies. However, should you have any queries on our comments, please do contact me on 020 7851 4025.

Yours faithfully,

Matt Humphreys
Associate Director