

- City of London
- Glasgow
- Edinburgh



R.IC/SM/PD6657

CHARTERED SURVEYORS

28 June 2010

Clarges House  
 6-12 Clarges Street  
 London W1J 8HB  
 Tel: 020 7493 4000

Planning Policy  
 Freepost LON 11863  
 London Borough of Haringey  
 639 High Road  
 Tottenham  
 London  
 N17 8BD

10 114, 115, 116

Dear Sir/Madam,

**REPRESENTATIONS ON LB HARINGEY CORE STRATEGY, SITE ALLOCATIONS DOCUMENT AND DEVELOPMENT MANAGEMENT POLICIES SUBMISSION DRAFTS**

We write on behalf of our client Lee Valley Estates who have an interest in two significant development sites within the Borough, known as Hale Village and Hale Wharf, both of which fall within the Tottenham Hale Growth Area and Urban Centre Masterplan SPD boundary.

**Hale Village**

As I am sure you are aware, in October 2007 outline planning permission was granted for the redevelopment of the former GLS Depot, now referred to as Hale Village. The proposals included 1210 residential units and a mix of uses such as retail, student accommodation, a health centre and energy centre.

To date reserved matters consents have been granted by the Council for the detailed design of seven of the twelve development plots. Moving forward, reserved matters or full applications will be submitted for the remaining development plots, which will be assessed against the emerging LDF documents.

**Hale Wharf**

My client, in partnership with ISIS are currently in the process of developing a masterplan for Hale Waterside and the adjoining sites, including the Petrol Station (to the east) and Lock Keepers Cottages (to the west). In accordance with the Council's Tottenham Hale Urban Centre Masterplan (THUCM) SPD the emerging proposals for Hale Wharf will comprise residential-led mixed use development.

**Representations**

The following representations on the Core Strategy, Site Allocations Document and Development Management Policies submission drafts are submitted in the context of the aforementioned sites.

In general the documents outline a clear and positive strategy for guiding development over the plan period. However, we have a number of detailed observations to make on behalf of our client. These comments are primarily made in respect of the Core Strategy document, though references are made to other documents where relevant.

Conflict between housing growth and employment protection policies

We support the general direction of policy within Chapters 3 (Housing) and 5 (Employment); however, the Council need to reconcile the need to deliver housing and protect the hierarchy of employment land. Both Hale Village and Hale Wharf appear to fall within growth areas and employment areas.

Policy SP1 promotes development in the Tottenham Hale Growth Area that will include up to 5175 new homes

P:\CURRENTJOBS\PD6657 Hale Village (s106)\100628 LVE Core Strategy Reps SM.doc

114  
 42/11/2010

and new business floorspace up to 2026. In respect of Hale Wharf, we support the Council's emerging proposals for this site, as outlined in paragraph 2.1.13 which includes housing and commercial uses.

Within Chapter 5 (Employment), Hale Wharf is defined within figure 5.1 as a Local Employment Area. Paragraph 5.1.18 goes on to suggest that all designated employment sites should be protected for employment uses. Paragraphs 5.1.11 to 5.1.13 then suggest that within some Local Employment Areas the principle of mixed use development including residential, employment and community facilities.

In summary, it appears the Council's aspirations for the individual Local Employment Areas, in particular Hale Wharf, are somewhat unclear. Perhaps within this chapter the Council should indicate specific Local Employment Areas where mixed use development would be encouraged, in accordance with Chapter 3 this would include Hale Wharf. Alternatively, the Council could re-designate these sites as mixed use development areas, this would provide prospective developers with greater certainty and the Council with sufficient comfort that employment uses would need to form apart of any future redevelopment.

With specific reference to the proposed land use designations for Hale Wharf, the Council must adopt a consistent approach across the Development Plan Documents. For example, the Site Allocations DPD indicates the site could be redeveloped for mixed use purposes including commercial, community centre and residential, whereas the Core Strategy and THUCM SPD suggests the site should be redeveloped on a residential-led mixed-use basis. We recommend, the Site Allocations SPD is amended to ensure consistency with the Core Strategy and THUCM SPD.

#### Affordable Housing

The policy wording relating to affordable housing targets and tenure split is extremely rigid and provides no opportunity for site specific considerations, such as viability or other community benefits, to be accounted for when negotiating the quantum and mix of affordable housing with the Council.

We therefore recommend Policy SP2 is amended to account for site specific considerations or a new policy is inserted into the Development Management Policies document to address this issue.

#### Other issues

As a general comment, figures 1.4 and 1.5 are very unclear, it is difficult to distinguish between the employment land and growth area designations. Although figure 2.1 is clearer it shows the both Lee Valley Estate's sites as proposed growth areas and existing employment areas. Defining the land use designations as existing and proposed implies the existing designations will be superseded by the proposed designations. This appears contrary to the remainder of the Core Strategy, therefore clarification should be provided under figure 2.1 to confirm whether the existing designations are to be retained or deleted.

The area surrounding Hale Village is shown as an area of change on figure 2.1, yet unlike other areas of change defined on this plan, there is no specific commentary on the proposals for this area.

Hale Village is still designated as Strategic Industrial Land, we recommend this designation is deleted in light of the Council's grant of outline consent in October 2007 for a scheme comprising residential-led mixed use development.

Figure 2.1 suggests a primary school will be provided at Hale Village, we recommend this is deleted as we have recently been advised by the Council that a school will not be provided at Hale Village.

Yours faithfully

Montagu Evans LLP