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

19 Millings Place  
100 Tower Bridge Road  
London SE1 3JF  
Telephone  
020 7080 2121  
Facsimile  
020 7080 2120  
info@tibbalds.co.uk  
www.tibbalds.co.uk

Dear Sir/ Madam

**Haringey's Core Strategy, Site Allocations Document and Development Management Policies, Submission Drafts (Comments submitted on behalf of ISIS Waterside Regeneration)**

**Introduction**

We provide the following comments on LB Haringey's Submission Draft Documents on behalf of ISIS Waterside Regeneration. ISIS own and control a significant underused brownfield site that fronts onto the River Lea Navigation Channel, known as 'Hale Waterside' (see Figure 1).



*Figure 1: Hale Wharf Regeneration Opportunity Ownership Plan*

ISIS are supportive of the Council's aspirations outlined within the Tottenham Hale Supplementary Planning Document (SPD), which outlines a comprehensive strategy for the regeneration of Tottenham Hale.

In pursuit of the Council's aims, ISIS have signed a collaboration agreement with

**Principal**  
Andy Kareki  
BA(Hons) MSc(Exec) FRIBA

**Directors**  
Jane Dann  
BA MA(UD) DipArch MRTP  
Jennifer Fross  
BA(Hons) MRTP  
Sue Rowlands  
BA(Hons) DipArch MA(UD) PIPA MRTP  
Hilary Satchwell  
BA(Hons) DipArch RIBA

**Associate**  
Katja Stille  
DipArch DipArch MA(UD)

Registered Company  
Tibbalds Planning and  
Urban Design Limited  
19 Millings Place  
London SE1 3JF

British Waterways and Lea Valley Estates, in order to bring forward a masterplan that delivers the comprehensive regeneration of the Hale Waterside and neighbouring sites, The Petrol Station (to the east) and Lock Keepers Cottages (to the west). It should be highlighted that Haringey Council was originally intended to be a signatory to the same agreement as the Council owns the Paddock area.

It is envisaged that the proposals will deliver a landmark new development comprising a vibrant mix of residential and commercial uses. The proposals will incorporate a range of high quality public spaces and places. Subject to third party funding, they will also facilitate the delivery of a new pedestrian/ cycle bridge, which forms an important part of the Tottenham Hale Green Link Project which links Tottenham High St with Hale Wharf. Discussions with Council Planning Officers and Transport for London Design for London are ongoing regarding this project.

Given this context and ISIS' ambitions we would confirm that the emerging LDF documents would outline a clear and positive strategy for guiding the development of the borough. However, ISIS have a number of detailed comments to make, which they feel would make the Core Strategy and supporting DPDs more effective, deliverable and flexible. Without the suggested amendments we feel that the document would not be sound.

Below we provide comments relating firstly to Hale Waterside and secondly to the Core Strategy and other DPDs more generally.

## **Hale Waterside**

### Delivering comprehensive regeneration

#### *Relevant policy: Site Allocation for Hale Wharf*

ISIS support the identification Tottenham Hale as a key location for accommodating growth within Haringey (paragraph 2.1.4) and that it represents an opportunity to "create a thriving, sustainable urban centre, provide more than 2,500 homes and a substantial number of jobs". The identification of Tottenham Hale as an area suitable for high-density development and its designation as a Growth Area, is also supported.

The general thrust of comments in relation to Hale Waterside are also supported. However, ISIS feel that there is a need to consider and address the Hale Waterside site within it's wider context and recognise the need for neighbouring landowners to work together in order to deliver coherent and consistent development in this location.

Therefore, in order to reflect the masterplan vision set out within the Tottenham Hale SPD and in pursuit of ISIS' aims to deliver the comprehensive regeneration of Hale Waterside, the proposed Site Allocation should incorporate the two neighbouring sites. These are identified within the SPD as being key to the

regeneration of the wider area and should therefore all form part of the allocation.

Suggested revision:

- Amend red line within Site Allocations DPD to include two adjacent sites.

## Providing an appropriate mix of uses

*Relevant policies: Core Strategy policy SP1 & Site Allocation for Hale Wharf*

ISIS fully support the vision outlined within Tottenham Hale SPD which sets out aspirations for the site to provide an "important and distinctive destination for the area", providing a mix of residential, retail, leisure, community and workspace uses, together with publicly accessible open space and improved pedestrian and cycle links.

In its current form, however, the wording within the Site Allocations document and Core Strategy fail to correspond to either this vision or to one another. Specifically, the list of land use "Options" outlined within the Site Allocations DPD, refers to "mixed-use [development] including commercial, community centre, public space, bridge links and residential". ISIS would advise, that given that the Council masterplan vision outlined within the Tottenham Hale SPD and the need to cross-fund the other uses and community facilities, the scheme will be residential-led. Therefore, the Site Allocations DPD wording should be amended to reflect this context and in line with the Core Strategy.

Suggested revision:

- Core Strategy paragraph 3.1.13: "a mini-masterplan is being devised to underpin a comprehensive residential-led development for the entire Hale Waterside site, which could provide a significant number of homes as well as commercial uses, a community facility, water-related leisure/ retail uses, publicly accessible open space and a new bridge link. The delivery of the bridge link will be subject securing to third party funding."
- Site Allocations DPD – Options: "A residential-led, mixed-use development, including commercial uses, a community facility, water-related leisure/ retail uses, publicly-accessible space and a bridge link".

## Defining 'employment-generating uses'

*Relevant policies: Core Strategy policy SP8*

ISIS support the general thrust of this policy. However, the need to protect the Borough's hierarchy of employment land needs to be reconciled with the Council's aspirations to bring about substantial change and accommodate growth at Tottenham Hale. Specifically, within the Tottenham Hale SPD, the Council outline their aspirations to create a new 'landmark' destination at Hale Waterside, with a vibrant mix of uses, including residential, retail and leisure, as well as workspace.

6/1/13.1

HL8

The current wording of the policy seeks to resist any overall loss of employment-generating floorspace within Local Employment Area. Paragraphs 5.1.11-5.1.13 go on to further define what kind of uses will be allowed under certain circumstances, but also stop short of defining what 'employment-generating floorspace' could include. The policy would be made more robust by providing greater clarity on this matter.

Suggested revision:

- Paragraphs 5.1.11-5.1.13 should provide more information on what employment-generating floorspace could include e.g. retail, tourism uses, leisure uses etc. and should also take into the other aspirations within the Core Strategy Site Allocation docs to encourage 'residential-led mixed use redevelopment' of this area.

6/12/5.1  
HJC

Creating a landmark development

*Relevant policy: Core Strategy SP13: Open Space & Biodiversity*

While ISIS supports the general thrust of the policy, there is some concern over the wording of the first bullet point. This requires the existing boundaries of the Green Belt, Metropolitan Open Land and Open Space to be protected and "enhanced".

ISIS' concern is that the land that lies to the east and west of Hale Wharf lies within designated Green Belt. PPG2 sets out clear objectives for protecting the openness of Green Belt land, through restricting the height, scale and layout of development within it. To retain this designation in its current form would severely restrict the scale and nature of development that can take place on the sites to the east and west of Hale Wharf. This, in turn, would impact upon the Council's ability to deliver its objectives for Hale Waterside, which includes the creation of a "landmark" for the area, offering a "visual gateway to the area for those arriving from London Borough of Waltham Forest to the east" (Tottenham Hale SPD, paragraph 7.4.2).

To be of a sufficient scale to fulfil this role, development would need to significantly exceed the height of the existing buildings. We therefore advise, that in accordance with London Plan Policy 3D.9 and PPG2, sufficient justification exists to amend boundary of the Green Belt in order to deliver the Council's aspirations for Tottenham Hale.

Suggested revision:

- That the Council amend the boundary of the Green Belt to omit the Petrol Station site.

6/10/6.3  
HJC

## General Comments

### Core Strategy Policy SP2: Housing

Taking into account the current economic context and revised wording in Policies 3.12/ 3.13 of the London Plan, ISIS question the Council's approach to set rigid targets of 50% affordable housing, with a split of 70% Social Rented Housing and 30% Intermediate. This level is unlikely to be achieved in future given:

- the likely absence of grant funding from Central Government in future; and
- particularly on sites such as Hale Wharf, the likely level of other S106 requirements, in order to deliver community benefits and aspirations for improvements/ links to the wider area.

#### Suggested revision:

- "...to provide 50% affordable housing on site, subject to the specific circumstances of individual sites" (Policy SP2, 5)"
- "...Delivering an affordable housing tenure split of 70% Social Rented Housing and 30% Intermediate Housing, or the current London Plan target".

### Core Strategy SP5: Water Management and Flooding

The requirement to undertake a Sequential/ Exception Test should not apply to those sites allocated in the Plan. In accordance with national planning policy (PPS25), the Sequential Test/ Exception Test will need to be undertaken as part of the plan-making process. This should not, therefore, need to be repeated as part of the development management process.

#### Suggested revision:

- "All development on un-allocated sites in these areas will apply the PPS25 Sequential Test and Exception Test".
- Also in relation to waterspace management, there should be acknowledgement (in the Core Strategy / Site Allocation docs) that a waterspace strategy should be prepared or updated by British Waterways as this needs to form an integral part of the masterplan for the Hale Wharf area.

### Development Management DPD, Policy DMP14

See comments made in relation to Core Strategy policy SP5. Bullet point e) should be amended accordingly.

### Development Management DPD, Policy DMP27

See comments made in relation to Core Strategy policy SP13. Site should be

61/4/3.2

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61/5/4.2

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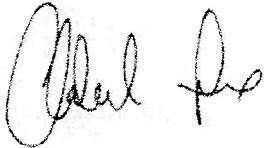
removed from the Green Belt.

Subject to implementing the changes outlined above, ISIS consider that LB Haringey's Core Strategy (together with the Site Allocations Document and Development Management Policies) would be sound.

Please do not hesitate to contact us if you require any further information in relation to the above.

Yours sincerely

For Tibbalds Planning and Urban Design



**Michael Fox**  
Senior Planner

[michael.fox@tibbalds.co.uk](mailto:michael.fox@tibbalds.co.uk)  
Direct dial: 020 7089 2137

Cc Chris Breslin ISIS