

**Planning and Regulatory Services**

Hackney Council  
2 Hillman Street  
London  
E8 1FB  
020 8356 8051

Stephen Kelly  
Assistant Director Planning and Building  
Control,  
Planning and Regeneration  
London Borough of Haringey  
Level 6 River Park House,  
225 High Road,  
Wood Green  
N22 8EL

Natalie.broughton@hackney.gov.uk

4 March 2016

Dear Stephen

**Pre-Submission Version Development Plan Documents**  
**Tottenham Area Action Plan DPD**  
**Site Allocations DPD**  
**Strategic Policies DPD**  
**Development Management DPD**

Thank you for the opportunity to comment the above Local Plan documents. The Council's comments on each of these documents are set out below.

London Borough of Hackney broadly supports the objectives of the Site Allocation DPD and Tottenham AAP documents and is preparing an Action Area Plan for Stamford Hill, which borders South Tottenham. Hackney is committed to working with Haringey on cross boundary issues for the Stamford Hill/South Tottenham to promote and enhance development in these areas.

**Site Allocation DPD and Development Management DPD**

London Borough of Hackney is particularly interested in close working on key sites in the south of Haringey and specifically would like to be an active participant in any future masterplanning exercise for strategic sites identified in the south of the borough. The Council is of the view that sites adjacent to the borough boundary including two sites identified at Regulation 18 listed in the SADPD as *Site SA33: Vale Road/Eade Rd* and *Site SA 34 Overbury Rd/Eade Rd* would benefit from further detailed masterplanning to meet identified needs and Hackney would welcome the opportunity to play an active role in this process.

It is also noted that Haringey has made provision for proposals for warehouse living within the Haringey Warehouse District as defined in the Site Allocations Local Plan. A number of these sites allocations are situated at the Borough boundary. Policy DM19: Warehouse Living set out the criteria which proposals for warehousing living will be assessed against.

Live / work arrangements are not supported under Hackney's existing Development Plan due to the historical loss of employment floorspace in the Borough through residential conversions and the difficulty in regulating the work component. Whilst the DM39 considers controls over management and warehouse living space, there is a concern that this policy may potentially create a number of land-use and enforcement problems in the future if not monitored rigorously.

The Council would welcome further discussion with Haringey officers to understand how the employment policies within the DMDPD (in particular DM39), and allocations within SADPD have been underpinned by the Council's Employment Land Study and Economic Growth Assessment.

### **Tottenham Area Action Plan DPD**

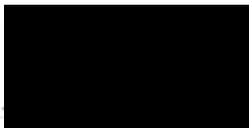
It is the Council's view that joint working on the Tottenham AAP/ Stamford Hill area is essential to successfully tackle the specific growth issues and challenges associated with meeting the needs of the community in this area. This is particularly the case with regard to meeting the growing need for large family homes, schools and social infrastructure such as Synagogues. The South Tottenham AAP outlines some of the issues, opportunities, and challenges associated with its regeneration. Hackney is keen to work with Haringey in meeting these challenges going forward.

### **Haringey Strategic Policies DPD**

The Council notes that the Haringey Strategic Policies DPD has identified a borough housing supply figure of approximately 22,000 additional homes, which is significantly above the Objectively Assessed Need figure of 13,450 additional homes. It is also noted that the Haringey's affordable housing targets would be reduced from 50% to 40% and the tenure split would be changed from a 70/30 social rent/intermediate to 60/40.

The Council considers these to be cross boundary strategic issues and would welcome further discussion with Haringey on these matters particularly in the context of Hackney's Local Plan review which has recently commenced.

Yours sincerely,

A solid black rectangular box used to redact the signature of Ian Rae.

Ian Rae  
Head of Planning