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4th March 2016

Dear Mr Ball,

**TH11 : FOUNTAYNE ROAD
TOTTENHAM AREA ACTION PLAN – PRE SUBMISSION
CONSULTATION MARCH 2016**

I write on behalf of my client Mr Green, with regard to the Tottenham Area Action Plan Pre Submission Consultation. My client owns the majority of Site TH11: Fountayne Road. I am writing to support the re-designation of the site as a Regeneration Area, but challenge the proposed housing figures and suggested employment floorspace capacity. We submitted representations to the Preferred Options Consultation in May 2015 which supported the re-designation of the site but objected to the re-provision of employment floorspace and the heritage considerations. Please refer to **Appendix A** for submitted representations.

Site Location and Description

The site is located to the east side and south side of Fountayne Road. The site has a PTAL of 4. The site is located 500 metres to the south of Tottenham Hale Underground and Rail station, and approximately 500 metres to the west of Seven Sisters Underground Station.

The surrounding area comprises a mix of uses including warehouses and industrial, live/work, residential and retail uses.

The site comprises a mixture of uses. These are predominantly live/work and residential uses. The site also comprises a car repair garage and limited warehousing. The site comprises a variety of buildings. Along the eastern side of Fountayne Road there are original warehouse buildings comprising approximately 2 storeys, these runs perpendicular to Fountayne Road. To the south of Fountayne Road are further former warehouse buildings, comprising approximately 2 storeys.

Context to Estate

The estate houses approximately 500 people, who are predominantly aged 25 – 35. All occupants are registered for, and pay Council Tax. Across Haringey we understand there are approximately a further 1,000+ people in warehouse living that we are aware of, a further 2,000+ in Hackney and considerably more across wider London.

The principal underlying characteristic is the entrepreneurial approach of the residents, setting up small creative businesses and adopting a co-operative and open approach to the sharing of skills and ideas. Many people run their own businesses. These range across a spectrum of creative industries.

Their incomes are relatively low, and the advantage of these spaces is they provide affordable space where artists can live (and work in some cases).

The changes to Mr Green's properties have taken place organically over the past 10-15 years and have provided a new lease of life to previously redundant warehousing and vacant office space, giving a home to a wide variety of individuals - most with a creative arts background. This regeneration has largely been a 'bottom up' process with people learning about the spaces through social networks and using their creative talents to adapt them, making the necessary improvements to facilitate safe occupation for their comfort and to suit their living arrangements.

As a result of the process, previously unoccupied estate buildings and unsafe streets and neighbourhoods (where prostitution and drug dealing prevailed) have been transformed into vibrant and safe places, with innovative creative and economic activity sustained and promoted. Local businesses have benefitted from this growing community and the increased spending power that has been brought to these neighbourhoods as well as the benefits of reduced crime.

Format of Accommodation

Each warehouse unit varies but a typical example comprises a large communal area with kitchen, sitting area(s), and some creative space. These areas are often well lit with good levels of natural daylight. Off this communal area will be a number of large (approximately 16 m²) bedrooms. For some units these will have direct access to natural daylight, for a few units the light will be borrowed.

In addition units will have a number of shared bathrooms and sometimes outdoor amenity space and cycle parking. The large communal spaces and large bedrooms exceed London Plan minimum sizes and are therefore very popular and good value.

Mr Green has been committed to ensuring excellent standards are achieved throughout their estates. Unlike other estates they ensure units are not crammed with too many rooms, large areas of communal spaces are provided and a high level of amenity is achieved.

POLICY REPRESENTATIONS

Tottenham Hale Area Action Plan

The site at Fountayne Road is allocated under the Tottenham Area Action Plan Policy TH11 and is recognised as having the potential for development to increase accessibility and provide increased employment floorspace and warehouse living accommodation. On behalf of my client, we welcome this mixed use designation however seek to challenge the intensification of employment land on the site and indicative housing capacity.

Policy AAP4 Employment

In accordance with table 3 within the emerging Site Allocations Document, the site at Fountayne Road has been designated as a 'Local Employment Area: Regeneration Area.' In paragraph 6.13 of the emerging Development Management Document it states that 'mixed use redevelopment of employment land will be restricted' to such designations and that 'the Strategic Policies Local Plan provides the basis for a more flexible approach to development in such Regeneration Areas. Furthermore, the London Plan and Haringey's Strategic Policies require that more intensive land uses are directed to highly accessible locations. Mixed-use schemes proposed on non-designated employment sites will not be considered suitable if they are in areas of poor public transport accessibility.'

This site has evolved over the past 15 years to become predominantly residential in use with a well-established warehouse community with around 500 residents. The majority of the units are in residential use (previously commercial space). The majority of this space has been in established residential use by the host community for 5-10 + years and therefore capable of qualifying for a Certificate of Lawfulness of Existing Use as residential. To designate the land as employment floorspace therefore contradicts paragraph 22 of the NPPF, which states: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose." On this basis we suggest that the designation as a Local Employment Regeneration Area is relaxed given the high proportion of the site is currently in residential use and has been for over 5 years, and the prospect of the use returning to employment use is unrealistic.

The AAP Policy TH11 states that the Council aspire to create a mix of uses through the 're-introduction of creative employment uses,' and that 'employment generating uses should be maximised subject to the other aims of the policy being met.' On behalf of my client we do not agree with the inclusion of these statements given significant proportions of the site are currently in residential use and very limited employment floorspace currently operational within the site. Re-introducing previous employment uses at this site will be detrimental to the thriving warehouse community at Foutnayne Road.

Policy AAP3 Housing

Point C in emerging AAP policy AAP3 states 'development proposals incorporating a housing element will be expected to provide the housing in accordance with the minimum capacities, set out in the Site Allocations in this AAP. Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised.'

My client supports the inclusion of this statement as it is considered that the site at Fountayne Road has the capacity to provide a higher density scheme over that suggested within the draft policy. Emerging Site Allocation TH11 sets out an indicative capacity of 113 residential units with 3,900m² of commercial floorspace. Assuming the average unit size would be 70m², the commercial floorspace would therefore equate to approximately 33% of the total amount of floorspace proposed.

Density and the London Plan Matrix

On this basis, the density of a proposal with 3,900m² of commercial floorspace and 113 new units on a site with a total area of 2.1ha would be 81 units per hectare. With reference to the density matrix within the London Plan (table 3.2), the

proposed density range should be between 45 and 260 units per hectare for a site with this PTAL rating. The proposed density is not being fully maximised taking into account the sites sustainable location and the existing residential units on the site.

In proposing 360 units on the site (based on there being 3,900m² of commercial floorspace and the average unit size being 70m²) the density on the site would be 260 units per hectare hence meeting the maximum density as suggested in London Plan table 3.2.

Notwithstanding this, paragraph 3.10 within the emerging Development Management Document takes a different approach in stating:

'Whilst useful, the matrix is but one consideration or tool to be used in informing the appropriate development density applicable to an individual site. Other considerations should include local context, site specific circumstances, housing need, housing choice, and the achievement of quality design being of equal weighting.'

On this basis, the suggested indicative capacity for residential units should be reviewed and increased, taking into account both the existing units on the site and the sustainable location of the site. Therefore, we recommend that in line with policy AAP3, the wording of the TH11 policy and the suggested number of units be amended to encourage maximum density.

Building Heights

The Growing London Report by the Mayor's Design Advisory Group examined how best to meet London's housing needs, and suggests that 'we have to make better use of the land we have available. We have to develop more densely, and we need to do so within the context of the existing urban fabric and communities.'

In addition, London Plan Policy 7.7 supports tall building in locations which improve legibility of an area by emphasising visual significance and contribute towards improving permeability of a site, and significantly contribute towards local regeneration. A tall building on the Fountayne Road site would therefore accord with this Policy.

Currently the site allocation has no guidance on acceptable building height. The site is in a very sustainable location bound by a railway line to the south and other employment/ mixed uses to the east and west. Given significantly taller buildings will be brought forward to the north of the site on the retail park and around Tottenham Hale, medium height development should be supported on this site.

The policy also needs to have flexibility to ensure a viable scheme can be delivered, which may require an increase in height at an appropriate part of the site to ensure the full regeneration benefits of the site are deliverable.

Furthermore, Policy DM6 restricts the development of tall buildings to Tottenham Hale, Northumberland Park, and Woodgreen and Haringey Heartlands, as demonstrated on map 2.2. Given the site at Fountayne Road is located within Tottenham Hale we suggest that this should be included within the policy wording of the Site Allocation TH11. This should be encouraged in order to achieve a high density mixed use scheme as outlined above.

I trust these comments can be taken into account when the Pre Submission version is considered.

Fountayne Road, LB Haringey
LB Haringey
March 2016

It would be very useful to come and meet you to discuss these representations. Please do not hesitate to contact me or Sophie Hinton if you have any further questions.

Yours sincerely,



John Ferguson
Senior Associate Director