

DGM/LO/DP3713

12 January 2017

Haringey Council
Planning Policy
Level 6
River Park House
225 High Road
Wood Green
N22 8HQ

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700
facsimile 020 7004 1790

www.dp9.co.uk

Dear Sir / Madam,

**HARINGEY'S LOCAL PLAN
SCHEUDLE OF MODIFICATIONS TO THE DEVELOPMENT MANAGEMENT DPD:
NOVEMBER 2016**

We write on behalf of our client, Austringer Estates Ltd, in relation to Haringey's Local Plan Development Management DPD Proposed Modification (November 2016) document and to provide a response to the proposed modifications.

Our client owns land off Brook Road, which forms part of Site Allocation SA21 (Clarendon Square Gateway). One of the proposed modifications to the Site Allocations DPD (SADPD) Proposed Modification (November 2016) document, relates to Site Allocation SA21 and seeks to include an additional 'Site Requirement' which states "*The site is subject to the requirements of Policy DM38 – Employment Led Regeneration.*" We have requested that the aforementioned modification is rejected.

There are several proposed modifications to Policy DM38 which we have reviewed and comment on below.

DMMod61: Amend Title

We have no comments on the proposed modification of the title from "*Employment Led Regeneration*" to "*Local Employment Area – Regeneration Areas.*"

DMMod62: Amend Part A

The proposed modification is as follows:

*"A. The Council will support proposals for mixed-use, **employment-led** development within a Local Employment Area – Regeneration Area ~~or on a highly accessible non-designated employment site~~ where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace. In addition to complying with other policy requirements, proposals must."*

Whilst it is acknowledged that Site SA21 falls within the 'Local Employment Area: Wood Green Regeneration Area' planning designation, the site also falls within the Wood Green Metropolitan Centre, Wood Green Growth Area and Blue ribbon network planning designations.



We consider that the inclusion of “employment-led” should not be included so as to avoid conflict with the aforementioned planning designations and to allow part of the site to be led by residential development.

We therefore request that this proposed modification is rejected.

DMMod63: Delete DM38 Part A(a)

The proposed modification seeks to delete the following text “*a. Suitably demonstrate that for reasons of viability a mixed-use scheme is necessary to facilitate the delivery of employment floorspace*” from the current wording.

Whilst we appreciate that this is a borough wide policy, the deletion of this is at odds with the SADPD Proposed Modification which, relating to Site SA21, proposes to introduce a ‘Site Requirement’ which states that “*The development should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability which must be assessed looking at the mix of uses and the scheme as a whole.*”

We would recommend that this is reviewed to ensure consistency.

DMMod64: Amend Part A (b)

The proposed modification seeks to amend part (b) as follows:

“Maximise the amount of employment floorspace to be provided within the mixed-use scheme, ~~having regard to development viability;~~

For consistency across this document and others, we consider that the proposed deletion should be rejected.

DMMod65: Amend Part A (c)(ii)

The proposed modification seeks to amend the wording as follows:

“ii. Flexibility of design to enable adaptability to different business uses over the lifetime of the development; and”

We agree with this proposed modification.

DMMod66: Amend Part A (c)(ii)

The proposed modification seeks to amend the wording as follows:

“iii. Environmental quality of the site.; ~~and~~”

We agree with the proposed modification.

DMMod67: Amend and Re-Order

The proposed modification seeks to re-order DM38 Part A(c)(iv) to DM38 Part A(d) and amend to read:



“d. **Make** ~~P~~provision for an element of affordable workspace where viable;”

We agree with the proposed modification.

DMMod68: Delete Part A(d)

The proposed modification seeks to delete part (d) which states the following:

“d. Investigate the site’s potential to contribute to meeting the Borough’s identified gypsy and traveller accommodation needs;”

We agree with the proposed modification.

DMMod69: Amend Part A(e)

The proposed modification seeks to amend part (e) as follows:

e. Ensure an ~~adequate separation of uses~~ **appropriate standard of amenity for the development’s users and neighbours**, particularly where new residential floorspace is introduced as part of a mixed-use scheme.

It is considered that further clarification is required regarding the use of the word ‘amenity’; it is unclear as to whether this relates to overlooking or daylight / sunlight issues or does it relate it to the provision of open space. If it is the latter, then it is considered that the obligation to provide open space for neighbours is too onerous and we would request this element is rejected.

DMMod70: Amend Part A(g)

The proposed modification seeks to amend part (g) as follows:

“g. **Be designed to** enable connection to ultra fast broadband.”

We agree with the proposed modification.

We trust the above and enclosed is satisfactory for your purposes, however please do not hesitate to contact Louise Overton should you have any queries or require further information.

Yours faithfully,

DP9 Ltd

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Encs.