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Dear Sir/ Madam

Response to Haringey's Core Strategy: Focused Consultation on Schedule of Minor Changes and the Implications of the Government's 'Plan for Growth'

1.0 Introduction

We provide the following comments on LB Haringey's Core Strategy: Schedule of Minor Changes on behalf of Isis Waterside Regeneration. These comments follow our comments made earlier into the Submission stage of the Core Strategy, Site Allocations and Development Management documents.



Figure 1: Hale Wharf Regeneration Opportunity Ownership Plan

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2.0 Background

Isis own and control a significant underused brownfield site that fronts onto the River Lea Navigation Channel, known as 'Hale Waterside' (Hale Wharf) (see Figure 1). In pursuit of the Council's aims for the regeneration of Tottenham Hale, Isis have signed a collaboration agreement with British Waterways and Lea Valley Estates, in order to bring forward a masterplan that delivers the comprehensive regeneration of the Hale Wharf and neighbouring sites.

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, Transport for London and Design for London are ongoing regarding this project.

Within the context of the Government's recently published 'Plan for Growth', our response to the amendments to the Core Strategy outlined within the Schedule of Minor Changes is provided within the following sections.

3.0 Comments on Implications of the Government's 'Plan for Growth'

The Government's Plan for Growth outlines the role of planning in helping to deliver growth within the UK economy. It sets out a range of measures to make planning more business and development-friendly and to streamline the planning process overall. In the context of this emerging policy it is now for Local Planning Authorities to reflect this 'pro-growth' agenda and the presumption in favour of sustainable development within the plan-making process.

Isis believe that the Core Strategy and the changes made since our last comments present a positive and pro-active plan for guiding the future development of the Borough.

In the context of the Hale Wharf site we welcome the more detailed work that has been undertaken in relation to understanding the role and function of existing employment sites and based on this understanding the approach to the future development of certain key sites, including Hale Wharf. The changes to employment policy, including the proposal to designate the least valued employment sites as 'Regeneration Areas' where mixed-use development will be promoted, now dovetails more successfully with the Council's own strategy for growth, the Government's growth agenda and the emerging National Planning Policy Framework.

In relation to Hale Wharf specifically, we welcome the support given to the future requirement to develop a mini-masterplan to underpin a comprehensive

residential-led development of the site.

However, as a result of these changes we would suggest that there are some minor inconsistencies that will need to be addressed going forward, before the Core Strategy and other Development Plan Documents (DPDs) can reflect the Plan for Growth entirely. These are discussed further within the following sections.

4.0 Comment on Schedule of Minor Changes

Changes to Policy SP8 in relation to Policy SP1

We welcome the positive and pro-active approach towards mixed-use development on that the Council are advocating on sites such as Hale Wharf.

The changes made to policy SP8 would result in a policy that links much more successfully with its strategy for growth outlined within policy SP1. Specifically:

- through identifying 'Regeneration Areas' as a new sub-category of Local Employment Areas, the Council are recognising the potential of such sites to contribute to much wider regeneration goals through delivering homes and other uses (such as retail and community uses); and
- through the omission of the need to re-provide an equivalent amount of employment floorspace when redeveloping Local Employment Areas, the Council has provided the opportunity for sites to deliver a wider mix and range of employment-generating floorspace as part of a mixed-use development.

However, while it is not the subject of this consultation process, we highlight one potential inconsistency with the Core Strategy that will need to be considered by the Council and/ or the Inspector in finalising the future Development Management Policies Development Plan Document (DPD). Specifically, policy DMP19 a) requires that the Council will not permit the redevelopment or change of uses of land or buildings in employment land use unless 'the land is no longer suitable for business or industry use on environmental, amenity and transport grounds in the short, medium and long term'.

In the context of the Hale Wharf site the continuation of this policy stance would require Isis, in bringing forward a mixed-use development that is consistent with Core Strategy policy, to demonstrate in the first instance that the land is no longer suitable for business/ industry. However, the more detailed work already undertaken by the Council justifies a more flexible approach to the future development of the site. Therefore, such flexibility for sites such as Hale Wharf needs to be carried forward into the Development Management Policies DPD, policy DMP 19 in particular.

Changes to Policy SP1

We welcome the proposal to develop a mini-masterplan for the development of the Hale Wharf site and support the Council's proposals for the wider regeneration of Tottenham Hale.

In taking forward the development of the area, we would highlight the importance of developing an implementation/ delivery strategy to support any future masterplanning strategy for Tottenham Hale. We would anticipate that such an implementation strategy would outline the key infrastructure requirements across the area and the methods of funding its delivery. A key element of such an infrastructure delivery plan is the bridge linking to the Hale Wharf site, which forms an important component of the Ashley Link. The implementation strategy will need to recognise that funding for key infrastructure, such as the bridge, will also need to come from third party sources (other than the developer).

The bridge link is a major piece of infrastructure that will deliver significant benefits to the wider community. It is also an extremely costly piece of infrastructure, which will only be able to be delivered as a result of pooling contributions from a number of development sites. Any infrastructure delivery plan or emerging CIL charging system should acknowledge the situation.

Changes to Policy SP5: New text insertion at paragraph 4.2.5

We welcome the additional Sequential and Exception Testing work undertaken for Tottenham Hale. This work has demonstrated that the benefits delivered by the mixed-use redevelopment of Tottenham Hale cannot be realised on any other sites within a lower flood risk zone. This provides a positive basis for progressing the regeneration of the area and will help to unlock the regeneration of sites such as Hale Wharf.

In the light of this information, we do highlight one minor inconsistency within the additional wording proposed at the end of paragraph 4.2.5. Specifically, the existing wording implies that a Sequential and Exception Test would still be required in support of any mixed-use development at Tottenham Hale. However, this contradicts paragraph 8.6 of the Core Strategy Identified Areas of Development: Sequential/ Exception Test document (dated March 2011), which sets out that:

- the Sequential Test; and
- parts a) and b) of the Exception Test have been passed; and
- that that future planning applications will only need to satisfy part c) of the Exception Test through undertaking a Flood Risk Assessment (FRA).

Therefore, given that the Council have satisfied the requirements set out within paragraph 4.2.5 apart from the need for an FRA, we would welcome further revisions to the wording in order to reflect that an FRA is the only outstanding

requirement on Hale Wharf.

Subject to the above, we fully support the amendments to policy SP5 and the further work undertaken.

5.0 Conclusion

The Haringey Core Strategy provides a positive and proactive strategy for the future development of the Borough. We welcome the amendments that the Council have made since our last submission, which have addressed the majority of our concerns. Subject to the clarification of the points set out above Isis believe that they have a positive basis upon which to move forward.

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

Yours sincerely
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