

Hearing Statement for Rapleys LLP (Miss Wakako Hirose) on behalf of LaSalle Investment Management (Representor ID. 8)

HARINGEY SITE ALLOCATIONS SA18 AND SA21 EXAMINATION MATTER 2, ISSUES 7, 9 & 10

29 July 2016

Our Ref: WH/he/615/N22/21/1

SITE ALLOCATIONS / SA18 SA21/ MATTER 2 / ISSUES 7,9&10 REPRESENTOR ID 8 RAPLEYS LLP FOR LASALLE INVESTMENT MANAGEMENT

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1 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of LaSalle Investment Management ('LaSalle') in response to the Inspector's Matter 2 Issues 7, 9 and 10.
- 1.2 Our client represents the long leasehold owner of the Guillemot Place site and the Bittern Place site, both of which are allocated for development in Wood Green/Heartlands, to which this Statement relates. LaSalle is committed to the ongoing promotion of the sites' mid to long term redevelopment potential, and seeks the Site Allocation ensures that renewal and redevelopment of the sites will be deliverable.
- 2 ISSUE AND QUESTION 7: CAN IT BE DEMOSTRATED THAT ALL OF THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES, AND THE REQUIREMENTS OF THE DEVELOPMENT MANAGEMENT POLICIES <u>HAVE</u> BEEN TAKEN INTO ACCOUNT IN CONSIDERING WHETHER DEVELOPMENT OF THE SITE ALLOCATIONS IS VIABLE?
- Our main concern with the Site Allocations document is that there are a number of aspirations and expectations which are expressed as Site Requirements and Development Guidelines for Policy SA18 and SA21, which are onerous and too prescriptive, particularly in the absence of a detailed Masterplan for the allocated site and the emerging Area Action Plan for Wood Green ('AAP'). Whether both sites can be delivered in line with the "requirements" and "guidelines" will depend on a number of factors, including:
 - Whether and when land parcels in different ownership within the allocation will come forward.
 - Market demand and commercial/rental value of employment generating uses in future.
 - The development of adjoining sites and associated change in the character of the area and surroundings.
 - A detailed vision and comprehensive overall plan for the delivery of the Wood Green Growth Area, including infrastructure requirements, to be set out in the AAP.
- 2.2 Therefore, it cannot yet be demonstrated by evidence whether the aspirations and expectations expressed as requirements and guidelines can be realistically delivered without undermining the deliverability of sites renewal and redevelopment. As such, the site allocation with prescriptive requirements is not a positive policy framework or enabling policy to facilitate our sites' renewal and redevelopment. In particular, the requirements as set out in SA18 and SA21 combined with the requirements of the Development Management Policy DM38 would unreasonably restrict the development potential of the sites, which in turn will undermine the deliverability and viability of sites' renewal and regeneration.

3 ISSUE AND QUESTION 9: DECENTRALISED ENERGY

3.1 We consider that the requirement for part of the site to provide an easement for the site for the network, for which there is no connection at present, is particularly onerous, because there is no feasibility or timescale for the delivery of the decentralised energy network is available. The requirement for an easement is therefore unjustified.

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4 ISSUE AND QUESTION 10: CYCLE AND PEDESTRIAN LINKS

4.1 We do not object to the principle of the aspiration for cycle/pedestrian links in order to promote sustainable modes of travel. That said, however, the delivery of a cycle/pedestrian link will be influenced by a number of factors, including the site's configuration, layout of a scheme which provide viable and usable floorspace and the relationship to the adjoining development sites and land in separate ownership. In addition, the delivery of infrastructure requirements for the Borough such as cycle and pedestrian links should be funded by the Community Infrastructure Levy (CIL). Provision of land for, and delivery of, a pedestrian/cycle link, in addition to the CIL, represent a double charging, which should be avoided. As such, in the absence of the delivery mechanism, including funding, the requirement for the provision for cycle/pedestrian links is not justified and will undermine the deliverability and viability of the redevelopment of the allocated sites coming forward.

5 CONCLUSION

- 5.1 We consider that as currently worded, the site allocations SA18 and SA21 are not sufficiently flexible or positively prepared to ensure the deliverability and viability of development of the allocated sites, particularly in the absence of a Masterplan for the allocated site and an emerging AAP.
- 5.2 We wish to participate in the discussion of these policies at the forthcoming hearing sessions.

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