

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 3

29 July 2016

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

Contents

- 1 Introduction
- Issue and Question: Whether the site requirements and development guidelines would be onerous and, preventing development from coming forward? Are they outside the applicant/owner control and therefore not always achievable?
- Issue and Question: Can it be Demonstrated that residential use Should be subsidise new workspace? how will this achieve the aspirations for the site which include residential in the indicative capacity?
- Issue and Question: There are numerous landowners and the site may be developed in parts, is it reasonable to expect a masterplan? who will provide the masterplan?
- 5 Conclusion

Appendices

Appendix 1 Guillemot Place
Appendix 2 Bittern Place

1 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of LaSalle Investment Management ('LaSalle') in response to the Inspector's Matter 3 in relation to the Site Allocations in Wood Green.
- 1.2 Our client represents the long leasehold owner of the Guillemot Place site and the Bittern Place site, which are allocated as part of SA18 and SA21, respectively. LaSalle is committed to the ongoing promotion of the sites' mid to long term redevelopment potential, and wishes to ensure that the redevelopment of the sites is viable and deliverable.
- 1.3 Notwithstanding that the sites' redevelopment potential is a mid to long term opportunity, our client has commissioned an architect to prepare an indicative scheme for each site (Appendix 1 - Guillemot Place, and Appendix 2 - Bittern Place). The purpose of the exercise is to demonstrate potential mixed use development schemes in order, not least, to inform each site's potential capacity, responding to the sites' constraints and opportunities and the Council's strategic objective for growth. We consider this to be a necessary first step to ensure that both sites' allocations are sufficiently flexible to help deliver high density mixed use development, which can respond to changing circumstances, particularly in the absence of an adopted Area Action Plan ('AAP') for Wood Green, and development proposals which have emerged since the previous representations were made. It should be noted that these schemes are submitted on an indicative basis, and further analysis and work, including collaborative work with the Council and the adjoining landowners, are necessary to definitively explore the sites' renewal and regeneration, as the Council advances the emerging AAP. The indicative schemes demonstrate the potential mix of uses and capacity for each site.
 - The Guillemot Place site: Mixed use development comprising commercial floorspace (the range of uses could include B1a offices or workspace, small scale retail, leisure uses and studio) with residential above with a capacity of circa 590 sq.m (6,350sq.ft) and circa 100 residential units, on the basis of the provision of 8/9 storeys.
 - The Bittern Place site: Mixed use development comprising commercial floorspace (range of uses could include main town centre uses, including B1a offices) on the ground floor with option 1) Class B1 offices/residential above and 2) residential above.
- 2 ISSUE AND QUESTION: WHETHER THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES WOULD BE ONEROUS AND, PREVENTING DEVELOPMENT FROM COMING FORWARD? ARE THEY OUTSIDE THE APPLICANT/OWNER CONTROL AND THEREFORE NOT ALWAYS ACHIEVABLE?
- As stated in our hearing statement for Matter 2 and our previous representations, we consider that the site requirements and development guidelines are onerous and too prescriptive. In particular, we are concerned that:
 - The requirement for "maximum employment floorspace" with capped commercial rents would prevent development from coming forward because it would place significant uncertainty over the commercial viability of a scheme. As demonstrated on the indicative plans, the quantum of commercial floorspace which could be delivered on the sites is influenced by the configuration of the sites, and would need to respond to the need to provide high density mixed use development to increase the capacity of the site. Depending on the type and nature of non-residential uses for which there needs to be market demand and an appropriate level of rental value, the requirement for

"maximum employment floorspace" with capped rents would undermine the delivery of the sites' renewal and redevelopment. There should be sufficient flexibility, by allowing employment generating uses.

- There are requirements and guidelines which are considered to be "infrastructure requirements" for the Wood Green/Haringey Heartland infrastructure requirements, such as provision of cycle/pedestrian links through the allocated sites, and decentralised energy. The achievability of these requirements whilst ensuring the deliverability of redevelopment of the allocated sites, is outside the applicant or landowner's control particularly, where there is no feasibility and delivery mechanism at this stage particularly in terms of funding and coordinated delivery. It should be identified as a guide so that these aspirations are explored as part of a Masterplan for the allocated site and/or the emerging AAP, until such time when a feasibility and delivery mechanism is available.
- With regard to SA18, due to the site's configuration, it would be challenging to
 incorporate a cycle/pedestrian through this site as it would divide the developable area
 and reduces the site capacity. In addition, depending on the type of commercial uses
 on the ground floor, the required "active frontages" may not be appropriate or
 achievable.
- 3 ISSUE AND QUESTION: CAN IT BE DEMONSTRATED THAT RESIDENTIAL USE SHOULD BE SUBSIDISE NEW WORKSPACE? HOW WILL THIS ACHIEVE THE ASPIRATIONS FOR THE SITE WHICH INCLUDE RESIDENTIAL IN THE INDICATIVE CAPACITY?
- 3.1 This requirement in relation to Policy SA18 does not provide a positive policy framework to enable redevelopment of the allocated sites in the context of the Council's strategic objective for growth in Haringey Heartlands/Wood Green. Whilst residential development could potentially subsidise new workspace provided that there is demand for such floorspace, the quantum of residential development and an appropriate level of employment generating floorspace should be considered with the objective of delivering a high density mixed use development to facilitate redevelopment. The development viability cannot be secured if the aim of the policy is to secure new workspace.
- 4 ISSUE AND QUESTION: THERE ARE NUMEROUS LANDOWNERS AND THE SITE MAY BE DEVELOPED IN PARTS, IS IT REASONABLE TO EXPECT A MASTERPLAN? WHO WILL PROVIDE THE MASTERPLAN?
- 4.1 The issues and options AAP consultation document published in February 2016 states that due to the lack of a clear and comprehensive overall plan for the area as a whole, development and investment has taken place on an ad hoc site-by-site, scheme-by-scheme basis in the absence of an understanding of how these schemes might contribute to the delivery of a shared vision of how the area could look and feel in the future (page 7). It goes on to state that the Site Allocations and the Strategic Policies will establish the broad amount of development to be provided in the Wood Green Area, and further and more explicit detail is required about how individual sites will come forward and how wide community and sustainable outputs will be coordinated and their delivery secured.
- 4.2 Therefore, in the absence of an AAP, it is considered reasonable and necessary to expect a masterplan for the allocated site to ensure that the delivery of land parcels in different ownership is coordinated and complement each other and that an individual parcel can come forward independently in phases. The indicative concept plans for each site in our client's interests demonstrate a potential scheme, which will be refined through further

analysis and discussions with the Council and other landowners of the allocated site, where appropriate and possible, as part of the Masterplan process.

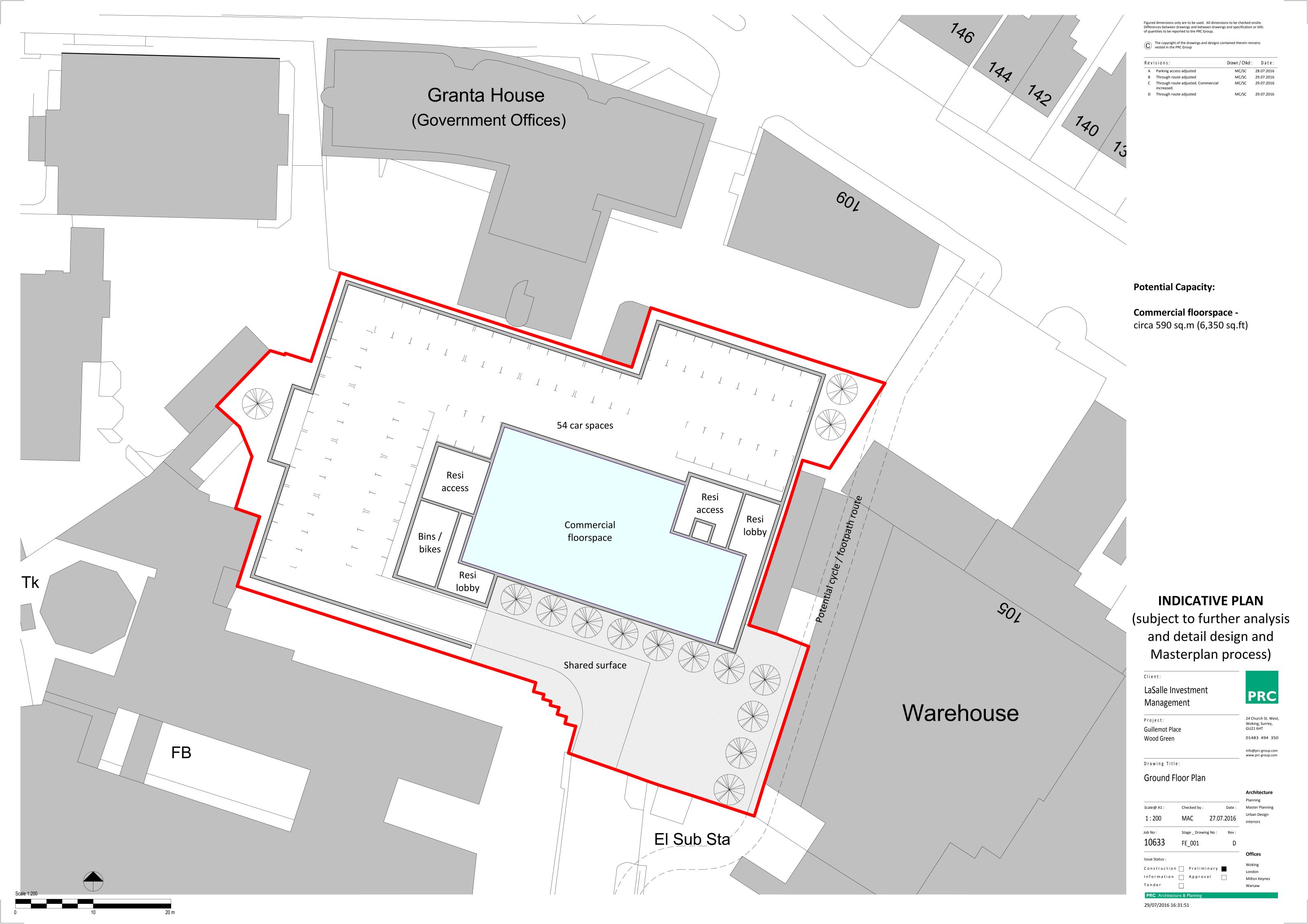
- 4.3 In the absence of the emerging AAP, the Masterplan process should be coordinated by the Council with input from the landowners/developers, before an individual site within the allocated site comes forward. We are in discussions with the Council's regeneration team regarding the Bittern Place site, and the Council has expressed their intention to coordinate the delivery of the Bittern Place site and the adjoining land parcels through the Masterplan process.
- As appended in Workspace's representations in March 2016, the Chocolate Factory site has prepared a Masterplan to include our client's site (the Guillemot Place site part of SA18) and other landholdings surrounding their development site. Whilst such an approach may demonstrate that the delivery of the adjoining sites may not be undermined, we are concerned that in the absence of a Masterplan for SA18 and the emerging AAP, such an approach could prejudice the future delivery of the allocated sites. We accept that any development would have some impact on the adjoining sites. However, there should be a coordinated approach to ensuring that such an impact would not be to the extent that it would prejudice the adjoining sites' development opportunity where such sites are allocated for redevelopment to facilitate the Council's strategic objective to regenerate the area as a whole.
- As such, we consider that a Masterplan and the AAP should be progressed with collaboration of landowners, wherever feasible, as a matter of urgency to ensure that the delivery of the allocated sites in Haringey Heartland/Wood Green would not be prejudiced or undermined by development coming forward in the early stage of the Site Allocation. To ensure that the Site Allocation Plan is deliverable with regard to the allocated sites in Wood Green, we consider it necessary to amend the site allocation policies in Wood Green to include a requirement to prepare a site wide masterplan which is to be coordinated by the Council with input from landowners to ensure that such a masterplan can meet the Council's strategic objective for the site and the wider area, and each landowner's aspirations.

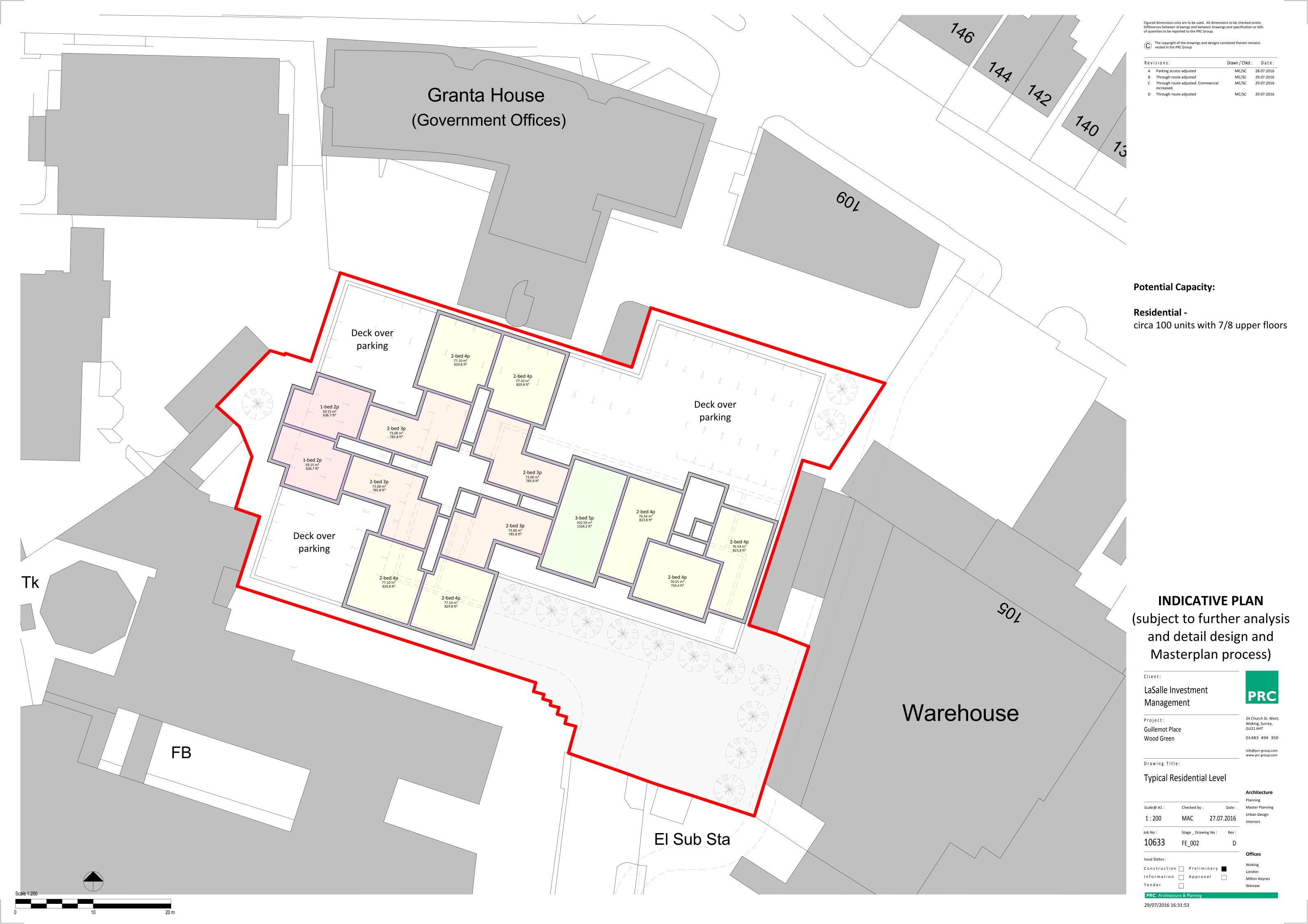
5 CONCLUSION

- 5.1 We consider that, as currently worded, the site allocations SA18 and SA21 are not sufficiently flexible or positively drafted 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. In addition, for the Plan to be deliverable and effective and the soundness of the Plan, we consider it necessary to ensure that masterplans for the allocated sites and surrounding allocations, which are represented by multiple landowners, are coordinated by the Council.
- We wish to participate in the discussion of these policies at the forthcoming hearing sessions.

INDICATIVE SCHEME LAYOUT:

Guillemot Place (SA18)





INDICATIVE SCHEME LAYOUT:

Bittern Place (SA21)



