

Planning Policy Team
Level 6
River Park House
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London
N22 8HQ

26 February 2016

15/085

BY EMAIL - ldf@haringey.gov.uk

Dear Sir or Madam,

**HARINGEY SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT PRE-SUBMISSION
VERSION JANUARY – MARCH 2016**

We write on behalf of **Oakforest Properties Ltd** the applicant for a planning application submitted on Land to the East of Cross Lane, Hornsey (HGY/2016/0086) for the 'erection of a part six storey, part seven storey development (plus basement parking) to create 79 residential dwellings and 1,274 sq m of flexible business (B1a) floorspace with associated access, landscaping, car parking and other infrastructure'.

This site is included in the emerging Site Allocations DPD under Policy SA47 – Cross Lane. We do not consider that the allocation is sound for the following reasons.

Replacing existing floorspace

The policy proposes 1,386 sq m of employment floorspace on site and that *'the existing floorspace should be replaced within the development site'*. The proposal to ensure there is no net loss of employment space on site is not considered justified as it does not take account of the higher level of job creation from B1 floorspace in comparison to the B8 floorspace.

The existing B8 units are not fully let and only support 13 full-time employees (FTE), however the proposed 1,274 employment space would deliver in excess of 150 FTE, despite the net loss of around 500 sq m of employment floorspace.

In terms of developing an effective employment strategy for the site, we consider that this approach is of far greater economic value than re-providing floorspace that is proven to be unsuitable and poorly equipped to sustain jobs. Even if the units were fully let, which they are not, the proposal still equates to a very significant uplift of jobs on the site.

The proposed policy allocation is not considered to be sound on the basis that it is neither justified nor appropriate. We recommend that the site allocation states that proposal seeks to deliver a significant increase of jobs on the existing proposal and the target level of employment space on site and the requirement to replace existing floorspace are removed.

Proposed residential units

The policy states that the indicative capacity of the site is 40 residential units. This figure is well below the proposed capacity on the site and we understand it was formulated without reference to the proposals for the site. No one within the project team was consulted on the figure that was used and we understand that officers within the development management team working on the application site were not approached either.

We therefore conclude that the indicative figure used in this policy is not based on a reliable assessment of the site's capacity and cannot be considered sound on the basis that it is not justified or based on a robust evidence base.

We trust the above comments will be taken in to account within the submitted version of the plan and we would be happy to engage with plan makers to agree suitable and appropriate rewording of the allocation.

Yours Faithfully

Jamie Sullivan
ASSOCIATE