

Site Allocation WG SA 19: Wood Green Cultural Quarter (South)

We write on behalf of Workspace Management Limited with regard to the proposed redevelopment of the Chocolate Factory site at Wood Green, Haringey. Workspace own The Chocolate Factory and a number of surrounding buildings. The Chocolate Factory is located to the south west of Wood Green and currently offers a variety of studio and start up units for small businesses directed at artists and creative businesses. The surrounding properties offer a range of employment uses to varying degrees of success in terms of employment offer and contribution towards the townscape quality of the area.

Workspace have been working with LB Haringey developing proposals for the site since 2013. This has involved a series of pre-application meetings (through a Planning Performance Agreement), presentations to the Quality Review Panel, public consultation, Development Management Forum and a Pre-Committee Presentation. In addition, representations have been submitted in respect of the emerging Site Allocations DPD and the Wood Green AAP.

The proposals are at an advanced stage, with notable consensus achieved as to the principle of redevelopment and the nature and scope of the proposals. Indeed, the scheme was recently reported to the Pre-Committee Meeting on 2nd February 2017 with the following Officers commentary at paragraph 7.1:

“Principle of the development – The redevelopment of the site to create a mixed use development comprising a comprehensive amount of commercial floorspace together with residential units is acceptable in principle, and in accordance with the site allocation for the site. Provision of affordable workspace would be expected to be provided as part of the application.”

A planning application to be submitted in Spring 2017.

These representations have been prepared in the context of the above discussions and scheme development, having regard to the provisions of the National Planning Policy Framework March 2012.

Site Address

The redline boundary and the site address do not correspond. For example, it is understood that Mallard Place, John Raphael House and Olympia Business Estate fall within other emerging allocations. Based on the redline boundary, the buildings within the allocation are Chocolate Factory A, B and C and Parma House. The allocation should be amended accordingly.

Indicative Development Capacity

Appendix A of the document sets out how the indicative development capacities for the site have been determined and states that:

“Where details of pre-application proposals are available and considered to be reasonable, the relevant housing capacity and employment floorspace have also been used to inform the site allocation. Likewise, where sites have been the subject of a detailed master planning exercise, the site allocation capacity will reflect the findings of the masterplans.”

To date the scheme discussed with Officers has related to a larger site than that set out in the above allocation. For example, it has included Quicksilver Place and land fronting Coburg Road (i.e. Mallard Place). Moreover, over the years a number of Masterplanning exercises have been undertaken that show how the proposals would relate to adjoining land owners. In short, various documents and indicative development capacities have been prepared that relate to different land holdings.

We would wish to discuss with Officers how the indicative development capacity for the site has been determined as it does not appear to reasonably reflect pre-application discussions. Whilst we note that allocations should be aspirational and respond to a wider strategy, the development capacity specifically for employment provision is double what has been discussed and indeed endorsed by Officers (see 2nd February 2017 Pre-Committee Report). For example, given the extent of pre-application discussions, and the different site areas / masterplan areas tested, it may simply be that the AAP capacity has been taken from one of the many pre-application documents without understanding that it relates to a larger site area.

It is also noted that the development capacity has changed significantly in the emerging Wood Green AAP from the draft version of the document (working draft dated 1/3/2017) reported to the Regulatory Committee on 17th January 2017 and that set out in the version published for public consultation.

To assist understanding the differences, we set out below a table to illustrate the changes to the Wood Green AAP document from that reported to Committee in January 2017 and then the final consultation version published February 2017 and how these relate to the current pre-application proposals (insofar as they relate to the same redline area as the emerging allocation):

Indicative Development Capacity	Site Area	Net residential	Employment m²	Town Centre m²
Wood Green AAP WG SA19 as reported to January 2017 Regulatory Committee	1.2ha	391	7,810	1,953
Wood Green AAP February 2017 Consultation Version	1.4ha	279	15,621	1,953
Pre-Application Scheme to reflect the redline of the WG SA19	1.28ha	Circa 220	Circa 7,650	Circa 1,800

The Wood Green AAP is drafted to set the development context for the area and respond to the Mayor's intention to designate Wood Green as an Opportunity Area in the next iteration of the London Plan (para 2.4 of the AAP). The allocation should therefore be aspirational, however, it is unclear why the employment development capacity of the site doubled between the two versions of the document published one month apart. Moreover, whether this was the intention of Officers or simply a mistake.

To achieve this employment development capacity in combination with residential and town centre uses would be a notable step change from that discussed and endorsed as part of pre-application discussions. Whilst this quantum of development may be achievable on the site, it is unlikely to be within the parameters of the current scheme. Specifically, we would question whether it would be achievable with the retention of the Chocolate Factory building, which the emerging allocation identifies as to be retained.

In short we would welcome clarity as to Officers intentions for the site allocation.

Development Requirements: Bullet 7

The site requirements state that:

“Parma House and the 80s extension to the Chocolate Factory will all be permitted for demolition, subject to alternative premises for viable incumbent uses to be retained and/or pre-provided being identified within the local area.”

It is not clear what the purpose of this provision is, the level of control that the provision seeks to achieve or the mechanism to achieve it. If the intention of policy is to secure the decanting of existing tenants, it is not a planning matter. It is not the role of the planning system to control existing occupancy or tenancy agreements, this is addressed in other legislative provisions. Rather it is for the planning system, and therefore policy, to guide proposals in relation to the quantum, form and type of commercial accommodation to be secured as part of any redevelopment scheme.

Notwithstanding the above in principle objection, it is not clear how the provision would work in practice. For example, how is a ‘viable incumbent use’ and ‘local area’ defined? The availability of commercial space in the local area is not within the control or deliverability of the applicant. It is therefore unclear how the planning system could reasonably control this whilst meeting the tests of imposing a condition or a planning obligation. Whilst surplus space may be identified on submission of an application, this may have changed on determination or even implementation of the scheme. Whilst there may be surplus accommodation, it may not meet the space or cost requirements of the tenants. Moreover, the tenant cannot be compelled to move to identified accommodation.

The above provision should be deleted.

Development Requirements: Bullet 10 and 11

These states that:

“Residential development will be considered suitable on this site, with viability form (*sic*) the scheme used to create new commercial floorspace and an improved public realm in the centre of the Cultural Quarter.”

“Affordable commercial rents may be sought having regard to the viability of the scheme as a whole”.

The above implies a policy weighting to achieve commercial accommodation, an improvement in the public realm and if viable affordable commercial rents. It is unclear how policy relates to affordable housing provision, for example is it the intention of policy that commercial rents are to be achieved ahead of affordable housing?

In our view, there is a need to ensure that the resultant scheme creates a mixed and balanced community and responds to its surroundings both spatially and in land use terms. Accordingly, it should be considered in the round.

Policy WG2: Housing, figure 7.7 and reasoned justification 7.19 - 7.29

It is noted that Point 2 of the policy highlights that new family housing is to be focussed outside of the town centre and Cultural Quarter. This is supported.

Policy WG3: Economy figure 7.8 and reasoned justification 7.31 - 7.39

Criteria (v) of the policy states that inter alia affordable rents (70-80% of market rents) will be required on sites which are to provide an incubatory function.

We object to this. It is unclear what is meant by an 'incubatory function' moreover it is unclear what evidence base the 70-80% of market rent is derived. If it is intended that incubatory units are small and medium sized units, to then require that provision and that they provide discount market rents is arbitrary and may discourage the provision of such accommodation. The employment 'offer' of a development should be considered in the round in terms of achieving the optimum form, type and quantum of floorspace having regard to market demand.

Moreover, the employment offer may be just one element of an allocation/scheme. There is a need to ensure that the resultant scheme creates a mixed and balanced community and responds to its surroundings both spatially and in land use terms.

We do however support the provisions of paragraph 1.15 of the AAP document which states that the employment objective of the Council relates to job creation.

Policy WG4: Wood Green Cultural Quarter figure 7.9 and reasoned justification 7.41 - 7.44

The policy states that the Council will seek to achieve the maximum feasible quantum of culturally-orientated commercial floorspace in the area. It is unclear what is meant by culturally-orientated commercial floorspace or how the planning system can control it.

As noted above, the employment/cultural offer may be just one element of an allocation/scheme. There is a need to ensure that the resultant scheme creates a mixed and balanced community and respond to its surroundings both spatially and in land use terms.

Policy WG5: Wood Green's Urban Design Framework, Figure 7.12 and Reasoned Justification 7.45 - 7.50

At point 2, the policy states that new landmark buildings will be supported at the locations identified in Figure 7.12. This figure identifies the Chocolate Factory as a potential landmark building (No. 8).

Whilst supported, this is an existing landmark building rather than a new proposed location. Consistent with the work undertaken at pre-application stage, including testing the proposals within local townscape views, it is considered that there is potential for a new local landmark building on the site of the existing Parma House to mark the new square / public realm to the cultural quarter. This has the potential to emphasise the importance of the location and help to guide visitors through the area to the cultural quarter consistent with the intentions of policy.

It is noted that there are a number of AAP proposed landmark building locations that also fall within designated views. Extensive testing has been undertaken to ensure that the proposed location at the existing Parma House can achieve a landmark building without encroaching on designated views of Alexandra Palace.

Policy WG6: Local Tall Buildings and Local Views Policy, Figure 7.13 and Reasoned Justification 7.51 - 7.54

In designating new views there is a need for transparency as to the special quality of a view, the elements within it that are to be protected and how. In short to provide the basis for the determination of future planning applications that fall within the view.

It is unclear what methodology the Council has used to test and propose the new views within Figure 7.13. This should be published for comment as part of the AAP, together with the parameters against which new development will be assessed. Moreover, from the AAP it is understood that the proposed view from the High Road is designated in anticipation of being created through redevelopment of proposed allocation. On this basis clarity is needed as how new development within this view will be assessed ahead of it actually being created and what are the parameters against which it is to be assessed.

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30 March 2017