

BY SPECIAL DELIVERY (LDF@haringey.gov.uk)

Site Allocations Regulation 18 Consultation
Planning Policy Department
Planning, Regeneration & Economy
Level 6
River Park House
225 High Road
London
N22 8HQ

21650/A3/EH
27 March 2015

For the attention of Mr Gavin Ball

Dear Sir

**LONDON BOROUGH OF HARINGEY: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT
DPD PUBLIC CONSULTATION**

THE CHOCOLATE FACTORY, WOOD GREEN (POLICY SA24)

We write on behalf of Workspace Management Limited with regard to the proposed redevelopment of the Chocolate Factory site at Wood Green, Haringey. Barton Willmore act on behalf of Workspace and submit the following information with respect of the ongoing consultation into the London Borough of Haringey (LBH) Site Allocations and Development Management DPDs:

- Concept Design document, prepared by Barton Willmore (March 2015); and,
- Redline Boundary Plan (Drawing SK-1000).

The Chocolate Factory Site

Workspace owns 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 within their control 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.

The wider area known as Haringey Heartlands is the subject of historic and emerging designations as an area for regeneration and growth to provide new homes and jobs. The designation covers a wide area from Wood Green Underground Station to Hornsey to the south with land either side of the railway (SPG, 2010). The character of the area has been the subject of change. The Western Utility Lands (to the west of the railway) have been subject to regeneration and part of the Eastern Utility Lands (including the Gas Works site) is the subject of a recent grant of planning permission (March 2012) for mixed use development including 1,080 new homes, offices, restaurant and community uses (LPA Ref: HGY/2009/0503).

The Local Plan: Strategic Policies document was adopted on Monday 18 March 2013. This seeks to continue the above growth, focusing on the remaining areas of the Eastern Utility Lands and specifically promoting and expanding the original UDP designation of Wood Green as a Cultural Quarter. The focus of the Cultural Quarter is the Chocolate Factory (para 7.2.9).

Workspace wishes to build on the success of the Chocolate Factory and explore with Officers the existing offer of the Cultural Quarter and opportunities to secure its future in the long term in accordance with policy. To facilitate discussions at this stage of the consultation process, we have prepared a Concept Design Document, which although high level, provides a useful starting point for discussions.

Site and Surrounding Context

The Chocolate Factory creative industries complex, which is part of the cultural quarter, consists of various buildings in the north of the site. The Mountview Academy of Theatre Arts is housed in an industrial building to the centre; three small industrial units are used as an annex to Mountview Academy; Area 51, a specialist education provider for teenagers and young adults is housed in an industrial building; with other community and commercial uses occupying industrial premises. The site also includes land north of Clarendon Road. About 40% of the site is used for surface car parking.

North of the site is a school and factory units to the rear of the Job Centre. To the east is Parma House, in part adjoining and in part over Clarendon Road North. The southern boundary is Coburg Road; south of this are small scale industrial units and beyond the disused gasholders which form part of the Clarendon Square redevelopment site, and small factory units at corner of Coburg and Western Roads. Western Road forms the western boundary of the site; to the west is a Council depot and vacant railway land.

Coburg Road forms a primary east-west pedestrian and cycle route linking Alexandra Park and Muswell Hill to the west with Wood Green, Noel Park and Tottenham to the east. Western Road forms part of the improved north-south vehicular access route created recently to open up the development potential of this and all the other Haringey Heartlands sites. The surrounding area intensively developed, generally 2 to 3 storeys – most premises appear occupied.

Current Development Proposals

The supporting Concept Plan and Proposals Document set out in detail the evolving mixed use scheme at The Chocolate Factory and should be read in conjunction with this representation.

Pre Application Advice

The Workspace consultant team met with the GLA in October 2013. The comments received were encouraging, and subject to suggested design changes, the Greater London Authority (GLA) supports emerging mixed use proposals for the site.

The development team also met with Haringey Officers in January 2014 and again in March 2015 to present the scheme as a whole, as well as the comments received previously from the GLA. The most recent set of comments from LBH were received on 17 March 2015 and the current Concept Plans have not yet taken them into consideration.

The consultant team is now working up a detailed planning application to be formally submitted for consideration in Autumn 2015. A Screening Opinion will be sought in due course, as well as a further pre application meeting with LBH.

Adjoining Landowners

Workspace has met with adjoining land owners over the past six months to discuss the emerging development proposals for SA 24. The Concept Plan for the Chocolate Factory and surrounding land can be delivered on Workspace controlled land without compromising the ability of adjoining landowners to redevelop a comprehensive scheme for the wider area. Workspace will endeavour to work with these parties over the next six months.

Planning Policy Context

Development of the Chocolate Factory site is designated in the emerging Site Allocations DPD as policy SA 24 (Wood Green Cultural Quarter (south)). The purpose of policy SA 24 is as follows:

'Enhancement of Wood Green cultural quarter through improvements to Chocolate Factory and Parma House, and the surrounding land. Comprehensive redevelopment of the remaining sites for mixed use (employment and residential) development.'

The supporting text explains that the following requirements must be met:

- The original Chocolate Factory building will be retained.
- Heights should be limited to 8 storeys on this site.
- Parma House, the Mountview academy building, the buildings fronting Coburg Road east of Clarendon Rd, and the extension to the Chocolate Factory will all be permitted for demolition, subject to alternative premises for viable uses to being retained and/or re-provided.
- The Mountview Academy will only be permitted to be demolished once alternative premises have been found.
- There should be a minimum of 50% employment floorspace across this site. Uses that positively support the enhancement of the cultural quarter will be expected as part of any redevelopment.
- A public realm will be created that will act as the focal point for the Cultural
- Quarter in this the site around Clarendon Road.
- Active frontages to both sides of Clarendon Road will be required, which contribute to the cultural output of the area.
- Development should follow the principles set out in any future Council approved masterplan.
- Clarendon Rd will be enhanced and provide a north-south pedestrian and cycling connection through the site.
- Capped commercial rents will be expected in this area in line with the Draft Development Management Policies DPD.

The supporting text explains that the following Development Guidelines should be respected:

- A new building on the corner of Coburg and Western Rds should form part of the Coburg/Western Rds tall building cluster, reflecting the allocated tower across Western Rd to the west.
- Clarendon Road will be extended through Guillemot Place to connect Wood green Cultural Quarter to Wood Green Common, and Alexandra Palace Station.
- A new active frontage to Western Rd should be created.
- Coburg Rd may become part a predominantly cycle & pedestrian route linking Wood Green with Alexandra Palace and the west of the borough through the Penstock foot tunnel.
- Development contributions for a dedicated cycle and pedestrian crossing of Western Rd into the Penstock Tunnel should be secured through development on this site.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring

- part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

Representations

Site Allocations DPD

In respect of policy SA24, Workspace supports the broad principles of redevelopment included within the policy. Given the existing public transport links and the likelihood of CrossRail 2 coming in the future, this is considered an important site that can provide new houses and commercial space over the next plan period. Furthermore, the site and surrounds form a significant part of the wider regeneration strategy for Wood Green and will help to deliver important new routes towards Alexandra Palace and beyond.

Workspace raises the following comments with respect of policy SA24:

- We require further clarification of the term 'Cultural Quarter'. The term is widely used within the supporting policy, but at no point is there a clear and concise definition. The inclusion at this stage will help stakeholders clearly understand the aspirations for the site.
- Workspace objects to the maximum height being set at eight storeys. The site is within a Metropolitan Town Centre with good public transport links and should be a location for intensification of uses. Each site should be appraised on its own merits and a detailed scheme will have to take account of landscape and visual matters, as well as protecting important strategic views. Rather than restricting height, the policy should focus on ensuring good quality design that sits within the existing urban landscape.
- In the context of the status of Wood Green, it should also be noted that the broad location is earmarked by the Mayor as an 'Intensification Area' capable of delivering 1,000 new homes. The supporting text in Annex one of the Intensification Areas document states the following:

A range of development opportunities on the railway and former industrial lands to the south-west of Wood Green town centre with significant potential for improvement, building on the area's industrial heritage.

Phases of residential and mixed-use development at Hornsey waterworks sites have been completed. Other key sites with development potential include the Clarendon Road gas works and adjacent Coburg Road industrial area. Mixed-use regeneration of these sites adjacent to Wood Green town centre should support delivery of the full range of uses. Site assembly and provision of better links with the town centre and Alexandra Park are key to comprehensive development. Opportunities should be explored to redevelop parts of Wood Green town centre for high-density, mixed-use schemes and strengthen pedestrian connections to the town centre and library. Any new development and infrastructure brought forward in this area must avoid adverse affects on any European site of nature conservation importance (to include SACs, SPAs, Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects.

- In respect of tall buildings, we note the comments provided in the Urban Characterisation Study which advise that a tall building could be located beyond the south west boundary of the site, adjacent to the railway line. We disagree with this analysis and consider that a landmark building should be integral to the wider development area rather than tucked away next to railway sidings. We look forward to discussing this in more detail with the LBH Conservation and Design officers.

- The policy requires a minimum of 50% employment floorspace across this site. It is explained that such space should include uses that positively support the enhancement of the cultural quarter. Whilst supporting this element, Workspace raises concern with a quantitative approach. Instead there should be a qualitative test applied to each site. At present the 50% figure is not supported by evidence and is simply an aspiration. It is our view that this element could in fact stifle development coming forward and create viability issues to delivery.
- Workspace does not support the provision of capped commercial rents both in policy SA24 or the Development Management DPD. There is no supporting evidence looking at viability and we also consider that its inclusion goes beyond the spectrum of planning and would be particularly hard to enforce.

Development Management DPD

The following sets out our consideration of the relevant Development Management policies as follows:

Policy DM16 (Housing Supply)

The policy outlines the importance of optimising housing capacity on individual sites. We support this position and consider that should residential development come forward in the future, SA24 should be maximised to ensure an acceptable level of residential units can be provided. Furthermore, the Further Alterations to the London Plan (FLAP) were adopted in March 2015 and plan for a higher number of houses than under the 2011 London Plan. If LBH is to meet the targets outlined, it must optimise well located town centre centres.

Policy DM17 (Housing Mix)

The proposed policy outlines that new residential development, including mixed use schemes comprising residential accommodation, should provide a mix of housing having regard to; individual site circumstances, site constraints, scale of development, mix of affordable units, priority afforded to the delivery of affordable housing, optimise housing outputs and the need to achieve mixed and balanced communities. The policy states that LBH would not support developments or proposals which contain a mix exclusively made up of 1 or 2 bedroom units unless they are part of a larger developments or within neighbourhoods where such provision would help to address existing imbalances.

Workspace considers that the policy as currently drafted does not meet the flexibility tests within the NPPF. To ensure that residential or mixed use development sites are optimised, there should not be restrictions on the housing mix as this could create deliver problems. The policy should therefore include a caveat related to viability.

Policy DM30 (Decentralised Heating)

Workspace acknowledges that 'Decentralised Energy' is supported by both national and regional policy as a means of meeting requirements of the Climate Change Act on carbon emission reduction. The London Plan also includes a target for 25% of heat and power used in London to be generated through the use of localised DE systems by 2025. The policy must, however, consider the costs involved. At present the policy is not sufficiently flexible to ensure that development comes forward in a timely and viable manner.

Policy DM50 (Facilitating Site Regeneration and Renewal)

LBH proposes mixed-use redevelopment on sites where it is necessary to facilitate renewal and regeneration of existing employment land and floor space. Workspace supports the principle of this policy but raises concern with the inclusion of 'Point D' which states that a proportion of employment floor space should be provided as affordable workspace. The exact proportion is not, however, stated. It is suggested that a 'flexible approach' is taken to the offer of affordable workspace, to ensure that its delivery is subject to viability in the same way affordable housing is.

The NPPF (Para. 173) outlines that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Workspace therefore raises concern that the policy is not in accordance with the NPPF given that scheme viability is not taken into consideration. We also raise concern as to whether the end product would be enforceable, and if so, by whom?

Should you have any queries, please do not hesitate to contact myself or my colleague Sophie Jamieson (sophie.jamieson@bartonwillmore.co.uk) at this office.

Yours faithfully



ED HANSON

Associate

cc: Ian Dubber – Workspace Management Ltd

Enc. As described