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**Representations**

**On Behalf of  
LaSalle Investment Management**

**Haringey's Local Plan:  
Alterations to Strategic Policies  
Site Allocation DPD  
Development Management DPD  
Pre-Submission Version Consultation**

**March 2016**



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## 1 INTRODUCTION

1.1 These representations are submitted, on behalf of LaSalle Investment Management ('LaSalle') on Haringey's Local Plan Pre-Submission consultation documents (2016), namely:

- Alterations to Strategic Policies 2011-2026;
- Site Allocations DPD, and
- Development Management DPD.

1.2 LaSalle acts on behalf of the long leaseholders of Units 1-3 Guillemot Place ('the Guillemot Place site') and Units 1-4 Bittern Place ('the Bittern Place site') in Wood Green/Haringey Heartland, to which these representations relate. We previously submitted representations to the preferred option consultation in March 2015. We are supportive of the Council's aspirations for growth of housing and employment in Wood Green/Haringey Heartland and the principle of the allocation of these sites for redevelopment, identified as a long term opportunity. We consider that a major transformation of the area, through redevelopment of the allocated sites, will bring about significant regeneration benefits in the area, while increasing the development capacity to meet the employment and housing needs. As such, LaSalle is committed to the promoting of the sites' long term redevelopment potential for residential-led mixed redevelopment.

1.3 That said, however, in the previous representations, we expressed a number of concerns with the detailed Site Allocations and Development Management policies, as there were a number of aspirations expressed as 'requirements' which were considered onerous and unjustified. Our concerns were that such policy requirements would prejudice and undermine the viability and deliverability of the redevelopment of these sites, which would ultimately frustrate the regeneration opportunity.

1.4 Since our previous representations were made, LaSalle had further discussions with the Council's Planning Policy Team. In addition, LaSalle had discussions with the Council's Regeneration Team which is preparing the emerging Wood Green Area Action Plan ('AAP'), which aims to manage the regeneration of Wood Green in a coordinated and comprehensive manner through a detailed and proactive policy framework to guide development, regeneration and investment decisions.

1.5 These representations are made to ensure that Haringey's Local Plan provides an appropriate policy framework to facilitate the delivery of regeneration of the area. These representations have been prepared bearing in mind the emerging AAP, which is in the early stages of the plan making process, with its initial Issues and Options consultation published in February 2016, (to which we will make representations in due course).

1.6 Our representations are based on the test of soundness (whether it is positively prepared, justified, effective or consistent with National Policy), as set out in National Planning Policy Framework ('NPPF'), and are structured as follows:

- Chapter 2 – the Guillemot Place and Bittern Place sites: background and context;
- Chapter 3 – representations on the Alterations to Strategic Policies consultation document;

- Chapter 4 – representations on the Site Allocation ‘Wood Green Cultural Quarter’ (SA18) in relation to the Guillemot Place site;
- Chapter 5 – representations on the Site Allocation ‘Clarendon Square Gateway’ (SA21) in relation to the Bittern Place site;
- Chapter 6 – representations on the Development Management Policies, and
- Chapter 7 – conclusion.

## 2 BACKGROUND

### The Sites and Surroundings

- 2.1 Both the Guillemot Place site and the Bittern Place site are located in Haringey Heartland/Wood Green, which is currently characterised by mixed uses, including industrial, community, leisure, office, studio and workshop space. More widely, the area of Wood Green encompasses a range of uses, including residential, retail, office, leisure, community and industrial. Building heights in the area vary from 2 storey residential properties to larger 5/6 storey commercial buildings.
- 2.2 The subject sites are currently occupied by industrial buildings, comprising warehouse/office accommodation and parking. Site Location Plans (ref: 615/N22/21/1 SLP01 and 615/N22/22/1 SLP01), showing the extent of our clients interest are attached at **Appendices 1 and 2**. The Guillemot Place and the Bittern Place Sites extend to 0.343ha and 0.377ha, respectively.
- 2.3 The sites are accessed off Coburg Road (via Clarendon Road to Guillemot Place), which in turn has access to Mayes Road (B151) to the east. Both sites are within walking distance to Wood Green and Turnpike Lane Underground Stations, as well as Alexandra Palace and Hornsey Overground Stations. There are a number of bus routes within walking distance. As such, the sites are served by good public transport links, which will be enhanced significantly by the proposed Crossrail 2, for which the alignment and the location of the station(s) are still under review/consideration.
- 2.4 The derelict and vacant land to the south of Bittern Place (including gasholders), extending to 4.38 ha was granted planning permission for large scale residential-led mixed use development. Therefore, the immediate area is already subject of significant regeneration.

### Strategic Growth/Intensification Area

- 2.5 The sites are within the Haringey Heartlands/Wood Green Intensification Area, as designated in the London Plan (2015), and the Haringey Heartland Growth Area, in the Haringey Local Plan: Strategic Policies (2013). The London Plan identifies an indicative employment capacity of 2,000 jobs, with a minimum housing requirement of 1,000 in the Haringey Heartland/Wood Green Intensification Area. Coburg Road industrial area is identified as one of key sites with development potential. In addition, it identifies that mixed use regeneration of the sites adjacent to Wood Green Town Centre should support delivery of a full range of uses.
- 2.6 In the context of the above, both sites, which are brownfield urban land, and offer significant redevelopment potential which would form part of the regeneration of Wood Green and contribute to meeting the strategic objectives to secure growth both in terms of housing and employment.

### 3 ALTERATIONS TO HARINGEY'S STRATEGIC POLICIES

- 3.1 It is noted that the Strategic Policies are being reviewed, in light of changes in the overarching planning framework, particularly the Further Alterations to the London Plan (2015) ('the London Plan'), which have significantly increased Haringey' minimum annual housing target from 802 dwellings to 1,502 dwellings.
- 3.2 Therefore, as stated in our previous representations, we consider that the Council's approach is justified in that the Strategic Policies should be reviewed to bring the Strategic Policies up-to-date in terms of housing requirements for the Borough. Our representations on the proposed alterations are set out as follows.
- 3.3 **Paragraphs 1.3.45 and 3.1.11 (ref: Alt 17 and Alt 33)** – The proposed alteration states that the London Plan designates Haringey Heartland/Wood Green as an Area of Intensification with potential to deliver approximately 2,000 new jobs and 1,000 new homes as part of a mixed use development. The capacity identified in the proposed alteration is not in line with the London Plan's approach i.e. an indicative capacity of 2,000 jobs, and a minimum of 1,000 new homes.
- 3.4 We therefore **object** to the proposed alterations, as they are not consistent with the 2015 London Plan to secure an increased capacity to meet and exceed the housing target through redevelopment in Haringey Heartland/Wood Green. We request that the reference to the number of jobs and new homes are amended as follows:
- “...with potential to deliver ~~approximately~~ **an indicative capacity of** 2000 new jobs and a **minimum of** 1,000 new homes as part of mixed use development”
- 3.5 **Strategic Objective 2 (Alt 27)** – It is noted that the revised housing requirement is calculated on the basis of the requirements from 2011-2014 based on the previous Local Plan annual target of 802, and from 2015-2026 based on the adopted 2015 London Plan annual target of 1,502. Whilst we do not necessarily object to the housing target being calculated, it is not consistent with the London Plan's requirement to identify the objectively assessed housing needs to seek to exceed the London Plan target.
- 3.6 In this regard, the London Plan Policy 3.3 requires that Boroughs should seek to achieve and exceed the minimum annual housing target as part of the Local Plan preparation. Furthermore, it requires Boroughs to draw on the housing benchmarks in developing their Local Plan housing targets, augmented where possible with extra housing capacity and to seek to enable additional development capacity, particularly brownfield housing capacity, through, inter alia, intensification areas and mixed use redevelopment. We therefore **object** to the proposed alterations, and consider that strategic objective for housing needs should expressly state that it will seek to meet and exceed the London Plan target in line with the amendments to Policy SP2 (ref: Alt30).
- 3.7 **Figure 1 and Table 2 (ref: Alt 31 and Alt 32)** – Whilst we support the principle of identifying a broad distribution for housing in each of the Growth Area, we are concerned that the table and figure do not correspond. More specifically, Figure 1 does not provide a boundary of Haringey Heartlands and Wood Green Metropolitan Town Centre, while Table 2 identifies broad housing distribution for each area. In order to allow for flexibility in the emerging Site Allocations DPD and

the AAP to refine the housing distribution, we consider that the housing distribution should be amalgamated.

- 3.8 We **support** the amendment made to Table 2 to include the wording '*minimum*' in respect of the broad housing distribution in response to our previous representations, as this would be consistent with the requirement to exceed the London Plan's housing requirements. .
- 3.9 It is not clear how the capacity and distribution of new housing has been identified, as there is no evidence base document available. We request a further opportunity to comment on Table 2 once evidence base for this table is made available.
- 3.10 **Policy SP2 (ref: Alt 48 and 49)** – We **support** the Council's amendment to replace "complies" with "is designed having regard to" in respect of Criterion 2 on the use of the housing design and space standards set out in the Mayor's Housing SPG (2012) and the London Plan, and the play space standards set out in the Mayor's Play and Informal Recreation SPG (2012).
- 3.11 We note that Criteria 5 and 6 have amended the affordable housing requirement, based on the viability assessment. The Council's evidence on viability assessment shows that the mixed use development on a site within Haringey Heartland/Wood Green is unviable if it were to provide 30% affordable housing provision. We consider that a lower percentage should be set for development in Haringey Heartland/Wood Green, on the basis of the Council's viability evidence, to ensure viability and deliverability of the sites allocated for redevelopment/regeneration. We therefore **object** to setting the borough-wide affordable housing target, and for Haringey Heartland/Wood Green **the target should be lower than 30%**.

## 4 SITE ALLOCATION SA18 'WOOD GREEN CULTURAL QUARTER NORTH' - GUILLEMOT PLACE

### Proposed Site Allocation and Commentary (Paragraphs 2.48 and 2.49)

- 4.1 We support the principle of the allocation of the site for future redevelopment, which is consistent with Haringey's Strategic Policies for the Wood Green Growth Area. However, we **object** to the wording of the proposed allocation, as it allocates the site for "enhancement of the cultural quarter with the provision of a new link" and does not expressly allocate the site for redevelopment notwithstanding the indicative development capacity for net residential units (89) and employment (3,061 sq.m) in the table.
- 4.2 The NPPF required Local Plans to "*allocate sites to promote development and flexible use of land, bringing forward new land where necessary*" (Paragraph 157). Furthermore, the NPPF states that "*Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan*" (Paragraph 154). We therefore consider that the proposed wording of the site allocation is ambiguous and does not positively support regeneration of the site. It is also unclear how the indicative development capacity has been identified, for which we would request a further opportunity to comment once clarified.
- 4.3 It should be noted that the site is within the strategic growth area and a Regeneration Area of the Local Employment Area ('LEA'), where uses appropriate in a mix use development include residential uses (Policy SP8). As such, the site allocation should be made clear that the site is allocated for a mixed use development, to include, inter alia, residential use and employment generating uses, in line with the strategic policy objectives. Our view is reinforced by the Council's preferred option expressed in the emerging AAP (February 2016), which envisaged residential use as part of the mixed use development of the site.
- 4.4 Furthermore, it is considered necessary to allocate the site for "mixed use development to include residential use", in order to ensure the effectiveness of the Local Plan as a whole, and to be consistent with the proposed Development Management Policy DM10 (A) states that "the Council will support *proposals for new housing on sites allocated for residential development, including mixed use residential development within the Site Allocations Local Plan and Area Action Plans*".
- 4.5 We are concerned with the draft commentary for the allocation, which states that "*the redevelopment of the existing employment area will play a key role in supporting the realisation of new employment floorspace in the Borough through attractive and complementary employment uses with ancillary residential use.*" We **object** to the reference to "complementary employment uses with ancillary residential use." The term "complementary employment uses" should be amended to "employment generating uses" in order to ensure that a wide range of economic use can be considered. The term 'ancillary residential use' appears to suggest that residential accommodation ancillary to commercial uses e.g. manager's flat/accommodation ancillary to public house use. This is contrary to the strategic growth and regeneration objectives.



- 4.6 We are also concerned with the reference to “comprehensive redevelopment on the site,” as the allocation is in two separate ownerships, and it may not be feasible to deliver a comprehensive scheme, depending on circumstances in the future.
- 4.7 Whilst we do not object to the aspiration to deliver a comprehensive site wide scheme, we consider that the policy should be sufficiently flexible to allow an individual plot to be brought forward independently, in the event that comprehensive redevelopment is not achievable, particularly as the allocated site is identified as long term potential. We therefore request that there is flexibility to allow for phased development to be delivered by a masterplan approach.
- 4.8 As expressed in the previous representations, the site is also considered appropriate for student accommodation if a requirement for further student accommodation is identified in the future. It is noted in paragraph 3.21 of the Proposed Submission Development Management document that Haringey has a role to play in fostering relationships with existing higher education institutions and in meeting the needs for purpose built student accommodation. In this respect, Policy DM15 specifically refers to Haringey Growth Areas and within or at the edge of a town centre as being suitable locations for future student accommodation, where required. As the site’s redevelopment is a long term opportunity, we consider it appropriate to allow for flexibility to facilitate student accommodation in the allocation, in line with Policy DM15.
- 4.9 In terms of creation of a new north south link, it is understood that the aspiration is to provide permeability by way of a new pedestrian/cycle link. We consider that this should be specified in the wording of the allocation for clarity.
- 4.10 Accordingly, we request that the wording of the site allocation and commentary is amended as follows:

*Proposed Site Allocation (Paragraph 2.48)*

***“mixed use redevelopment to include residential and/or student accommodation and employment generating uses, which would enhance the Wood Green Cultural/creative Quarter, including an opportunity for a new north south pedestrian/cycle link between Clarendon Road and Wood Green Common”.***

*Commentary (Paragraph 2.49)*

“The Wood Green Cultural Quarter represents a significant opportunity for improvement in the greater Wood Green Area. The redevelopment of the existing employment area will play a key role in supporting the realisation of new employment ~~opportunities~~ **floorspace** in the Borough through attractive and complementary employment **generating** uses with ~~ancillary~~ residential use. Development will create a high quality public realm which supports opportunities to visit and gather. **In order to facilitate** a new connection from the Cultural Quarter towards Alexandra Palace Station, **a new pedestrian/cycle link** should be ~~designed~~ **created** as part of comprehensive **or otherwise phased** development on this site **to be delivered by a masterplan approach, where practically feasible and viable.”**

### Site Allocation Boundary

- 4.11 The site allocation boundary for SA18 should be amended so that there is no overlap between different ownerships with other allocated sites SA19 and SA18. Specifically, both the eastern and western boundaries (within LIM's interest as shown on the site location plan at Appendix 1) are not drawn correctly. We request that allocation maps are amended to reflect the correct ownership boundaries in each site allocation.

### Site Requirements

- 4.12 **The first bullet point (a site wide masterplan approach):** We support the site wide masterplan approach as the allocation is in multiple ownerships. This approach would facilitate the delivery of regeneration of the site in a coordinated manner without undermining the delivery of part of the allocated site to come forward first. However, it is considered that minor amendment is necessary to ensure that the policy can facilitate phased delivery.
- 4.13 **The third bullet point (pedestrian and cycle link):** The requirement is ambiguous as to whether "an extension" of Clarendon Road is an aspiration to be provided in the form of an extended "road" or a "pedestrian/cycle link." It is our understanding from discussions with the Planning Policy Team that it is the latter which is also clarified in Development Guidelines. We would strongly object to the provision of a road through the allocated site, as such a requirement would seriously undermine the viability of the future redevelopment opportunity of the site, as it will take up a significant proportion of the development land, and there are normally substantial costs associated with the construction of roads. We **object** to the current wording as it could be interpreted to mean an extended vehicular road, and is not sufficiently clear.
- 4.14 Whilst we support the aspiration to create a pedestrian/cycle link through the site, it may not be feasible to deliver such a pedestrian/cycle link due to viability and it is not clear whether the job centre site (which will be required to provide a link) will become available for redevelopment over the lifetime of this Plan and the emerging AAP. Therefore, such an aspiration should not be identified as a "requirement," and we request that this is identified as "*an opportunity subject to feasibility and viability*".
- 4.15 Furthermore, the provision of a pedestrian/cycle link will be for the benefit of the wider public and the regeneration of Wood Green/Heartlands, rather than to serve the development of the allocated site alone. As such, the developers of the site should not be expected to fund the provision of the link, and such infrastructure should be funded by the CIL, as otherwise the regeneration of the site may become undeliverable due to viability issues. Accordingly, the provision of a new pedestrian and cycle network should be designed in as part of any masterplan for the wider area, or in the emerging AAP, for including in the Council's Infrastructure Delivery Plan, and the Regulation 123 list, to secure the delivery.
- 4.16 **The fourth bullet point (active frontages):** We note the aspiration to create an enhanced public realm at the south of the site which is intended to act as a focal point of the Cultural Quarter. However, we are concerned with the 'requirement' to provide active frontages to both sides of Clarendon Road to contribute to this vision, as it is prescriptive in the absence of a scheme/masterplan for the adjoining site and how it would relate to a scheme for the site. Whether active frontages can be provided or is appropriate will depend on the type of uses, layout

and relationship with adjoining developments. In order to ensure flexibility and that the delivery of a viable scheme is not compromised, it should be identified as a guide rather than a site requirement.

- 4.17 **The fifth and sixth bullet points (employment floorspace and cultural quarter):** We welcome the removal of the previous criterion setting a target of 33% employment floorspace, and are generally supportive of the amended criterion which seeks to secure the maximum quantum of employment floorspace feasible from redevelopment. However, in order to achieve strategic growth objectives, the type, quality and mix of employment ‘generating’ uses will be taking into account in the consideration of the viability of the site’s redevelopment options. This should also be considered in the context of the Council’s aspiration for uses which would positively support and enhance the cultural quarter. Redevelopment of the site to provide new employment/commercial uses and residential use would support the improvement and enhancement of the cultural quarter including public realm and visual appearance.
- 4.18 We consider that the requirement for the provision of “employment floorspace” is ineffective and does not provide sufficient flexibility to facilitate the delivery of redevelopment. The NPPF states that the Local Plan should allocate sites to promote development and flexible use of land. Therefore, all employment generating uses and economic development, as defined by the NPPF, should be considered for an appropriate mix of uses to deliver a viable regeneration scheme, subject to occupier interest and market demand at that time, which would result in contributing to the enhancement of the cultural quarter.
- 4.19 **The seventh bullet point (residential development):** This requirement is unsound, as there is no justification and is contrary to the strategic growth and regeneration objectives for the area. It implies that residential development is conditional on the provision of new workspace. The site’s strategic designation and objective does include both job and housing growth, the term ‘subsidise’ new workspace for which no definition is give, is contrary to the strategic policy and national policy which requires Local Plans to secure sustainable development – positive growth.
- 4.20 Residential development may be necessary to ensure viability of the regeneration scheme, depending on the market conditions and type of uses being proposed. However, as the site is designated in an area of growth and intensification, it should not be expressed as conditional on the provision of a particular type of commercial uses.
- 4.21 **The eighth bullet point (masterplan/AAP):** It requires that development of the site follow the principles set out in any future Council-approved masterplan for the area and/or the emerging AAP. A masterplan is already required as part of redevelopment of the site (as per the first bullet point). As such, it is not clear what any future Council approved masterplan is. In addition, the emerging AAP states that once adopted this site allocation will be superseded. We therefore do not consider this requirement is necessary.
- 4.22 **The ninth bullet point (capped commercial rents):** We *strongly object* to the requirement of “capped commercial rents” as such a requirement would, fundamentally, constrain the deliverability of the regeneration scheme. There is no definition of and justification (including viability evidence) for the requirement to cap commercial rents. In principle, the requirement for capping the commercial rents goes beyond the purpose of the Local Plan, and it is a concern as

there is no clear policy objective and justification as stated. Fundamentally, this requirement, as currently drafted, will make any scheme unviable, as not only it is unrealistic to “cap” rents commercially, but it will act as an impediment to securing the necessary inward investment towards the regeneration of the area, particularly where there are substantial costs associated with redevelopment.

- 4.23 We therefore strongly object to the capped rent requirement as it is not justified and would fundamentally affect the deliverability of regeneration of the site.

#### Development Guidelines

- 4.24 **The first bullet point (pedestrian and cycle link):** The Development Guideline states that Clarendon Road will be extended as a pedestrian link through Guillemot Place and the Job Centre site. For the reasons we state at paragraphs 4.13 and 4.15, such an expectation requires careful wording, so as to ensure that the delivery of the regeneration of the area is not constrained by the expectation of the policy, if it is not practically feasible or viable to provide the pedestrian/cycle link through the site, and if it cannot be delivered by the CIL.
- 4.25 **The second bullet point (a new junction):** This guideline suggests that a new junction at Mayes Road, Western Road and the aspirational extension of Clarendon Road is expected. Whilst a cycle and pedestrian link through the allocation site may be appropriate, subject to feasibility and necessary funding, the provision of a road through the site will make the redevelopment of the site unviable, as it would take up a significant proportion of the development site, and there are normally substantial costs associated with the delivery of a road/junction. The site’s redevelopment should only be expected to design a pedestrian/cycle link within the site, where feasible and viable, that would connect to the existing Mayes Road.
- 4.26 **The third bullet point (decentralised energy network):** We would comment that any requirement for the site to provide an easement for the work should be deleted, where an existing network does not exist or it is not practically feasible or financially viable. This point is supported by the London Plan Policy 5.5 which states that boroughs should require developers to prioritise connection to existing or planned decentralised energy network, where feasible. As worded, the requirement to provide connection adds an unnecessary cost to the development, which could make the scheme unviable.
- 4.27 **Tall Buildings** – Previously there was a criterion which supported the principle of tall buildings. Whilst we objected to the limitation of the height, we were supportive of the principle of tall buildings on the site. The site’s strategic designation is for growth and intensification and in order to increase the development capacity by making efficient use of the site, the policy should encourage and support the principle of tall building.
- 4.28 In respect of identifying tall building clusters, **Paragraph 2.10** refers to the Urban Characterisation Study (2015) (UCS). As we commented in the previous representations, we are concerned with the recommended approach for Wood Green in this document. It recommends that heights should be greatest along the railway line (mid to high rise) stepping down to mid-rise towards the existing 2-3 storey building and terraces that line Hornsey Park Road and Mayes Road. We are concerned with this approach, as there are no development sites available or allocated along the eastern area of the railway line when compared with the Building Height Recommendation Plan

on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. We therefore **object** to the reference to this document unless it is updated as further work is undertaken, as evidence base for tall buildings or a material consideration in the determination of planning applications.

#### Suggested Wording of Site Requirements/Development Guidelines

- 4.29 We consider that there are a number of combined “requirements” and additional guidelines which would make the redevelopment of the site unviable. Policies should positively support redevelopment and provide details to guide/enable development in line with the Council’s objectives and visions as far as possible. Accordingly, we consider that the Site Requirements and Development Guidelines should be consolidated as “Development Principles and Guidelines,” as follows:

##### *Development Principles and Guidelines*

- (i) Development proposals will be required to be accompanied by a site wide masterplan, showing how the land included ~~meets this policy and~~ does not compromise co-ordinated development on the other land parcels **or phased delivery** within the Allocation.
- (ii) The Wood Green job centre and Guillemot Place are of limited architectural quality, and will be permitted for redevelopment.
- (iii) **Tall buildings on the site are supported in order to maximise the site’s redevelopment potential and increase the development capacity, subject to the required assessment under Development Management Policy DM6.**
- (iv) **The opportunity to extend Clarendon Road as a pedestrian and cycle link through the site allocation to link with Wood Green Common should be explored as part of the Masterplan, subject to feasibility and viability, and funding available through CIL to deliver the link.**
- (v) **Active frontages to the potential new pedestrian link should be explored, having regard to the site’s mix of uses and relationship to the enhanced public realm envisaged at the south of the allocated site, which will act as the focal point of the Cultural Quarter.**
- (vi) As part of mixed use development, the maximum quantum of **commercial/employment generating** floorspace feasible should be provided on this site, **having regard to the type of uses which would contribute to the regeneration of the cultural quarter and job creation subject to market demand and viability.**
- (vii) **Residential development will be supported in order to facilitate the regeneration of the site and in line with the strategic objective for Wood Green Growth Area.**
- (viii) Part of the site is located within Wood Green Common Conservation Area and any development should make a positive contribution to the setting of the Conservation Area, in particular Alexandra Primary School and 109 Mayes Road.

- (ix) The site is identified as being 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, **subject to feasibility and viability**.
- (x) Studies should be undertaken to understand what potential contamination there is on the site prior to any development taking place.
- (xi) A piling statement will be required prior to any piling taking place.
- (xii) Applicants must consult with Thames Water regarding wastewater and water supply capacity upon the preparation of a planning application.

### Summary

- 4.30 Overall, we support the principle of the site's allocation for a future mixed use development opportunity. However, it should be noted that the regeneration and creation of the wider cultural quarter cannot be facilitated without a viable redevelopment scheme. Furthermore, the strategic objectives for the site and the wider area are to maximise the development capacity to accommodate housing and job growth. Therefore, we consider that the site should be expressly allocated for mixed use development to include residential development and employment generating uses with the aspiration to facilitate a new pedestrian/cycle link where feasible and deliverable.
- 4.31 We stress that the site's regeneration should not be overburdened by a number of onerous policy requirements with prescribed details, without proper justification or feasibility work, as they will add significantly to the costs of redevelopment of the site, which will undermine the viability of any scheme. As drafted, the site allocation policy is **unsound** as it is not justified, effective or consistent with the strategic objectives for the area and national policy.

## 5 SITE ALLOCATION SA21 'CLARENDON SQUARE GATEWAY' - BITTERN PLACE

### Proposed Site Allocation and Commentary (Paragraphs 2.54 – 2.56)

- 5.1 We support the principle of the allocation of the Bittern Place site for a mixed use redevelopment, which is consistent with Haringey's Strategic Policies for Haringey Heartland/Wood Green Metropolitan Town Centre as a Growth Area, and an Intensification Area in the London Plan. It is however considered that the focus of the allocation should be to maximise the site's development opportunity in line with the Strategic Policy SP1. This allocation site lies within a Regeneration Area of the Local Employment Area ('LEA') (which permits a wide range of uses including residential), and the Wood Green Metropolitan Town Centre. As such, a wide range of employment generating uses and residential development should be considered appropriate in order to facilitate regeneration. We therefore **object** to mixed use development being "employment-led" in a sustainable town centre location, as a suitable mix of uses and quantum of each use should be considered based upon the marketing demand/need, viability and design/layout which promotes the efficient use of land.
- 5.2 It is unclear how the indicative development capacity (net residential units – 195 and employment – 6,734 sq.m) has been identified, for which we would request a further opportunity to comment once clarified.
- 5.3 Paragraph 2.55 states that the future development will cross subsidise a safe pedestrian and cycle link from Wood Green to Alexandra Palace Park via the Heartlands area and Cultural Quarter. Whilst we support the aspiration to create a pedestrian/cycle link, it should be aligned utilising the existing road, as otherwise it would minimise the development area which would make the redevelopment of the site unviable.
- 5.4 Furthermore, we **object** to the draft policy which seeks the future development to 'cross subsidise the pedestrian and cycle link, as the provision will be for the benefit of the wider public and the regeneration of Wood Green/Heartlands, rather than to serve the development of the allocated site alone. As such, the developers of the site should not be expected to fund the provision of the link, and such infrastructure should be funded by the CIL, as otherwise the regeneration of the site may become undeliverable due to viability issues. Accordingly, the provision of a new pedestrian and cycle network should be designed utilising the existing road in as part of any masterplan for the wider area, or in the emerging AAP, for including in the Council's Infrastructure Delivery Plan, and the Regulation 123 list, to secure the delivery of the provision.
- 5.5 As expressed in the previous representations, the site is also considered appropriate for student accommodation if a requirement for further student accommodation is identified in the future. It is noted in paragraph 3.21 of the Proposed Submission Development Management document that Haringey has a role to play in fostering relationship with existing higher education institutions and in meeting the needs for purpose built student accommodation. In this respect, Policy DM15 specifically refers to Haringey Growth Areas and within or at the edge of a town centre as being suitable locations for future student accommodation, where required. As the site's redevelopment is a long term opportunity, we consider it appropriate to allow for flexibility to facilitate student accommodation in the allocation, in line with Policy DM15.

- 5.6 Accordingly, we request that the wording of the site allocation and commentary is amended as follows:

*Proposed Site Allocation (Paragraph 2.54)*

***“Mixed use redevelopment to include employment generating uses (including town centre uses), and residential use and/or student accommodation, and the creation of a pedestrian/cycle link between Wood Green and Clarendon Square, with a legible streetscape, subject to feasibility and viability.”***

*Commentary (Paragraph 2.55-2.56)*

2.55 This site plays an important role in linking the Haringey Heartlands area to Wood Green High Rd. The future development ***should explore opportunities to facilitate the delivery of ~~will cross~~ subsidise*** a safe pedestrian and cycling link from Wood Green to Alexandra Palace Park via the Heartlands area and Cultural Quarter ***through utilising the existing road in the masterplan.***

2.56 New commercial and residential development ***and/or student accommodation*** will be permitted along this route.

**Site Requirements**

- 5.7 **The first bullet point (a site wide masterplan approach):** We support the site wide masterplan approach as the allocation is in multiple ownerships. This approach would facilitate the delivery of regeneration of the site in a coordinated manner without undermining the delivery of part of the allocated site to come forward first. However, it is considered that minor amendment is necessary to ensure that the policy can facilitate phased delivery.
- 5.8 **The third and sixth bullet points (pedestrian and cycle link):** These criterion states that a pedestrian and cycle link along the “entire length of the site” and “the east-west linkage should be as straight as possible between Wood Green High Road and Clarendon Square.” We consider that this should be clarified as an alignment utilising the existing road.
- 5.9 **The fourth bullet point (employment floorspace):** We welcome the removal of the previous criterion setting a target of 33% employment floorspace, and requirement to specifically provide Class B1 a and c uses. We are generally supportive of the amended criterion which seeks to secure the maximum quantum of employment floorspace feasible from redevelopment. However, in order to achieve strategic growth objectives, the type, quality and mix of employment ‘generating’ uses will be taking into account in the consideration of the commercial viability of the site’s redevelopment options.
- 5.10 We consider that the requirement for the provision of “employment floorspace” is ineffective and does not provide sufficient flexibility to facilitate the delivery of redevelopment. The NPPF states that the Local Plan should allocate sites to promote development and flexible use of land. Therefore, all employment generating uses and economic development, as defined by the NPPF, should be considered for an appropriate mix of uses to deliver a viable regeneration scheme, subject to marketing demand and commercial viability.



- 5.11 This criterion also requires maximum employment feasible to be provided on site 'once the connection has been secured.' We object to this as it is not sufficiently clear or justified.
- 5.12 **The fifth bullet point (active frontages):** We are concerned with the 'requirement' to provide active frontages to both sides of a new pedestrian/cycle link, as it is prescriptive in the absence of a scheme/masterplan for the adjoining site and how it would relate to a scheme for the site. Whether active frontages can be provided or is appropriate will depend on land uses, layout and relationship with adjoining developments. In order to ensure flexibility and that the delivery of a viable scheme is not compromised, it should be identified as a guide rather than a site requirement.
- 5.13 **The seventh bullet point (capped commercial rents):** We strongly object to the requirement of "capped commercial rents" as such a requirement would, fundamentally, constrain the deliverability of the regeneration scheme. There is no definition of and justification (including viability evidence) for the requirement to cap commercial rents. In principle, the requirement for capping the commercial rents goes beyond the purpose and scope of the Local Plan, and it is a concern as there is no clear policy objective and justification is stated. Fundamentally, this requirement, as currently drafted, will make the scheme unviable, as not only it is unrealistic to "cap" rents commercially, but it will act as an impediment to securing the necessary inward investment towards the regeneration of the area, particularly where there are substantial costs associated with redevelopment.
- 5.14 We therefore strongly object to the capped rent requirement as it is not justified and would fundamentally affect the deliverability of regeneration of the site.

#### Development Guidelines

- 5.15 **The first bullet point (height of buildings):** We support the amendment made to the consideration given to the height of new buildings which backs onto the residential properties on Hornsey Park Road.
- 5.16 Previously there was a criterion which supports the principle of tall buildings on the site. Whilst we objected to the limitation of the height, we were supportive of the principle of tall buildings on the site. The site's strategic designation is for growth and intensification and in order to increase the development capacity by making efficient use of the site, the policy should encourage and support the principle of tall buildings.
- 5.17 **The second bullet point (framing the space):** It is considered that this requirement is unnecessary and too prescriptive as it would depend on the alignment of the link and should be considered as part of masterplanning of the allocated site.
- 5.18 **The fourth bullet point (decentralised energy network):** We would comment that any requirement for the site to provide an easement for the work should be deleted, where an existing network does not exist or it is not practically feasible or financially viable. This point is supported by the London Plan Policy 5.5 which states that boroughs should require developers to prioritise connection to existing or planned decentralised energy network, where feasible. As worded, the requirement to provide connection adds an unnecessary cost to the development, which could make the scheme unviable.

- 5.19 **The eighth bullet point (new street trees):** We consider that the provision of new street trees is too prescriptive, as it should be considered as part of masterplanning and detailed landscape design.
- 5.20 **The ninth bullet point (car free development):** It is considered that car free development *may be* appropriate for the site in the future when Crossrail 2 becomes operational (although we understand from the emerging AAP that it is to be delivered in the latter half of 2020s). Fundamentally, parking provision for any development proposals should be assessed as part of the Transport Assessment or Statement based on the London Plan's parking standards and in line with the Development Management Policy DM32. As such, we consider that minor amendments to the criterion are necessary for clarity and consistency with Policy DM32.

#### Suggested Wording of Site Requirements/Development Guidelines

- 5.21 We consider that there are a number of combined "requirements" and additional guidelines, particularly the prescriptive design requirements for the new pedestrian and cycle link, which would make the redevelopment of the site unviable. Policies should positively support redevelopment and provide details to guide/enable development in line with the Council's objectives and visions as far as possible. Accordingly, we consider that the Site Requirements and Development Guidelines should be consolidated as "Development Principles and Guidelines," as follows:

#### *Development Principles and Guidelines*

- (i) Development proposals will be required to be accompanied by a site wide masterplan, showing how the land included ~~meets this policy and~~ does not compromise co-ordinated development on the other land parcels **or phased delivery** within the Allocation.
- (ii) No buildings are required to be retained.
- (iii) **Tall buildings on the site are supported in order to maximise the site's redevelopment potential and increase the development capacity, subject to the required assessment under Development Management Policy DM6.** Height of new buildings where they back onto the residential properties on Hornsey Park Road should be considered carefully to respect their residential amenity.
- (iv) **The opportunity to create an east/west pedestrian and cycle link with appropriate landscaping, utilising the existing road should be considered as part of a Masterplan, subject to feasibility and viability, and funding available through CIL to deliver the link.**
- (v) **Active frontages to the potential new pedestrian link should be explored, having regard to the site's mix of uses and relationship to the enhanced public realm envisaged at the south of the allocated site.**
- (vi) As part of mixed use development, the maximum quantum of **commercial/employment generating** floorspace feasible should be provided on this site, **having regard to the type of uses which would contribute to the regeneration of the town centre site and job creation subject to market demand and viability.**

- (vii) The Moselle River runs in a culvert under this site, and as been identified as being in a potentially poor condition. Any development of this area should ensure that as a minimum the culvert is made safe, and ideally the potential for the Moselle to be deculverted is expected.
- (viii) The site is identified as being 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, **subject to feasibility and viability**.
- (ix) Studies should be undertaken to understand what potential contamination there is on the site prior to any development taking place.
- (x) A piling statement will be required prior to any piling taking place.
- (xi) Applicants must consult with Thames Water regarding wastewater and water supply capacity upon the preparation of a planning application.
- (xii) **The provision of car parking will be assessed as part of the Transport Assessment or Statement.** The site **may be** suitable for car free development due to its good, and improving public transport access in the long-term, **which will be assessed in line with the London Plan and the Development Management Policy DM32.**

### Summary

- 5.22 Overall, we support the principle of the site's allocation for a future mixed use development opportunity. However, it should be noted that the regeneration cannot be facilitated without a viable redevelopment scheme which maximises the site's development potential to facilitate housing and job growth in line with the Council and London Plan's strategic objectives. Therefore, we consider that the site should be expressly allocated for mixed use development to include housing and a range of employment generating commercial uses to ensure flexibility and delivery in the long term. In particular, we request that there is no ambiguity about the aspiration for the new pedestrian and cycle link to be provided utilising the existing road as it is fundamental in ensuring the delivery of regeneration of the site.
- 5.23 The site's regeneration should not be overburdened by a number of onerous policy requirements, without proper justification or feasibility work, as they will add significantly to the costs of redevelopment of the site, which will undermine the viability of any scheme. As drafted, the site allocation policy is **unsound** as it is not justified, effective or consistent with the strategic objectives for the area and national policy.

## 6 REPRESENTATIONS ON THE DEVELOPMENT MANAGEMENT POLICIES

6.1 In general, in the context of the sites allocated for redevelopment, we are concerned that the Development Management DPD ('DM') consultation document contains a number of policies which are too prescriptive or considered to be onerous requirements. Such development management policies are unnecessary and, more crucially, would undermine the delivery of the strategic objectives.

6.2 The NPPF stresses the importance of ensuring deliverable Local Plans. The NPPF at paragraph 173 states as follows:

*"Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the 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. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable."*

6.3 More specifically, at paragraph 174, the NPPF states that the cumulative impact of the local standards in the Local Plan and supplementary planning documents and policies that support the development plan and nationally required standards should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle.

6.4 Therefore, Haringey's MD DPD should ensure that the strategic objectives and allocations to secure the Council's development needs are deliverable. However, a number of policies contained within the consultation document fail to meet the requirements and guidance of the NPPF. These policies are set out below:

### Development Management Policies

6.5 **Policy DM3 (Public Realm):** Criterion B requires the management of the new privately owned public spaces, including their use and public access, will need to be agreed by Council. We **object** to this, as it is onerous to require the private estate management matters to be agreed by the Council, and it goes beyond the role of planning policy. We therefore request that **the second sentence of Criterion B is deleted.**

6.6 **Policy DM6 (Building Heights):** We **object** to Criterion B which requires proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in 'community benefit'. There is no justification or explanation for requiring justification in relation to community benefit. The Growth Area is likely to include tall/taller buildings in order to intensify and increase the development capacity in order to facilitate growth and regeneration. As such, it is considered unnecessary and onerous to justify community benefit.

6.7 We welcome and support the amendments made to Map 2.2 as it identifies the Wood Green Growth Area as potential locations appropriate for Tall Building, in line with the strategic objectives. As the Tall Building Validation Study (November 2015) indicates, further detailed work

will be necessary including assessment of individual site that would be subject of any planning applications, as required by Criterion E. As such, the approach to define the Growth Area as potential Tall Building locations is considered appropriate.

- 6.8 Sub-criterion c under Criterion C requires proposals for Tall Buildings should be consistent with the Council's Tall Buildings and Views Supplementary Planning Document ('SPD'). The NPPF defines SPDs as documents which add further detail to the policies in the Local Plan and can be used to provide further guidance for development on specific sites or on particular issues such as design. The NPPF further advises that SPDs should be used where they can help applicants make successful applications. It makes it clear that it is not part of the Development plan. As such documents will not go through the examination process, we are concerned that the criterion requires proposals to be "consistent with" yet to be prepared SPD, for which no clarification is provided as to what additional guidance will cover over and above the requirements set out in the DM in relation to tall buildings, key views and design. In order to ensure that such a SPD is not used to add unnecessary and unjustified requirements for proposals for tall buildings, it is considered that the criterion is amended to state:

~~"have regard to be consistent with~~ the Council's Tall Buildings and Views Supplementary Planning Document."

- 6.9 **Policy DM6's supporting paragraph 2.42** refers to the Urban Characterisation Study (2015) (UCS). As we commented in the previous representations, we are concerned with the recommended approach for Wood Green in this document. It recommends that heights should be greatest along the railway line (mid to high rise) stepping down to mid-rise towards the existing 2-3 storey building and terraces that line Hornsey Park Road and Mayes Road. We are concerned with this approach, as there are no development sites available or allocated along the eastern area of the railway line when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. We therefore **object** to the reference to this document unless it is updated as further work is undertaken, as evidence base for tall buildings or a material consideration in the determination of planning applications.
- 6.10 **Policy DM10 (Housing Supply):** We support Criterion A which supports and directs proposals for new housing to sites allocated for residential development, including mixed use residential development. However, as noted in our representations on the Site Allocations document, this policy would be ineffective unless the Site Allocations document specifically allocates mixed use development sites, namely the Sites SA18 and SA21, to include residential use.
- 6.11 **Policy DM13 (Affordable Housing):** Sub-criterion a) of Criterion A refers to the borough-wide target of 40% affordable housing provision. As we objected (to the Strategic Policies SP2) we consider that for development proposals within Haringey Heartland, a lower affordable housing target should be set, to ensure the deliverability of redevelopment schemes to facilitate regeneration of the area.
- 6.12 **Policy DM15 (Specialist Housing):** Criterion C supports student accommodation to be delivered as part of new major development schemes in Haringey's Growth Areas and within or at the edge of a town centre, if a requirement for further student accommodation is identified in the future. We

support this aspect of the policy, as student accommodation could be delivered on long term redevelopment opportunity sites in Haringey Heartland such as our client's sites.

- 6.13 Criterion D sets out criteria based assessment for proposals for student accommodation. We **object** to sub-criterion f) as it is considered onerous to require the provision an element of affordable student accommodation in the event that it is not made available for occupation by members of a specified educational institution(s). In line with the London Plan (paragraph 5.53B), the provision of an element of affordable student accommodation should be **subject to viability, and in the context of average student incomes and rests for broadly comparable accommodation provided by London universities**. The supporting paragraph 3.33 should also be amended.
- 6.14 **Policy DM20 (Open Space) and Figure 4.3 Green Grid** Criterion C seeks all development providing new or replacement open space wherever possible, to connect to the All London Green Grid. The policy's supporting paragraph 4.15 explains that Figure 4.3 shows the existing and proposed Green Grid, including possible links to other points of interest in the Borough such as cultural quarter and town centres. As Figure 4.3 shows new proposed green grid running through the Heartlands and identified as cycle and walk to green space. In order to clarify the purpose of the Green Grid, the supporting paragraph 4.15 should be amended to state that proposed Green Grid is a pedestrian and cycle link opportunity.
- 6.15 **Policy DM22 (Decentralised Energy):** Criterion B requires all major developments to incorporate site-side communal energy system, irrespective of whether it is connected to Decentralised Energy and to optimise opportunities for extending such systems beyond the site boundary. It should be noted that the London Plan Policy 5.6 requires development proposals *examine opportunities* to extend the *Combined Heat and Energy (CHP) system* beyond the site boundary. It is therefore unreasonable to require development proposals to optimise opportunities for extending the communal energy system, irrespective of viability and feasibility. We therefore **object** to sub-criterion b) and consider that it should be amended as follows:
- “all development that incorporates site-side communal energy systems should optimise opportunities for extending such systems beyond the site boundary, **and where feasible and viable...**”
- 6.16 We support the amendment to sub-criterion d) of Criterion C which will take account of technical feasibility and financial viability of a connection to an existing or planning future Decentralised Energy network where connection is expected.
- 6.17 **Policy DM38 (Employment-Led Regeneration):** The policy supports proposals for mixed use development within a LEA – Regeneration Area (RA), where this is necessary to facilitate the renewal and regeneration, including intensification, of existing employment land and floorspace. However, this represents repetition of Strategic Policy SP8 which states that RAs can include uses appropriate in a mixed use development including residential uses, and Policy SP1 identifies Wood Green/Heartlands as a Growth Area, where development is required to maximise opportunities. Whilst we do not object to the principle of supporting mixed use development in RAs, we are concerned with the number of criteria for proposals for mixed use development:

- a) It is noted that Paragraph 6.14 in relation to criterion a) states that applicants will be required to submit a viability assessment that demonstrates the proposed mixed use is necessary to enable the delivery of employment uses, and mixed use proposals will not be acceptable unless the introduction of a non-employment use is demonstrably necessary to make the employment development viable. There is no clear justification why this requirement is necessary, as Policy SP8 permits mixed use development within the LEA - RAs. The policy is considered to be onerous as the term 'employment uses' could be interpreted to mean traditional employment uses (those within B Class uses) whilst employment generating uses are permissible under Policy SP8. Furthermore, Policy SP1 identifies Wood Green/Heartlands as a Growth Area, where both jobs and housing are sought to be delivered through an intensive mixed use development. As such, this criterion should be removed as it would add an unnecessary requirement to developers to justify the principle of mixed use development, which is enshrined in the Strategic Policies particularly in relation to sites allocated for mixed use redevelopment in the Site Allocation document or in the emerging AAP.
- b) The criterion seeks to maximise the amount of floorspace to be provided within the mixed use scheme having regard to development viability. This requirement is ambiguous and would be difficult to demonstrate the "maximum" amount of employment floorspace that can be achieved on site. This requirement does not take account of the type of employment uses, the quality of employment floorspace and the number of jobs generated from them, and the relationships with other uses proposed within a mixed use development. We therefore object to this requirement as currently worded.
- c) The criterion requires provisions of demonstrable improvements in the site's suitability for continued employment and business use having regard to a number of sub-criterion including provision for an element of affordable workspace, where viable. As currently worded, it is not unclear what this policy is seeking to achieve. We therefore **object** to this and suggest the following:
- "The provision of employment generating floorspace should represent improvements to the existing provision, having regard to..."***
- d) It is not unclear why proposals in the Regeneration and Growth Areas are required to investigate gypsy and traveller accommodation needs. We request clarification and justification for this for a further opportunity to comment.
- e) Residential amenity can be protected by design and appropriate mitigation measures. Therefore, we consider that it is inappropriate to require an adequate "separation of uses," as it would compromise the development potential for allocated mixed use development sites.
- f) We would agree that any proposals should ensure that the employment function of the site and nearby employment sites are not undermined.

- g) The NPPF requires Local Planning Authorities to support the expansion of electronic communications network including high speed broadband. However, it is not expressed as a requirement for developers to provide high speed broadband from development proposals. Whether development can be connected to high speed broadband will depend on the availability of broadband infrastructure. As such, this should not be expressed as a requirement for development proposals to enable connection to high speed broadband.



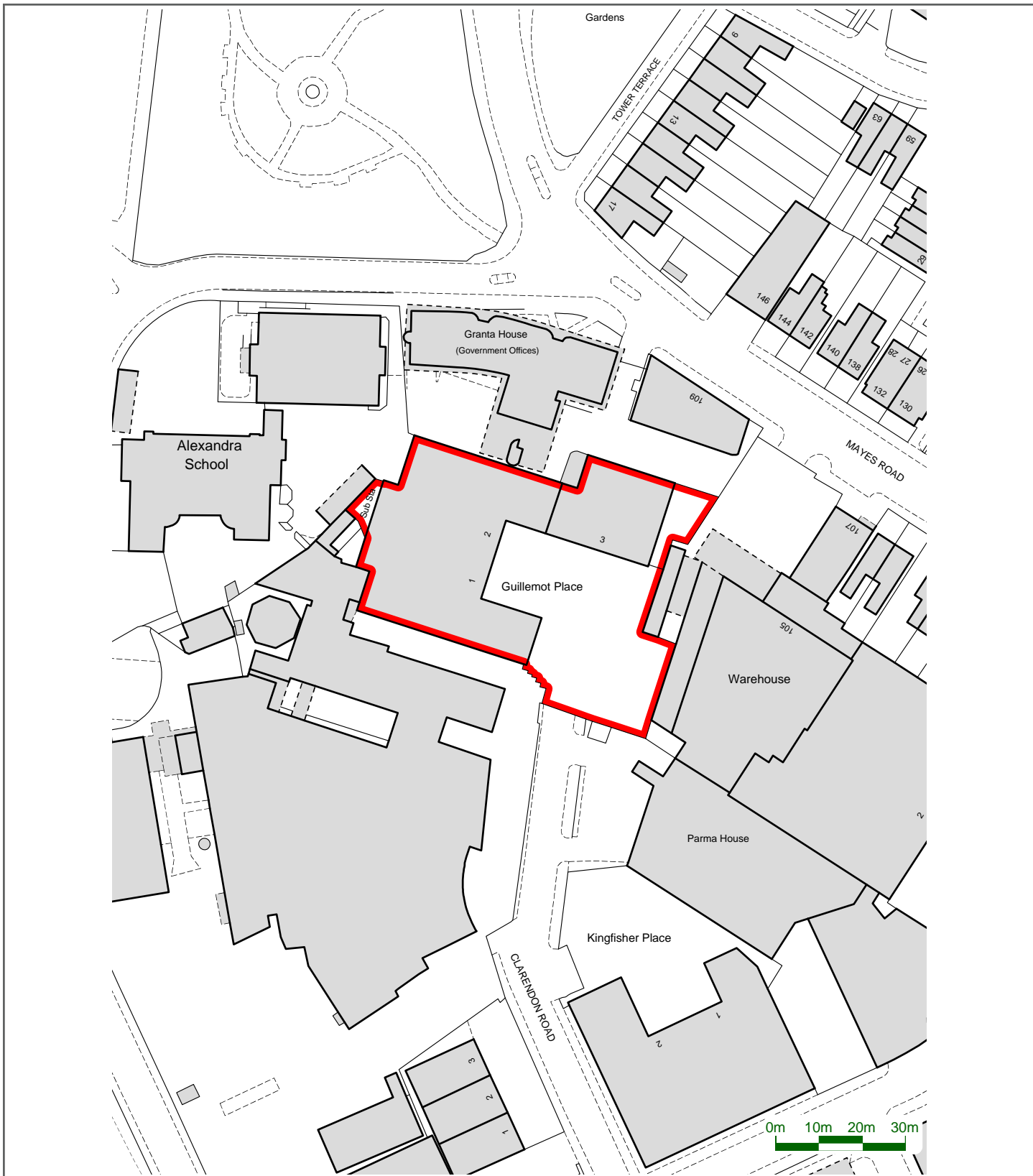
## 7 CONCLUSION

- 7.1 These representations are submitted on behalf of LaSalle Investment Management.
- 7.2 LaSalle is committed to the promoting of the sites' long term redevelopment potential for residential-led mixed redevelopment so that they will contribute to the strategic policy objective for growth and regeneration.
- 7.3 The adopted London Plan has increased the Council's housing targets significantly. This emphasises the need for a review of the Strategic Policies to ensure that Haringey's Local Plan seeks to meet and exceed the minimum housing targets set by the London Plan. This is particularly relevant to Wood Green/Haringey Heartland, which is designated as an intensification area in the London Plan to increase the site's development capacity for housing and employment. We therefore generally support the proposed Alterations to the Strategic Policies, which have increased the housing target in line with the London Plan, and confirm the Council's commitment to the strategic growth objective for Haringey Heartland, subject to our suggested amendments, and clarification.
- 7.4 In terms of the Site Allocations document, we support the recognition of the Guillemot Place site and the Bittern Place site as redevelopment opportunities through the development allocations under SA18 and SA21. Whilst we would welcome and support some of the amendments made from the previous policies in response to our representations, we remain concerned with the policies as drafted, particularly a number of onerous and prescriptive requirements and guidance. The allocations should specifically allocate both sites for mixed use redevelopment, including residential use and/or student accommodation and employment generating uses, which we consider is essential for the successful delivery of the regeneration of the sites and the wider area.
- 7.5 Furthermore, there are a number of aspirations and onerous and unjustified requirements, which would prejudice and undermine the viability and deliverability of the redevelopment of these sites. Similarly, the Development Management Policies document contains a number of policy standards and requirements which are considered to be ambiguous, unnecessarily prescriptive and onerous. We consider that the effect of the combined aspirations and requirements will be a barrier for landowners/developers to facilitate the regeneration of the area.
- 7.6 Haringey's Local Plan as a whole must be deliverable, and therefore we respectfully request that our concerns and our suggested changes which we consider are required to ensure viable and deliverable development of the sites, and for the soundness of the plan are taken fully taken into account.
- 7.7 We look forward to receiving confirmation that these representations have been duly received. In addition, as a key stakeholder, we request that we are kept informed of all future consultation opportunities associated with the preparation of Haringey's Local Plan. LaSalle is committed to working with the Council to assist in the preparation of sound Local Plan documents and will be able to provide further information as necessary.



Appendix 1  
Site Location Plan – Guillemot Place





**SITE LOCATION PLAN**

Guillemot Place,  
Clarendon Road,  
LONDON. N22 6XG.



Scale @ A4 : 1:1250

Plan No. : 615/N22/21/1\_SLP01

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Appendix 2  
**Site Location Plan – Bittern Place**





**SITE LOCATION PLAN**

Bittern Place,  
Coburg Road,  
LONDON. N22 6TP.



Scale @ A4 : 1:1250

Plan No. : 615/N22/22/1\_SLP01

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