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LB Haringey  
Policy Team Leader  
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By e-mail

Dear Planning

**Re: Representations on Wood Green Area Action Plan (AAP), Preferred Options Stage,  
February 2017**

This letter sets out Representations on the Wood Green AAP (Preferred Options) made on behalf of Electoral Reform Services Ltd (ERS) of 33 Clarendon Road, N8 0NW.

ERS wish to make representations on two Site Allocations:

*WG SA24: Clarendon Road South*

*WG SA21: Land Adjoining Coronation Sidings, Western Road*

This Representation (an objection) is in three parts. The first section sets out the case for changes to the Site Allocation, the second the nature of the changes sought by ERS and the third proposes amendments to the Site Allocations that would satisfy these objections.

**The Case for changes to WG SA 24:Clarendon Road South**

The case for changes to the above Site Allocation is based on:

1. An Employment/Economic case-ERS is a very important local employer who can and wish to expand being able to demonstrate expansion year on year. The Council's proposals put the whole business strategy for growth at risk and/or at the very least prevent its expansion.
2. A planning/development case-the overall site area cannot achieve all of the residential, employment and educational outputs which the Council wish to secure.

A more realistic assessment is required and clearer employment related priorities set.

3. An educational case-any school of over 9000m<sup>2</sup> will be on a very compromised site and other more realistic alternatives should be considered.

### The Employment/Economic Case

It should be stressed that ERS supports the general principle of regeneration of the Haringey Heartlands area. ERS supports mixed use development and a mixing of residential and employment use, subject to the safeguards of maintaining a 24 hour business. Indeed the mixed employment and residential development plans provide opportunities to expand ERS's activities and improve the general environment of the Heartlands Area.

ERS is very important to the borough because they:

- are an established firm in the borough and on this site since 1992
- are world leaders in providing ballots for national and local elections
- employ around 200 people in both highly skilled and low skill jobs
- take on 50 additional staff at busy times
- are one of the borough's biggest employers
- make significant annual investment in capital including digital equipment
- work at the forefront of digital technology
- are occupying part of the Hertie building next to their site
- are renting the property which is a warehouse behind Herties building

The nature of their business is key. ERS have to be very responsive to immediate demands. A ballot for industrial action cannot be delayed because the forms are not ready. They cannot shut down and relocate because the election work is constant (and growing). They handle over 3000 balloting projects per annum not just at 'typical' election time. The company has no wish to relocate as it has a pool of locally sourced

labour that help them deliver to the tight time-scales in which they work.

Much of ERS's work relates to paper ballots and the design and dispatch of millions of paper ballot papers and then dealing with their return and count. The digital part of the balloting business is growing, but due to legislative requirements the demands of paper balloting require large scale machinery on the ground floor of the business and warehousing to support the supplies necessary to ensure that ballots can be sent out in the required timescales.

The on-going nature of the business means that ERS are not a foot-loose business able to re-locate easily. The process of moving would put the whole business and brand at risk.

Moreover, ERS's growth is constrained by the physical size of the buildings on Clarendon Road. If the business can expand into adjoining sites then the company can expand and take on additional employees. ERS are already occupying about 65% of the floor space in the adjoining Hertie building on a temporary basis but would like to acquire additional floor space to permanently expand their business.

It is crucial to ERS that the Council's Site Allocation is sufficiently unambiguous to ensure that the ERS's very important employment contribution to the borough is not put at risk.

### **The Planning Development Case**

The Site Allocation sets unrealistically high indicative development capacities for SA24. The whole site allocation area is 2.2ha but the net developable area is much smaller, estimated at approximately 1.2ha (see Plan 1 attached to Appendix 1). All of the development capacities set out in SA24 cannot be achieved as there is simply not enough land. The setting of priorities is therefore critical because not everything is going to fit.

A primary school of 9193m<sup>2</sup> (floor area) will require a significant footprint even it is built to very constrained standards. This should not be at the expense of key employment sites such as ERS. The Council also wishes to secure local community facilities also. They have expressed concerns about any development of the Virgin Media site because of the digital hardware on and under it. This leaves very little space to provide for a school site.

The Council should re-consider what quantum of development can reasonably be secured on the Site Allocation Site overall as they are trying to squeeze too many competing uses onto the site.

Moreover the priorities for Site Allocation 24 should be re-considered. The school is given the highest priority within SA24. This means that it could be sited on the ERS site and the important employment contribution made to the borough lost.

ERS would want to go further in not only safeguarding their site from school development but allowing for additional land that would allow their business to expand increasing their employment contribution.

## **The Education Case**

The need for additional school places in London have been generated by patterns of in-migration as well as the construction of new homes. Many boroughs have based their predictions on new school populations on an extrapolation of high rates of in-migration coupled with high estimates of new family housing. There is some doubt now whether the rates of in-migration, post Brexit, will come to pass and the mix of housing will so favour family sized dwellings that will increase school populations in the borough. The overall school population assumptions should be re-assessed as the AAP nears completion.

Practically however the question is should the authority seek to shoe-horn a primary school into this area, certainly to be at the expense of key employment uses, when there are other less constrained sites available. To secure 9193m<sup>2</sup> of primary school floor space would require 0.45ha for a building of two stories and a foot print of 0.3ha for a three storey building plus areas required for playspace. The plan in appendix 1 shows that most of the sites in SA24 are between 0.1 and 0.2 of a hectare. This could mean that half of the developable site area of Site Allocation 24 could be allocated to delivery of a primary school.

The Council's preference is to secure a school site in the southern part of Clarendon Road because the wider school need is projected to be in this area. The down side of this location is that the school will be on a very compromised site. Other sites are available. Such as Site WG21 at Coronation Sidings on Western Road less than 450m from the ERS site. This site is 0.9ha is vacant and in single ownership. The site could accommodate a school and allow enabling development to help fund it.

This is why an objection is also made to Site Allocation WG SA21.

#### **Nature of the Changes Sought to WG SA 24**

The nature of the changes sought to the Site Allocation are set out below. The principle changes ERS seek are the following:

- That the presence of key employers in the SA24 area should be recognised
- That the ERS site should be protected from school development
- Any school provision if in Site SA24, should be so located to accommodate some reasonable expansion plans of ERS in the near future.

#### **Nature of the Changes Sought to WG SA 21**

The change proposed is to allow the following:

- Provision of a primary school secured by enabling development on the remainder of the site.

## Proposed Changes to WGSA24

The proposed changes are set out in Red and the text proposed to be deleted is struckthrough.

### Proposed Site Allocation:

Subject to appropriate re-provision of the existing community uses, creation of a new primary school, and new mixed use development including community, commercial and residential uses. **The ERS site should be protected and development proposals should allow for an expansion of the employment use.**

### Commentary

This site is currently of a mixed characteristic, including a mix of community, employment and residential uses. There is potential for the site to be used more intensively, and complement the development which is expected to take place in the Clarendon Rd development. There is a need for new primary school provision, and this site offers an ideal location to serve both the Wood Green and Harringay areas **but protecting key employment uses.**

### Site Requirements

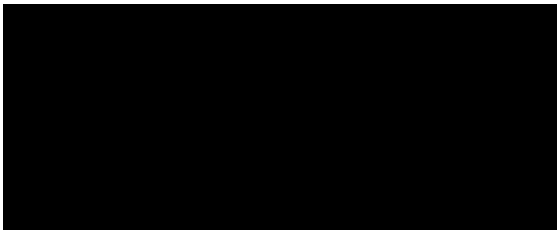
- No buildings need to be retained, but businesses should be retained within the AAP area, wherever possible **but notably the ERS site because of its employment contribution to the borough.**
- A new 2 forms of entry primary school, with potential to be expanded to 3 forms of entry, will be provided on this site, **noting the need to protect the ERS site and allow for its expansion.**

## Proposed Changes to WGSA21

Creation of ~~employment-~~ **primary school led** mixed use development with residential, including a landmark building marking the entrance to Wood Green from Alexandra Palace and the west of the Borough

I am acting as agent for this ERS and would be happy to answer any questions you may have.

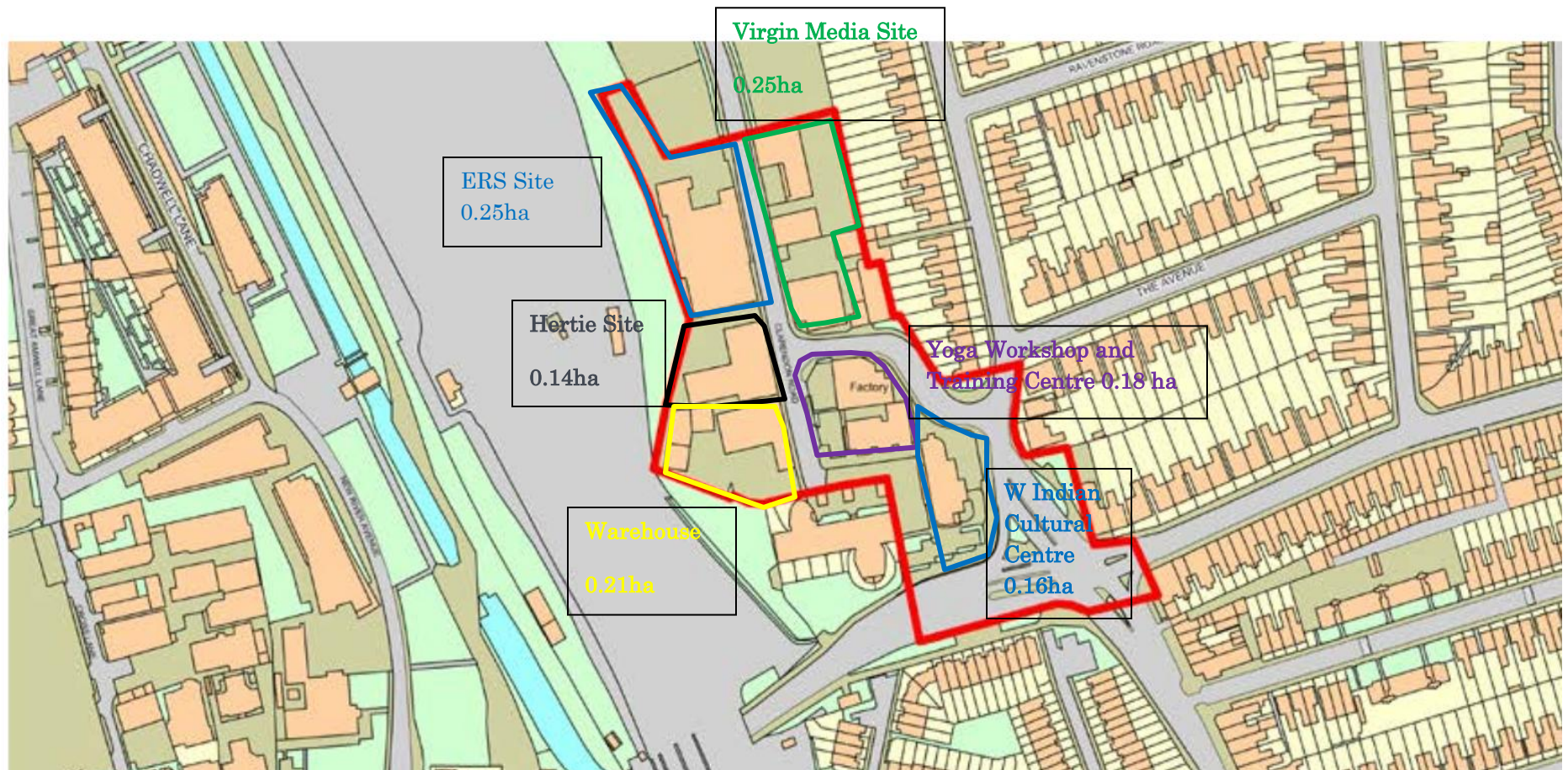
Yours sincerely



David Carroll, M.Sc., MRTPI

Planning Co-operative

# WG SA 24: CLARENDON RD SOUTH



Note- all areas are approximate



