
Representations

**On Behalf of
LaSalle Investment Management**

**Haringey Local Plan:
Alterations to Strategic Policies
Site Allocation
Development Management Policies
Preferred Options Consultation**

March 2015



Our Ref: WH/lh/615N22/21/1

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1 INTRODUCTION

1.1 These representations are submitted, on behalf of LaSalle Investment Management ('LIM'), on Haringey's Local Plan Preferred Options consultation documents, namely:

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

1.2 LIM is 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 Growth Area, to which these representations relate. We previously submitted representations on the draft Site Allocation document (February 2014) and supported the principle of the allocation of these sites for redevelopment, identified as a long term opportunity.

1.3 On behalf of our client, we confirm our client's aspiration to promote both sites for residential-led mixed-use development, and the inclusion of these sites in the Site Allocation document. In particular, we consider that both sites have the potential to contribute significantly to meeting the identified development needs, including housing and employment generating uses, and to the regeneration of the area.

1.4 These representations, therefore, are sought to ensure that Haringey's Local Plan provides an appropriate policy framework to facilitate the delivery of regeneration of the area, while meeting the strategic objectives to meet the objectively assessed needs. Accordingly, these representations 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 specific allocation (SA23) in relation to the Guillemot Place site;
- Chapter 5 – representations on the site specific allocation (SA26) 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 **Appendix 1**. 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 Crossrail 2, for which a new line has been safeguarded by the Mayor.
- 2.4 The derelict and vacant land to the south of Bittern Place (including gasholders), extending to 4.38 ha was granted outline planning permission for large scale residential-led mixed use development. Therefore, the immediate area is already subject of a significant regeneration project.

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 to regenerate the area and to meet 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' annual housing target from 802 dwellings to 1,502 dwellings. It should be noted that the annual housing target as set out in the London Plan is a minimum requirement.
- 3.2 We therefore agree that the Strategic Policies should be reviewed to bring the Strategic Policies up-to-date in terms of housing requirements for the Borough. We consider that such a review process is necessary to ensure that sufficient sites are identified in the Site Allocation document, to meet and exceed the requirements in line with the London Plan. 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 identification of the capacity is not in line with the London Plan identifies an indicative capacity of 2,000 jobs, and a minimum of 1,000 new homes. These paragraphs should therefore be amended to ensure consistency with the 2015 London Plan, to secure an increased capacity to meet and exceed the housing target through redevelopment in Haringey Heartland/Wood Green.
- 3.4 **Strategic Objective 2 and Policy SP1 (Alt 27, Alt 30)** – 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 object to the housing target being calculated, it does not accord with the London Plan's requirement to identify the objectively assessed housing needs to seek to exceed the London Plan target. The London Plan Policy 3.3 requires that Boroughs should seek to achieve and exceed the minimum annual housing target as part of the LDF preparation. Furthermore, it requires Boroughs to draw on the housing benchmarks in developing their LDF 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 consider that the housing target should not be treated as a maximum and the policy should expressly state that the Council will seek to meet and exceed the London Plan housing target.
- 3.5 **Table 3.1 and Figure 3.1 (Alt 31 and 32)** – We note that the Council proposes to identify growth areas and areas of change on a single map. However, there are discrepancies in the table provided in the consultation document at page 36 and in Appendix 1 of the consultation document at page 41. We request that a clearer plan is produced for further comment. In terms of Table 3.1, whilst we support the principle of identifying a broad capacity for housing in each of the Growth Area, we are concerned that the location and Figure 3.1 do not correspond. This is particularly relevant to our client's interest, the Bittern Place site, as it is located in Wood Green Metropolitan Town Centre and in Haringey Heartland.

- 3.6 We consider that the broad distribution of new housing should be identified as a minimum so that development sites' capacity can be maximised through the Site Allocations document to deliver housing which will exceed the London Plan's requirements.
- 3.7 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 3.1 once evidence base for this table is made available.
- 3.8 The Strategic Policies designate Local Employment Areas (LEA) which include the "Regeneration Area" category, where a mixed use development including residential uses will be permitted. It should be noted that regeneration of an industrial area is costly, and residential development is needed to deliver a viable regeneration scheme. The 2015 London Plan Policy 3.3 states that Boroughs should identify and seek to enable additional development capacity, particularly the potential to realise brownfield housing capacity to supplement the housing targets through, inter alia, intensification areas and mixed use redevelopment. We therefore consider that mixed use development in the Regeneration Area of the LEA is part of the overall requirement Haringey's housing requirements, as set out in Haringey's Strategic Policy SP1 and Table 3.1. We consider that this approach will contribute to effectively securing housing development to meet and exceed the housing requirements.
- 3.9 **Policy SP2 (ref: Alt 48 and 49)** – Criterion 2 requires "compliance" with 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). We object to this criterion as the SPGs and the Mayor's standards should be treated as a "guide" rather than a requirement. We consider that the criterion as currently drafted goes beyond the purpose of non-statutory guidance. We request that this should be amended as "is designed having regard to" rather than "complies".
- 3.10 We note that Criteria 5 and 6 have amended the affordable housing requirement, based on the viability assessment. The Council's 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 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.
- 3.11 Furthermore, it should also be recognised that under national policy, where a vacant building is demolished to be replaced by a new building, the developer should be offered a financial credit when the local planning authority calculates any affordable housing contribution which will be sought.
- 3.12 **Paragraph 3.2.6 (Alt 55)** – The Council's housing trajectory at Appendix 2 has no evidence base to understand how the trajectory and 5-year rolling housing supply are delivered, as it does not appear to be based on the most recent Annual Monitoring Report published in July 2014. Therefore, we request an opportunity to comment once further evidence for the trajectory is published, as it is not clear whether the trajectory demonstrates sufficient capacity to exceed the Borough's objectively assessed need and its strategic housing requirement.

4 SITE ALLOCATION SA23 – THE GUILLEMOT PLACE SITE

PROPOSED SITE ALLOCATION

- 4.1 The Site Allocation document allocates the Guillemot Place site, together with the adjoining government office, as “Wood Green Cultural Quarter (North)” under SA23. The proposed site allocation is for the *“enhancement of the cultural quarter including creation of a new north/south link between Clarendon Road and Wood Green Common”*.
- 4.2 We support the principle of the allocation of the site for future redevelopment, which is consistent with Haringey’s Strategic Policies for the Haringey Heartland area as a Growth Area. However, it is considered that the proposed site allocation does not expressly allocate the site for the delivery of redevelopment as it only refers to the enhancement of the existing cultural quarter and the provision of a new north/south link. It should be noted that the site is within the strategic growth area and a Regeneration Area of the Local Employment Area (‘LEA’). 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.
- 4.3 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 draft Development Management Policy DM16 (A) states that *“proposals for new housing will be supported and directed to sites allocated for residential development including mixed use residential development within the Site Allocations Local Plan”*.
- 4.4 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 3.25 of the Preferred Options 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 DM2 specifically refers to Haringey Growth Areas and Areas of Change as being suitable locations for future student accommodation, where required. The policy states that provision of further student accommodation will be supported as part of new major development schemes these locations. As the site’s redevelopment is a long term opportunity, we consider it appropriate to include student accommodation in the allocation, in line with Policy DM2.
- 4.5 We consider that the reference to a mixed use to include residential use and/or student accommodation, is necessary to ensure sufficient flexibility and viability in order to secure a deliverable regeneration scheme for this site.
- 4.6 The site specific allocation Map for SA23 should be amended to ensure that there is no overlap between different ownerships in the other allocated site. Specifically, the eastern boundary of SA23 appears to include a small section of the adjoining ownership allocated within SA25. We request that allocation maps are amended to reflect the correct ownership boundaries in each site allocation.

SITE REQUIREMENTS

- 4.7 Our representations on the site requirements are set out as follows:
- 4.8 **The first bullet point (principle of redevelopment):** We support the principle of the redevelopment of the site as a long term opportunity. We agree that the existing buildings at Guillemot Place are of limited architectural quality, and the redevelopment of the site is necessary to increase the development capacity of the site (to meet the strategic development needs), and to contribute to the regeneration of the site and the wider area.
- 4.9 **The second bullet point (pedestrian and cycle link):** The requirement is ambiguous whether “an extension” of Clarendon Road is an aspiration to be provided in the form of an extended “road” or a “pedestrian/cycle link,” (although it is assumed that it is meant as a latter based on the first bullet point under the development guideline stating that Clarendon Road will be extended as a pedestrian and cycle link). We strongly object to the provision of a road through the allocated site, as it is in separate ownerships, and such a requirement would seriously undermine the viability of the future redevelopment opportunity, 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 consider that such an onerous requirement, which is unnecessary and unlikely to be feasible or deliverable, should not be included in the allocation as a policy requirement, as it would threaten the future redevelopment opportunity.
- 4.10 Whilst we support an aspiration to create a pedestrian/cycle link through the site, it may not be feasible to deliver such a pedestrian/cycle link in terms of 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. Therefore, such an aspiration should not be identified as a “requirement,” and we request that this is identified as *“an opportunity, where practically feasible, subject to viability”*. As such, this should be listed as an opportunity rather than a site requirement.
- 4.11 Furthermore, such a pedestrian/cycle link will be for the benefit of the wider public and the regeneration of Haringey Heartland/Wood Green, 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 future Wood Green Area Action Plan, for including in the Council’s Infrastructure Delivery Plan, and the Regulation 123 list, to secure the delivery of the provision.
- 4.12 As a matter of principle, the reference to “a link” should be amended to specify that it is for pedestrian and cyclists.
- 4.13 **The third bullet point (tall buildings):** In general, we support the principle of tall buildings on the site. However, we object to the wording of the policy which limits the height of the building to 8 storeys. The site’s strategic designation is for growth and intensification, and the consented Clarendon Site redevelopment scheme established the principle of tall buildings in the area. In order to increase the development capacity by making efficient use of the site, and to ensure

viability, it is necessary to provide taller buildings subject to design and assessment of key views. Therefore, a site allocation policy should not look to place a restriction on building heights.

- 4.14 It is noted that Haringey's Urban Character Study (2015) ('UCS') identifies that there is an opportunity to substantially increase the general building height in Haringey Heartland, as part of intensification and regeneration plans. However, 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 railway embankment when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. The USC's recommendation, which is reflected in the draft allocation SA23, will significantly constrain the redevelopment opportunity of the area, particularly the strategic objective to intensify and to increase the development capacity for growth.
- 4.15 It should also be noted that the site is already surrounded by 3-5 storey existing buildings. Therefore, the restriction of the height up to 8 storeys may not be considered to maximise the site's potential, and could unnecessarily prejudices the future redevelopment opportunity.
- 4.16 Therefore, we consider that the height restriction is contrary to the NPPF, which seeks to ensure sufficient flexibility, and the general heights should be identified as a guide, rather than a requirement.
- 4.17 **The fourth bullet point (design and layout):** We agree that there is an opportunity to enhance the public realm of Haringey Heartland in general. However, as drafted, it is considered too prescriptive to "require" active frontages on to all sites of Clarendon Road, as it would depend on the design, land uses, and adjoining developments. This point therefore should be identified as an opportunity rather than a site requirement.
- 4.18 **The fifth bullet point (employment generating uses):** We agree that it is appropriate to provide some types of employment generating uses and active frontages on the ground floor of the site. However, as drafted, it should not be identified as a site requirement, as the detailed form, design and layout of the site, should be considered by the applicants. This point should be amended, and stated as a guide rather than a site requirement.
- 4.19 **The sixth bullet point (employment floorspace target):** We object to the criterion setting a target of 33% employment floor space as part of mixed use redevelopment, as there is no evidence demonstrating that this percentage target is necessary to meet the strategic growth and LES objectives. Such a target would undermine the viability and deliverability of a mixed use regeneration scheme. Depending on the mix and the quantum of the development, it may not be feasible or viable to provide 33% of the floorspace as employment floorspace. Furthermore, a target based on a percentage of floorspace does not take account of type and quality of employment generating uses. The target based on a percentage of floorspace is not properly justified by evidence, and when considering a viability of the site's redevelopment options and mix of uses, such a policy requirement will be a barrier for site owners/developers to promote their sites for redevelopment.

- 4.20 Furthermore, we consider that the requirement for the provision of “employment floorspace” does not provide sufficient flexibility. 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.
- 4.21 **The seventh bullet point (enhancement of cultural quarter):** Given that there are other aspirations such as the improvement of the public realm is also identified as a “requirement” to contribute to the enhancement of the cultural quarter. We are concerned with a number of “requirements” for the improvement and enhancement of the cultural quarter, as such combined requirements will inevitably affect the developer’s viability to deliver a regeneration scheme. It should be noted that redevelopment comprising cultural uses which generally have lower commercial value, such as artist studios/workspace, is unlikely to make a regeneration scheme viable on previously developed land, where costs associated with redevelopment is generally high, and the Mayor and the Council’s CILs are already in place. In this context, residential development is necessary to ensure viability of the regeneration scheme, not least because the site is designated in an area of growth and intensification to increase a housing capacity. As such, we request that the site requirements are reviewed allow sufficient flexibility, as follows:
- “as part of mixed use redevelopment, uses that contribute to the regeneration of the cultural quarter will be supported, where appropriate, and subject to feasibility and viability.”*
- 4.22 **The eighth bullet point:** We object to the requirement to follow the principles set out in the future Council approved Masterplan for the area. This is difficult when the Masterplan has not been prepared. In addition, there appears to be no timescale or indication whether it is to be prepared as an informal Masterplan or to be incorporated in the Site Allocations. At this stage, the site allocation should not “require” the site’s redevelopment to follow the principles of a yet to be prepared Masterplan. Any aspiration, which has the potential to delay the redevelopment, should not be included in the site allocation as a requirement.
- 4.23 If the Council considers it necessary to prepare a Masterplan, it should be an informal Masterplan, and the landowners/developers should be engaged in the preparation from the early stages.
- 4.24 Additionally, on the basis that the allocated site is in two separate ownerships, we request that the allocation policy is sufficiently flexible to secure the redevelopment and regeneration of the area without delay. 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 a comprehensive redevelopment is not deliverable, due to unforeseen circumstances in the future, particularly as the allocated site is identified as long term potential.
- 4.25 **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 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.

- 4.26 We therefore strongly object to the capped rent requirement and this requirement should be deleted. Our comments on this point should be read in conjunction with our representations on the Development Management Policy DM50.

DEVELOPMENT GUIDELINES

- 4.27 **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 4.9 and 4.10 of this statement, 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 deliver the pedestrian/cycle link through the site, and if it cannot be delivered by the CIL.
- 4.28 **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. As noted above, we consider that a “road” through the allocation site as an extension to Clarendon Road is unnecessary for the success of the regeneration of the area. We therefore object to the suggested extension of Clarendon Road associated junction.
- 4.29 **The third bullet point (decentralised energy network):** It is understood that the Council is preparing further evidence on the delivery of decentralised energy networks in the Borough. In advance of the publication of this evidence, 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.
- 4.30 **Fourth bullet point (mitigation):** The guideline suggests that mitigation of and improvement to local air quality and noise pollution should be made on site. We object to this guideline as it is an onerous requirement to seek mitigation of and improvement to the development’s impact over and above the identified impact arising from the development proposals, taking into account the existing operation.

Summary

- 4.31 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. Therefore, we consider that the site should be expressly allocated for mixed use development to include residential development, which will be a fundamental component to facilitate the regeneration of the site, and is in line with the London Plan and the Council's strategic growth and intensification objectives.
- 4.32 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.

5 SITES SPECIFIC POLICY SITE ALLOCATION SA26– THE BITTERN PLACE SITE

PROPOSED SITE ALLOCATION

- 5.1 The Site Allocation document allocates the Bittern Place site, together with the Iceland Supermarket site and vacant land on the western side of Brook Road, as “Clarendon Square Gateway” under SA26. The proposed site allocation is for the *“creation of a new link between Wood Green and Clarendon Square. Mixed use redevelopment of existing buildings to create a legible streetscape along this link.”*
- 5.2 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. However, the focus of the allocation should be the delivery of an appropriate mixed use development to maximise the site’s development potential, thereby contributing to the regeneration of the wider area. 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 uses, including residential development, which contribute to the strategic development needs, should be considered appropriate for this allocation site.
- 5.3 Furthermore, it is considered necessary to allocate the site for mixed use development to include residential use, to be consistent with the draft Development Management Policy DM16 (A) which states that *“proposals for new housing will be supported and directed to sites allocated for residential development including mixed use residential development within the Site Allocations Local Plan”*. Therefore, to ensure the effectiveness of the Local Plan as a whole, the site allocation document should expressly allocate the site for mixed use residential development to ensure that a viable and deliverable redevelopment scheme is secured.
- 5.4 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 3.25 of the Preferred Options 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 DM2 specifically refers to Haringey Growth Areas and Areas of Change as being suitable locations for future student accommodation, where required. The policy states that provision of further student accommodation will be supported as part of new major development schemes these locations. As the site’s redevelopment is a long term opportunity, we consider appropriate to include student accommodation in the allocation, in line with Policy DM2.
- 5.5 We consider that a pedestrian/cycle link between Wood Green and Clarendon Square could utilise existing Brook Road, rather than create a “new” link, particularly in the event that the individual plots in different ownership come forward independently. The provision of a new link will take up a significant proportion of the development site, which could affect the development viability, affecting the deliverability. Matters associated with the delivery of, and funding for, such a pedestrian/cycle link are addressed in our representations below on the site requirement.

5.6 Accordingly, the site should be allocated as follows:

“Mixed use redevelopment (residential and/or student accommodation) and employment generating uses, including town centre uses) of existing buildings, and the provision of a pedestrian/cycle link between Wood Green and Clarendon Square, with a legible streetscape through utilising the existing road or the provision a new pedestrian/cycle link, subject to feasibility and viability.”

SITE REQUIREMENTS

- 5.7 **The first bullet point (principle of redevelopment):** We agree that the existing buildings at Bittern Place are of limited architectural value, and when the opportunity arises in the future (during the Plan period), they should be demolished for redevelopment.
- 5.8 **The second bullet point (Avenue):** Whilst we do not necessarily object to the aspiration to provide an avenue connecting Wood Green and Clarendon Square, we are concerned with the deliverability of such an avenue, as currently shown on the proposed allocation plan, cuts through the Bittern Place site. A pedestrian/cycle link of this kind is not necessary to serve the allocated development site, rather it will serve the wider regeneration of the area. Therefore, this should not be identified as a requirement and its provision should be secured subject to feasibility and viability.
- 5.9 We understand from the diagram on page 38 of the consultation document, the Council’s aspiration is to provide a cycle network within Wood Green. The reference to the “avenue” is ambiguous, and it is subject to interpretation. We would request that the avenue is amended to clarify that it is a pedestrian/cycle avenue.
- 5.10 With regard to the layout and design of site in relation to the avenue, we are concerned with the requirements under the **5th and 6th bullets points**, as they prescribe the form of the development and the east and west linkage (i.e. the avenue). We consider that it is premature and unnecessary to prescribe the form of the development, and fundamentally, the policy does not allow sufficient flexibility. We therefore object to these requirements.
- 5.11 In terms of the delivery and funding of the avenue (pedestrian and cycle link), such provision will be for the benefit of the wider public and the regeneration of Haringey Heartland/Wood Green, 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 future Wood Green Area Action Plan, for including in the Council’s Infrastructure Delivery Plan, and the Regulation 123 list, to secure the delivery of the provision.
- 5.12 **The third bullet point (height):** In general, we support the principle of tall buildings on the site. However, we object to the wording of the policy which limits the height of the building to 7 storeys. The site’s strategic designation is for growth and intensification, and the consented Clarendon Site redevelopment scheme established the principle of tall buildings in the area. In order to increase the development capacity by making efficient use of the site, and to ensure viability, it is

necessary to provide taller buildings subject to design and assessment of key views. Therefore, a site allocation policy should not look to place a restriction on building heights.

- 5.13 It is noted that Haringey's Urban Character Study (2015) ('UCS') identifies that there is an opportunity to substantially increase the general building height in Haringey Heartland, as part of intensification and regeneration plans. However, 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 railway embankment when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. The USC's recommendation, which is reflected in the draft allocation SA23, will significantly constrain the redevelopment opportunity of the area, particularly the strategic objective to intensify and to increase the development capacity for growth.
- 5.14 It should also be noted that the site is already surrounded by 3-5 storey existing buildings. Therefore, the restriction of the height up to 7 storeys may not be considered to maximise the site's potential, and could unnecessarily prejudices the future redevelopment opportunity.
- 5.15 Therefore, we consider that the height restriction is contrary to the NPPF, which seeks to ensure sufficient flexibility, and the general heights should be identified as a guide, rather than a requirement.
- 5.16 **The forth bullet point (employment floorspace):** It requires that uses on the ground floor of this site should be employment generating, either B1a or B1c. In addition, there will be a target of 33% employment floor space for this site. Having reviewed the published evidence base documents, these requirements are not sufficiently justified and have potential to undermine the redevelopment potential, particularly in the context of the site being brownfield and its location within the Metropolitan Town Centre. Appropriate employment generating uses and their quantum should be brought forward as part of a mixed use redevelopment scheme, subject to market signals at the time, to ensure that the redevelopment of the site is deliverable.
- 5.17 **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 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.
- 5.18 We therefore strongly object to the capped rent requirement and this requirement should be deleted. Our comments on this point should be read in conjunction with our representations on the Development Management Policy DM50.

DEVELOPMENT GUIDELINE

- 5.19 **The first bullet point (height):** The guideline states that height will be restricted where they back onto the residential properties. The wording goes beyond the purpose of a guideline and it does not effectively protect the residential amenity. We request that this guideline is amended as follows:

“Height of new buildings where they back onto the residential properties on Hornsey Park Road should be considered carefully to respect their residential amenity.”

- 5.20 **The second bullet point (avenue):** Please refer to our concern expressed at paragraph 5.9 in relation to the design of the avenue.
- 5.21 **The fourth bullet point (decentralised energy network):** It is understood that the Council is preparing further evidence on the delivery of decentralised energy networks in the Borough. In advance of the publication of this evidence, 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.
- 5.22 **The fifth point (air quality and noise pollution):** The guideline suggests that mitigation of and improvement to local air quality and noise pollution should be made on site. We object to this guideline as it is an onerous requirement to seek mitigation of and improvement to the development’s impact over and above the identified impact arising from the development proposals, taking into account the existing operation

Summary

- 5.23 Overall, we support the allocation of the site for a future redevelopment opportunity, as we consider that the site is a sustainable location to deliver the Borough’s development needs, particularly housing.
- 5.24 However, we consider that the site should be expressly allocated for mixed use development to include residential development and employment generating uses, which will be a fundamental component of the mix to facilitate the regeneration of the site, and is in line with the London Plan and the Council’s strategic growth and intensification objectives.
- 5.25 The site’s redevelopment opportunity, particularly on previously developed land, should not be affected 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.

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 Policies ('DMP') 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 development management policies should be sufficiently flexible to 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:

REPRESENTATIONS ON THE DEVELOPMENT MANAGEMENT POLICIES

6.5 **Policy DM3 and Paragraphs 2.20-2.23 (Privacy and Overlooking):** We consider that it is unnecessary to prescribe a privacy distance and design to make the policy effective as currently worded in Policy DM3 and supporting paragraphs 2.20-2.23. As there is detailed design guidance on housing contained within the Mayor's Housing SPD, and the DMP Policy DM18 (A) seeks to protect the privacy and amenity of neighbouring uses, we consider that Policy DM3 is unnecessary.

6.6 **Policy DM4 (Public Art):** We object to the policy requiring major development proposals to consider how the scheme can contribute to public art. The online national planning practice guidance advises that public art is not necessary to make a development acceptable in planning terms. Whilst opportunities for public art may be considered as part of the public realm, where appropriate and viable, it should not be expressed as a policy requirement for major development proposals to consider *"how they contribute to public art"*. We therefore request that this policy is deleted.

- 6.7 **Policy DM5 (Siting and Design of Tall Buildings) and Map 2.2:** We object to Criterion A which states that tall buildings will only be acceptable in areas identified on Map 2.2. As stated in our representations on the Site Allocations SA23 and SA26, we are concerned that in Haringey Heartland, tall buildings are only acceptable along the railway line (where there is limited development opportunity) and Cobourg Road.
- 6.8 The strategic designation for Haringey Heartland/Wood Green is for growth and intensification. In order to increase the development capacity on brownfield land and to ensure development viability in Haringey Heartland, the policy should not look to restrict building heights. The restriction on tall buildings without a proper consideration of design and assessment key views within the growth and intensification areas would undermine the opportunity to increase development capacity, which in turn affects the regeneration opportunity.
- 6.9 It is noted that Haringey's Urban Character Study (2015) ('UCS') identifies that there is an opportunity to substantially increase the general building height in Haringey Heartland, as part of intensification and regeneration plans. However, 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. The USC's recommendation, which is reflected in Map 2.2, will significantly constrain the redevelopment opportunity of the area, particularly the strategic objective to intensify and to increase the development capacity for growth.
- 6.10 Therefore, we consider that the height restriction is contrary to the NPPF, which seeks to ensure sufficient flexibility. In general, tall buildings should be acceptable in Haringey Heartland/Wood Green, and the policy should not look to restrict heights as a requirement.
- 6.11 **Policy DM16 (Housing Supply):** We support Policy DM16 (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 SA23 and SA26, to include residential use.
- 6.12 **Policy DM19 (Affordable Housing):** Criterion A refers to the borough-wide target of 40% affordable housing provision. 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.
- 6.13 Criterion D requires that in negotiating the level of affordable housing provision, viability assessments must be based on a standard residual valuation approach with the benchmark land value taken as the existing/alternative use value. We consider that it is too prescriptive to define the methodology of viability assessments, as it should be considered on a case by case basis, based on RICS Professional Guidance on "Financial Viability in Planning." This criterion should therefore be amended to:

“The Council will agree the site specific methodology to be used for affordable housing economic viability assessment with the developers.”

- 6.14 **Policy DM21 (Specialist Housing):** Criterion C supports student accommodation to be delivered as part of new major development schemes in Haringey Growth Areas and Areas of Change, 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.
- 6.15 Criterion D sets our criteria based assessment for proposals for student accommodation. We object to criterion e as it is considered onerous to require all student accommodation proposals to be made available for occupation by members of a specified educational institution(s). We therefore request that this criterion is removed.
- 6.16 **Policy DM26 (Open Space):** Criterion B requires all residential developments in Areas of Open Space Deficiency and in wards which fall below the Borough-wide target of open space to provide new open space and/or make financial contributions to enable the provision of new open spaces or improvements to the accessibility and quality of existing open space. In this regard, it should be noted that the Government advises that the Community Infrastructure Levy should be the principal means of funding infrastructure. As such, contributions should only be sought relative to site specific mitigation and infrastructure requirements directly arising from the development. Therefore, Criterion B should be amended to make it in line with national policy and guidance.
- 6.17 **Policy DM27 (Green Grid):** Criterion B seeks contributions towards the provision or improvement to pedestrian and cycle linkages between sites within the Green Grid and other open spaces. This requirement is not an on-site requirement. Developers should not be required to contribute to off-site pedestrian and cycle linkages, particularly development schemes facilitate a route through the site (by incorporating a route within the development scheme). This is a significant issue, as cumulative obligations would undermine development viability. Furthermore, the Council’s current Regulations 123 list includes improved Greenway cycle and pedestrian routes. Therefore, the enhancement of the existing borough-wide pedestrian and cycle linkages and future aspirations to provide a new pedestrian and cycle network in the Haringey Heartland and Wood Green (as referred to in the draft Site Allocation) should be included in the Regulations 123 to facilitate the delivery and necessary funding. Criterion B should therefore be amended.
- 6.18 **Policy DM48 (Safeguarding Employment Land and Sites):** We consider that this policy is a duplication of Policy SP8, and is unnecessary to be repeated in the Development Management Policies document.
- 6.19 **Policy DM49 (Maximising the use of employment land and sites):** Criteria A and A(b) require all new development within designated employment areas to achieve the maximum amount of employment floorspace reasonably possible on sites. This requirement is ambiguous and is 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 relationship with other uses proposed within a mixed use development. We therefore object to this requirement as currently worded.

- 6.20 Criterion A (B) seeks to ensure an adequate separation of uses, particularly where new residential floorspace is introduced as part of a mixed use scheme. 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, and it is not in line with the NPPF which requires Local Plan policies to be flexible.
- 6.21 **Policy DM50 (Facilitating Site Regeneration and Renewal):** Whilst the policy supports proposals for mixed use redevelopment on sites where it is necessary to facilitate renewal and regeneration (including intensification) of existing employment land and floorspace, the criteria based requirements set out in the policy are unreasonably restrictive. Particularly, in relation to sites allocated for mixed use redevelopment/regeneration in the Site Allocation document, it is unnecessary and onerous to demonstrate and justify the principle of mixed use development. The mixed use regeneration site should not also be expected to provide “maximum amount of employment floorspace”, as it is ambiguous and impractical as set out in our representations on Policy 49 at paragraph 6.17 of this Statement.
- 6.22 In addition, with regard to criterion (d) there should be no requirement to provide a proportion of the employment floorspace as “affordable workspace” without providing the definition of affordable workspace or taking into account development viability. As no supporting justifications or evidence quoted as to what this proportion should be, we object to this policy criterion. It should be noted that both cost and size are the primary variables when considering the definition of “affordable workspace”. These factors are influenced by the type of workspace to be provided which is ultimately related to the end occupant that the space is marketed towards. Therefore, this policy requirement is unworkable in terms of an assessment of economic viability of mixed use redevelopment schemes.
- 6.23 Furthermore, we strongly object to paragraph 5.19 which states that *“the Council will expect that development which is enabled through a mixed use scheme contributes to the provision of affordable workspace in perpetuity”*, and that *“the Council will use planning conditions to ensure rental value increases are kept below the level of inflation on commercial floorspace.”*
- 6.24 Seeking the provision of non-defined “affordable workspace” “in perpetuity” is a fundamental concern, as this requirement is too onerous for development proposals and will undermine the viability and deliverability of mixed use redevelopment schemes to the detriment of the Local Plan’s strategy and objectives. In terms of the use of planning conditions to keep the level of rental value increases below the level of inflation of commercial floorspace, there are a number of practical issues associated with the approach, as the market conditions and economic trends will change over time, and there is no practical mean to set the frequency of rental reviews. Fundamentally, the use of planning conditions to control the level of commercial rental value does not meet the tests of the use of planning conditions as set out in the NPPF and its practice guidance.
- 6.25 As currently drafted, and in the absence of any definition of affordable workspace, we request that criterion d and paragraph 5.19 should be deleted as it would undermine the economic viability of mixed use regeneration sites.

- 6.26 We therefore strongly object to Policy DM50 as it does not encourage inward investment towards renewal and regeneration of existing employment land, particularly in Haringey Heartland/Wood Green. This policy would seriously undermine the Council's regeneration and growth objectives.
- 6.27 **Policy DM52 (Loss of employment land and floorspace):** The wording of the policy suggests that sites allocated for mixed use redevelopment (including employment generating uses) which involve the demolition of existing employment floorspace may be required to satisfy all of the criteria to justify the loss of existing employment floorspace to alternative employment generating uses. As the definition of employment uses referred to in this policy is not defined in the policy, we reserve our right to comment further on this policy, once the "employment uses" to which this policy refers are defined.

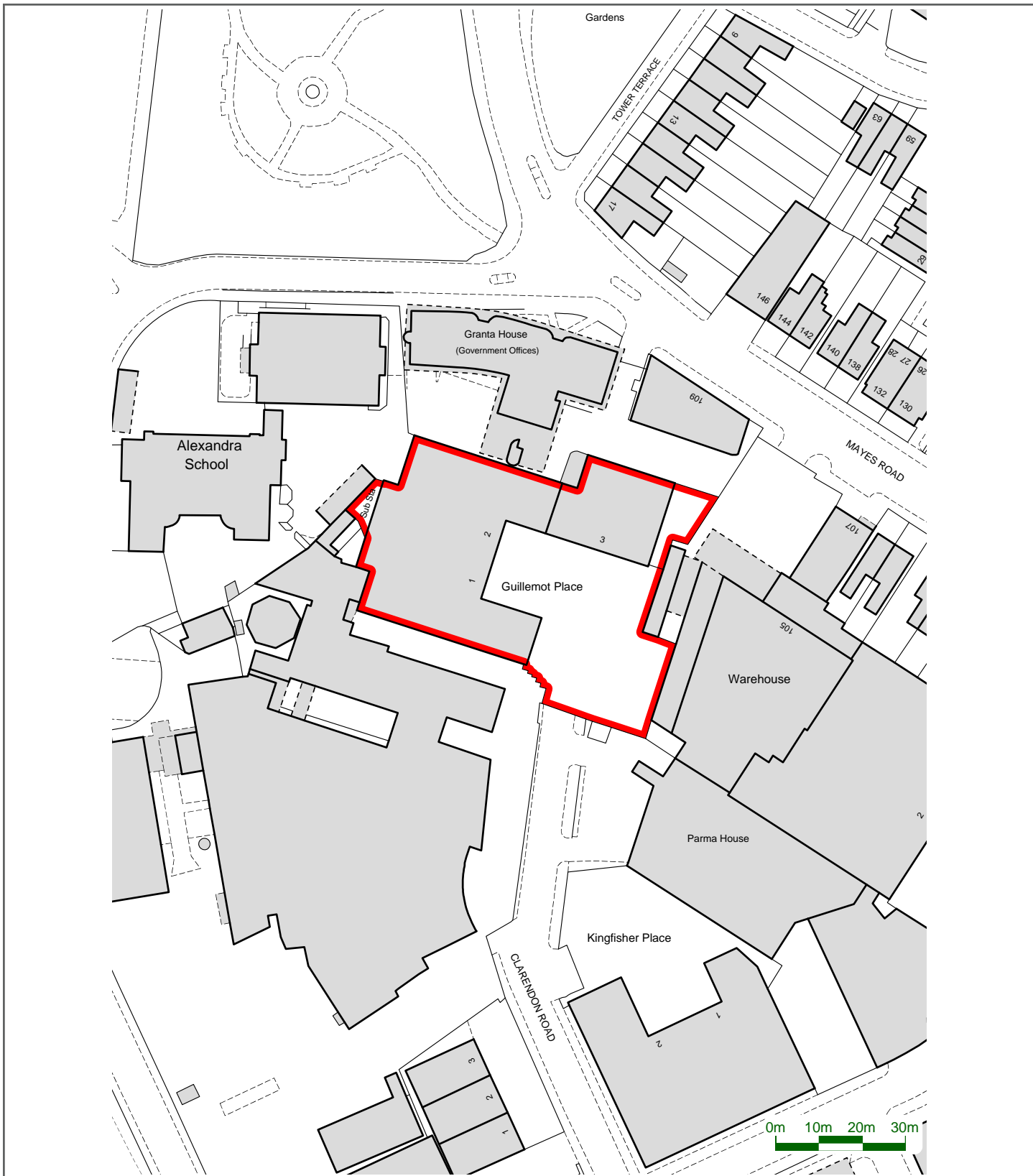
7 CONCLUSION

- 7.1 These representations are submitted on behalf of LaSalle Investment Management.
- 7.2 LIM 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 recently 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 SA23 and SA26. However, as we have set out in these representations, we have a number of concerns with the policies as drafted. The draft allocations should specifically allocated both sites for mixed use redevelopment, including residential use and/or student accommodation, 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, as currently drafted, contains a number of policy standards and requirements which are considered to be 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 to the draft policies that we consider are required to ensure viable and deliverable development are taken into account in the next stage of the consultation documents.
- 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. LIM 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 Plans





SITE LOCATION PLAN

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



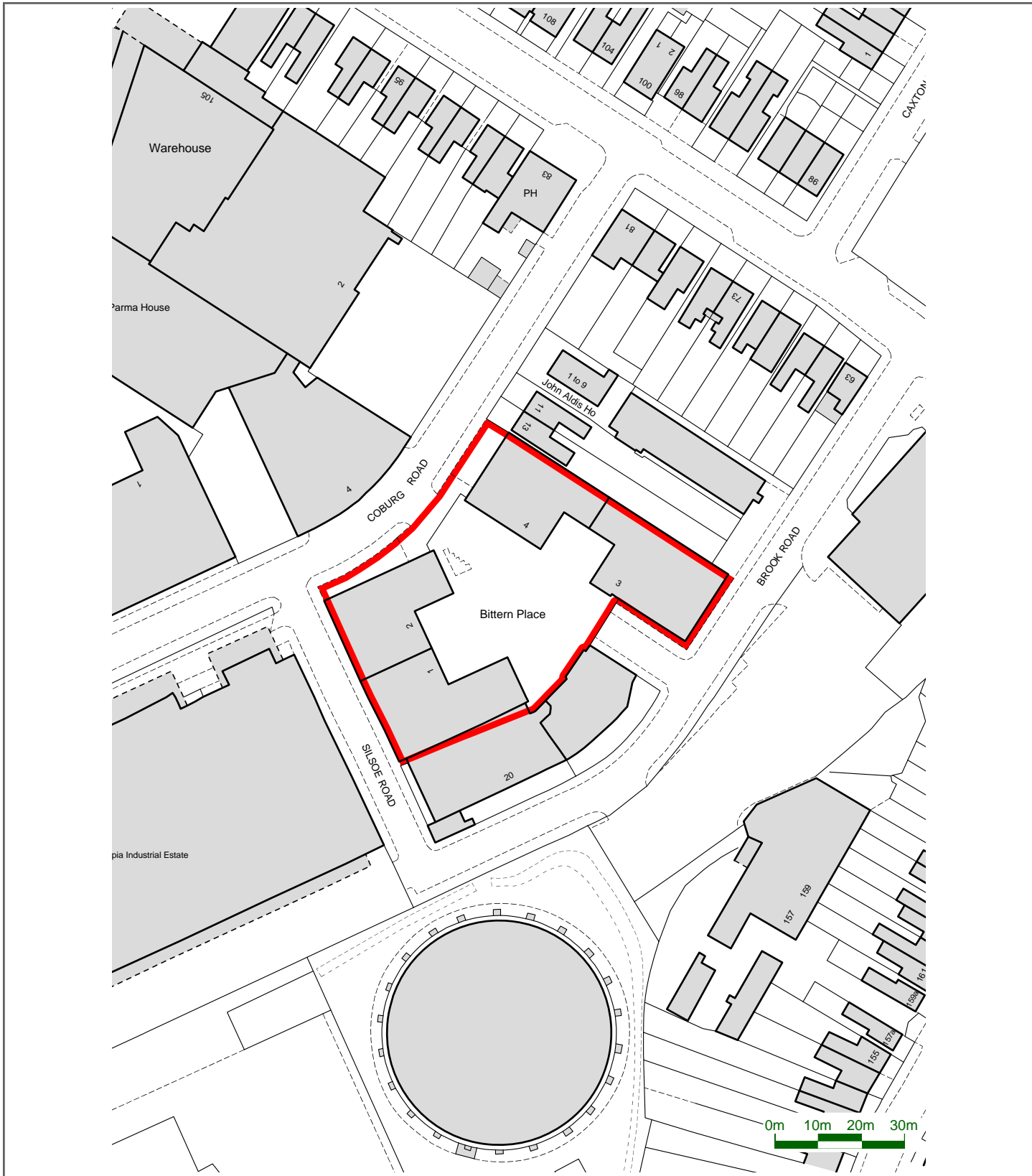
Scale @ A4 : 1:1250

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

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SITE LOCATION PLAN

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



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