

Hearing Statement for
Rapleys LLP (Miss Wakako Hirose) on behalf of
LaSalle Investment Management (Representor ID. 16)

**HARINGEY DEVELOPMENT
MANAGEMENT POLICIES DM3,
DM6, DM38 EXAMINATION
MATTERS 1, 2 AND 3
ISSUES 2, 4, 16 & 17**

29 July 2016

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

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1 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of LaSalle Investment Management ('LaSalle') in response to the Inspector's Matters 1, 2 and 3.
- 1.2 Our client represents the long leasehold owner of the Guillemot Place site and the Bittern Place site, both of which are allocated for development in Wood Green/Heartlands in the Site Allocations document, to which this Statement relates. LaSalle is committed to the ongoing promotion of the sites' mid to long term redevelopment potential, and wishes to ensure that the redevelopment of the sites is viable and deliverable.
- 1.3 In this statement we provide our response to the Inspector's Matters per policy, including the Inspector's specific questions for policy.

2 ISSUE 2 POLICY DM 3 (PART B) - PUBLIC REALM, PRIVATELY OWNED SPACES

- 2.1 We maintain our objection that the requirement for the management of new privately owned public spaces, including their use and public access, to be agreed by the Council. The management of privately owned spaces whether publicly accessible or not are the responsibility of landowners, and it is not a matter for the Council to exercise control beyond assessing the design and quality of new public spaces created by development through the planning application process. Therefore, this requirement is unjustified and unsound.

3 ISSUE 4 POLICY DM6 (PART B) - BUILDING HEIGHTS, COMMUNITY BENEFIT

- 3.1 We maintain our objection to the policy requiring justification for taller buildings in association with community benefit. This requirement is not defined, or justified, and as such, it does not provide a clear indication of what the applicant would need to demonstrate to satisfy this requirement of how a decision maker should react.

4 ISSUES 16 AND 17 POLICY DM38 - EMPLOYMENT-LED REGENERATION

- 4.1 We maintain our objection to the policy, as stated in our previous representations. Whilst Policy DM38 supports mixed use development in a Local Employment Area ('LEA') - Regeneration Area, it is subject to the applicant demonstrating that it is necessary to facilitate site renewal and regeneration, and satisfying a number of detailed criteria. The Council is preparing an Area Action Plan for Wood Green ('AAP'), which is intended to provide the details of the strategic designation of the area as a Growth Area. In the absence of an AAP at this stage, we question whether the detailed and prescriptive nature of the policy requirements for allocated mixed use development sites, as currently drafted, are appropriate and help facilitate sites' regeneration and renewal in the future. Until the preparation of the AAP advances and a comprehensive overall vision and plan is available, the policy framework for sites allocated for mixed use development should be flexible.
- 4.2 We consider that the requirements of Policy DM38 are particularly onerous and unnecessary for the allocated sites in Haringey Heartlands/Wood Green. The principle of mixed use development in the LEA- Regeneration Area and allocated sites is already established in Policy SP8, which does not require any justification as it states that a Regeneration Area "can include uses appropriate in mixed use development such as small scale walk-to retail, community and residential." Wood Green is designated as an Intensification Area in the London Plan (2015) and the Growth Area in the Alterations to Strategic Policies, both of which seek to optimise residential and non-residential output through high density development. In the context of this strategic policy framework, it is understood that the Guillemot Place and the Bittern Place sites allocated for mixed use development under SA18

and SA21 of the Site Allocations document, and therefore no justification should be required for the principle of mixed use development on allocated sites.

- 4.3 The Strategic Policies' objective for Haringey Heartlands/Wood Green is to increase the area's capacity to accommodate growth in terms of the number of jobs and homes as part of an intensive mixed use redevelopment. The Strategic Policies also state that it will be important for a flexible approach to economic development to be taken on LEAs by not placing significant restrictions on the type of employment use that is permitted on allocated sites. The policy DM38 seeks "employment and business floorspace" as part of sites' renewal and regeneration, which could be interpreted as B class uses only, as no definition of "employment and business floorspace" is provided in the policy or supporting text. A broader range of economic development which creates jobs but do not fall within B Class uses would also contribute to the Strategic Objectives for the LEA - Regeneration Area. Therefore, Policy DM38 is not sufficiently flexible to facilitate the allocated sites' renewal and regeneration through mixed use development.

5 CONCLUSION

- 5.1 We considered that the above policies do not meet the tests of soundness, as they are not justified or sufficiently flexible to ensure that the London Plan's strategic objective relative to the Area of Intensification and the Borough's strategic objective for the Wood Green Growth Area are met through the delivery of the allocated sites' renewal and regeneration.
- 5.2 We wish to participate in the discussion of these policies at the forthcoming hearing sessions.