
Examination in Public
LB Haringey Site Allocations DPD

Matter 2 – General Issues for Development Sites
Matter 3 – Site Specific Issues

Prepared by Barton Willmore LLP on behalf of Workspace

July 2016

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1.0 OVERVIEW

1.1 This Written Statement has been prepared on behalf of Workspace (Representor Reference 9) in respect of Matters 2 and 3 of the Inspector's Draft Matters and Issues for Examination of the London Borough of Haringey's Site Allocations DPD.

1.2 This Statement has been prepared with due regard to the tests of 'soundness', as set out in Paragraph 182 of the National Planning Policy Framework ('NPPF'), namely:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

1.3 The detail contained within our representation dated 3 March 2016 provides an assessment of how the relevant site allocations respond to the 'soundness' tests outlined above. We do not seek to repeat that assessment within this Statement.

1.4 In accordance with the Inspector's Guidance Notes, this Statement responds only to the matters raised by the Inspector in the Draft Matters and Issues for Examination. This Statement respects the 3,000 word limit, and limits repetition from previous representations to points salient to responding to/ providing context for the matters raised.

Workspace's Land Holding

- 1.5 The Workspace land holding occupies 1.68 hectares, of which 1.35 hectares is located to the east of Western Road and 0.33 hectares is located to the west (see Land Ownership Plan provided at Appendix 1 of our representation dated 3 March 2016). The Chocolate Factory and surrounding buildings to the east of Western Road are included as part of draft Site Allocation SA19 'Wood Green Cultural Quarter (south)' along with the buildings fronting Coburg Road which fall outside of Workspace's ownership. The land to the west of Western Road referred to as 'Quicksilver Place' is not included in SA19 or any other draft site allocation.
- 1.6 Site Allocations SA18, SA19 and SA20 collectively comprise the Wood Green Cultural Quarter. Thus, whilst Workspace's land holding falls predominantly within SA19 and the main body of our comments relate to this Site Allocation, Site Allocations SA18 and SA20 are also relevant and will be commented upon where appropriate.

2.0 MATTER 2 – GENERAL ISSUES FOR DEVELOPMENT SITES

2.1 With respect to Matter 2, we seek to respond to Matters 2(2), 2(6), 2(7), 2(8) and 2(9).

2. How would the scale, type and distribution of the allocated sites conform to the London Plan and be consistent with the Strategic Policies (including alterations)?

2.2 The proposed alterations to the Strategic Policies DPD update it to reflect the increased housing requirements of the London Plan 2015 and growth strategy which sees Haringey Heartlands/ Wood Green identified as a 'Growth Area' where site opportunities are to be maximised. However, the Site Allocations DPD continues to express site capacity as 'indicative'. In our view, this approach is not consistent with the London Plan or proposed alterations to the Strategic Policies DPD and is not sufficiently positive to satisfy the NPPF. The capacity of the site allocations should be expressed as 'minimum' with the allocations positively worded to encourage growth and optimisation of the sites.

2.3 For Site Allocations SA18, SA19 and SA20, the Site Allocations DPD aims for employment-led regeneration with 'some residential' to enable increases in employment floorspace. The principle of employment-led regeneration is welcomed. However, in the context of the growth strategies and housing requirements, the site allocations should not seek to limit residential to only that which can be justified on the basis of an increase in employment floorspace. The site allocations should encourage an appropriate and viable mix and balance of uses having regard to market demand.

6. Taking into account the aims of the Strategic Policies, how does the potential for loss of employment land in some of the allocations allow for the supply of employment land? Has sufficient land been identified to meet needs in the short and long term?

2.4 LB Haringey is projected in the London Plan 2015 to have the greatest increase in jobs of any London borough (29.5%). It is therefore essential to ensure that sufficient employment land in the right locations is protected and additional land allocated. The employment-led regeneration of Site Allocations SA18, SA19 and SA20 would ensure

employment provision in this area is maintained at an appropriate level and improved where feasible and viable.

2.5 The site allocations aim to increase employment floorspace and job creation. This implies that the quantum of employment floorspace and job density should both increase. This is particularly onerous. Aiming for an increase in the quality of employment floorspace and density of jobs would ensure that both quantitative and qualitative enhancements were delivered.

2.6 Workspace also own land at Quicksilver Place, immediately to the west of Site Allocation SA19, on the opposite side of Western Road. This land is currently in employment use and will come forward for enhanced employment provision as part of the redevelopment proposals for the Chocolate Factory and surrounding Workspace land. Quicksilver Place provides an opportunity to allocate additional land for employment uses that supports the aspirations for the Wood Green Cultural Quarter and growth strategy of the borough as a whole.

7. Can it be demonstrated that all of the site requirements and development guidelines, and the requirements of the Development Management policies have been taken into account in considering whether development of the site allocations is viable?

2.7 In our view, greater flexibility should be embedded within the site allocations to ensure viable redevelopment proposals can be developed that allow the requirements of other development plan documents and guidance to be addressed alongside site requirements and any unknown costs. Seeking limitations on 'higher value' uses such as residential only where they result in increases in employment floorspace (as proposed by SA19) may prejudice the ability of sites to come forward thus preventing improvements to employment provision and the provision of much needed new homes.

8. Are the locations identified the most appropriate when considered against all reasonable alternatives?

2.8 Site Allocation SA19 is located within the Haringey Heartland/ Wood Green 'Growth Area' where growth and site optimisation is encouraged through the London Plan and alterations to the Strategic Policies. This site is well served by public transport and is considered an appropriate location for growth.

9. The criterion on Decentralised Energy attached to many of the site allocations is not clear? Who might require land for easement? What do you mean by a potential decentralised energy network? How have you assessed the implications of this criterion on viability/deliverability? Should this say where feasible?

2.9 We agree that this element of the site allocations requires further clarification. As drafted the impact of this criterion on future redevelopment proposals is unclear and provides unnecessary uncertainty. The criterion should be omitted or amended to state that, should a decentralised energy network be developed within the area in the future, connection would be encouraged provided that this is feasible and viable.

3.0 MATTER 3 – SITE SPECIFIC ISSUES

3.1 Workspace own land within SA19. The Inspector has not raised any specific matters in respect of this Site Allocation. However, the matters raised in respect of Site Allocations SA18 and SA20 apply equally to SA19. With respect to Matter 3, we therefore seek to respond to the matters relating to Site Allocations SA18 and SA20.

SA8, SA17, SA18, SA20, SA21 – whether the site requirements and development guidelines would be onerous, preventing development from coming forward? Are they outside the applicant/ owner control and therefore not always achievable?

3.2 Redevelopment of employment sites can be complex, particularly where existing buildings are to be retained and unknown costs may be incurred as a result of a sites industrial past (such as the Chocolate Factory SA19). Viability will be key to the delivery of such redevelopment projects, thus sufficient flexibility is required within site allocations to allow viable schemes to be developed. Requirements for increases in employment floorspace and jobs, new public realm, retention and refurbishment of existing buildings, pedestrian/ cycle routes, 'capped' commercial rents and planning obligations alongside CIL payments all place burdens on development viability. When considered alongside potential land contamination and remediation works, the weight of requirements could impact delivery.

3.3 The site allocations should make clear which requirements are considered 'essential' and which are 'desirable' and that all will be considered in the context of development viability.

SA18 – can it be demonstrated that residential use should subsidise new workspace? How will this achieve the aspirations for the site which include residential in the indicative capacity?

3.4 Sites Allocations SA18, SA19 and SA20 all state that residential may be acceptable in order to facilitate the delivery of additional employment floorspace. This approach seeks to limit residential only to that required to deliver additional employment. This places a limiting factor on the ability of these site allocations to optimise their potential to deliver new homes alongside improved employment space. The sites are identified as appropriate locations for residential growth. Thus the site allocations should seek to maximise the quantum of employment floorspace and new homes and

seek an appropriate and viable mix and balance of uses to ensure delivery and the ability of the sites to respond to changing market demand and conditions.

SA20 (and many other policies) – there are numerous landowners and the site may be developed in parts, is it reasonable to expect a master plan? Who will provide the master plan?

- 3.5 Given the multiple land owners on Site Allocations SA18, SA19 and SA20, in our view, it is unreasonable to expect a master plan to be submitted for approval that covers the entire Cultural Quarter or individual site allocations. It is accepted that individual schemes should demonstrate that they would not fetter or prejudice the ability of adjacent sites to come forward in the future. An illustrative master plan may assist in this regard. However, it should not commit adjacent land to a certain form, scale or type of development and there should be no requirement for this to be formally approved by the Council.