
London Borough of Haringey

Site Allocations DPD and
Strategic Policies DPD

Pre-Submission Consultation

Written Statement

Prepared on behalf of Workspace Management Ltd

March 2016

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APPENDICES

APPENDIX 1 : SITE LOCATION PLAN

APPENDIX 2 : PRE-APPLICATION REPORT (DECEMBER 2015)

1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Workspace. Workspace owns over 100 properties in London providing 5.4 million square feet of space that is home to some 4,000 businesses employing over 30,000 people. Workspace provides business premises tailored to the needs of new and growing companies across London.
- 1.2 Workspace are the owners of the Chocolate Factory and surrounding buildings on the east and west sides of Western Road; see site location plan enclosed at **Appendix 1**. This includes the Chocolate Factory, Parma House and Quicksilver Place. The Chocolate Factory is located to the south west of Wood Green and currently offers a variety of studio and start up units for small businesses directed at artists and creative businesses. The surrounding properties within their control offer a range of employment uses to varying degrees of success in terms of employment offer and contribution towards the townscape quality of the area.
- 1.3 Workspace's land holding is located within an area known as 'Haringey Heartlands'. The wider Haringey Heartlands area is the subject of historic and emerging designations as an area for regeneration and growth to provide new homes and jobs. The designation covers a wide area from Wood Green Underground Station to Hornsey in the south with land either side of the railway. The Council are also bring forward an Area Action Plan (AAP) for Wood Green. The character of the area has been the subject of change. The Western Utility Lands (to the west of the railway) have been subject to regeneration and part of the Eastern Utility Lands (including the Gas Works site) are the subject of a planning permission (March 2012) for mixed use development including 1,080 new homes, offices, restaurant and community uses (LPA Ref: HGY/2009/0503). We understand a new application is being prepared by St William Group.
- 1.4 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. 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.

- 1.5 Pre-application discussions regarding the redevelopment of the Workspace land are on-going with the London Borough of Haringey ('LBH') and the Greater London Authority ('GLA'). The 1.68 hectares of land owned by Workspace will be the subject of a detailed planning application. Additionally, a masterplan has been prepared for the wider area which incorporates a further 1.74 hectares of land surrounding the Chocolate Factory and illustrates how this could come forward as part of a wider vision. A Pre Application Masterplan report is included at Appendix 2, The additional land is included in Site Allocation SA18 'Wood Green Cultural Quarter (north)' and as part of SA20 'Wood Green Cultural Quarter (east)' and, with the Chocolate Factory, covers the majority of the 'Wood Green Cultural Quarter'. A hybrid planning application is expected to be submitted for formal determination in late spring.
- 1.6 These representations are lodged in respect of Workspace's 1.68 hectare land holding on the east and west of Western Road. Workspace has previously submitted representations in respect of the emerging Site Allocations and Strategic Policies consultation drafts. Workspace wishes to build on the success of the Chocolate Factory and enhance the employment and residential capacity of the area. Workspace welcomes the allocation of the land for mixed use redevelopment provided that sufficient flexibility is embedded within the allocation, as outlined in this representation, to allow the development potential of the land to be optimised in accordance with adopted and emerging policies.
- 1.7 This current consultation represents the final opportunity to comment ahead of submission for Examination. In testing the soundness of a local plan, paragraph 182 of the National Planning Policy Framework ('NPPF') provides the following tests:
- **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.

2.0 SOUNDNESS TEST: POSITIVELY PREPARED

- 2.1 In accordance with the NPPF, local plans should be based on a strategy that seeks to meet objectively assessed needs. The most up to date housing and employment requirements for London are set out in the London Plan (2015). This identifies an increased annual housing requirement for Haringey of 1,502 (up from 820 houses per annum in the previous version of the London Plan, 2011) and a 29.5% increase in jobs (the greatest increase of any London borough). The requirements set out in the London Plan are expressed as minima and, furthermore, represent a constrained approach having regard to the evidence base documents. Haringey should therefore be aiming to exceed the requirements for both housing and employment provision within the borough. To achieve this, Haringey needs a positive and robust strategy for growth.
- 2.2 Workspace welcomes the alterations to the Strategic Policies DPD in response to the London Plan, including the identification of Haringey Heartlands / Wood Green as a 'Growth Area' where site opportunities are to be maximised and 13,500 dwellings are to be provided (up from 5,000 previously) (Policy SP1); the increased housing requirement for Haringey Heartlands of 2,145 dwelling per annum (expressed as a minimum) up from 1,430 (Table 2); and the classification of Wood Green as a Regeneration Area appropriate for a mix of uses (Policy SP8). However, Workspace does not consider that Site Allocation SA19 has evolved sufficiently to reflect the growth strategies of the London Plan (2015) and draft alterations to the Strategic Policies DPD.
- 2.3 To accord with the growth strategies, SA19 should seek to encourage growth and optimisation of site potential. At present SA19 seeks 'enhancement' and 'improvement' of the area. It identifies its aim as to 'increase employment uses' and that some residential will be permitted. In our view this is not sufficiently positive and forward-looking to satisfy the NPPF test. The site allocation should be updated to reflect the growth strategies. It should seek to maximise the capacity of the site and optimise its potential to deliver an increased quantum and improved quality of employment floorspace along with an increase in residential as part of a vibrant and viable mix of uses appropriate to the area. Indicative capacity should be expressed as a minimum as per the London Plan and proposed alterations to Table 2 of the Strategic Policies DPD and in acknowledgement of the significant growth required to address housing and employment needs in the area.

3.0 SOUNDNESS TEST: JUSTIFIED

- 3.1 In testing whether a plan is justified the NPPF identifies that the plan should be the most appropriate strategy when considered against reasonable alternatives and based on proportionate evidence.
- 3.2 The site allocation seeks 'comprehensive redevelopment.... for employment-led mixed use development with residential'. It goes on to clarify that a coordinated approach to development will be expected. Workspace has prepared an illustrative masterplan to demonstrate how the area could be comprehensively redeveloped and to show that the detailed proposals on Workspace land will not fetter or prejudice the redevelopment of the wider allocation and adjoining allocations (namely SA18 and SA20). Workspace welcome acknowledgement that land parcels may come forward separately provided that they are compatible and result in a coherent redevelopment. It is considered that this approach to the redevelopment of the area is justified and appropriate.
- 3.3 At present site allocation SA19 only includes land to the east of Western Road. Workspace considers that the land to the west of Western Road (Quicksilver Place) should also be included within SA19 as this land falls within the Cultural Quarter, represents an opportunity for further improvement and increase of employment floorspace and will be an integral part of the forthcoming planning application proposals on Workspace land. It would be justifiable in the context of the strategy for the regeneration and growth of the area to allocate this additional land for redevelopment as part of SA19.
- 3.4 The site allocation refers to the Wood Green Cultural Quarter and encourages 'Uses that positively support enhancement of the cultural quarter'. However, 'cultural quarter' is not defined in the document and a list of uses appropriate to a cultural quarter is not provided. Without this clarification it is not possible to say whether such uses are justified.

- 3.5 The redevelopment of the Chocolate Factory site is complex, not least as it involves the retention and refurbishment of the original Chocolate Factory building, provision of high quality public realm and remediation works owing to the site's industrial past. It is also located adjacent to a conservation area and careful consideration will need to be given to the impact on character in this regard. Owing to this, viability will be a key consideration in developing the proposals for the site. The strategy for the site should therefore provide for a mix of uses including 'higher value' uses such as residential to allow for enhanced employment provision and the site-specific requirements. In our view, the site allocation should be updated to encourage the quantum of residential and other appropriate uses required to achieve this rather than seeking to limit it to 'some residential' as currently worded.

4.0 SOUNDNESS TEST: EFFECTIVE

- 4.1 In testing whether the policy is effective, we suggest that the test is whether the wording of the site allocation is sufficiently flexible and the level of prescription appropriate to allow the site to be delivered within the timescales envisaged.
- 4.2 Whilst, in our view, the level of prescription is appropriate and assists in outlining the vision for the area, we consider that additional flexibility could be embedded within policy wording to account for, inter alia, unforeseen issues and changes to market demand. For example, we support the retention of the Chocolate Factory and Workspace is committed to securing its long-term future. There are no known structural issues with the original buildings. However, should these be discovered, it may no longer be viable or feasible to retain the building. The policy should allow for such circumstances.
- 4.3 Additionally, Workspace is committed to providing employment space where viable. Workspace has concerns with the provision of capped commercial rents both in policy SA19 and the Development Management policy DM38 (separate representations have been prepared addressing DM matters). There is no supporting evidence looking at viability and we consider that its inclusion goes beyond the spectrum of planning and would be particularly hard to enforce. It is noted that draft Policy DM38(c) (iv) gives consideration to viability when determining affordable rents. Workspace requests that at a minimum viability matters should be expressly noted in the site allocation. If LBH seek to minimise rental income, this will be to the detriment of the type employment space that Workspace deliver and would create unnecessary uncertainty.
- 4.4 Workspace supports the provision of a dedicated cycle and pedestrian crossing of Western Road as envisaged in SA19. The site allocation states that this will be secured through development contributions. Haringey has an adopted Community Infrastructure Levy ('CIL') Charging Schedule (2014) which generates funds to support the delivery of infrastructure in the borough. The updated Infrastructure Delivery Plan (2013) ('IDP') which supports the local CIL includes projects such as transport and highway safety improvements, and the 'Heartlands east-west cycle route' (see Table 4). By requiring development contributions alongside local CIL, there is a risk of 'double charging'. The Council should ensure that this does not occur. Furthermore, by expressly requiring development contributions to one item, the site allocation appears to prioritise this above any other works that may be

required. We suggest that the policy is reworded to clarify that this will be balanced against other funding priorities at the time. This recognises that priorities may change as the area evolves and allows for additional flexibility in this regard.

- 4.5 The benefit of connecting to a decentralised energy network is recognised. There is not currently a network in place within the local area. Should one become available the aspiration would be to connect to this. However, it is not considered reasonable to seek land owners to relinquish part of the site to provide an easement for such a network, nor in our view should this be necessary. We consider this element of the site allocation is overly prescriptive and should be omitted.

5.0 SOUNDNESS TEST: CONSISTENT WITH NATIONAL PLANNING POLICY

5.1 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6). Paragraph 7 of the NPPF states that the planning system has a number of roles to play in achieving sustainable development:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

5.2 In our view the proposed allocation will deliver sustainable development as defined by Paragraph 7 of the NPPF:

Economic Role

- 5.3 The London Plan 2015 identifies Wood Green as an Area for Intensification with a minimum capacity of 2,000 jobs and 1,000 homes (Policy 2.13 and Table A1.2). The draft Strategic Policies DPD classifies the area as a Regeneration Area which is defined as the most flexible of the employment categories as it seeks uses appropriate to mixed use developments. SA19 acknowledges that redevelopment of the area for a mix of uses is appropriate. It therefore provides the opportunity to bring forward development in the right place and at the right time in accordance with the NPPF.
- 5.4 In our view, the site has capacity beyond that stipulated in the site allocation which is demonstrated through the recently submitted pre-application information. As set out above, in recognition of the increased housing and employment requirements of the borough, we consider that the site allocation should be positively worded to encourage and facilitate growth in the area and optimise the potential of the site in accordance with the London Plan and amended Strategic Policies DPD.
- 5.5 Key infrastructure requirements are identified in the site allocation which is helpful provided that their provision does not place unreasonable financial burdens on the redevelopment in the context of the range of site-specific requirements and aspirations, and does not result in 'double charging' with CIL.
- 5.6 Flexibility in the uses sought on the site will be essential to ensure that development can respond to changing market and economic conditions, and that the development remains viable and can be delivered within the timescales envisaged by the site allocation. The policy should be amended to reflect this.

Social Role

- 5.7 The proposed allocation provides the opportunity to support strong, vibrant and healthy communities by identifying residential as part of the intended mixed use development. This will contribute to providing a supply of housing to meet the needs of present and future generations and the housing growth envisaged by the London Plan and Strategic Policies DPD.

- 5.8 As a mixed use allocation, it provides the opportunity to include uses that will support the needs of the new community and reduce the need to travel, including the new employment uses that create job opportunities. The balance of land uses will be key in this regard.
- 5.9 The allocation provides for the regeneration of the wider area, presenting the opportunity to create a high quality built environment for existing and future residents of the surrounding area.

Environmental Role

- 5.10 The allocation contributes to the environmental role of sustainable development by providing for the redevelopment of brownfield land and the retention of the original Chocolate Factory building. The allocation, illustrative masterplan and application provide the opportunity to review means by which to protect/ enhance the natural and historic environment, improve biodiversity, use natural resources prudently, minimise waste and pollution and adapt to climate change.

6.0 SUMMARY

6.1 Workspace supports the broad principles of redevelopment of the Chocolate Factory and surrounding buildings included in draft policy SA8. Given the existing public transport links and the likelihood of CrossRail 2 coming in the future, this is considered an important site that can provide new houses and commercial space over the next plan period. Furthermore, the site and surrounds form a significant part of the wider regeneration strategy for Wood Green and will help to deliver important new routes towards Alexandra Palace and beyond.

6.2 Workspace do, however, raise concerns with a number of elements of the draft policy as currently written and seek amendments where outlined in this representation.