

**BY EMAIL AND POST: [localplan@haringey.gov.uk](mailto:localplan@haringey.gov.uk)**

Local Plan Team  
London Borough of Haringey  
River Park House (6<sup>th</sup> Floor)  
Wood Green  
N22 8HQ

21650/A3/VB/ac  
12<sup>th</sup> January 2017

Dear Sirs

**SITE ALLOCATIONS DPD MAIN MODIFICATIONS CONSULTATION**

We write on behalf of Workspace Management Limited.

Workspace are the freehold owner of the Chocolate Factory and a number of surrounding buildings at Wood Green. This landholding forms part of the wider emerging Site Allocation SA19 Wood Green Cultural Quarter. Representations were lodged on behalf of Workspace at the Regulation 18 and 19 consultations in respect of the Site Allocations DPD. These representations were tested at the Examination and Schedule of Main Modifications have been published for comment. We lodge further representations to the proposed modifications insofar as they relate to Site Allocation SA19 Wood Green Cultural Quarter.

By way of background, Workspace have been developing proposals for land within Site Allocation SA19. Proposals are advanced, extensive Officer and public consultation has been undertaken and an application is to be lodged shortly. These representations are therefore informed by an advanced and tested scheme.

**Modification SAMod44**

This modification seeks to replace Requirement 4 with:

"The development should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability which must be assessed looking at the mix of uses and the scheme as a whole."

It is noted that this wording is common to a number of site allocations (see SAMod46, SAMod51 SAMod62), however that slightly amended wording is proposed for Site Allocation SA18 which includes reference to 'provision of affordable commercial rents', it is unclear why such a distinction would be made for this site?

The MM should also be read in the context of MM SAMod3 which identifies that any redevelopment which results in a loss of employment floorspace may result in a requirement for a financial contribution.

The wording of the MMs when taken together is to achieve no net loss and the maximum quantum of employment floorspace. This is overly restrictive in that it makes the quantum of employment floorspace the 'marker' of an acceptable scheme in policy terms. It places a burden on the allocation that could impede sustainable development and the creation of a scheme that not only responds to the needs of the local market but also the wider policy objective of creating mixed and balanced communities.

The National Planning Policy Framework paragraph 7 sets out the role for economic development in achieving sustainable development as follows:

"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."

Policy should be worded positively. There is an opportunity at SA19, and indeed other emerging allocations, to review and understand the nature of the current employment offer on the site, what is working and what is not, and what innovation is needed to respond to the existing and forecast needs of the local market. For example, are start-up units needed and would an element of affordable capped rents assist and support growth and innovation? It may be that a scheme which better meets the needs of the market results in a reduced quantum of employment space. The employment offer in its entirety should be reviewed in terms of achieving the optimum form, type and quantum of floorspace rather than simply the maximum quantum. The MM lacks that flexibility.

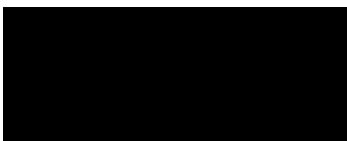
Moreover, the employment offer is just one element of the allocation. There is a need to ensure that the resultant schemes creates a mixed and balanced communities and respond to its surroundings both spatially and in land use terms.

We would seek the following revised wording to address the above concerns:

"The development should demonstrate that the optimum quantum and form of employment floorspace has been provided having regard to the scheme as a whole and the objective of achieving a mixed and balanced community."

In addition, Modification SAMod4 and the requirement to achieve no net loss of employment floorspace should be deleted.

Yours faithfully



**VICTORIA BULLOCK**  
Director

cc: Ian Dubber : Workspace