

WH/615N22/21/001

14 December 2016

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

email: [Localplan@haringey.gov.uk](mailto:Localplan@haringey.gov.uk)  
Submission by Email Only

51 Great  
Marlborough Street,  
London W1F 7JT

0370 777 6292  
[info@rapleys.com](mailto:info@rapleys.com)  
[rapleys.com](http://rapleys.com)

LONDON  
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Dear Sir/Madam

**Re: Haringey Local Plan Examination – Main Modifications Public Consultation November 2016 – January 2017 – Representations on behalf of LaSalle Investment Management**

We have been instructed by LaSalle Investment Management ('LaSalle') to submit representations on the Council's Proposed Main Modifications to the Alterations to the Strategic Policies, the Development Management DPD and the Site Allocations DPD.

We have previously objected to various aspects of the above Local Plan documents, which are set out in our original representations and hearing statements, which were presented and explored further at the hearing sessions.

Our representations on the Main Modifications to the three Local Plan documents are set out below.

**Main Modifications to the Alterations to the Strategic Policies (November 2016)**

**AltsMod22 (Paragraph 5.1.21):** the proposed amendments to the supporting paragraph 5.1.21 state that much of the predicted increase in demand for B1 space (including light industrial) is to be met through reconfiguration of redundant existing industrial and warehouse floorspace and through mixed use development within LEA – Regeneration Areas and town centre sites. We do not have any objection to the strategic approach to meeting Class B1 floor space. However, it should be noted that the extent of Class B1 floorspace and specific uses should be considered at the time when a planning application is submitted, taking into account market demand and conditions, viability and deliverability.

We also do not have object to the following additional sentence: "The trajectory identifying the locations and phasing to deliver the additional employment floorspace needed is set out at Appendix 2b, and will assist in monitoring delivery over the plan period," on the basis that Appendix 2b makes it clear that the table sets out an indicative employment floorspace capacity for each site and that the actual amount of floorspace will depend on the floorspace to be retained and reconfigured, the achievement of the maximum floorspace on existing employment sites having regard to the proposed overall mix, site layout and constraints and viability.

RAPLEYS LLP IS REGISTERED AS A  
LIMITED LIABILITY PARTNERSHIP  
IN ENGLAND AND WALES

REGISTRATION NO: OC308311

REGISTERED OFFICE:  
FALCON ROAD, HINCHINGBROOKE  
BUSINESS PARK, HUNTINGDON  
PE29 6FG

REGULATED BY RICS

## Main Modifications to the Development Management DPD (November 2016)

**DMMod12 (Policy DM6)** – we support the proposed amendment to remove the reference to requiring “community benefits” as justification for taller buildings, and consider that this amendment is necessary to make this policy sound.

**DMMoD9, and 13 (Policies DM5 and DM6)** – we support the proposed amendments which require proposals to “have regard to” non-statutory Supplementary Planning Documents, on the basis that these planning documents should not be given the same status/weight as statutory Development Plan documents.

**DMMoD35 and 37 (Policy DM15Df and Paragraph 3.33)** – we support the proposed amendments to policies/guidance relative to student accommodation, which reflect the need to take account of viability and the London Plan guidance.

### Modifications relating to Policy DM38

**DMMod62** – We objected to the term “employment-led” regeneration being sought for the Local Employment Area – Regeneration area, on the basis that “employment” is generally regarded as B Class Uses and could be interpreted as a wide range of other employment generating uses may not be suitable in the Regeneration Area. The Inspector noted that the strategic policy makes it clear that employment-led regeneration includes a wide range of uses outside B Class Uses, and on that basis, our concerns were already dealt with in the Strategic Policy. On this basis, we do not object to the proposed modification which makes reference to “employment-led regeneration.”

**DMMod63** – We support the removal of the criterion which seeks justification for mixed-use development in the Regeneration Area, on the basis that the Strategic Policy allows the principle of mixed use development in the Regeneration Area.

**DMMod64** – We consider that criterion b) should be amended to “Maximise the amount of employment floorspace to be provided within the mixed-use scheme, as far as practically feasible and viable.” This is on the basis that the amount of employment floorspace that can be provided depends on a number of factors including the type of employment uses, the quality of employment floorspace and the relationship with other uses proposed within a mixed use development. We therefore object to the modification to make the policy effective.

**DMMod69-71** – We support the modifications as proposed.

**DMMod107 (Policy DM48)** – We object to Criterion B which lists areas where the Council may seek planning obligations. In particular, we consider that public art should not be listed under B as clearly it is not necessary to make development acceptable.

## Main Modifications to the Site Allocations DPD

**SAMod1** – On the basis that the Strategic Policies document includes these sites for delivery of both employment and housing, for clarity, the proposed modification should be amended further as follows:

“This Site falls within a Regeneration Area, and as such employment-led missed use development, ***including residential development,*** will be appropriate here.”

**SAMod2** – We support the removal of “capped rents” and the introduction of consideration of the viability of the scheme in the consideration.

**SAMod5** – We support the proposed replacement of the term “subsidise/cross subsidise” with “viability” considerations.

**SAMod22 (Paragraph 2.6)** – We support the proposed clarification of the emerging Wood Green Area Action Plan (AAP) which will revisit and reassess the site allocations and supersede the existing allocations once the AAP is formally adopted in 2018. It is considered that the allocations in the meantime are necessary to ensure that sites which have not yet come forward will not be undermined by redevelopment of sites coming forward in the early phase.

#### **Modifications relating to SA18 (Wood Green Cultural Quarter (North))**

**SAMod36 and 41 (5th site requirement and 9th bullet point under Site Requirement)** – We support the proposed amendments on the basis that the requirement to maximise quantum of employment floorspace is subject to viability, which is assessed looking at the mix of uses, the provision of affordable rents and the scheme as a whole. This would provide the necessary clarity to the applicant in demonstrating “maximum employment floorspace” feasible.

**SAMod38 (Paragraph 2.49)** – we **object** to the first amendments under SAMod38. We support the removal of the term “ancillary” residential use. However, residential use should not be expressed as “enabling” use on the basis that it is located within the mixed use regeneration area, and it is not clear why it has to be expressed as “enabling”.

**SAMod42 (8th bullet point under Site Requirement)** – We **object** to this amendment., as it requires that development on SA18 should have regard to the adjoining site allocations (SA19 and SA20) while both SA19 and SA20 Allocations do not have the same requirement to have regard to SA18. Therefore, it is unreasonable and ineffective to seek SA18 only to have regard to the adjoining allocations.. We consider that all three sites should ensure that each development site will not compromise the deliverability and viability of the adjoining site and this should be reflected in SA19 and SA20 also.

**SAMod43 (Development Guideline on the connection of the pedestrian and cycle route)** – We **object** to the modification on the basis that the exact alignment of a new pedestrian/cycle route is unknown and no work is undertaken to assess whether it is appropriate in highway design terms or safe to create a junction at Mayes Road and Western Road. Therefore, we consider that this is amended as follows:

“The connection of this route at **Mayes Road, Western Road or** the confluence of Mayes Road and Western Road should be carefully managed to ensure that an optimal **and safe** new **connection to the existing road network, which is acceptable in highway terms** ~~junction~~ is created.”

#### **Modifications relating to SA21 (Clarendon Gateway)**

**SAMod48 (Site requirement 4)** – we do not have objection to the proposed modifications.

#### **Modifications relating to SA22 (Clarendon Square)**

**SAMod49** – The proposed modifications state that the site could support increased scale and densities beyond that already provided, subject to achieving an acceptable overall land use

mix. As this site adjoins other development allocations within the Regeneration Area, including SA21, any increase in scale and density would have an impact on the surrounding sites. It is therefore important to ensure that any new planning application should also be required to demonstrate that proposals would not compromise the deliverability of development of the adjoining sites. This should be incorporated in SA22.

## Summary

We respectfully request that our representations are fully taken into consideration in the Inspector's final report on the soundness of the Plans.

In the meantime, we look forward to receiving written confirmation that these representations have been duly made as part of this consultation exercise. Please send all your correspondence for the marked attention of Wakako Hirose (on the details below) and Jackie Ford ([Jackie.ford@rapleys.com](mailto:Jackie.ford@rapleys.com)).

Yours sincerely,

*Wakako Hirose*

Wakako Hirose (Dec 14, 2016)

### **Wakako Hirose**

BA (Hons) DipTP MRTPI

Senior Associate

Town Planning

wakako.hirose@rapleys.com

0207 255 8042