

615/N22/21/1

26 April 2017

London Borough of Haringey
Planning Policy
Level 6, River Park House
225 High Road
Wood Green

Submission by email only: localplan@haringey.gov.uk

Dear Sir/Madam,

Re: Wood Green Area Action Plan Regulation 18 Preferred Options Consultation Document – Representations on behalf of LaSalle Investment Management

We act on behalf of LaSalle Investment Management ('LaSalle') and are instructed submit representations to the above consultation. We request that these representations are taken into account as part of the current consultation.

Background

LaSalle acts on behalf of the long leaseholders of Units 1-3 Guillemot Place and Units 1-4 Bittern Place, both of which are located within in the Haringey Heartland sub-area within the Wood Green Area Action ('AAP').

LaSalle has engaged with the Council's Local Plan process since 2014, and more recently involved in the examination of the Alternations to Strategic Policies, Site Allocations DPD and Development Management DPD (the Local Plan documents'). LaSalle also submitted representations to the Issues and Options AAP consultation in March 2016.

As the Alternations to Strategic Policies and the Development Management DPD will form part of the Development Plan, alongside the AAP (once adopted), but have not yet been adopted, our representations are made in the context the Proposed Submission Documents with the Main Modifications.

Both sites are allocated for redevelopment in the Site Allocations document as part of the regeneration of Wood Green. This confirms the sites' significant redevelopment potential to meet the Council's planning objectives for growth and regeneration of Wood Green. The principle of redevelopment and policy requirements for the development of each site are set out in the Site Allocations document and it is understood that the site allocations in relation to our client's sites will be superseded by new allocations (WGSA17 Bitten Place and WGSA20 Wood Green Cultural Centre (north) including Guillemot Place) in the AAP. Our client is committed to the promotion of the sites' redevelopment potential for mixed use development and seeks to ensure that the AAP provides a positive and clear framework which delivers viable redevelopment of the sites.

Chapters 5&6 – Spatial Vision and Development Strategy for Haringey Heartlands

Chapters 5 and 6 set out the spatial vision and development strategy for the AAP. We comment on the vision and strategy for the Haringey Heartlands which is relevant to our client's sites.

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Paragraph 5.6 sets out the vision for the area:

- To establish an improved cultural quarter;
- To create new homes, jobs and open spaces through the redevelopment of Clarendon gas works;
- To create a new civic boulevard to improve connectivity between the west of the Borough and Wood Green.
- To prioritise family homes in parts of the area away from higher density mixed use area centred along a realigned Brook/Coburg Roads.

With regard to the second point, new homes and jobs are to be created only through the redevelopment of Clarendon gas works which is inconsistent with the strategic objective for the Growth Area and the Site Allocations in the Heartland Area, including our client's sites, which are allocated for mixed use development including employment and residential.

With regard to the fourth point, reasons for the realignment of Brook Road, which serves the Iceland site, the Bittern Place site and the Clarendon Road South site, are not clear from the consultation document. Please refer to our comments on WGSA17 in more detail.

The spatial development strategy for the area focuses on the creation of urban realm, pedestrian and cycling east-west and north-south links, improvements to the existing park/open space. We note from the AAP consultation document that these are the Council's strategic objectives for the regeneration of the Heartland area. However, the Council should be mindful that combined requirements and obligations could prejudice the development of sites allocated to secure the regeneration of the area if they undermine the viability. For example, if the onus to deliver a part of the cycle/pedestrian link is placed on one land parcel/landowner, redevelopment of that site may not come forward, which in turn will not complete the network of the pedestrian/cycling link the Council seeks. In particular, we are concerned about the north to south link which is identified as a "new primary route" on Figures 5.1, 5.5, 7.6 and 7.10.

Chapter 7 AAP-Wide Policies

Policy WG1 – Town Centre Uses, Boundary and Frontages

Criterion 2C sets out strategic policies in relation to the Heartland sub area. We support the principle of transforming the area principally for a mix of employment and residential uses, with some new local town centre uses. Criterion iii) seeks a "new heart" for the Cultural Quarter, offering an alternative location to the Wood Green shopping offer, fulfilling an area-wide role, attracting visitors, seeking unique products, bars, cultural activities and attractions and cafes. We would assume that the "new heart" is the identified as "New Cultural Quarter Public Realm and Improvements", which overlaps two allocations on Figure 5.5. We consider that a range of uses which are deemed suitable for the new heart should be considered appropriate across the Cultural Quarter/Centre.

We object to criterion ii) (new ancillary retail) as the term "ancillary" has a distinct meaning and can only be provided as part of the principal non-retail use. It is assumed that the Council's intention here is to ensure that new retail use would not impact on the role of the Primary Shopping Area. In this context, we suggest that the term "ancillary" should be replaced with "complementary."

Policy WG3: Economy

The policy promotes new employment floorspace, increased jobs and job densities in the AAP area. The Heartland sub-area is proposed to be transformed from a principally industrial area to a mixed use area. We comment on the criteria for the mixed use area as follows:

i) Civic Core on site WGS17 (Bittern Place) - civic functions and additional office floorspace: With regard to office floorspace, paragraph 7.37 states that there is particularly forecast to be a market for small-medium size modern office space targeted at SMEs and start-ups. We consider that the provision of this type of office floorspace should carefully be considered, as it could undermine the viability of the development (thereby the ability to deliver the civic functions) depending on the development value of SMEs/start-up units.

iii) DEA19 will be retained as a Local Employment Area: Regeneration Area: There is no annotation for DEA19 on the Haringey's Local Plan Policies Map (2016). We request clarification on DEA19 and reserve our right to comment, if necessary.

iv) New creative workspace within the Cultural Quarter as part of mixed use development: Whether an element of new creative workspace can be incorporated within a mixed use development of allocated sites within the cultural quarter will depend on a number of factors including the market demand, site's constraints and viability. We therefore consider that "where feasible and viable" should be added to this criterion.

v) SME and affordable workspace: this provision will affect the viability and market demand and practical implications of mixing employment use with residential. As such, "where feasible and viable" should be incorporated in the criterion.

Paragraph 7.39 seeks new workspace to be created principally in the Heatlands area, with new office use created through mixed use developments in the centre of Wood Green. Figure 7.8 identifies the most of the Heartland area as a workspace location with the exception of the Bittern Place site and the Iceland site as a location for office/retail. We are concerned that the blanket approach is adopted in designating locations for particular types of employment floorspace. This is contrary to Strategic Policy SP8, which permits a wide range of uses appropriate in a mixed use development within the designated Local Employment Area – Regeneration Area, Strategic Policy SP15 (and supporting text) which seeks to foster new arts, cultural and leisure activities in addition to cultural workspace in the Cultural Quarter, and the town centre designation.

Policy WG4: Wood Green Cultural Quarter

The policy primarily seeks "culturally-orientated commercial floorspace" which could be interpreted to mean a wide range of commercial floorspace including restaurants and cafés. However, the criteria suggest that the policy seeks business units for SME start-ups/move-on space and affordable entry level business floorspace, with ground floor frontages promoting active streetscapes. We do not object to the principle of seeking commercial floorspace for creative industries and artist studios, or SME type operators. This is on the proviso that other types of commercial floorspace, such as cafe, restaurant, gym, leisure use and small retail, which are all considered to be suitable and complement the strategic objective for the Cultural Quarter to attract visitors, are not precluded from the definition of "culturally-orientated commercial floorspace." An appropriate mix of uses should be considered taking

into account the market demand, the development viability, design and other requirements of the Local Plan.

Criterion 2 seeks to create a new piece of public urban realm at the centre of the Cultural Quarter through Site Allocations refs: WGSAs 16, 19 and 20 (including the Guillemot Place). It seeks to create a pedestrian orientated urban realm with space for interaction all day including night time, and events, with particular focus on the provision of a new north-south link. We question the deliverability as the location of the public realm is at the vehicular access point for Guillemot Place, which has no other vehicular access.

In addition, we are aware that WGSAs 19 (Wood Green Cultural Quarter South) is already at the pre-application stage, which has been brought forward without a Cultural Quarter-wide Masterplan. We are concerned that the Council's strategic objective to create new public urban realm in combination with WGSAs 19 and WGSAs 20, as envisaged in the draft AAP, may prevent the delivery of the regeneration and enhancement of the Cultural Quarter, in the absence of a Masterplan which ensures the viability and deliverability of all sites and land parcels allocated within the Cultural Quarter. We therefore question the deliverability of the provision of public urban realm at the centre of Cultural Quarter without bringing forward a coordinated Masterplan.

Similarly, with regard to the north-south link, which is proposed to cut through the Guillemot Place site and referenced repeatedly throughout the document, a feasibility study should be undertaken by the Council through a collaborative Masterplan exercise with the landowners of WGSAs 20. This is necessary to ensure that the viability of the development of our client's site is not undermined. The allocation and specific alignment of the north-south link should be informed by such a collaborative Masterplan with a clear delivery mechanism. Our concern applies to the requirements under **Policy WG5 E**.

Overall, based on the policy, as currently drafted, there is a risk that the Council's aspiration for the Cultural Quarter is not deliverable, due to the restrictive nature of the type of commercial floorspace required and the lack of evidence for the delivery of the public realm and the north-south link.

Policy WG5 and WG6 Landmark Buildings and Tall Buildings

There are several locations in the Heartland area which are identified as potentially suitable for landmark buildings. Policy WG6 provides policies for tall buildings. It is important to ensure that tall or landmark buildings will not impact on the development potential of the adjoining Site Allocations, particularly in relation to daylight and sunlight issues. We request that this point is included in Policy WG6.

Site Allocations

Indicative Development Capacity

It is noted that the development capacity attributed to each site is an indicative minimum not prescriptive. We agree that it should not be a prescriptive standard, and whilst we do not object to the principle of the floorspace expressed as a minimum, we consider that this should be applied to the development capacity of the site as a whole rather than the capacity identified for specific type of floorspace/use for that allocation being treated as a minimum. This is because the number of dwellings and the type and quantum of floorspace that may be achieved on a site will be determined by a number of factors, including scheme viability, relevant policy requirements and site constraints, as the Council acknowledges in Appendix A.

Infrastructure for the Regeneration of the Haringey Heartland Sub-Area

The Development Management Policies DPD, which is soon to be adopted, contains Policy DM54 which promotes the development of advanced, high quality communications infrastructure to support economic growth, and seeks “ultrafast” connections in Regeneration Areas. Policy DM38 seeks proposals in the Regeneration Area are designed “to enable connection to ultrafast broadband.” The requirement of Policy DM38 would not be effective if ultrafast broadband/wireless internet infrastructure is not in place. This is not recognised in the published Infrastructure Delivery Plan or in the AAP consultation document. We consider that this is an omission which needs to be addressed in the AAP to ensure consistency with the Development Management Plan DPD and to support economic growth and regeneration of the Haringey Heartland sub-area.

WGSA17 Bittern Place

The site is allocated for mixed use development comprising predominantly civic uses with a mix of residential and commercial above as an extension of Wood Green Town Centre. The allocation also seeks the establishment of a new east-west link and the creating of the eastern portion of a new Civic Boulevard (“Boulevard”).

Our comments on the site allocation, requirements and development guidelines are made in order to ensure that the allocation is deliverable:

Site Requirements

- Employment led-mixed use development: As we commented on Policy WG3, aside from office floorspace associated with civic functions, the provision/requirement for office floorspace for SMEs/start-up workspace should only be sought if it can be demonstrated that it does not undermine the viability. In this regard, as the site is located within the Town Centre boundary, a range of other town centre uses should also be considered appropriate. Indeed, the indicative capacity includes town centre floorspace (in addition to employment floorspace). We therefore consider that town centre uses should be included in the site requirements as appropriate uses for the site.
- New Boulevard: This is a strategic objective for Wood Green and to be delivered from three Site Allocations adjoining the Boulevard. It is considered that a delivery/masterplan for the Boulevard is necessary in order to ensure that it can be delivered in a coordinated manner, without undermining the deliverability of all site allocations which are required to contribute to the provision of the Boulevard. Under the Boulevard requirement, we note that Coburg Road may be stopped up. We request that any change to the road network in the Heartland area should be considered comprehensively and consulted upon in order to ensure a suitable access strategy for all development sites.

Development Guidelines

Brook Road: The Site Allocation includes Brook Road and seeks development to address the Road. If this guideline is intended to be works/contributions to upgrade the road, it represents an off-site requirement, it will further impact on the viability. This guideline has not been justified and therefore we request that this guideline is removed.

Decentralised Energy Network: This should be amended to be consistent with the Site Allocations document which states - “Proposals should reference the Council’s latest

decentralised energy masterplan regarding how to connect, and the site’s potential role in delivering a network within the local area.”

WGSA20 – Wood Green Cultural Centre (North)

The site allocation includes multiple land parcels in different ownerships, this requires a coordinated approach to the delivery of the development, in order to ensure that the development is viable and can be delivered as part of comprehensive or otherwise phased development, bearing in mind a number of requirements which the allocation as a whole would need to satisfy. It is therefore critical that this allocation is informed by a Masterplan in order to ensure the deliverability and viability of the allocation.

The site is allocated for a comprehensive redevelopment enhancing the Wood Green Cultural Quarter, including creation of a new north south link between Clarendon Road and Wood Green Common. The site is located in the Growth Area in the Strategic Policies, and in addition to the enhancement of the Wood Green Cultural Quarter, the principle of “mixed use development including employment/commercial and residential” should be referenced in paragraph 8.39.

The Site’s Commentary in paragraph 8.40 focuses on the delivery of workspace, a high quality public realm and a new pedestrian and cycling connection, with no reference to residential development. Strategic Policy SP8 permits the principle of residential use within the Regeneration Area, and it is also established in the emerging Local Plan that the site’s redevelopment will contribute to Haringey’s housing requirements. Therefore, residential use should also be included in the commentary.

Site Requirements

Wood Green Cultural Quarter Policy: it requires the aims of Policy WG4 are met through the development of this allocation. As expressed in our comments on Policy WG4, we are concerned that the requirements set out in WG4 are not demonstrated to be deliverable.

Extension of Clarendon Road/Pedestrian and Cycle Route: We request that this requirement is amended to - “the opportunity to extend Clarendon Road as a pedestrian and cycle link through the site allocation to linking the Cultural Quarter with Wood Green Common should be explored”.

More specifically, the Development Guideline states that a pedestrian and cycle link will be provided through Guillemot Place and the Job Centre Site. We strongly object to this, as it prejudices the regeneration of the Guillemot Place site, and the delivery mechanism and alignment of the route has not yet been explored or tested through a Masterplan of the allocation. We consider that the development guideline on the specific alignment of the cycle/pedestrian route is not justified and should be deleted.

Access to the site by car and for servicing: it requires this to be undertaken from Western Road and Mayes Road. We fundamentally object to this because that Guillemot Place’s only vehicular access is via Clarendon Road. As such, this requirement, if it is facilitated by development coming forward in early phases, will halt existing business operations at the Guillemot Place. Furthermore, this requirement will blight the redevelopment of the Guillemot Place site.

High Quality Public Realm: We refer to our comments on Policy WG4. It has not been demonstrated how the delivery of high quality public realm can be achieved as it involves

other Site Allocations. We agree that a Public Realm Strategy is required, although this requires a joint working with other landowners within the allocation and other allocations. We consider that a robust delivery strategy is necessary which ensures the viability of the development of the site.

Type of Commercial floorspace: We consider that in addition to workspace-type commercial floorspace, other types of commercial floorspace appropriate in the Cultural Quarter should be included in the allocation as per our comment on Policy WG4.

Relocation of the job centre function: It requires the reprovision of the existing job centre function within the AAP area prior to its redevelopment. As the reprovision is likely to be a complex and potentially lengthy process, we are concerned that this requirement may delay or prevent the redevelopment of the site. As expressed elsewhere in the representations, there should be a Masterplan for the allocated site, allowing a phased development of each land parcel, which does not rely on the relocation of the job centre. Fundamentally, as the relocation of the job centre cannot be facilitated by landowners not in control of the job centre site or the operator, this requirement should only relate to the redevelopment of the job centre site alone in isolation of the redevelopment of the other parcels of land within the allocation.

Development Guidelines:

Tall building: The guideline states that this site is not suitable for a tall building due to the potential impact on long views of Alexandra Palace and the new local view from Wood Green High Road. The Development Management Policies DPD identifies the Haringey Heartland as an Tall Building Growth Area, where tall buildings are suitable. The relevant Development Management Policies set out criteria which proposals for tall buildings would need to demonstrate. As such, the guideline which expressly states that a tall building is unsuitable is not in conformity the Development Management Policies DPD. We therefore object to this guideline and request that it is amended as follows: "Tall buildings should be designed to ensure that protected views are carefully managed."

The extension of Clarendon Road: please refer to our comments on this point under the site requirement.

Conclusion

We continue to support the regeneration of the Heartland area. However, the AAP's aspirations require further testing and evidence, particularly in terms of the delivery of infrastructure requirements where several Site Allocations with each involving a number of land parcels in different land ownerships are required to facilitate the delivery.

The NPPF requires Local Plans to be deliverable, and to ensure viability, the costs of any requirements likely to be applied to development should provide competitive returns to willing landowner/developer to enable the development to be deliverable. It is therefore fundamental that the policies and site allocations contained the AAP are supported by robust evidence.

We wish to continue our ongoing engagement with the Council on the Bittern Place and the Guillemot Place and would be grateful for an opportunity for a meeting to discuss a potential Masterplan for the allocated sites.

We would be grateful for written confirmation that these representations have been received.
Please send all correspondence to Wakako Hirose at wkako.hirose@rapleys.com.

Yours sincerely,

Rapleys LLP
Rapleys LLP (Apr 26, 2017)

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