

04 March 2016

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Dear Sir/Madam

RE: REPRESENTATIONS – HARINGEY LOCAL PLAN: SITE ALLOCATIONS DPD – PRE-SUBMISSION VERSION (JAN 2016)

Thank you for allowing us the opportunity to make representations to the Development Management DPD (Pre-Submission Version) and the Sites Allocation DPD (Pre-Submission Stage Document) consultation, together with the proposed Alterations to Strategic Policies Consultation (Pre-Submission Version). We respond on behalf of our client Safestore Ltd whose interest relates to three sites within the London Borough of Haringey:

- Wood Green (105 Mayes Road, N22 6UP)
- Alexandra Palace (Alexandra Palace Way, N8 7HP)
- New Southgate (Bounds Green Industrial Estate, Bounds Green Road, N11 2UD)

On behalf of Safestore Ltd we previously submitted representations on the 23rd March 2015 to the Development Management DPD and Sites Allocation DPD (Preferred Option) consultation, in addition to the Proposed Alterations to the Strategic Policies 2011-2026 consultation.

The Wood Green Safestore site fronts onto Mayes Road which is proposed to be within Site Allocation 20: Wood Green Cultural Quarter (East), within the Site Allocation DPD. As a result, these representations focus on the proposed Wood Green Cultural Quarter (East) site allocation within the Sites Allocation DPD (Pre-Submission Stage Document).

Proposed SA20: Wood Green Cultural Quarter (East) Site Allocation

Overall, we welcome the Wood Green Cultural Quarter (East) site allocation designating the site for employment-led mixed use development with residential accommodation.

However, we are of the opinion that the bullet points outlined under the 'Site requirements' section are restrictive and there is a lack of clarity with how the overall Cultural Quarter area could come forward for comprehensive re-development. As such, we have outlined our comments against the relevant bullet points of the proposed site allocation policy below;

- *'Development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets this policy and does not compromise co-ordinated development on the other land parcels within the Allocation'*

The Site Allocations DPD does not specify who would co-ordinate the site wide masterplan and to date, Safestore as a significant landowner within the area has not participated nor been consulted on the preparation of any masterplan prepared by or for the LB Haringey.

It is unclear who will bring forward the masterplan. If the Council intends to bring forward a masterplan for the area itself then Safestore would welcome the opportunity to engage pro-actively and collaboratively with the Council in this process.

We appreciate that a Masterplan could be a very effective method to aid the delivery of the comprehensive re-development of the site, however it is essential that landowners such as Safestore have the opportunity to participate in its formation. As such, we suggest that additional clarification is added to this policy on how the Council will seek to deliver a Masterplan.

- *'The aim of this allocation will be to increase employment use on this site. Some residential will be permitted to enable increases in employment floorspace and jobs creation in the area'*

Employment uses are the established land uses for this part of Wood Green. As such, we understand the proposals to increase employment use on the site to improve employment facilities and job creation for the benefit of the borough overall. However, we consider that the text, as drafted, is restrictive in nature and may not allow for the re-development opportunity of the site to be optimised.

The NPPF states that Local Plans should be positively prepared, seeking opportunities to meet needs in their area. There is currently a clear growth agenda at a national and regional level seeking to optimise economic development, as well as housing. The NPPF sets an overarching emphasis on encouraging new development, ensuring it is not overburdened by the planning process, with a presumption in favour of sustainable development at its heart. Redeveloping brownfield employment sites such as this one is considered sustainable development and in accordance with the NPPF.

The London Plan outlines that a rigorous approach should be taken to industrial land management to ensure a sufficient stock of land and premises is retained to meet the needs of different types of industrial and related uses. Where compatible the London Plan states that the managed release of surplus industrial land should be undertaken especially to provide more housing in appropriate locations, but ensure a sufficient stock of land and premises is retained to meet the future needs of industrial and related uses in different parts of London. The proposed site allocation does not seek to extinguish the existing employment use, but re-provide enhanced employment floorspace enabled through the provision of residential development.

The policy as drafted seeks to ensure that employment uses are maximised and would only allow for a limited amount of residential development which would be required to enable the commercial aspects of the scheme to come forward. However, this may not allow for the optimisation of the residential development as required by the NPPF and London Plan Policy 3.3.

Given the clear need for new housing, as well as employment facilities, we consider it restrictive to limit the residential development to only the quantum required to allow for the maximum employment floorspace. Rather, we consider that the policy should be more aspirational in order to deliver the optimum amount of commercial and residential development (or any other use considered acceptable as the uplift). These comments also apply to emerging Policy DM38.

- *'Development should follow the principles set out in any future Council-approved masterplan'*

As outlined under the first bullet point the Site Allocations DPD does not specify who would co-ordinate the site wide masterplan. Safestore have not participated nor been consulted on the preparation of any masterplan prepared by or for the LB Haringey and would welcome the opportunity to become actively involved in this process.

- *'Capped commercial rents will be expected in this area in line with Policy DM38'*

Draft Policy DM38: 'Employment-Led Regeneration' within the Development Management DPD (Pre-Submission Stage) states that employment-led regeneration should provide demonstrable

improvements in the site's suitability for continued employment and business use, having regard to the provision of an element of affordable workspace where viable. However, draft Policy DM38 does not make any specific reference to "Capped Commercial Rents" and therefore this reference within proposed SA20 is unclear.

We previously submitted representations, on behalf of Safestore, in March 2015 to the Site Allocation (Regulation 18) Consultation. Our previous representations outlined that applying a blanket policy of capped commercial rents in the area would be contrary to the London Plan unless it was subject to viability considerations.

Within the Council's response to the Regulation 18 consultation exercise it is stated that, "The Council is cognisant of the need for developments to be viable, and welcomes a range of approaches to delivering workspace that enables economic growth in Haringey". In light of this response, and due to the lack of clarity regarding the policy position on 'Capped Commercial Rents', we consider that Policy SA20, as drafted, should be expanded confirming that any capped commercial rents are subject to viability considerations.

Summary

Overall, Safestore supports the Wood Green Cultural Quarter site allocation designating the site for employment-led mixed use development with residential accommodation.

However, we propose that the 'Site Requirements' discussed in the bullet points above are amended as set out above.

Safestore are keen to continue positively engaging with the Council throughout their review of the Local Plan and would welcome the opportunity to discuss this matter further. If you have any queries or require any further information please do not hesitate to contact Adam Conchie (020 7911 2659) or Iain Buzza (020 7911 2054) at these offices.

Yours sincerely

A handwritten signature in black ink, consisting of the letters 'GVA' in a stylized, cursive font.

GVA Grimley Ltd