



**HARINGEY'S LOCAL PLAN: DEVELOPMENT MANAGEMENT POLICIES PREFERRED OPTIONS  
CONSULTATION (FEBRUARY 2015)  
REPRESENTATIONS SUBMITTED ON BEHALF OF DIAMOND BUILD PLC**

Colliers International, on behalf of our client Diamond Build Plc, are instructed to comment on the Local Plan: Development Management Policies Preferred Options document. This representation should be read in conjunction with comments submitted to Tottenham Area Action Plan (TAAP) Preferred Options document which we note is linked to the Local Plan: Development Management Policies Preferred Options document and as such is being progressed in parallel.

Our client's land is located at 52-68 Stamford Road (as shown in Appendix A) and comprises the company's Head Office. The business is well-established in the area and has operated from this site for a number of decades. Diamond Build has a clear commitment to remain on the site, therefore welcomes the opportunity to provide input into the preparation of the Local Plan: Development Management document.

It is proposed to re-allocate the site as a 'Local Employment Area: Regeneration Area' under Policy AAP 5 of the TAAP, which is supported in-principle subject to the provision of more flexibility to introduce different uses on viability grounds. With this in mind, we wish to make representations to the following policies to ensure that the vision of the TAAP can be delivered:

*Policy DM50 'Facilitating Site Regeneration and Renewal'*

We support the general approach to Policy DM50 which is included in recognition of the large number of long term designated industrial sites which are no longer viable, and provides scope for mixed use redevelopment and intensification of such sites. It is agreed that this approach could be used as a key driver in promoting site regeneration and renewal in areas such as Tottenham Hale. We believe there is a clear need for designated 'Local Employment Area: Regeneration Areas' and support the need to focus such designations to the most accessible locations (by public transport) which provide the most scope for intensification, to enable regeneration objectives to be realised.

However, we object to the detailed application of this policy as the feasibility work undertaken by Colliers International, on our client's site at 52-68 Stamford Road, highlights the clear viability issues associated with providing any employment use on the site. The wording of draft Policy DM50 should provide more flexibility, with the need to provide a proportion of the employment floorspace as affordable workspace removed or revised to only be included in proposals where it is viable to do so.

Policy DM52 'Loss of employment land and floorspace'

We object to the wording of draft Policy DM52 which seeks to restrict the loss of employment land. The approach is based on a justification that the NPPF seeks a more flexible approach to employment land, whereby it is important to promote economic development by ensuring that sites are not needlessly protected when there is no reasonable prospect of them coming forward for specific types of development. However, the wording including in draft Policy is considered unnecessarily restrictive due to the level of criteria which would need to be fulfilled in order to comply with the policy. This is not consistent with Paragraph 22 of the NPPF and in its current wording would seek to undermine draft Policy DM50.

This policy should be revised to better reflect national policy objectives, this includes specific reference to the fact this policy would not be relevant if the site is a designated 'Local Employment Area: Regeneration Areas'. It is considered that the provision of evidence outlining that a site is no longer suitable or viable for an existing or alternative employment uses, or a 2 year marketing campaign is considered a more appropriate approach to ascertain whether the site is surplus to employment requirements. We also support the need to have an additional requirement which allows for the release of employment sites if they are required to support regeneration objectives. However, these community benefits should be clarified in the text and should include how enhancements to appearance, design and provision of new floorspace etc can meet this criterion.

In addition, the requirements to incorporate community facilities and also make financial contributions to employment related initiatives in order to justify loss of employment should be dependent on whether this would be viable.

In conclusion, the allocation and development of our clients' land at 52-68 Stamford Road for a mixed-use employment and residential scheme is considered essential to facilitate the regeneration of the area. Therefore, we object to policies DM50 and DM52 which should be revised in order provide more flexibility, we would be happy to discuss this in more detail.