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13th March 2015

DHA/13/17

The Strategic Planning of the London Borough of Haringey
6th Floor
River Park House
Wood Green
London
N22 8HQ

Dear Sir

COMMENTS ON THE FOLLOWING CONSULTATION DOCUMENTS:
Tottenham Area Action Plan Preferred Option Consultation Document – February 2015
Preferred Option Site Allocations DPD Consultation Document – February 2015
Local Plan option Development Management Policies Consultation Document – February 2015

I have pleasure in enclosing our representations on the above documents.

Yours Faithfully

Derek Horne

COMMENTS ON

HARINGEY'S TOTTENHAM AREA ACTION PLAN PREFERRED OPTION
CONSULTATION DOCUMENT FEBRUARY 2015

By

Derek Horne & Associates, acting for Majorlink Ltd.

DHA/13/17

9th March 2015

Our clients, Messrs' Majorlink Ltd are the Freeholders of substantial employment floor space within the Borough and within the area of the Tottenham Action Plan. We have been asked on their behalf to comment on the above document. For ease of reference we include in the margin the policy number or sub-headings to which the comments relate.

TH9 (Fountayne and Markfield Road)

Objection is raised to the area of land included within TH9. It should also include the adjacent buildings, in particular the building complex of imperial Works, which is also owned by Majorlink and is of a similar character to the remainder of the site the subject of the proposed policy. For the Council's assistance we identify on the attached plan the area of land associated with Imperial Works.

Whilst welcoming the allowance of 'warehouse living' it should be made clear as to whether this refers to residential use under use class C3 of the use classes order or relates to 'live/work', which is sui-generis.

Site requirements

Objection is raised to the requirement to specify employment uses at ground floor level. My experience of live/work units, both within Haringey and elsewhere within London, is that tenants prefer to utilise the available floor space in a flexible manner for both employment and residential use. Such an arrangement has been endorsed in appeal decisions within the London Borough of Haringey in relation to appeals at Fountayne Road, Markfield Road and at Omega Works in Hermitage Road and by other London Boroughs including Hammersmith and Barnet.

In addition to the above, objection is raised to the intention to cap commercial rents. In a market economy the best way to secure

investment in employment development is not to inhibit market conditions. The intention to cap commercial rents would act as a disincentive to investors and would, therefore, be likely to deter would be investors, contrary to the Council's objectives.

Development Guidelines

Objection is raised to the inclusion within the guidelines of a requirement for the quantum of dedicated employment floor space to match that originally built on site. In live/work units there is, by definition, a mixture of residential and employment uses. More particularly, if the Council's intention is to designate parts of the building at ground floor to be use purely for employment purposes that would imply a degree of segregation of non-employment uses in the case of live/work units, which would certainly mean a reduction in dedicated employment floor space, which would prejudice live/work.

COMMENTS ON

HARINGEY'S LOCAL PLAN PREFERRED OPTION DEVELOPMENT

MANAGEMENT POLICIES CONSULTATION DOCUMENT FEBRUARY 2015

By

Derek Horne & Associates, acting for Majorlink Ltd.

DHA/13/17

9th March 2015

Majorlink are the owners of a number of commercial buildings within your Borough. We have been asked on their behalf to comment on the above document. For ease of reference we include in the margin the policy / paragraph number to which the comments relate.

Policy DM48 (B) Safeguarding Employment Land and Sites

Given the acknowledged overprovision of employment land throughout London and within the London Borough of Haringey, we object to the Council's policy to seek to retain, in employment use, any non-designated employment sites and floor space, if not identified in policy DM48 (A).

Policy DM49 (A) This policy is unclear. It states that it relates to designated sites and where employment uses are proposed. No objections are raised to the words chosen unless it is intended for the policy to relate to non-designated employment sites. If the policy is intended to relate to non-designated employment sites then objection is raised for the same reasons as is given in policy DM48 (B) above.

Paragraph 5.14 The requirements of the Council to meeting higher design standards is laudable. However, where it relates to existing buildings, such as obsolete industrial buildings built prior to the second world war, in respect of which it is intended to make internal rearrangements, such as, for example, to provide for live/work units, the quality of the internal accommodation should be left to the tenants. It is our experience that if required to refurbish such buildings to higher standards the accommodation might not be affordable.

Policy DM50 Facilitating Site Regeneration and Renewal

Whilst supporting proposals for mixed use redevelopment we object to criteria a – e for the following reasons:-

- a. Mixed use developments should not be restricted to sites with a PTAL of 4 or higher where the site is already in employment use, since mixed use developments containing a mixture of commercial and residential or live/work units are more sustainable than buildings within a single use and are more likely to reduce the need to commute between living and working areas.
- b. Irrespective of viability, mixed uses should be encouraged because they are more sustainable. In my experience such uses are only proposed where they are more viable.
- c. This part of the policy, which requires there to be no loss of employment floor space, would preclude the conversion of existing obsolete commercial buildings to live/work and would, as a consequence, in some instances, if not all, fail to encourage new employment.
- d. The Council implies in its employment policies that viability is an important criterion (for example see policy DM50(e)). If the Council seek, as they have indicated in paragraph 5.19 and in the draft Site Allocation Document (see page 103 upon which we shall comment separately), to cap commercial rents, this will surely discourage investment in employment. This would be contrary to the council's objectives as set out in paragraph 5.2 of this document. Live/work units provide affordable accommodation. Our experience is that live/work units provide affordable accommodation - that is why they are popular within the London Borough of Haringey.
- e. Proposed mixed use developments will be inhibited if the Council insists on limiting the increase in rental figures to below inflation, as proposed in paragraph 5.19, since it may deter investment.

Policy DM51

Warehouse Living

This policy is welcomed but should not be restricted only to the area of Fountayne Road/Markfield Road identified in policy TH9 of the Tottenham Area Action Plan. Nor should it preclude a loss of employment floor space, since such developments often relate to vacant and under used commercial buildings that will generally be bought back into greater employment use as a consequence of their conversion.

Paragraph 5.26

This paragraph should be re-worded to only resist the loss of designated employment floor space.

COMMENTS ON

HARINGEY'S PREFERRED OPTION SITE ALLOCATIONS DPD
CONSULTATION DOCUMENT FEBRUARY 2015

By

Derek Horne & Associates, acting for Majorlink Ltd.

DHA/13/17

9th March 2015

Our client, Majorlink Ltd, are the owners of a number of commercial buildings within your Borough. We have been asked on their behalf to comment on the above document. For ease of reference we include in the margin the policy / paragraph number to which the comments relate.

SA2 (Changes to Designated Employment Areas)

Changes to Designated Employment Areas are proposed to include SSP29 (Omega Works) within LSIS1 (Crusader Industrial Estate). This proposal conflicts with figure 5.1 and policy SP2 of the Haringey Local Plan Strategic Policies 2013 – 2026 which specifically exclude Omega Works from all of their employment designations. No justification is given for the intended inclusion of Omega Works within SA2. If this amendment were to go ahead it would be in direct contradiction to the Council's recently published Haringey Local Plan Strategic Policies 2013 – 2026. The exclusion of Omega Works from SA2 within the strategic policies by the Council was, no doubt, carefully considered and should not be changed without detailed justification. The omission from SA2 of Omega Works would not have any material impact upon the other sites listed within the proposed policy, given the previous planning history of the site, which includes planning permission for a mixed use development, which is separately identified under SA36 from the Crusader Industrial Estate SA35. Moreover, it is noted that whilst the Crusader Industrial Estate was identified as being within a Defined Employment Area, Omega Works was not. We believe that the two industrial areas should remain separately identified as per figure 5.1 of the Local Plan.

Vision for the Area The Council states that it will work with local land owners and residents to produce master plans and potentially a SPD to help guide development in the area. Our client owns the Freehold of a substantial area of commercial land with the Haringey Warehouse District and

also within the Tottenham Action Plan Area. My client's properties have been the subject of planning applications and appeals and are, therefore, well known to your Officers. Yet, to date, we are not aware of our client having been invited to be involved in any dialogue with your Officers. It is regretted that the council have failed to engage with our client in the preparation of the Sites Allocation DPD, the Tottenham Area Action Plan and the Council's Consultation Document on Development Management Policies, which were all recently published in February 2015. Our client only became aware of these documents through our clients' tenants.

Site Requirements Objections are raised to the provision of pedestrian and cycle connections through the site of Omega Works. This would preclude the development of the site in the manner previously approved by the Council and no justification is given as to its necessity. There are already adequate pedestrian and cycle links from Hermitage Road through to the Crusader Estate, at the rear.

The current use of the site as having significant residential use is incorrect, with planning permission recently been granted on appeal, for a significant level of live/work usage.

No justification is given for the imposition of capped commercial rents. Such restrictions are likely to deter, rather than encourage, investment in employment.

Development Guidelines The requirement to retain the central façade of the existing building and a pedestrian link to Finsbury Park Avenue are proposed without any justification and would prejudice the development of Omega Works, in respect of which planning permission has already been granted for a mixture of commercial floor space and residential.