



23 March 2015

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Dear Sir

**RE: CONSULTATION ON THE DEVELOPMENT MANAGEMENT AND THE SITE ALLOCATIONS DPD
CONSULTATION DOCUMENT – REPRESENTATIONS MADE ON BEHALF OF SAFESTORE.**

Thank you for allowing us to make representations to the Development Management Document and the Sites Allocation DPD (Preferred Option stage) consultation, together with the Alterations to Strategic Policies 2011-2026 consultation. We respond on behalf of our client Safestore whose interest relates to the future development of their site which fronts onto Mayes Road and is located within Site Allocation 25: Wood Green Cultural Quarter (east), within the Site Allocation DPD consultation document. The site is bordered by Cambridge House to the north, Parma House to the south, the chocolate factory building to the west and Mayes Road to the east. The site is currently operating as a self-storage (use class B8) business.

Commentary

As we understand it the Development Management Policies Preferred Option document the Development Management Policies document, Site Allocations and Tottenham Area Action Plan will form part of Haringey's Development Plan, all of which we support in principle. The Alterations to Strategic Policies 2011-2026 document is proposed to be updated to incorporate the adopted London Plan targets for housing and jobs. We welcome the introduction of additional documents to support the Local Plan in light of the new housing and jobs targets introduced by the London Plan. However, we are keen to ensure that the aspirations and objectives outlined in the plans align with the objectives of the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG) to proactively drive and support sustainable economic development to deliver new homes, together with Safestore's own aspirations for the site. In accordance with this, there are a number of thematic and specific considerations which we consider should be accounted for in greater detail to ensure that the 'Development Management Policies document, the Site Allocation document and the Alterations to Strategic Policies 2011-2026 document' is in accordance with the Haringey Council Local Plan, the London Plan and the NPPF.

Growth

There is currently a clear growth agenda at a national and regional level seeking to optimise housing and economic development. 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. Planning should operate to encourage and not act as an impediment to sustainable growth (Para 19). The recently adopted further alterations to the London Plan, states that over the next 10 years the London Borough of Haringey should provide a minimum of 15,019 residential units (1,502 units annually). We firmly support the Council's aim of seeking to accord with the NPPF and the minimum housing targets outlined within the adopted Further Alterations to the London Plan. However, we outline our stance below where necessary to ensure that the proposed policies and site allocations can help to enable the delivery of the objectives of these plans.

Flexibility

In addition to the promotion of growth, planning must also provide sufficient flexibility to ensure that sites can be assessed on their own merits and can respond appropriately to the local context. The Development Management Policies and Alterations to Strategic Policies 2011-2026 documents should ensure that each policy option pursued makes it clear that in those circumstances where it is neither practical nor appropriate to comply with requirements set out in policy, the presumption in favour of sustainable development will be applied and schemes will be assessed with regard to their overall benefits.

Viability

Viability is also a key consideration for future development and this should be reflected throughout the proposed Development Management Policies document and any future alterations to the Local Plan. To avoid restricting the delivery of new homes and jobs, the viability of the development should be assessed on a site specific basis. Where a less flexible approach is taken, this may have significant implications for the development coming forward. The costs incurred through the planning process have a direct influence on the amount, quality and use of the land coming forward and could potentially inhibit development proposals, which would otherwise have a positive impact for the Borough.

Representations

Having regard to the thematic considerations addressed above, we set out representations to the specific documents below:

Development Management Policies Consultation Document February 2015

Page 29 (Policy DM16 Housing Supply) – The policy outlines the importance of optimising housing capacity on individual sites. We support this stance and agree that should residential development come forward on the Safestore site in the future, the site should be optimised to ensure the maximum level of residential units can be provided.

Page 30 (Policy DM17 Housing Mix) – The policy outlines that new residential development, including mixed use schemes comprising residential accommodation, should provide a mix of housing having regard to; individual site circumstances, site constraints, scale of development, mix of affordable units, priority afforded to the delivery of affordable housing, optimise housing outputs and the need to achieve mixed and balanced communities. The policy goes on to add that the Council would not support developments or proposals which contain a mix

exclusively made up of 1 or 2 bedroom units unless they are part of a larger developments or within neighbourhoods where such provision would help to address existing imbalances.

We consider that the proposed policy is flawed and is contrary to the spirit of both the NPPF and London Plan. The policy is inflexible in nature and could result in policy burdens on the site which hamper the delivery of development as it does not consider a number of legitimate scenarios that could hamper the delivery of family housing, such as:

- Taking into account areas where 1 or 2 bedroom units would be more suitable than family housing such as town centres or high density neighbourhoods;
- Taking into account the viability of the scheme;
- Taking into account the redevelopment of existing buildings which could not be readily converted into family housing.

To ensure that residential or mixed use development sites are optimised, restrictions on the housing mix may prevent this from occurring. As such, we consider that the definition of where developments of 1 and 2 units only would be acceptable should be expanded to include considerations such as viability, the appropriateness of family housing in the area and the optimisation of the development site.

Policy DM50 (Facilitating Site Regeneration and Renewal) – The Council supports proposals for mixed-use redevelopment on sites where it is necessary to facilitate renewal and regeneration of existing employment land and floorspace. We support the principle of this policy but do not consider that point d complies with the NPPF. Point d states a proportion of the employment floorspace should be provided as affordable workspace, albeit the exact proportion is not explicitly stated. It is suggested that a flexible approach is taken within the policy to the offer of affordable workspace, to ensure that its delivery is subject to viability in the same way affordable housing is. The NPPF (Para. 173) outlines that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It is considered that proposed Policy DM50 is not in accordance with the NPPF given that scheme viability is not taken into consideration

Site Allocations DPD Consultation Document February 2015

Page 45 - The aim of the western heartland area is to bring back into use underused brownfield land and maximise capacity for housing and employment growth, including 3000 (presumed) new homes, and 2000 new jobs. It is proposed that connectivity to the Cultural Quarter will be improved by replacing the current dead end of Clarendon Road with a pedestrian and cycling connection through to Wood Green Common and Alexandra Palace Station. Whilst we support the proposal to increase connectivity through the western heartland area, it is unclear where the proposed through route would be located. However if the route was proposed to be located through the Safestore site it could have a significant impact upon the operations and security of the Business. Safestore request that they are fully engaged in any proposed discussions regarding this proposed route.

Pages 74 & 76 - The Safestore site is predominately located within site allocation SA25: Wood Green Cultural Quarter (east). However a minor part of the Safestore site is also located within site allocation SA23: Wood Green Cultural Quarter (north), an ownership plan (attached to this

letter) demonstrates this. We requested that for completeness the entire Safestore site is allocated entirely within site allocation SA25: Wood Green Cultural Quarter (east).

Page 76 – SA25: Wood Green Cultural Quarter (east) incorporates the Safestore site. The proposed site allocation seeks redevelopment of the existing buildings to create a mixed use development; we support the principle of allocating the site for mixed use development. We do not agree however that the existing buildings must be retained as they are not considered to be of any particular building merit. It is considered that in order to improve the townscape and optimise the existing site, the policy should remove the stipulation that the existing buildings should be retained. It is not appropriate or reasonable for the policy to seek the retention of buildings that have little townscape or heritage merit and could compromise the optimisation of the site, contrary to the London Plan and NPPF.

Page 77 – The site requirements outline that building heights should be limited to a maximum of 8 storeys. We consider that the inclusion of a limit to the maximum height of buildings on the site is inflexible and unreasonable. We suggest that there should be sufficient flexibility within the policy to ensure that the most appropriate type of development is delivered for the location. The policy should seek to ensure that any future planning application is accompanied by a detailed townscape assessment justifying storey heights rather than imposing an arbitrary policy requirement which could burden development sites from optimising their potential in line with the NPPF and London Plan.

Page 77 – The site allocation proposes that a new connection linking Clarendon Road and Coburg Road should be established, including access for businesses. We support the provision of improved accessibility within the proposed site allocation. However, we wish to fully engage with the Council regarding the potential of any proposed route through the Safestore site. A route through the Safestore site could have a significant impact upon the operations of the business.

Page 77 – The document states that the uses on the ground floor of this site should be employment generating; there will be a target of 33% employment floorspace for this site. We support the principle of providing a mix of uses across the site. However it is likely to be extremely difficult to ensure each building contains a mixture of uses which complies with the suggested employment target of 33%. We therefore suggest that sufficient flexibility is given to each planning application to ensure the most appropriate type of development is supported and delivered. The London Plan (Para.4.52) outlines that the viability is a consideration, including its bearing on development costs and other priority planning obligations. Where relevant, the number and size of units should be determined on the merits of each case. It is considered that flexibility is suitably worded into the proposed Site Allocation DPD and Development Management Policies documents.

Page 77 – The site requirements outline that development brought forward on the site should follow the principles set out in any future Council approved Masterplan. We support the principle of adopting a Masterplan for the area; however we request that Safestore are fully engaged in the formulation of any Masterplan. The Masterplan should seek to optimise the development potential of the area.

Page 77 – The policy outlines that commercial rents will be expected to be capped in this area in line with the Draft Development Management Policies DPD. This is considered contrary to the London Plan (Para. 4.51) which states that boroughs may impose planning obligations, where appropriate, feasible and viable, to provide or support affordable shop units suitable for small or independent traders. Capping commercial rents could result in a reduction in the provision of employment workspace generated through new developments as well as resulting in the optimum scheme for the site not being delivered. In order to accord with the London Plan, viability considerations should be incorporated within the proposed Site Allocation DPD and Development Management Policies documents to ensure they are sound and legally compliant.

Page 77 – The document outlines that the site is identified as being in an area with potential for being part of a de-centralised energy network. We support the proposal to connect into the de-centralised energy network, however the policy should consider the costs of connecting into a de-centralised energy network, and the impact this could have upon the viability of the scheme. It is suggested that the policy remains flexible to ensure that where viable and reasonable the developer is encouraged to connect in to the de-centralised energy network.

Alterations to Strategic Policies 2011-2026 (Formerly the Core Strategy) February 2015

Proposed Alteration 6 – We support the proposed alteration which suggests that the Council are committed to consider Wood Green as an opportunity area. Opportunity areas are considered to contain brownfield land with a significant capacity for new housing, commercial and other development linked to existing and potential improvements to public transport accessibility.

Proposed Alteration 28 – We support the Borough's desire to increase the capacity to deliver approximately 22,000 homes between 2011 and 2026, rather than the previous proposal of 13,000. The proposal to increase the number of homes ensures that the proposed alterations to the strategic policies accords with minimum housing targets outlined in the London Plan (March 2015).

Proposed Alteration 30 – We support the inclusion of Wood Green Metropolitan Town Centre as a growth area where development should be promoted. However there should be sufficient flexibility to ensure optimised schemes are brought forward by developers.

The strategic direction of the current national planning policy seeks to enable the delivery of schemes which make best use of sites and deliver better outcomes for the Borough. It is therefore essential that the Local Development Plan provides a clear succinct framework, giving developers the confidence to invest and facilitate high quality development, with recognition that to promote sustainable development a 'competitive return' is necessary (NPPF, Para. 173). This objective must remain central to the preparation of the DPD and we seek that future policies are drafted in this context.

We look forward to further engagement in the consultation process. If you have any queries, please contact Adam Conchie (020 7911 2560) or Iain Buzza (020 7911 2054) of these offices in the first instance.

Yours sincerely

A handwritten signature in black ink that reads "GVA". The letters are slightly slanted and have a casual, professional appearance.

GVA Grimley Ltd