



04 March 2016

London Borough of Haringey
River Park House
225 High Road
Wood Green
N22 8HQ

Dear Sir/Madam,

**REPRESENTATIONS SUBMITTED ON BEHALF OF DIAMOND BUILD PLC
HARINGEY LOCAL PLAN – PRE SUBMISSION VERSION CONSULTATION DOCUMENTS**

We write on behalf of our client Diamond Leasing Ltd, with regard to the “Haringey Local Plan – Pre submission Version” (January 2016) consultation documents, outlined below:

- Alterations to Strategic Policies
- Tottenham Area Action Plan (TAAP)
- Development Management Policies

These documents are being progressed in parallel, for which reason our representations are consolidated into a single response. Our comments should therefore be considered in this context.

These representations seek to demonstrate that amendments are required in order to ensure that the documents can be considered positively prepared, justified, effective and consistent with national policy; to ensure that the Local Plan is deliverable.

Representations to the Alterations to Strategic Policies - Pre submission Version

Our client is encouraged by draft Policy SP8's recognition that Local Employment Areas require a more flexible approach to the uses within them, due to the characteristics of individual sites and their surrounding area. In particular, there is a clear identified need to provide the most flexibility to defined Regeneration Areas. This is to ensure that a key objective of the Local Plan, urban renewal, is achieved. The inclusion of "Tottenham Hale, (Part SIL/RA), N17" as one of the defined Local Employment Areas, classified as a Regeneration Area, is supported. It is considered justified, effective and consistent with national policy.

Representations to the Tottenham Area Action Plan - Pre submission Version

Diamond Leasing Ltd is the sole freehold owner of a large proportion of "Proposed Allocation TH13: Constable Crescent" (see Appendix A). The site has been occupied for a number of decades by a subsidiary of this company, Diamond Build Plc, who are a local building contracting business. It is used as the firm's national Headquarters and primary office location. The site is currently arranged as a builders yard with a significant office floorspace functioning alongside external and internal storage. The contracting industry has changed significantly since the firm took control of the site. Material is no longer stored at central locations, but is typically delivered directly to site. This has meant that the level of required storage has significantly reduced. The site is therefore no longer fit for purpose and operates primarily as an office.

Our client wishes to build a bespoke purpose built unit which meets the business needs of Diamond Build Plc (approx. 500 sqm). They are seeking to self-build the development, which will allow them to showcase their work, create employment and ensure that the development is delivered to a high design and specification standard. They also propose to deliver additional Class B1 floorspace, with a capped rent where possible, to allow more businesses to operate from the site. Due to the low land values for employment uses in the area, there is a need to introduce a higher value use to deliver our clients scheme. Therefore, it is proposed to undertake a comprehensive redevelopment of the site for a mixed use employment (Class B1) and Residential (Class C3) scheme within the next 5 years. The inclusion of our clients site (Constable Crescent) as a defined "Local Employment Area: Regeneration Area" in Policy AAP4 "Employment" is essential to delivery our clients vision for the site as is considered justified, effective and consistent with national policy.

A full project team has been appointed and initial viability and design work has been undertaken to take into consideration the sites constraints and opportunities, together with the operational needs of Diamond Build Plc. In terms of viability and site capacity, there is a need to accommodate approximately 50 residential units into the scheme in order to deliver approximately 1000sqm of employment floorspace. The employment floorspace would utilise the ground floors and the supporting residential would be located on upper floors, to enable active frontages along Stamford Road and Constable Crescent which will provide natural surveillance. This is considered a key design criteria when taking into account the level of anti-social behaviour (including graffiti) that our client has experienced over the years. Taking into account our viability appraisals, to ensure that the entire allocation can be delivered there is a need to amend the "Indicative Development Capacity" to a more realistic number.

There is a real need to ensure that the supporting text included for “Allocation TH13: Constable Crescent” reflects the work that has been undertaken and supports the redevelopment of our clients site to safeguard the long term future of the business in the area. The only other alternative would be for the firm to move outside of London and the site would revert to the highest value light industrial use for the site, a builders / plant yard / merchant, whereby the existing building and site layout would be retained. However, this would not meet the regeneration aims of the area and would have negative impacts on the amenity of the surrounding residential units.

With this in mind, we request the following amendments to Allocation TH13: Constable Crescent:

Address	1-7 Constable Crescent and 52-68 Stamford Road		
Site Size (Ha)	0.7	PTAL Rating	5
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
		(2017)	
Current/Previous use	Residential, employment and vacant land		
Ownership	Mix of private and public freeholds and leaseholds		
How site was identified	Tottenham District Centre Framework		
Planning designations	Flood Zone 2		
	Local employment area: South Tottenham		
	Tottenham Hale Growth Area		
	Locally significant industrial site		
Indicative Development Capacity	Net residential units		Commercial m ²
	66 100		2,300

Site Allocation

5.177 ~~Potential development to increase accessibility, provide increased employment floorspace and warehouse living accommodation.~~ Potential redevelopment of the sites for commercial-led mixed use development with residential.

Commentary

5.178 This area has a range of buildings of variable quality, many of which are underutilised and produce unsuitable neighbours for the existing surrounding residential uses, which has the redevelopment potential to accommodate a mix of employment and residential floorspace ~~warehouse living accommodation~~ in the South Tottenham area. By introducing new employment floorspace, facilitated by new homes in the area, this site can make a positive contributing to meeting the Boroughs employment and housing needs.

Site Requirements

- The site will be given a Designated Employment Area: Regeneration Area status to reflect the Council’s aspiration to create a mix of uses on this site through the re-introduction of ~~creative~~ employment uses.

- The quantum of dedicated employment floorspace on the site should be maximised through any development. Residential uses will be permitted only ~~on the Stamford Road frontage~~ to cross-subsidise new employment stock and should be located in the most appropriate location taking into account site constraints and opportunities in order to maximise the level of commercial floorspace deliverable on site. ~~adjacent to the existing residential uses adjoining the site.~~
- Capped commercial rents may be expected in this area in line with Policy DM38.
- ~~An element of Warehouse Living will be accepted on this site. This will be required to be in conformity with the requirements of Policy DM39.~~

Development Guidelines

- Reintroducing suitable employment generating uses is the key aim of this policy.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- ~~Development along the edge of the retained South Tottenham LSI area should be employment only, to avoid the creation of unsuitable neighbouring uses.~~ Development should be design-led, taking into consideration site specific constraints and opportunities to ensure that the maximum deliverable employment floorspace is delivered on site.
- The creation of development which overlooks the park on Stamford Road will be supported to improve passive surveillance.

Representations to the Development Management Policies - Pre submission Version

Our client is encouraged by Policy DM38's support for mixed-use development within a defined "Local Employment Area – Regeneration Areas". It goes on to identify additional policy requirements that a scheme must include in order to be considered acceptable. However, our client does not consider Part D, which requires the need to investigate the site's potential to meeting the Boroughs identified gypsy and traveller accommodation needs, justified. The main aim of this policy is to maximise the amount of employment accommodation deliverable on a site, through the introduction of a higher value uses such as market residential. The introduction of the need to investigate accommodating gypsy and traveller accommodation would have a similar, if not bigger, impact as having to include affordable housing into a mixed use scheme i.e. the level of deliverable employment floorspace would be significantly reduced.

In order for this approach to be considered effective, there is a need to define in the wording of the policy that the provision of affordable housing would not be required, as the introduction of residential units is only considered acceptable where it seeks to facilitate the maximum provision of employment floorspace including where possible capped rents. We propose the following amendment to Policy DM38(d):

d ~~Investigate the site's potential to contribute to meeting the Borough's identified gypsy and traveller accommodation needs;~~ In order to maximise the amount of employment floorspace to be provided in the mixed use scheme, affordable housing provision will not be required;

Next Steps

I would be grateful if you could acknowledge receipt of this letter and should you require any further information, please do not hesitate to contact me.

Yours sincerely,

**Alison Mackay BA (Hons) MSc MRTPI
SENIOR PLANNER**