



19 August 2016

Jackie Lawrence
Programme Officer
Haringey Council
Level 6, River Park House
225 High Road
Wood Green
N22 8HQ

BY EMAIL

Dear Jackie,

**MATTERS AND ISSUES FOR THE TOTTENHAM AREA ACTION PLAN
ON BEHALF OF DIAMOND BUILD PLC
REPRESENTOR REFERENCE ID: RTAAP162**

On behalf of our client, Diamond Build Plc, we write with regards to the Haringey Local Plan – Inspector’s Draft Matters & Issues for Examination issued on the 2nd August 2016. This letter should be read as formal comments in relation to Question 6, posed by the Inspector in relation to Matter 2 ‘Area Wise Issues’ of the Tottenham Area Action Plan, as set out below:

6. Are the policies which seek mixed use consistent and reasonable in their approach to re-provision of employment floor space? What is meant by cross subsidise, and why does it apply to some mixed use policies (SS4, TH6, TH12, TH13) and not others? Can it be demonstrated to be viable? Why do some mixed use policies (BG4, TH9) seek replacement employment and others do not?

Our client, Diamond Leasing Ltd, wishes to highlight the outcome of the in-depth pre-application engagement they have undertaken with the Borough over the last 2 years in relation to the redevelopment of their site for a mixed use scheme. This includes initial meetings with the Regeneration Department whom outlined the studies they have undertaken of the Tottenham area demonstrated that the existing employment land values is a clear constraint to bringing forward the redevelopment of employment sites which are, in most cases, no longer fit for current employment operator requirements. Development appraisals undertaken by Colliers International, to advise Diamond Leasing Ltd on the viability of redeveloping their site for a purpose built headquarters to meet their business needs, also confirms these findings. Therefore, the approach and rational taken to introduce a higher value use to cross subsidies much needed new build

employment floorspace as part of a mixed use scheme, through Proposed Policy DM38 of the Development Management Policy and Proposed Allocation TH13: Constable Crescent, is considered justified.

In order to provide some context our client is the sole freehold owner of a large proportion of "Proposed Allocation TH13: Constable Crescent". 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.

Their Development Brief is to deliver 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 comprising 1,000 sqm employment floorspace (Class B1) and 52 residential units (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. An indicative layout plan, demonstrating that this level of development is achievable, accompanies this letter.

That said, 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. However, it must be highlighted that the cross subsidy approach is counterintuitive and undeliverable if the higher value use needs to provide an element of affordable floorspace in its own right such as affordable housing. The only other alternative to redeveloping the site under the emerging cross subsidy

approach 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, and in order for the TAAP to be considered sound, 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 Adjacent to ecological corridor		
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 LSIS 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.

I would be grateful if you could confirm receipt of this letter in the first instance and should you require any further information, please do not hesitate to contact me on the details provided in this letter.

Yours sincerely,



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

