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**By email - Philip.Elliott@haringey.gov.uk**

Our ref PEA002/0001/4165-9409-0555/2/AH  
20 July 2022

Dear Sir

**Planning Application Reference - HGY/2021/3175: High Road West, London, N17 (the "Site")**

As you are aware we are instructed by Peacock Estate Management Limited who manage and administer the Peacock Estate and Nesta Works (together "**the Estate**") and represent the businesses who own and occupy units on the Estate. Further details relating to our client and our detailed objection to this application are set out in our letter dated 17<sup>th</sup> December 2021 ("**the Objection Letter**"). We also wrote to you on 1<sup>st</sup> July 2022 in response to the re-consultation on additional planning documents ("**the Second Objection Letter**").

We have reviewed the letter sent to you on behalf of the applicant by DP9 dated 7 July 2022 ("**the DP9 Letter**") which purports to respond to the Objection Letter and to an objection made by Tottenham Hotspur Football Club ("**THFC**"). We have also reviewed the officers' report to the planning committee ("**the Report**") and wish to make the following brief points. We should be grateful if you would provide copies of this letter to members of the planning committee.

Provision of floorspace

Both the DP9 Letter and the Report state that a minimum of 4,686 sqm of B2, B8 and E(g) space will be provided. However, Table 1 at paragraph 3.2 of the report provides the following parameters.

B2: 0 - 7,000 sqm

B8: 0 - 1,000 sqm

E(g): 1,525- 7,200 sqm

It is therefore clear that the applicant is only obliged to provide 1,525 sqm of E(g) floorspace and no B2 floorspace at all. This contravenes the commitment with the DP9 letter says the applicant gave to the Council's Overview and Scrutiny committee on 3 August 2021 and there appears to be no other condition or planning obligation which requires the developer to deliver a minimum of 4,686 sqm of B2, B8 and E(g)

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floorspace. Even if this commitment were to be honoured it still does not provide any comfort to occupiers of the Estate as the entirety of this allocation could, and all likelihood would, be designated to more residential compatible uses such as offices leaving no reasonable prospect for the businesses of the Estate to be relocated in the new development (we set this out in further detail in our Second Objection Letter and also note THFC's objection in relation to floorspace).

### Commercial Relocation Strategy

The proposals will result in the removal of viable B2 uses without any commitments or guarantees secured for relocation (on-site or off-site). This represents a clear contravention of policy SP8 of the Council's Local Plan and is compounded by the Applicant's failure to support the existing independent small and micro businesses on the site (again in breach of policy SP8).

Instead the Applicant relies on a Commercial Relocation Strategy ("**CRS 2018**") from 2018 which is both out of date and inadequate (as discussed in further detail in our Objection Letter). The Report recognises that the CRS is out of date with the first head of term of the section 106 agreement requiring submission of a "Business Relocation and Affordable Workspace Strategy" to be submitted with each reserved matters application. It is unclear how this document interacts with the out of date CRS 2018 and it is concerning that at several points in the Report (paragraphs 4.26, 26.7 and 26.11) that reliance appears to have been placed on the 2018 document. Given the reliance on the CRS 2018 for the Equalities Impact Assessment (to reduce a major adverse equality impact to a minor one), to justify the loss of existing industrial premises in policy terms, and the complete removal of business at the Estate and elsewhere, Members should have had the opportunity to evaluate the relocation strategy that will actually be used rather than one prepared four years ago and this is not a matter that can be deferred to a later date.

### Employment

The applicant seeks to justify the loss of 85 businesses and 690 FTE skilled jobs (based on the CRS 2018 and again therefore out of date) on the basis that they will be replaced by temporary construction jobs and indirect supply chain jobs. As paragraph 26.8 states the development has only potential to accommodate 392 jobs on-site once complete and many of these will be retail and leisure jobs.

Since the application was deferred, neither officers nor the applicant have made any effort to engage with our client despite the findings of the Council's Overview and Scrutiny Committee as set out in our Objection Letter. It is clear that the applicant wishes to cleanse the development area of industrial businesses (most of them BAME owned) to maximise profitability. Our client hopes that members will not enable it to do so.

Yours faithfully

**Town Legal LLP**

cc Fiona Rae, Committee Secretariat (by email)