## **WILL & NICOLA SPOKES**

2<sup>nd</sup> March 2016

Planning Policy Department Haringey Council

Dear sir/madam

**REF**: Haringey Site Allocations DPD / Site Ref. Number <u>SA49</u>: 72-96 PARK RD & LYNTON ROAD (Pages 122-123)

As local residents, we are writing with regards the consultation now running on the revised version of the Haringey Site Allocations DPD, with regards the above site "SA49" in Crouch End, which lies immediately opposite our home.

Our consultation comments are as follows:

We do not believe this site allocation meets the "justified" or "positively prepared" soundness tests for the following reasons:

1) Lack of proper consultation and impact of loss of local employment floorspace and jobs:

Haringey Council has pulled together 3 separate sites to make up this allocation as follows:

- a) 72-96 Park Road owned by an independent freeholder (Orantez), there are 4 businesses on this site, plus some residential units. There is an extant planning permission on this site to add an additional 2 stories to the existing two storey building (Haringey Planning ref: HGY/2006/1839).
- b) The Courtyard industrial estate on Lynton Road (owned by a second independent freeholder; all 9 businesses on the site lease their premises)
- c) Green space on the corner of Lynton Road and The Grove, owned by Haringey Council.

However, the Council failed to adequately consult ANY of the 13 businesses potentially affected by the development of this site as proposed - given one of the "Site Requirements" for this site is "No buildings need to be retained on this site", any of the businesses risk as a minimum, facing relocation whilst development takes place or at worst, risk closure of their business due to a lack of 'like for like' premises provision in the new development and the scarcity of other suitable business premises in the North London area.

At a meeting some fellow residents, Courtyard business owners and I held with the Council Members for Housing and Planning and various

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other staff from the housing and planning teams on 30th June 2015, the Council member for Planning admitted that each of the individual businesses had not been consulted by letter (or directly in any other manner), as only the freeholder's details were on their mailing system and thus, they were also unaware of the presence of any businesses on the site (in the previous iteration of the Sites Allocation DPD document, the proposed development guidelines were for an entirely residential development).

Whilst we welcome the changes in the new Sites Allocation DPD document to mixed use, in response to us highlighting this issue in June, it does not and will not protect all of the existing jobs and businesses on the site and it does not alleviate the fact that in the initial preparation of the Sites Allocation DPD, the research, evidence/information gathering and subsequent public consultation on this site was far from robust and consequently the potential development of this site is set to have a devastating impact on both employment floorspace and job numbers in Crouch End.

Furthermore, there are contradictory statements within the Sites Allocation DPD guidelines for SA49 with regards it's mixed use allocation, as follows, that also indicate that this element of the plan has been poorly researched and conceived:

The Site Requirements state that:

"No buildings need to be retained on the site"
"Replacement employment floorspace will be required to be provided to replace the number of jobs on this site."

Whilst the Development Guidelines state that:

"In line with policy SP9, if redevelopment results in a net loss of employment floorspace, a financial compensation will be required as set out in the Planning Obligations SPD."

"Any jobs lost through development of the site should be reprovided on site."

So, if, as above in the Site Guidelines, replacement employment floorspace needs to be provided to replace the number of jobs on the site and as per the development Guidelines, any jobs lost through the development of the site should be re-provided on the site, how can it also be possible to state that a development could also result in an uncapped and unquantified net loss of employment space for which the developer would have to provide financial compensation?

2) As noted above, the site at 72-96 Park has an extant planning permission (Haringey Planning ref <u>HGY/2006/1839</u>) to build up to two additional stories on the existing two storey building i.e. making four

stories in total. The commentary for SA49 in the Sites Allocation DPD states that: "**2.140** There is an existing planning consent for the western portion of this site permitting development up to five storeys on the site.". This is plainly incorrect and shows a lack of proper evidence gathering in relation to the preparation of this plan document.

3) As a resident of 43 Lynton Road, one of the houses immediately opposite the current entrance to the site we stand to be affected the most by the development of this whole site, yet Lynton Road is not stated as one of the two roads whose amenity will be protected by the Development Guidelines within the Sites Allocation DPD "Heights should be restricted to protect the amenity of properties on The Grove, and heights should be restricted to the north of the site to protect the setting of the church, and preserve the amenity of the back gardens on Palace Rd. ".

This is an oversight that must be immediately addressed – my consultation feedback in January 2015 highlighted the proximity of our house (and the whole row we are on – 45 to 33 Lynton Road) to the development and that all of these properties have bedrooms on the front side of the property so stand to be severely impacted both in terms of privacy and loss of light by a tall development in such close proximity. Again, more robust evidence gathering, including visiting adjacent homes which overlook the site and assessing the importance of the immediately adjacent green space opposite our houses, in terms of providing relief between two built up areas and also privacy, should have been conducted before preparing this plan.

- 4) The corner of green space (with mature trees) currently included as one of the three sites in SA49 should not be included as a space for potential development for the following reasons:
  - i) As mentioned above, the trees provide screening and privacy for the houses in Lynton Road, from the business area opposite and provide some relief from the traffic noise of Park Road for the residents in sheltered housing in the Grove.
  - ii) It is a busy, much used pedestrian route through from Park Road, down to the Grove and through to Palace Road and Priory Park, used particularly by parents with young children and their buggies, bikes and scooters and also by dog walkers.
  - iii) There is a dog waste bin on the green space which means the grassy area is used by dog walkers as a toilet stop, thus preventing soiling of the nearby pavement areas.
  - iv) The green space and trees also provides a welcome and attractive area of 'green relief' in an otherwise built up area.

Currently the Sites Allocation DPD provisions only provide possible protection for mature trees on the site – "The site contains a number of mature trees and these should be retained on site where possible." - but make no provision for the protection of this much used and valued

- green space. Thus we feel this space has not been properly assessed before being included into this plan and earmarked for potential development it is not justified to lose such a valued green space in this built-up area when as above, it provides many valuable uses for the surrounding community.
- 5) The Grove, one of the streets immediately adjacent to the site, contains sheltered housing for elderly and infirm Haringey residents. The Grove itself is a very narrow road, with single parking and is not wide enough for truck access (there have been previous issues with fire engine and delivery lorry access). With these two factors combined, it is blatantly not suitable for a very large, multiple-storey residential development with front doors opening onto The Grove, as proposed. Removing the parking spaces from The Grove to widen the access would simply serve to place more pressure on parking which is already under-served in the immediate area. Again, had the Council undertaken more robust evidence gathering in relation to this site and it's surrounds, it would have been obvious that this level and type of development on the Courtyard area of this site is not justifiable versus the impact on both vulnerable members of the community and the surrounding area.
- 6) The Courtyard portion of the site contains a large and attractive Victorian building that is a former piano factory. This building currently serves as offices for some of the businesses on the site and thus is in very good condition. This site, as the Sites Allocation DPD notes, borders the Crouch End Conservation area, so literally a few metres further and this building would be afforded much more protection. However, at present the Site Requirements for SA49 state that: "No buildings need to be retained on this site.". Meaning that this building could be completely destroyed. North London in the Victorian era had the greatest concentration of piano factories in the UK, so as such, this building represents part of the socio-economic history of this part of London: <a href="http://www.londonpianotuning.co.uk/history-of-piano-development/">http://www.londonpianotuning.co.uk/history-of-piano-development/</a>
- 7) If the site was developed with up to 41 residential units as proposed, this would potentially place a significant strain on local amenities such as parking (which in the surrounding streets is already at a premium) and school places, which it has been well reported are already oversubscribed in the Crouch End area/Haringey:

  <a href="http://www.theguardian.com/education/2014/apr/11/primary-school-places-offer-day">http://www.theguardian.com/education/2014/apr/11/primary-school-places-offer-day</a>

We have not seen evidence of an assessment of the impact on these two areas in relation to this proposed site development.

We would be very happy to meet with the Planning Inspector, along with some of our fellow residents, to discuss the above points.

Yours faithfully,

## Will & Nicola Spokes