

Defend Crouch End
c/o SMART Urban Ltd
and Nicola Spokes

Planning Policy Department
London Borough of Haringey

25th February 2016

Dear Sir/Madam

SUBMISSION DRAFT SSAD SA49 72-96 PARK ROAD AND LYNTON ROAD

On behalf of Defend Crouch End (c/o Nicola Spokes) Smart Urban Ltd is instructed to prepare representations on Haringey Council's Submission Draft Strategic Sites Allocation Document with regard to site SA49 72-96 Park Road and Lynton Road.

Defend Crouch End is a representative body of businesses and residents from Park Road, Lynton Road, The Grove, and Palace Road who are all stakeholders in the area. We have had two, well attended public meetings about this site.

SITE DESCRIPTION AND CONTEXT

The site is a reverse L-shaped block bounded by Park Road to the west and Lynton Road to the south and East. At the south eastern corner of the site there is currently an open space/ green park that provides a breathing space as you move from the busy Park Road into the residential area. The eastern edge of the site is currently a brick wall which faces onto the Grove, an elderly housing scheme built by the Council in the 1970s. Opposite the site to the south is the Maynard Arms public house on the corner and two storey residential units to the south on Lynton Road. The site is currently in three ownerships with the western block covering 72-96 Park Road is owned by Mr Stephen Orantez who has a current planning consent which has been implemented but not yet completed. The long narrow Lynton Road portion of the site is privately owned and is a gated employment land site occupied by a range of businesses, this part of the site is known locally as the Courtyard. The green park to the south eastern corner is owned by the London Borough of Haringey.

RESPONSE TO SITE ALLOCATION

As residents we have made comments on previous drafts of the SSAD and we acknowledge that some changes have been made in response to those comments (the allocation for mixed use, the protection of mature trees and the requirement to maintain job numbers). While we acknowledge the principle of development that inclusion of a site in the SSAD confers we do not consider the draft SSAD goes far enough to protect the amenity both within the site and for surrounding neighbours.

There are four main issues we will raise that we consider will improve the site proposals and we will provide evidence to support our points, this being one of the key tests for further changes at this stage of the process. The points we will address are:

- Red Line of the Site
- Loss of employment land
- Retention of the Green Space
- Protection of the Old Piano Factory

Red Line of the Site

Defend Crouch End Propose that the SSAD SA49 site boundary be tightened to exclude the western portion of the site owned by Orantez. The reason we propose this is that this part of the site is in separate ownership and on 14/12/2006 was granted permission for planning application HGY/2006/1839 *'Erection of a further two floors to existing 2 storey building to create 4x two bedroom and 2 x one and 3x three bedroom flats and 4 additional commercial units. Development includes alterations to elevations, formation of 5 car parking spaces and provision of covered bin store'*.

The owner has part implemented this consent and is still developing it out. For this reason Defend Crouch End do not consider it appropriate to incorporate this part of the site in the SSAD. This planning consent will deliver an additional 9 homes and 5 commercial units and is of appropriate density and design. There is no case for further intensification of this part of the site and anything larger than currently consented would be overbearing for residents opposite who live in two storey terraced cottage houses.

If, in any case, this part of the site remains in the SSAD the commentary at 2.140 on page 122 should be corrected. It currently states *'there is an existing planning consent for the western portion of this site permitting development up to five storeys on the site'*. This is incorrect and the residents propose that if this portion of the site is not removed from the SSAD the text be reworded to say *'there is an existing planning consent for the western portion of this site permitting development up to FOUR storeys on the site'*

Retention of the Green Space

The Green is a very welcome and restful spot as you transition from the busy Park Road and move to the residential area. The Green is a place for dog walkers and in summer is used for sitting out; it also forms part of a green walking route to Priory Park to the north east of the site. It is populated by 8 mature trees, six of which are very attractive silver birch trees. There is a dog waste bin on the path and two areas of green land. While the Council have moved to retain the mature trees on the site Defend Crouch End do not consider this goes far enough and instead propose that the Green is **RETAINED** as an area of amenity and green space.



View from Lynton Road towards The Grove



View from The Grove towards 35-45 Lynton Road

The Green is used by a large number of people including those working in the businesses on their breaks, local dog walkers, students who walk through on their way to and from school. In particular the open space is welcomed by the older and sheltered residents in the Grove development who are happy with this local green as it is easy for them to access from their homes and is safe as it is overlooked by neighbours and near their homes; the trees also serve to help shield their homes from the noise of very busy Park Road nearby. The green also offers an amenity space for the local residents between their homes and the more intensive commercial uses within the site boundary. It

will also be the nearest patch of amenity space for the new residential units in any site redevelopment as these units will not have gardens of their own and as such provides an important counterpoint to the further proposed intensification.

The Green also allows an important set back of the current buildings from the low level two storey cottage houses on Lynton Road and if a development were to encroach this space their amenity would be severely impacted as these houses have living rooms and bedrooms facing the green.

The Council's Local Plan Policy SP13: Open Space and Biodiversity states that '*New development shall protect and improve Haringey's parks and open spaces. All new development shall:*

- *Protect and enhance, and when and where possible, extend the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development;*
- *Provide amenity space in accordance with the Council's Open Space and Recreational Standards Supplementary Planning Document (SPD);*
- *Manage the impact of such new developments in areas adjacent to designated open space;*
- *Secure improvements, enhancement and management in both quality and access to existing green spaces;*
- *Seek on-site or financial contributions towards open space from new developments as set out in the Open Space and Recreational Standards SPD;*
- *Seek to secure opportunities for additional publicly accessible open space especially in those identified areas of Open Space deficiency*'

Haringey's Open Space and Recreation Standards SPD (March 2008) highlights areas where there is an open space deficiency and the area just south of the site covering central Crouch End is an area of open space deficiency (see figure B1). The SPD grades different types of open space in Table 1.1 which states that Amenity Greenspace should be determined on a site by site basis. The GLA Parks Hierarchy is also given in Table 1.2 and this defines this green space as a Small Local Park and Open Space due to its size. Defend Crouch End consider that while small this green space is still very valuable and so should be protected for its amenity value as a green space (not just the mature trees as currently stated in SA49) and that the SSAD is the appropriate document to do this as the site is now being considered within it and this approach is suggested by Haringey's Open Space and Recreation Standards SPD.

Defend Crouch End have also separately made an application to protect the site as an Asset of Community Value as it has been a green for over 5 years and can foreseeably be retained as a green into the future. This application is being made concurrently with our response to the SSAD in February 2016. However, we are clear that the Local Plan documents are also appropriate documents with which to give a further form of protection to open space (as stated in National Policy and Haringey's Open Space and Recreation Standard's SPD) and, to reiterate, we are seeking that the Green should be protected in Local Policy by referencing and protecting this green space in the SSAD, and also on the Local Plan Policies Map.

Protection of the Old Piano Factory

The SSAD states on page 123 that '*No buildings need to be retained on this site*'. While the site is not in a Conservation Area it is adjacent to Crouch End Conservation Area.

Defend Crouch End are of the view that the Old Piano Factory at the rear of the Courtyard is a very attractive Victorian era building that abuts the 1881 Mission House at 49 The Grove just outside the site to the north east. The Old Piano Factory is a two storey building of two wings which join on an angle at the top of the site, with a sloping tile roof and made of London Stock brick with red brick window head detailing. It has a shaped pediment architectural detail above the main door on the western wing and an expressed lintel above the door of the north wing. The building is a rather delightful example of how Victorian architecture expressed details in even warehousing and employment buildings. The building adjoins the listed Mission building (which is just outside the site and contains two residential units).

The Old Piano Factory building is also a much needed element of historic architecture in this locality, providing local heritage together with the Mission Building, among the modern buildings of the Grove, Lynton Road and Park Road which all date after 1970.



It is proposed that the building be locally listed and that the SSAD be redrafted to express the desire to see the RETENTION OF THIS BUILDING or strong reasons given why not and a very high quality of design to be offered as an alternative. We consider this building would be most suitable for continued employment land and it is already being well used as such but could potentially be converted for residential use.

Loss of Employment Land

Defend Crouch End has not had the time to conduct its own assessments but we would like to raise a number of studies and policy positions which would support our view that the site should be

identified for AN INTENSIFICATION OF EMPLOYMENT USE/ EMPLOYMENT LED MIXED USE DEVELOPMENT.

The site currently is host to a number of businesses who provide valuable services within the local economy and a number of jobs and rely on a relatively local customer base. Defend Crouch End consider the site should be primarily employment led redevelopment as despite the irrefutable need for additional homes in London there is also a need for mixed employment spaces, affordable workspace and the variety of jobs these sites offer. This site is not able to provide homes with gardens due to the requirement to retain the existing levels of employment land and the size of the site and therefore we contend the site should be intensified for employment use.

The Haringey Core Strategy Policy SP8: Employment states that *'the Council will secure a strong economy in Haringey and protect the borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas. The Council will:*

- *Protect B uses (under the Use Classes Order) including light industry, logistics, warehousing and storage facilities to meet the forecast demand of 137,000m² floorspace up to 2026;*
- *Support local employment and regeneration aims; ▪ Support environmental policies to minimise travel to work;*
- *Support small and medium sized businesses that need employment land and space; and*
- *Contribute to the need for a diverse north London and London economy including the need to promote industry in general in the Upper Lea Valley and in particular, promote modern manufacturing, business innovation, green/waste industries, transport, distribution and logistics.'*

The London Plan Policy 4.4 also seeks to ensure that industrial land and affordable floorspace in other locations is protected where there is demand.

The Federation of Small Businesses and the New Economics Foundation both regularly make the case for retention and improvement of workspace for small businesses through the JustSpace Campaign <https://www.justspace.org> . This site identifies an ongoing campaign by small businesses and other stakeholders not to see the continual erosion of industrial and employment land in London and in particular looks at ways the planning system currently contributes to the issue and how it can be used as a solution not a cause.

London's Industrial Land: Cause for Concern is a working paper produced by Jessica Ferm and Edward Jones of the Bartlett School of Planning UCL in February 2015 <https://justspacelondon.files.wordpress.com/2015/02/ferm-jones-londons-industrial-land-working-paper-final1.pdf> . They quote in section 3 p 15/16 a URS 2007 study that states *'between 2001 and 2006 90 ha per annum industrial land were lost to other uses, approximately double the GLA's proposed managed release in its 2003 Draft Industrial Capacity SPG'* and that *'for the period 2006-16 the GLA benchmark for loss remained at 48 ha per annum (GLA, 2008) while in reality 86.75 ha per annum was released between 2006 and 2010 (GLA, 2012)'*. On page 18 they further quote a paper by Lima (2014) which was a study of Haringey that *'revealed of 54 sites identified for redevelopment in the Council's Site Allocation Document five were Locally Significant Industrial Sites and six others were other industrial sites. Haringey is identifies in the London Plan (GLA, 2011, Map 4.1) for "limited" transfer of industrial land'*. The authors of this study conclude on pages 37-39 that development pressure and planning policy have played a role in the loss of employment land as well as deindustrialisation, exacerbated by the Government's permitted development rights facilitating the conversion of industrial land to residential. They go on to say that *'in contrast to what downward*

spiralling projections suggest evidence on the ground indicates that manufacturing is changing but not dead. The articulate that *'hidden industrial sites house businesses that are part of the local economic ecosystem and that relocation of these businesses is more problematic than often appreciated'* a point we would reiterate. The allocation of this site for a mix of residential and employment uses will likely result in a further loss of employment land above the planned level of release intended for London and Haringey.

Haringey's own Employment Land Study (February 2015) provides an analysis of the local property market. Due to its size this site is not classified as a Defined Employment Area within the borough but it is an employment area none the less. At 3.7 on page 13 the report notes *'there is a perceived lack of supply of build developments catering for industrial and warehousing uses, local commercial agents noted there was high occupancy in the existing protected areas. The stakeholder consultees identified the Borough was suffering from limited industrial stock and competing pressure from other uses e.g. residential'*. At 3.18 the report notes there is *'a lack of suitable B1c/B2 stock across the borough. There is an insufficient supply of employment locations with enough capacity to accommodate additional B1c/B2 industrial uses across the Borough. Local commercial agents consider that additional sites need to be brought forward ...in order to accommodate SME's.'* Figure 5.1 in the report shows there has been a steady decline in industrial floorspace since 2004.

We contend the evidence shows that the businesses currently on the site would find it very hard to identify other suitable premises in the area due to the overall lack of supply. This loss would potentially lead to a loss of jobs. Furthermore the evidence points to a greater than planned loss of employment land and a demand for such sites to provide jobs and support the London economy. Defend Crouch End consider the site has potential for intensification as employment use and should be classed a suitable for intensification of employment use/ employment-led mixed use development.

SUMMARY OF REQUESTED CHANGES FOR SA49

- Page 122 Change the site boundary to exclude the Orantez Site ownership
- Page 122 2.140 replace incorrect reference to 'five stories' with 'four stories'
- Page 123 Site requirements to be replaced as follows
 - Redevelopment of this site for intensification of employment use/employment led mixed uses will be permitted
 - Replacement employment floorspace will be required to enhance the number of jobs on this site
 - The Old Piano Factory is locally listed and of important amenity value and efforts should therefore be made to retain this building on this site. A strong justification will be needed to show why that is not possible and very high quality alternative design will be required to allow its replacement.
- Page 123 Development Guidelines
 - The current blank brick façade on the approach to the Grove [delete should replace with] COULD be replaced with active building frontages [delete with front doors] opening onto the street BUT OVERLOOKING SHOULD BE AVOIDED

- Attractive street frontage could be created to enhance the setting of the Conservation Area creating a 'gateway' to it AND THE OLD PIANO FACTORY SHOULD BE RETAINED RECOGNISING ITS CONTRIBUTION TO THE CHARACTER OF THE AREA
 - REDEVELOPMENT SHOULD BE EMPLOYMENT LED/ENHANCE EMPLOYMENT FLOORSPACE [delete current third bullet point with reference to loss of employment floorspace]
 - [delete fourth bullet point with reference to loss of jobs] REDEVELOPMENT SHOULD INCREASE JOBS AND EMPLOYMENT OPPORTUNITIES ON SITE
 - Fifth bullet point – Heights should be restricted to protect the amenity of properties on The Grove AND LYNTON ROAD, and heights should be restricted to the north of the site to protect the setting of the [delete church replace with] MISSION HALL BUILDING and preserve the amenity of the back gardens on Palace Road.
 - [delete the eighth bullet point]THE GREEN IS A LOCAL OPEN SPACE PROVIDING IMPORTANT AMENITY VALUE AND THE GREEN TOGETHETHER WITH THE MATURE TREES ON SITE SHOULD BE RETAINED
- Sixth, seventh and ninth bullet points to be retained.

Defend Crouch End understand the need for development but also value key aspects of the current site and consider that the proposed changes will enable any future development to be of the best possible quality while retaining and enhancing existing amenity afforded by the site. We would welcome an opportunity to represent ourselves at any future Public Inquiry.

We can be contacted via the following email address nicolaspokes@hotmail.co.uk

Yours sincerely

Nicola Spokes on behalf of

Defend Crouch End

A business and residents group with 26 members

Representations prepared by Seema Manchanda MA MRTPI, SMART Urban Ltd