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2 March 2016

Sent by post and e-mail to [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

Dear Sirs,

I wish to make representations to be considered alongside the Haringey "Site Allocations DPD, Pre-Submission version, January 2016" when it is submitted to the next review stage which I believe is to secretary of state or for examination by an independent planning inspector.

These representations are on behalf of my wife and I and all relate to **Site Allocation SA49: 72-96 PARK RD & LYNTON ROAD.**

We are challenging the soundness of the plan in line with our understanding of the process and feel all of our suggested improvements remain valid in all circumstances, including any areas where we have misunderstood the criteria. We have identified 4 groups of issues and have grouped our representations here under issues 1-4

**Issue 1: Change in use, protection of jobs, variety of local employment opportunities, premises for SME and micro-businesses**

We believe the **Site Allocation DPD is not consistent with national policy** and I would like the plan to be modified and have provided suggestions for improvement. The national policy is The Current London Plan, *Chapter 4 – London's Economy* that recognises the importance of workspace for SMEs and for new and emerging industries is also required including for the needs of micro-firms. Here is the relevant policy extract:

*"Policy 4.4 Managing industrial land and premises*

*4.18 Even an increasingly service-based economy needs space for less high-value activities crucial to sustaining the city's metabolism, including 'services for the service sector', manufacturing and maintenance, waste management and recycling, wholesale and logistics. Sufficient space to accommodate demand for workspace suitable for SMEs and for new and emerging industries is also required including for the needs of micro-firms."*

- The proposed change in use from Industrial to Mixed use Commercial and Residential will adversely affect the mix of employment and employment opportunities in the area. I would like to see protection of current mix of light industrial and retail use.
- The indicative development capacity for employment of just 718 by m<sup>2</sup> as we believe that this must be an underestimate given that the current site is stated as being '0.5 ha' (5,000 m<sup>2</sup>) i.e. indicative capacity is just 14% of the current footprint. By not increasing this the type and range of employment possible on the site will be restricted to only high-density type. Therefore the required employment capacity should be increased.
- The Development Guideline guideline that states '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.' appears to remove the safeguard to retention of employment 'floorspace' and this development guideline should be removed from the plan. Further, it appears to contradict another Development Guideline that states 'Any jobs lost through development of the site should be reprovided on site' and the Site Requirement that 'Replacement employment floorspace will be required to be provided to replace the number of jobs on this site.'
- We welcome the Development Guideline 'Any jobs lost through development of the site should be reprovided on site.' And would like this guideline to be strengthened so that it is safeguarded requirement.

## Issue 2: Protecting green space, trees and public rights of way

We value the public green space and right of way that is part of the site and it offers an effective and important break between the busy park road and the beginning of the residential area. We believe that the **Site Allocation DPD is not consistent with national policy** as National Planning Policy Framework paragraph 75 which states that 'Planning policies should protect and enhance public rights of way and access.'

We also think that this land has potential to be designated as Local Green space as it meets criteria listed in the National Planning Policy Framework paragraph 77 in so far as it is 'reasonably close proximity to the community it serves;' and 'where the green area concerned is local in character and is not an extensive tract of land.' Without specific protection of the green space in the plan we fear this resource will be lost. Our view is that the plan should have a requirement for the existing green space and public right to be retained, enhanced and even extended.



Linked to this point, we welcome the spirit of the Development Guideline that states that 'The site contains a number of mature trees and these should be retained on site where possible.' We are very worried about the inclusion of the words 'where possible' as these appear to allow a mechanism not to retain the trees. The plan should include a requirement to the effect that that any trees that can't be retained MUST be replaced by an increased number of comparable trees within the development.

*Extracts form National Planning Policy Framework*

*75. Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.*

*77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: ● where the green space is in reasonably close proximity to the community it serves; ● where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and ● where the green area concerned is local in character and is not an extensive tract of land.*

### Issue 3: Protection of buildings significant to the heritage of the local area

There is a Site Requirement that states 'No buildings need to be retained on this site.' We think that **this is not justified** and want to point out that there are several Victorian buildings including an attractive historical Piano Factory, which represent the heritage of the area, are in apparently good condition, and should be retained. I understand that the plan must be justified on robust and credible evidence, however, ***no evidence has been made available on how the conclusion that no buildings need to be retained was reached and therefore we question if the plan can valid in this respect.*** Please amend the plan to include retention of these buildings within the context of development that is complementary and enhances their setting.

### Issue 4: Disproportionate scale of development, lack of specific safeguards and contradictory Development Guidelines regarding heights.

We have **not seen specific evidence of sound infrastructure and delivery planning** that would justify the scale of residential development and I believe it represents an over development of the area. **We do not believe the plan is justified** and we request that the stated number of residential dwellings is significantly reduced from the proposed indicative capacity of 41.

**We do not believe the plan is sound** in so far as these two Development Guidelines appear to be contradictory and therefore the second should be removed:

1. 'Heights and elevation details should respond to the Park Road frontage and the established rhythm.'
2. 'Higher elements may be possible on Park Rd marking the entrance to Crouch End District Centre'

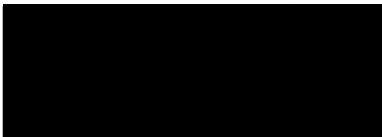
We **do not believe the plan is sound** as while it acknowledges the need to limit heights to protect amenity of the surrounding area, there is no safeguard to ensure this will happen. Relying on current development management policies is not satisfactory as there is no guarantee that the development management policies will not change in the future. Specifically, the plan contains the Development Guideline that '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.' Please add specific restriction on the restriction of the heights for The Grove, Lynton Road and the North of the site of 2 stories. This is a key safeguard for the site.

Finally, in addition, we suggest that a specific Site Requirement for parking provision is included. This can state that parking, including to meet the needs of disabled employees, residents and visitors to site in line with BS 8300, *Design of buildings and their approaches to meet the needs of disabled people – Code of practice*. Must be provided within the development scheme and that on-street residential parking permits will not be available to the development. This is needed as there is already insufficient local parking for residents. I believe that the council has the power to add this to the Site Allocation plan and the council should not simply delegate this to the DMDPD.

We are both happy to be contacted if any further clarification would be helpful.

Thank you for your time and fair consideration,

Yours faithfully,



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