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**REPRESENTATIONS TO  
PROPOSED ALTERATIONS  
TO HARINGEY'S ADOPTED  
STRATEGIC POLICIES, THE  
DEVELOPMENT  
MANAGEMENT  
DEVELOPMENT PLAN  
DOCUMENT, AND THE SITE  
ALLOCATIONS  
DEVELOPMENT PLAN  
DOCUMENT**

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**Arena Design Centre,  
and Eade and Overbury  
Roads**

**Provewell Estates**

**March 2016**

**Planning • Heritage**

Specialist & Independent Advisors to the Property Industry

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| <b>CONTENTS</b>  | <b>PAGE(S)</b> |
|--|----------------|
| 1.0 INTRODUCTION .....   | 4              |
| 2.0 SITE LOCATION AND DESCRIPTION .....  | 5              |
| 3.0 REPRESENTATIONS .....  | 6              |
| 4.0 ARENA DESIGN CENTRE DESIGNATION AS EMPLOYMENT AREA:<br>REGENERATION AREA ..... | 7              |
| 5.0 HOUSING NUMBERS METHODOLOGY .....  | 14             |
| 6.0 REPRESENTATIONS TO THE DEVELOPMENT MANAGEMENT DPD .....                        | 25             |
| 7.0 CONCLUSION .....   | 29             |

## **APPENDICES**

Appendix A – Arena Design Centre Site Plan

Appendix B – Overbury and Eade Road site plan

Appendix C – Representations 27<sup>th</sup> March 2015

Appendix D – Representations 6<sup>th</sup> March 2014

Appendix E – Survey table and map of lawful uses at Arena Design Centre

Appendix F – Assessment of Lettability and demand April 2015, by Currell Commercial Surveyors

Appendix G – Eade Road appeal decisions

Appendix H – Table 10.1 of Sustainability Appraisal

Appendix I - Studio Egret West presentation document

Appendix J – Arena Design Centre PTAL rating map – TfL

Appendix K – Survey table and map of lawful uses at Eade and Overbury Roads

## 1.0 INTRODUCTION

- 1.1 These representations are made on behalf of Provevell Estates, in response to the Proposed Alterations to Haringey's Adopted Strategic Policies, the Development Management Development Plan Document, and the Site Allocations Development Plan Document.
- 1.2 Provevell have an interest specifically in sites under their freehold ownership, SA30: Arena Design Centre (site plan at Appendix A), and SA34: Overbury and Eade Roads (site plan at Appendix B).
- 1.3 These representations follow on from previous representations made to the Council on 27th March 2015 to Haringey's Local Plan, Site Allocations DPD preferred options and Development Management Policies DPD preferred options (As recorded in Appendix C), on 6<sup>th</sup> March 2014 to Haringey's Site Allocations Regulation 18 Consultation Document, and the associated meetings (as recorded at Appendix D). These representations should be read in conjunction with these previous representations.
- 1.4 This representation builds on previous representations to reiterate outstanding concerns in relation to the current consultation documents, in particular the designation SA30 of Arena Design Centre as a Local Employment Area, Regeneration Area, and the Council's methodology for assessing the capacity of allocated sites, as detailed in Appendices 04 of the Site Allocations Development Plan Document. For a full understanding of our position with regards to the Council's Development Plan Documents, this representation must be read alongside our previous representations, as many of the issues made in previous representations remain.

## **2.0 SITE LOCATION AND DESCRIPTION**

2.1 The representation relates to the 2 sites within the majority freehold ownership of Provewell Estates:

- i. Site SA30: Arena Design Centre; and
- ii. Site SA34: Overbury and Eade Roads.

2.2 For a detailed site and surrounding area description, please refer to paragraphs 2.1-2.31 of the previous representations at Appendix C.

### 3.0 REPRESENTATIONS

3.1 In addition to the representations contained within this document, please refer to the representations dated March 2015 and March 2014 with regards to the following topics, for which Provewell's objections remain:

- The re-designation of the north eastern half of the Eade Road site to LEA: Regeneration Area, around Overbury Road from previously no designation.
- Requirement of re-provision of original pre-conversion levels of Employment Floorspace on sites.
- Differentiation of estates.
- Support for a gateway building on the corner of Eade Road and Seven Sisters Road.
- Policy DM40 (previously referred to as DM58) Loss of employment land and floorspace.
- Policy DM6 (previously referred to as DM5).

3.2 The following sections set out Provewell Estates' representations in response to the allocation of Arena Design Centre as a Designated Employment Area, and Haringey Council's methodology for calculating the indicative development capacity for Arena Design Centre and Eade and Overbury Road sites, set out within the current Site Allocation Development Plan Document.

#### **4.0 ARENA DESIGN CENTRE DESIGNATION AS EMPLOYMENT AREA: REGENERATION AREA**

4.1 Provewell strongly objects to the designation of SA30: Arena Design Centre as a Local Employment Area: Regeneration Area. The site has no previous employment designation and no reasonable prospect of being used for employment purposes. The evidence base for the employment designation is unsound, unjustified, and as it fails to distinguish fundamental differences between the sites within the Haringey Warehouse district, is flawed.

##### **Current Local Plan Site Designation**

4.2 This site is not currently allocated as designated employment land within Haringey's existing adopted Local Plan, including the Haringey UDP and Proposals Map 2006 and Core Strategy (2011).

4.3 Indeed Policy HSG 1, and table 4.1 of Haringey's UDP allocates Arena Business Centre as a 'Housing Site', for 67 units. Paragraph 4.9 states the housing sites are 'considered suitable for housing'.

4.4 Further, the nature of the site has changed considerably between 2006 and 2016, as a significant proportion of the site now has an established residential use. Only 10% of the site floorspace remains in employment use, with only 5 jobs as confirmed by our survey (Appendix E). Further details on the nature of the site at present are contained within our previous representations (see Appendix C).

4.5 The Core Strategy Policy SP8 defines Local Employment Areas as "local employment generating sites in the borough that need protection". The newly proposed designation of Arena Design Centre as an employment area therefore does not reflect this definition nor the purpose of LEAs in the Core Strategy, or the true nature of the site.

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## National Planning Policy on Employment Designations

- 4.6 The proposed employment allocation at Arena Design Centre conflicts with paragraph 22 of the NPPF, which states: "*Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.*"
- 4.7 Arena Design Centre is predominantly in lawful residential use currently with very limited employment use. Only Units D and E are in an employment use supporting 5 jobs, their leases come to an end in 2017 when they will be looking to relocate.
- 4.8 An assessment of lettable and demand for Units D and E at Arena Design Centre was undertaken in April 2015, by Currell Commercial surveyors (see appendix F). The letter concludes that the buildings are unlettable in their current state and less desirable than neighbouring units as a result of the conditions of accommodation and location. The letter states that "even if the buildings could be refurbished to create high quality commercial space it will not be simple to secure a commercial occupier due to the off pitch location problematic access and mainly residential nature of the Arena Estate."
- 4.9 For these reasons it is evident Arena Design Centre has little prospect of being an employment site and therefore should not be constrained by an allocation that protects it long term. The current Consultation on the proposed changes to national planning policy proposes to amend paragraph 22 of the NPPF to further reduce restrictions on unviable and underused employment land, emphasising that this land should be released unless there is significant and compelling evidence to justify why such land should be retained for employment use. Clearly the allocation of Arena Design Centre for employment use does not accord with the government's aspirations for such land, with no significant and compelling evidence justifying its retention.
- 4.10 Also of relevance is the Appeal Decision for Appeal refs APP/Y5420/C/14/2212163 and APP/Y5420/C/14/2212166, dated 25<sup>th</sup> September 2014 (see Appendix G) at units on the neighbouring Eade Road site where the



inspector considered that despite the allocation of the wider site as a LSIS, the premises were no longer suitable for business and no longer met the needs for modern industry should be released for more appropriate uses. Part of the justification for this the number of neighbouring residential units that had changed the character of the area.

4.11 Evidently, the allocation of the site does not reflect the character of the site, and is unjustified, given that there is little prospect of this allocation being realised. We have met with the Council and raised this issue on a number of occasions, listed below, yet this has not been taken into consideration through the development of the Local Plan:

- i. Representations to Haringey's Local Plan, Site Allocations DPD Preferred Options and Development Management Policies DPD Preferred Options – March 2015
- ii. Representations to Site Allocations DPD (Reg 18) Consultation Document – March 2014
- iii. Meeting with Haringey Council officers to discuss the masterplanning of Eade Road and Arena Design Centre sites to inform representations to the Site Allocations DPD – July 2014
- iv. Meeting with Haringey Council officers to discuss the mixed-use development potential of Eade Road and Arena Design Centre and the Site Allocations Preferred Options Document Consultation – August 2014
- v. Meeting with Haringey Council officers to present typologies of various development options of the live/work concept for the masterplan and the viability of the proposed masterplan – September 2014
- vi. Meeting with Haringey Council officers to present typologies of various development options of the live/work concept for the masterplan and the viability of the proposed masterplan – September 2014

- vii. Meeting with Haringey Council officers to discuss the draft policy and wording for warehouse living – December 2014

### **Designation Not Justified by Evidence Base**

- 4.12 The Evidence Base documents used to inform the site designations include the Sustainability Appraisal (SA) of the Site Allocations DPD, the Haringey Employment Land Study Final Report 2015 and the Workspace Viability Assessment 2014. The SA sets out a systematic process of outlining and applying a set of 'rules' to establish suitable site uses. Paragraph 10.2.5 states that:
- *A site is potentially suitable for **residential** development unless it is a Designated Employment Area (DEA: LSIS/EL/SIL)*
  - *A site is potentially suitable for **employment** development where it is a DEA, in a town centre, or where PTAL is good (4 or above).*
- 4.13 Table 10.1 of the Sustainability Appraisal sets out to identify potentially suitable sites based on this set of rules, and concludes that Arena Design Centre as a site that is 'potentially suitable for housing, and not suitable for employment' (see Appendix H). Evidently, using the Council's own preferred methodology from the evidence base demonstrates that Arena Design Centre is not an appropriate location for employment, and is more suitable for residential development.
- 4.14 On this basis, Arena Design Centre should be designated for residential development, as identified by the Sustainability Appraisal.
- 4.15 The Site Allocations SA states in paragraph 14.8.5 that *PTAL is a key factor that has influenced the approach taken for particular sites. Generally, an increase in jobs is only sought on sites with a PTAL rating above 3 (i.e. accessible sites), whilst a decrease in jobs is only acceptable on sites with a PTAL rating of 3 or below.* The SA then 'notes' in paragraph 14.8.7 that the PTAL rating for Arena Design Centre is low, yet it fails to justify why this is considered to be an acceptable employment location regardless.

- 4.16 Appendix A of the Haringey Employment Land Study 2015 shows a map of Defined Employment Areas (DEAS), and illustrates Arena Design Centre as being located within DEA1 'Regeneration Area'. However, the land area for DEA1 (1.6ha) clearly corresponds to Crusader Industrial Area only, and the analysis of DEA1 at paragraph 5.13-5.17 explicitly excludes Arena Design Centre. Therefore, whilst an in-depth analysis was carried out for the re-designation of Crusader Industrial Estate from LSIS to RA, no such examination was undertaken for Arena Design Centre. The proposed allocation of Arena Design Centre as LEA: RA has therefore not been tested by the evidence base, and is therefore flawed and unsound, and as such should be removed from an employment allocation.
- 4.17 In addition the London Borough of Haringey's Workspace Viability Assessment 2014 provides an analysis on Arena Design Centre, as a workspace cluster grouped with Arena, Crusader and Omega Industrial Estate. The assessment incorrectly states that Arena Design Centre is mainly used as offices, but recognises that "sections of Arena Business Centre have been in live/work use for a long period, and a return to commercial use is not considered likely". Given this recognition, the designation as an employment area is therefore contradictory, the substantial level of residential accommodation on the site (as highlighted above), has not been reflected in the designation. It should also be noted that the Workspace Viability Assessment concludes that Cluster 1 (where both sites are located) offers a good opportunity to provide new workspace with value achieved from cross subsidies from residential development, yet this analysis uses an assumed housing mix that does not correspond to the needs of the borough
- 4.18 For the reasons set out above together with previous representations, it is considered that the proposed employment designation at Arena Design Centre is flawed, as there is no sound justification for the designation of Arena Design Centre as an employment area within the evidence base. The site allocation for Arena Design Centre must therefore be amended to solely a 'residential allocation'.

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## Differentiation of Estates

- 4.19 The Council negates the initial findings of the SA, and proceeds to select Arena Design Centre under the broad grouping of Haringey Warehouse District, to establish an alternative use for the wider site. This method of grouping the individual sites within the area ignores the individual characteristics of each site, failing to distinguish key differences between the sites. It fails to recognise that Arena Design Centre is a predominantly residential area, with approximately 275 residents living on site, and has only two commercial units employing 5 people. In contrast, Crusader Industrial Estate directly to the south is solely in commercial use, and has good public transport links and parking provision.
- 4.20 The methodology used in the SA simply provides two options to Haringey Warehouse District – Option 1- 'Allow a mix of uses including residential' or Option 2- 'Maintain as employment, reflecting employment designation'. Considering Arena Design Centre is not an existing designated employment area, it clearly does not fit with this approach. Moreover, paragraph 14.8.10 of the SA states that "the plan is set to deliver on ambitious jobs growth targets through a focus on increasing the employment density at a range of existing employment sites", thus revealing that the existing status of Arena Design Centre has not fully been taken into consideration, as there has been no justification or detailed recognition of Arena Design Centre becoming an allocated Employment Area.
- 4.21 Furthermore, it should be noted that whilst site SA35: Land between Seven Sisters and Tewkesbury Roads is allocated within Haringey Warehouse District, it is not proposed as a Designated Employment Area accordingly allowing for a greater residential mix, to reflect the existing characteristics of the site. We consider that given the individual nature of Arena Design Centre, a similar methodology of approach should be applied to SA30.
- 4.22 Clearly there are vast dissimilarities between the sites, within Haringey Warehouse District that are not acknowledged under the proposed LEA: RA designation. Policy needs to allow for the differentiation between estates to ensure that site allocation aspirations can reasonably and realistically be

achieved, and ultimately Arena should not be included with the employment area designation.

## 5.0 HOUSING NUMBERS METHODOLOGY

5.1 This section outlines Provewell's objections to the Council's methodology for calculating the potential residential development capacity of both SA30: Arena Design Centre, and SA34: Eade and Overbury Roads, as set out in Appendix 4 of the Site Allocations DPD. This section examines the Council's methodology, and why it is not an appropriate measure for sites SA30 and SA34.

5.2 The Council have adopted a methodology for calculating the development potential for each site, other than sites that have been the subject of pre-application discussions, or a masterplan. Whilst there has been no formal pre-application enquiry to the Council with regards to the redevelopment of Arena Design Centre, or Eade and Overbury Roads, the Council are aware of Provewell's aspirations for the site, including details of the existing site capacity and potential capacity for each site. My client has engaged with the Council on numerous occasions, through meetings and formal representations to consultation documents as follows:

- Representations to Haringey's Local Plan, Site Allocations DPD Preferred Options and Development Management Policies DPD Preferred Options – March 2015
- Representations to Site Allocations DPD (Reg 18) Consultation Document – March 2014
- Meeting with Haringey Council officers to discuss the masterplanning of Eade Road and Arena Design Centre sites to inform representations to the Site Allocations DPD – July 2014
- Meeting with Haringey Council officers to discuss the mixed-use development potential of Eade Road and Arena Design Centre and the Site Allocations Preferred Options Document Consultation – August 2014

- Meeting with Haringey Council officers to present typologies of various development options of the live/work concept for the masterplan and the viability of the proposed masterplan – September 2014
- Meeting with Haringey Council officers to present typologies of various development options of the live/work concept for the masterplan and the viability of the proposed masterplan – September 2014
- Meeting with Haringey Council officers to discuss the draft policy and wording for warehouse living – December 2014

5.3 The Council are patently aware of Provewell's redevelopment aspirations, and the development potential and capacity of both the Arena Design Centre and Eade Road sites, yet this has not been reflected in the site allocations, as the Council's methodology vastly underestimates the redevelopment potential of the sites. Indicative and viable capacities as previously presented to the Council are set out in Studio Egret West's presentation (at Appendix I). The masterplan was first presented to the Council on 12th September 2014 (see meeting notes at **Appendix D**). The presentation demonstrates that the Council's proposed methodology is too conservative given the design work to date for Arena Design Centre and Eade Road and coupled with the existing capacities.

### **Presumptions**

5.4 The following analysis of the presumptions used by the Council to calculate development capacity demonstrates why the methodology is flawed.

#### ***Presumption 1 Existing PTAL***

5.5 The Council have used PTAL to calculate the development capacity for each site, the methodology sets out that PTAL is taken at the centre point of the site.

- 5.6 The Council have stated that the PTAL rating for SA30: Arena Design Centre is 1-2, and have stated that the indicative development capacity for the site is 40 residential units, based on the following assumptions:

Current Presumption

Site Area: 1 hectare

PTAL: 1

Setting: Urban

LP density matrix ranges: 60 units/hectare

Mix: 33% commercial, 67% residential

Total developable floorspace: 4,200sqm

Therefore the estimated residential capacity of the site is: 40 new homes

- 5.7 However, the PTAL output on the TfL website (at appendix J) shows that the site PTAL rating is 1a-3, with the centre point being 3. Therefore the density of the site should be calculated using PTAL rating 3. As detailed below, the residential development capacity for this site is 67 new homes:

Corrected Presumption 1

Site Area: 1 hectare

PTAL: 3

Setting: Urban



LP density matrix ranges: 100 units/hectare

Mix: 33% commercial, 67% residential

Total developable floorspace: 7,000sqm

Therefore the estimated residential capacity of the site is: 67 new homes

- 5.8 The Council have therefore incorrectly calculated the indicative number of units and underestimated the development capacity at Arena Design Centre.

***Future PTAL***

- 5.9 Additionally, the Site Allocation proposes that "redevelopment should look at the feasibility of connection up to the quietways network through the disused tunnel in the north-west corner of the site, linking through the St Ann's hospital site." This would increase the accessibility in and around the site, thus improving the PTAL; as such a higher PTAL rating of 4+ could be used to reflect this:

*Corrected Presumption 2*

Site Area: 1 hectare

PTAL: 4

Setting: Urban

LP density matrix ranges: 140 units/hectare

Mix: 33% commercial, 67% residential

Total developable floorspace: 9,800sqm

Therefore the estimate residential capacity of the site should be: 94 new homes

- 5.10 The PTAL rating, and subsequent development potential calculated by the Council for Arena Design Centre is therefore incorrect and fails to accurately reflect the existing or future accessibility of the site. We suggest a PTAL of 3 or 4 is used which will result in the uplift of indicative units from 40 to 94.

***Presumption 2 Employment floorspace modelled at 33%***

- 5.11 The Council's methodology sets out that employment floorspace as part of a non-town centre site allocation is modelled at 33%, although no reasoning has been given for this percentage. Indeed there is no justification for this in the evidence base. The existing ratio between employment floorspace, and residential floorspace is as follows:

*Current residential and commercial floorspaces – Eade Road Overbury Road*

Eade and Overbury Roads:

Residential floorspace with Certificate of Lawfulness: 8300.8sqm

Residential floorspace established use: 6132.1sqm

Commercial floorspace: 3925.22sqm

= 21.4% commercial

*Current residential and commercial floorspaces – Arena Design Centre*

Arena Design Centre:

Residential floorspace with Certificate of Lawfulness: 4589.5sqm

Residential floorspace established use: 2172sqm

Commercial Floorspace: 1060sqm

= 13.6% commercial

- 5.12 Clearly, the proposed mixed-use ratio does not reflect the existing characteristics of the sites. Using the Council's PTAL methodology, but the existing employment floorspace site ratio would enable the following:

Corrected Presumption Eade Road and Overbury Road

Eade and Overbury Roads: 165 residential units (78.6%)

Site Area: 1.5 hectare

PTAL: 4

Setting: Urban

LP density matrix ranges: 140 units/hectare

Mix: 21.4% commercial, 78.6% residential

Total developable floorspace: 14,700sqm

Corrected Presumption Arena Design Centre

Arena Design Centre: 121 residential units (86.4%)

Site Area: 1 hectare

PTAL: 4

Setting: Urban

LP density matrix ranges: 140 units/hectare

Mix: 13.6% commercial, 86.4% residential

Total developable floorspace: 9,800sqm

- 5.13 The 33% ratio between commercial and residential restricts the development potential to both sites. This requirement would also require a reduction in the amount of residential from current levels.

***Presumption 3 Site Capacity - floorspace***

- 5.14 The Council have used PTAL to calculate the overall development capacity, yet we would argue that this does not pay due regard to the existing site capacity, for the reasons outlined below:

Eade and Overbury Road:

- Total PTAL capacity (total floorspace): 14,700sqm
- Existing total capacity (total floorspace of existing structures): 18,358.12sqm

Arena Design Centre:

- Total PTAL capacity calculated by the Council (total floorspace): 4,200sqm

- Existing total capacity (total floorspace of all existing structures):  
7,821.5sqm

5.15 The above figures clearly show that the Council have underestimated the development capacity of both sites, and should the sites be redeveloped in line with the Council's figures, there would be a net loss of floorspace to the site. Moreover, the existing and proposed residential unit figures further demonstrate that should the sites be developed to the Council's figures, there would be a loss of residential accommodation, against the Council's own policy DM10 (Housing Supply), which states that:

*The Council will resist the loss of all existing housing, including affordable housing and specialist forms of accommodation, unless the housing is replaced with at least equivalent new residential floorspace.*

***Presumption 4 Site Capacity – number of residential dwellings***

Eade and Overbury Road:

- Council's proposed residential capacity (residential units): 141
- Existing residential capacity (lawful residential units – see Appendix K):  
226

Arena Design Centre:

- Council's proposed residential capacity (residential units): 40
- Existing residential capacity (lawful residential units – see Appendix E):  
81

5.16 The Council's set methodology for calculating potential development capacity for Eade and Overbury Road and Arena Design Centre fails to comply with Policy

DM11 of the Council's Development Management DPD, which explains in paragraph 3.10 that:

*Whilst useful, the matrix is but one consideration or tool to be used in informing the appropriate development density applicable to an individual site. Other considerations should include local context, site specific circumstances, housing need, housing choice, and the achievement of quality design being of equal weighting.*

5.17 Similarly, the London Plan Housing Supplementary Planning Guidance encourages boroughs to refine local approaches to Policy 3.4 of the London Plan (Optimising Housing Potential), to take account of local context and reflect particular local circumstances.

5.18 It therefore follows that the individual circumstances of the sites, as outlined above demonstrate that the capacity of both Arena Design Centre and Eade and Overbury Road sites is far greater than PTAL advises, and in this case PTAL is not the appropriate measure for calculating development densities this methodology would result in net loss of residential floorspace, against the aims of the Local Plan, and the London Plan Supplementary Housing Guidance.

### **Our Proposed Modifications to the Methodology**

#### ***SA34: Overbury and Eade Roads: minimum 226 residential units***

5.19 As outlined above and evidenced in Appendix K, the Overbury and Eade Road site has 226 existing lawful residential units, and as such this should be the minimum indicative figure for site redevelopment, as any lesser figure would result in the loss of housing in the borough.

#### ***SA30: Arena Design Centre: minimum 140 residential units***

5.20 It has also been demonstrated that Arena Design Centre has a far greater residential capacity than the 40 units put forward by the Council.

5.21 In light of our arguments demonstrating that Arena Design Centre should be used for residential purposes in Section 4 of these representations, it is considered that the residential capacity for Arena Design Centre should be calculated as 100% residential. The following calculations model Arena Design Centre using PTAL rating 4 for 100% residential, which more accurately reflects the character and development capacity of the site:

Site Area: 1 hectare

PTAL: 4

Setting: Urban

LP density matrix ranges: 140 units/hectare

Mix: 100% residential

Total developable floorspace: 9,800sqm

Total number of residential units: 140

5.22 Clearly, both sites have a greater site capacity than has been recorded by the Council. Should the sites be redeveloped in accordance with the figures in the Site Allocation as currently proposed, this would result in the overall loss of residential units and fail to comply with one of the core planning principles of the NPPF, which states that planning should:

*Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in*

*their area, taking account the needs of the residential and business communities.*

- 5.23 The Further Alterations to the London Plan, Inspector's Report November 2014 supports the focus on regeneration and meeting London's housing needs through development on brownfield land. The report stresses the importance of meeting the objectively assessed needs, stating in paragraph 57 that:

*The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need.*

- 5.24 In addition, paragraph 42 of the report supports innovative and "possibly unpopular solutions" are required to meeting the pressing need in London, and encourages the Mayor to explore alternative options for growth. Thus, the guidance contained within FALP is not sufficient to sustain the growing population of London; Haringey Council should emphasise the development potential of alternative sites such as Arena Design Centre and Eade Road, to go beyond required minimum housing need.

- 5.25 To achieve this aim, the Local Plan for Haringey must be more responsive to local circumstances, and take into consideration the existing level of development in order to ensure that future development opportunities maximise the development potential to meet the needs of the borough and London. Provewell therefore consider the more accurate and representative indicative capacity outlined above to be documented in the Site Allocations DPD.



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## 6.0 REPRESENTATIONS TO THE DEVELOPMENT MANAGEMENT DPD

6.1 This section sets out Provewell's objections policies contained within the Pre-submission version of the Development Management DPD.

### **Policy DM39: Warehouse Living**

6.2 Provewell support the inclusion of policy promoting Warehouse Living within the Haringey Warehouse District. Whilst Provewell accept an element of employment floorspace re-provision within the district, it is considered that the wording of the policy is too restrictive. The policy states in C:

*The preparation of a masterplan will have regard to the following matters:*

*B The lawful planning uses on site, establishing the existing baseline with respect to the intensification of the employment offer and re-provision of the host community;*

*C The quantum of commercial floorspace to be retained, re-provided, increased, and the resulting increase in employment density to be achieved having regard to the baseline at (b);*

6.3 The policy outlined above seeks to re-introduce employment uses to the site, focussing on the intensification and re-provision of employment floorspace, Provewell consider that this emphasis is overly restrictive, does not allow for adequate flexibility, and in the case of Arena Design Centre, which as detailed above is no longer desirable to businesses, would inhibit future development opportunities, to the detriment of the existing community and surrounding areas. Employment should be instead measured on density, rather than floorspace; employment re-provision should be met through the number of jobs rather than the amount of floorspace. The current floorspace creates space for 1 job per 45sqm; however redevelopment of the site will allow for 1 job per 10sqm, thus increasing capacity. Replacement floorspace will be of a far greater quality which would enable an increase in employment densities, and is

therefore likely to generate significant employment opportunities from redevelopment proposals.

#### **Policy DM40: Loss of Employment Land and Floorspace**

- 6.4 Provevell consider the requirement to provide 3 years of marketing evidence is overly restrictive.
- 6.5 Policy should be more flexible to ensure that employment land continues to meet the demand of the industry, and should market demand change over a period less than 3 years, then policy should be more responsive to this need. The Government favour a flexible response to reallocating redundant employment land, as evidenced by paragraph 22 of the NPPF, and the proposed alterations to the NPPF, which states in paragraph 35 that:

*a balance needs to be struck between making land available to meet commercial and economic needs, and not reserving land which has little likelihood of being taken up for these uses*

#### **Policy DM6: Building Heights**

- 6.6 This Policy restricts the development of tall buildings to Tottenham Hale, Northumberland Park, and Woodgreen and Haringey Heartlands, as demonstrated on map 2.2.
- 6.7 The Policy allows "proposals for taller buildings that project above the prevailing height of the surrounding area", but defines taller buildings as "those that are two to three storeys higher than the prevailing surrounding building heights". Provevell object to this limitation, as allowing for a flexible variation in building heights would enhance the streetscene.
- 6.8 It is considered that the Overbury and Eade Road site has the opportunity to deliver a landmark building which would act as a gateway to the Haringey Warehouse District, which would add to the vibrancy of the area, attract

businesses and residents alike, and will be intrinsic to the success of the Warehouse District overall. The site allocation SA34: Eade and Overbury Roads earmarks the location of this site on the corner of Seven Sisters Road and Eade Road has the opportunity to become a gateway location to the Warehouse District, yet the restriction of Policy DM6 prevents the opportunity from becoming fully realised. Policy DM6 needs to therefore allow for exceptions, in appropriate locations such as this.

6.9 The Growing London Report by the Mayor's Design Advisory Group examined how best to meet London's housing needs, and suggests that "we have to make better use of the land we have available. We have to develop more densely, and we need to do so within the context of the existing urban fabric and communities."

6.10 The PTAL rating for the corner of the site is 5, thus supporting the location for a taller, and higher density development at this part of SA34. Paragraph 65 of the NPPF states that:

*Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.*

6.11 The London Plan Policy 7.7 supports tall building in locations which improve legibility of an area by emphasising visual significance and contribute towards improving permeability of a site, and significantly contribute towards local regeneration. A tall building on the corner of Eade Road and Seven Sisters Road would therefore accord with this Policy.

6.12 Historic England's Tall Buildings Guidance Note 4 also highlights the advantages of tall building policies, and also stresses the importance of identifying areas appropriate for tall buildings, and ensuring early development on public consultation.

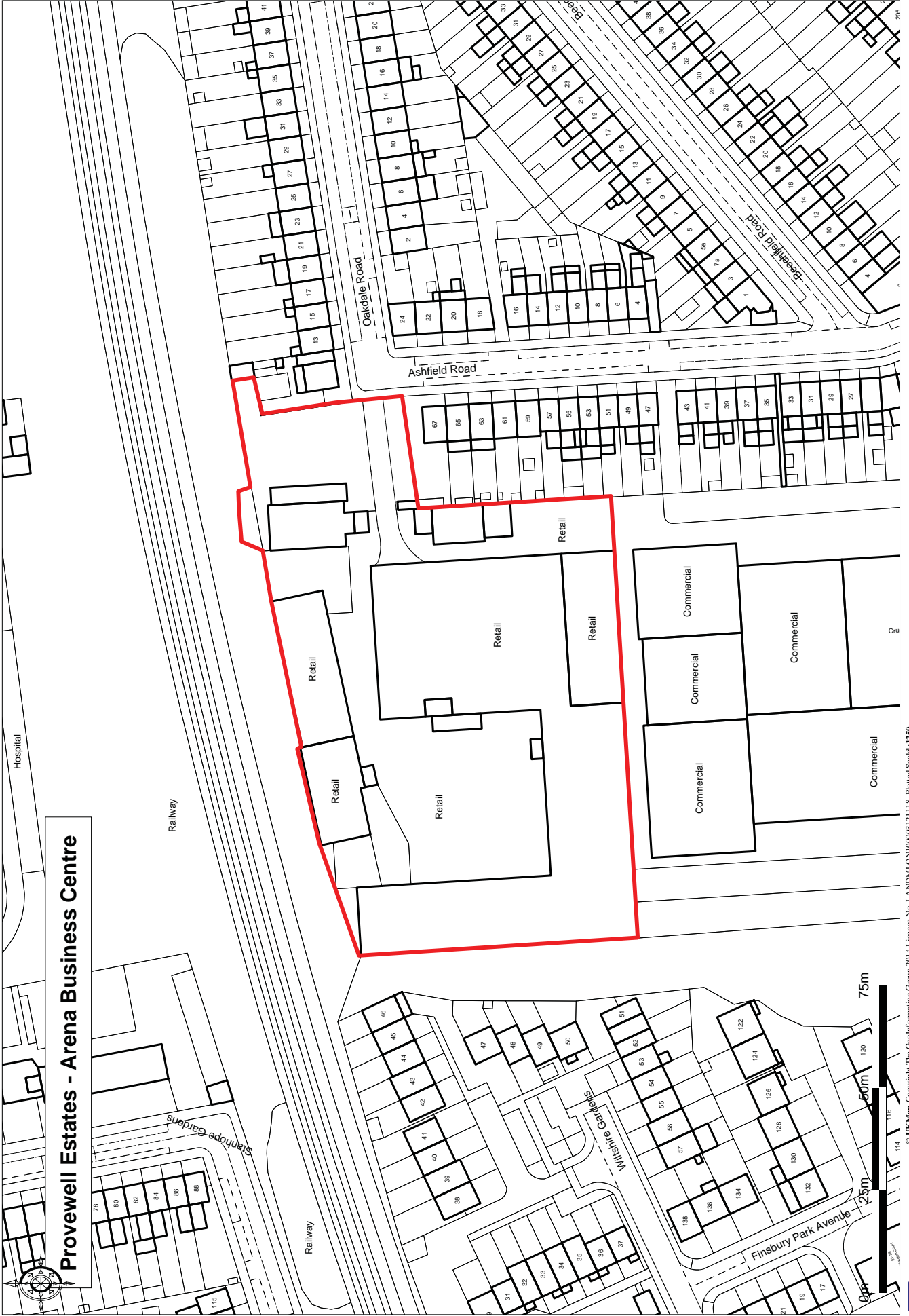
- 6.13 Haringey Council have identified this as a potential location for a gateway building; and DM6 should therefore carry this through to ensure that this opportunity is maximised. It is considered that this is an ideal location for a taller building, and in light of the above, this policy should not restrict building heights in sustainable locations.

## **7.0 CONCLUSION**

- 7.1 As outlined above, and evidenced in previous representations to the Council in response to earlier consultations, we consider that the designation of Arena Design Centre as a Designated Employment Area is unjustified, and the employment allocation should therefore be removed from the adopted version of the development plan.
- 7.2 Moreover, the development potential of each site has been grossly underestimated, and the rudimentary approach adopted by the Council fails to take account of the existing land uses or capacity, and should therefore be revised in line with the alternative methodology proposed above.
- 7.3 It is also considered that the wording of the DMP Policies are overly restrictive, inhibiting development opportunities and site viability.
- 7.4 We would therefore ask that our representations are thoroughly considered prior to adopting the Local Plan.

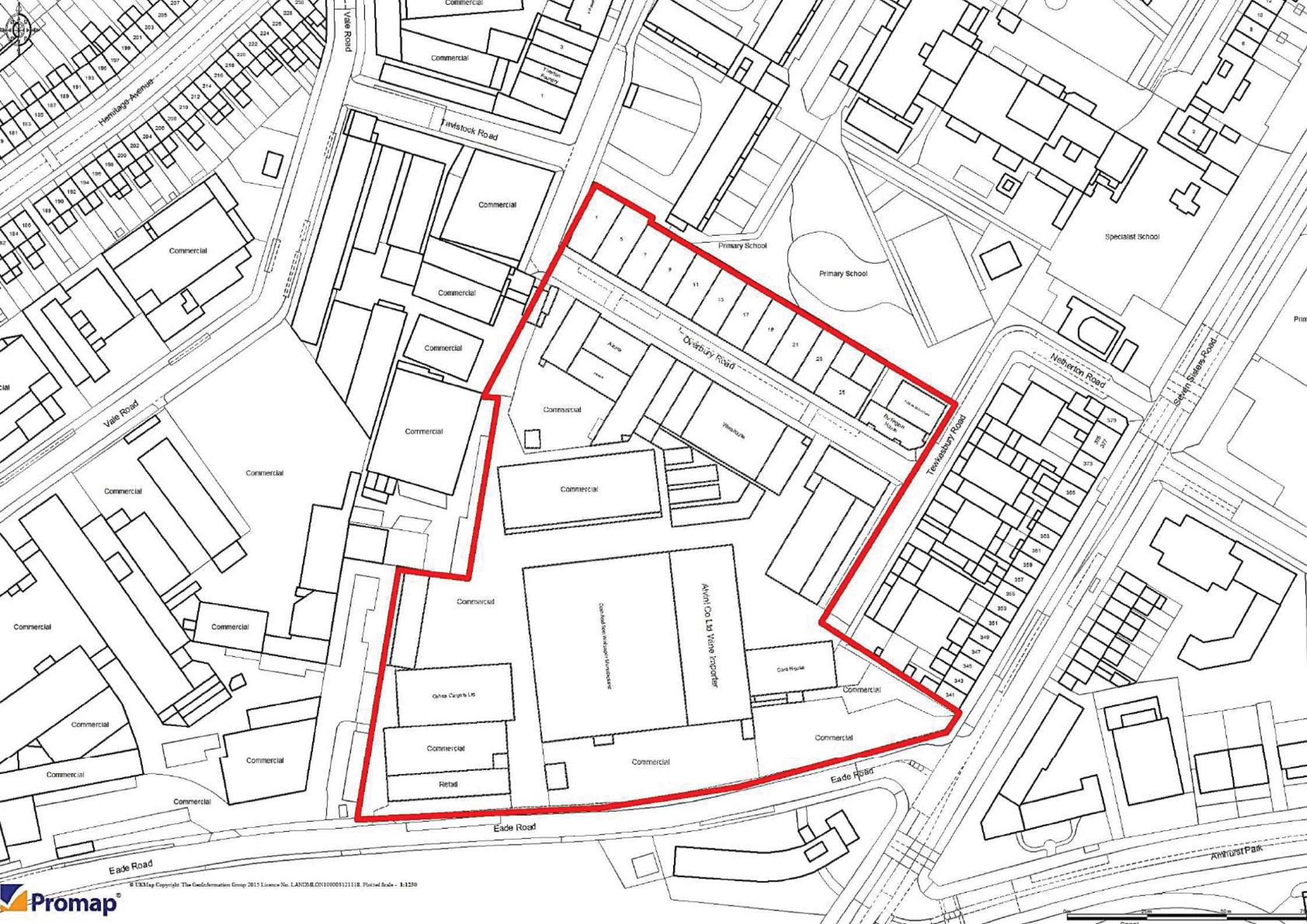
# **APPENDIX A**

# Provevell Estates - Arena Business Centre



# **APPENDIX B**





# **APPENDIX C**



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**REPRESENTATIONS TO  
HARINGEY'S LOCAL  
PLAN, SITE  
ALLOCATIONS DPD  
PREFERRED OPTIONS**

**AND**

**DEVELOPMENT  
MANAGEMENT POLICIES  
DPD PREFERRED  
OPTIONS**

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**PROVEWELL ESTATES**

**March 2015**

**Planning • Heritage**

Specialist & Independent Advisors to the Property Industry



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| <b>CONTENTS</b>  | <b>PAGE(S)</b> |
|--|----------------|
| 1.0 INTRODUCTION   | 4              |
| 2.0 SITE LOCATION AND DESCRIPTION                              | 5              |
| 3.0 LONG TERM VISION FOR SITES                                 | 14             |
| 4.0 POLICY REPRESENTATIONS                                     | 15             |
| 5.0 CONCLUSIONS  | 30             |
| 6.0 DEVELOPMENT MANAGEMENT POLICIES DPD POLICY REPRESENTATIONS | 32             |

## **APPENDICES**

Appendix 1 - Arena Design Centre Site Plan

Appendix 2 - Overbury Road and Eade Road Site Plan

Appendix 3 - Previous representations and note of correspondence with LB Haringey

Appendix 4 - Photographs of Arena Design Centre

Appendix 5 - Photographs of Overbury Road and Eade Road

Appendix 6 - Photographs of New River Studios, 199 Eade Road

Appendix 7 - Survey table and map of lawful uses at Arena Design Centre

Appendix 8 - Survey table and map of lawful uses Overbury Road and Eade Road

Appendix 9 - Current Local Plan Proposals Map Excerpt

Appendix 10 - Eade Road appeal decisions

## 1.0 INTRODUCTION

- 1.1 These representations are made on behalf of Provewell Estates, to Haringey's Local Plan, Preferred Options Site Allocations DPD and Preferred Options Development Management Policies DPD.
- 1.2 Provewell have an interest specifically in sites under their freehold ownership, Site SA34: Arena Design Centre (site plan at **Appendix 1**), and Site SA38: Overbury Road and Eade Road (site plan at **Appendix 2**).
- 1.3 These representations follow representations made on the 6<sup>th</sup> March 2014, on behalf of Provewell to Haringey's Site Allocations DPD Regulation 18 Consultation Document and a number of subsequent meetings and correspondence with planning officers at LB Haringey over the past 12 months (these representations and record of meetings are at **Appendix 3**). The previous representations focussed on promoting residential development and warehouse living on the estates, and demonstrating the inappropriateness of the sites for solely continued employment use.
- 1.4 This representation seeks to build on the policy as currently drafted and further promote the sites for mixed use, increased density redevelopment.
- 1.5 Section 1 sets out an introduction to these representations, section 2 sets out the context to Provewell's Estates, description of the 2 allocated sites including lawful uses, current policy designations and relevant appeal decisions. Section 3 describes the long term vision for the sites. Section 4 contains Provewell's representations to the Site Allocations DPD, and section 5 sets out the conclusions to these representations. Section 6 sets out Provewell's representations to the Development Management Policies DPD.

## 2.0 SITE LOCATION AND DESCRIPTION

### Context to Provevell's Estates

2.1 The Provevell Estate comprises the following areas in Haringey:

- Site SA34: Arena Design Centre; and
- Site SA38: Overbury Road and Eade Road.

2.2 These two areas house approximately 1,000 people, who are predominantly aged 25 – 35. All occupants are registered for, and pay Council Tax. Across Haringey we understand there are approximately a further 1,000+ people in warehouse living that we are aware of, a further 2,000+ in Hackney and considerably more across wider London.

2.3 The units are predominantly residential, but there are some commercial units. A number of residents are sole traders working at or near home. The principal underlying characteristic is the entrepreneurial approach of the residents, setting up small creative businesses and adopting a co-operative and open approach to the sharing of skills and ideas. Many people run their own businesses. These range across a spectrum of creative industries.

2.4 Their incomes are relatively low, and the advantage of these spaces is they provide affordable space where artists can live (and work in some cases).

2.5 The changes to Provevell's properties have taken place organically over the past 15 years and have provided a new lease of life to previously redundant warehousing and vacant office space, giving a home to a wide variety of individuals - most with a creative arts background. This regeneration has largely been a 'bottom up' process with people learning about the spaces through social networks and using their creative talents to adapt them, making the necessary improvements to facilitate safe occupation for their comfort and to suit their living arrangements.

- 2.6 The vast majority of units have or are in the process of achieving Building Regulations Certificates. As a result of this process, previously unoccupied estate buildings and unsafe streets and neighbourhoods (where prostitution and drug dealing prevailed) have been transformed into vibrant and safe places, with innovative creative and economic activity sustained and promoted. Local businesses have benefitted from this growing community and the increased spending power that has been brought to these neighbourhoods as well as the benefits of reduced crime. (Photographs of Arena Design Centre are at **Appendix 4**, and photographs of Overbury Road and Eade Road are at **Appendix 5**).
- 2.7 One example of a successful venture that LB Haringey and Provevell have supported over the past year is the establishment of New River Studios at Unit E, 199 Eade Road (a former industrial unit).
- 2.8 New River Studios was set up 2 years ago as an initiative to support creative businesses and artists. The building comprises studio space, rehearsal rooms, a pop up bar/cafe and exhibition space. So far the project has attracted 2 theatre groups, 1 photography studio, 1 filmmaker, 1 architecture firm, 3 fashion designers, 1 ceramicist, 1 clothing retailer and 2 set design companies. These have all been small businesses, some of whom live in the warehouses on the estate, and some people who live locally.
- 2.9 The rehearsal rooms give young people the opportunity to improve their music skills and specifically to learn how to play in a band. This initiative is funded by LB Haringey. Other partners on this include Beggars' Group, Homes for Haringey and Community Music, all of whom Provevell enjoy very good relationships with.
- 2.10 The exhibition space is partly used by Jackson's Lane. Jackson's Lane are running circus workshops from Unit E on Thursday evenings. They have also booked a showcase event in April and are planning more events. Jackson's Lane have been asked by LB Haringey to do more outreach work in Tottenham, but they have struggled to find a venue because Haringey's own facilities (Triangle



and Bernie Grant Centre) cannot open in the evenings because of funding cuts. Unit E therefore provides an excellent venue for them. (Photographs of New River Studios are at **Appendix 6**).

- 2.11 The success of New River Studios demonstrates the regenerative potential that can be realised in this area, re-utilising former industrial warehouses and providing a suitable and complementing neighbouring use to residential use and the warehouse community.

### **Format of Accommodation**

- 2.12 Each warehouse unit varies but a typical example comprises a large communal area with kitchen, sitting area(s), and some creative space. These areas are often well lit with good levels of natural daylight. Off this communal area will be approximately a number of large (approximately 16 m<sup>2</sup>) bedrooms. For some units these will have direct access to natural daylight, for a few units the light will be borrowed.
- 2.13 In addition units will have a number of shared bathrooms and sometimes outdoor amenity space and cycle parking. The large communal spaces and large bedrooms exceed London Plan minimum sizes and are therefore very popular and good value.
- 2.14 ProveWell have been committed to ensuring excellent standards are achieved throughout their estates. Unlike other estates they ensure units are not crammed with too many rooms, large areas of communal spaces are provided and a high level of amenity is achieved.

### **SA 34: Arena Design Centre**

#### ***Site Location and Description***

- 2.15 Site SA34: Arena Design Centre is located in the south of the borough, to the south of the Barking Gospel Oak Rail Line. The site is approximately 600 metres

from Haringey Green Lanes Overground Station and approximately 1km from Manor House Underground Station. A number of busses pass nearby the site on Green Lanes.

- 2.16 The site has a single vehicular and pedestrian access from Greater Ashfield Road, that is currently gated. The site comprises part of a former industrial estate, with dated industrial buildings comprising 2-3 storeys. There is an area of car parking in the middle of the site for approximately 40 cars. The site does not have any architecturally or historically important buildings, nor is it at risk from flooding. The site has a PTAL of 2.
- 2.17 The surrounding area to the east and west is an established residential community. To the north is the former St Anne's Hospital site that is currently in for planning for a large residential redevelopment, and will therefore form a residential neighbour to the site. The site borders Crusader Industrial Estate to the south that is in industrial use, and beyond this to the south is Omega Works, which is another warehouse living area.

### ***Lawful Uses of the Site***

- 2.18 Unlike most of the other established employment sites that have been identified in the Site Allocations DPD, this site has evolved over the past 15 years to become predominantly residential in use with a well established warehouse community and creative living/working. The site has 28 separate units. These units house between 3 and 6+ people per unit, with approximately 275 residents living on the estate. A table outlining the lawful uses and size of each unit and map showing the lawful uses of the units is at **Appendix 7**. Only Unit D and Unit E right are in commercial use. These units are used by a stone cutters and employ approximately 5 people. All the other units within the estate are in residential/ HMO or live/work use.
- 2.19 The table summarising lawful uses reveals:
- i. Approximately 4,600 m<sup>2</sup> of lawful residential use,
  - ii. Approximately 1,000 m<sup>2</sup> of lawful commercial space in commercial use,

- iii. Approximately 2,000 m<sup>2</sup> of additional residential accommodation (previously commercial floorspace) that is being occupied without Certificate of Lawfulness. However, the majority of this space has been in established residential use by the host community for 5-10 + years and therefore capable of qualifying for a Certificate of Lawfulness of Existing Use as residential.
- 2.20 In summary, the overall site has, either through a formal grant of planning (CLEUD), or longevity, approximately 6,600 m<sup>2</sup> of residential with only 1,000m<sup>2</sup> of commercial employing 5 people. The Estate has a residential feel and is no longer an important industrial estate or employment area (photographs of the site are at **Appendix 4**)
- 2.21 There are significant physical barriers to use of the site for commercial uses including access, quality of floorspace and the residential nature of the area.
- 2.22 The remaining commercial occupier, the Stonecutter, constantly complains about the quality of the site for business. Complaints include poor access, difficulty in turning and manoeuvring vehicles and conflicts with residential uses.

### **SA38: Overbury Road and Eade Road**

#### ***Site Location and Description***

- 2.18 Site SA38: Overbury Road and Eade Road is located in the south of the borough, to the west of Seven Sisters Road. The site is approximately 600 metres from Manor House Underground Station and within close proximity to Seven Sisters Road where a number of bus routes pass. The site has a PTAL of 5.
- 2.19 The site comprises a former industrial estate, comprising a number of former warehouses of varying ages. The warehouses range in size and height from 2 storeys to 4 storeys. The site does not have any architecturally or historically important buildings, nor is it at risk from flooding.

### ***Lawful Uses of Site***

- 2.20 The site has evolved over the past 15 years to become predominantly residential in use. The site has 68 separate units. These units house between 3 and 15 people per unit, with approximately 520 residents living on the estate. A table outlining the lawful uses and size of each unit and a map showing the lawful uses of the units is at **Appendix 8**.
- 2.21 Only Unit 1 and Unit 2 Overbury Road, part of Unit E, and the ground floor of Unit 4 199 Eade Road are in a commercial use. All the other units within the estate are in residential/ HMO or live/work use.
- 2.22 The table summarising lawful uses reveals:
- i. Approximately 8,300 m<sup>2</sup> of lawful residential use,
  - ii. Approximately 3,925 m<sup>2</sup> of lawful commercial space in commercial use,
  - iii. Approximately 6,132 m<sup>2</sup> of additional residential accommodation (previously commercial floorspace) that is being occupied without Certificate of Lawfulness. However, the majority of this space has been in established residential use by the host community for 5-10 + years and is therefore capable of qualifying for a Certificate of Lawfulness of Existing Use as residential.
- 2.23 In summary, the overall site has, either through a formal grant of planning permission or longevity, approximately 14,431 m<sup>2</sup> of residential floorspace with only 3,925m<sup>2</sup> of commercial floorspace accommodating very few jobs. (Photographs of the site are at **Appendix 5**).
- 2.24 To the north of the estate is Overbury Road. Overbury Road comprises 13 units in lawful residential use with approximately 57 residents.
- 2.25 On the southern side of Overbury Road there is the Old Ribbon Factory which comprises four certified residential units with approximately 33 people.

- 2.26 To the east of the estate is Tewkesbury Road which borders the appeal site. Along this road and within the site is a walk way named Catwalk Place. Within Catwalk Place are two residential buildings where a Certificate of Lawfulness of Existing Use has been obtained for residential use. This includes Cardigan House and The Button Factory which are 2 – 3 storeys in height and include 4 – 6 flats within each unit. This comprises approximately 63 residents.
- 2.27 To the west of Catwalk Place is the Cotton Mill, in respect of which a Certificate of Lawfulness of Existing Use is currently being sought for residential use, as it has been in residential use for over 4 years. It includes 5 flats with approximately 7 residents within each, totalling 35 residents. Neighbouring Cotton Mill to the west is Stone House. Stone House has a Certificate of Lawfulness of Existing Use for 12 flats at first floor, with approximately 25 residents. Cara House is located to the south eastern edge of the site. It comprises five storeys of lawful residential use and approximately 30 residents.

### **Current Planning Policy Designations**

#### ***SA 34: Arena Design Centre***

- 2.28 Arena Design Centre currently is not a designated employment area by the Local Plan. The current UDP identifies the Site as a Site Specific Proposal 17, and allocates the site for employed led mixed use development, with an indicative residential capacity of 67 new units.
- 2.29 In addition the earlier Reg 18 Consultation Document of LB Haringey's Site Allocations DPD (2014), accepted '*Sections of Arena Business Centre have been in live/work use for a long period, and a return to commercial use is not considered likely*'.

#### ***SA38: Overbury Road and Eade Road***

- 2.30 Overbury Road and Eade Road are currently part designated as a Locally Significant Industrial Site (LSIS), and part of the estate has no designation.

- 2.31 The current Proposals Map (at **Appendix 9**) includes part of the Eade Road site within Defined Employment Area 16, which is a LSIS. However at least half of the site allocation including Cotton Mill, Old Ribbon Factory, Button Factory, Overbury Road and Tewksbery Road is outside of the LSIS designation, and does not have a designation.

### **Emerging Planning Legislation**

- 2.32 On the 15<sup>th</sup> April changes to the General Permitted Development Order will introduce permitted development rights for the change of use of Use Class B8 Storage and Distribution to Use Class C3 dwellinghouse.
- 2.33 There are a number of conditions that have to be met, but the thrust of the changes mean there is an acceptance from Central Government on the principle of the change of use from B8 to C3.

### **Relevant Appeal Decisions**

#### ***Unit 4 and Unit C, 199 Eade Road***

- 2.34 Two recent appeal decisions relating to sites within the SA38 Overbury Road & Eade Road Estate are relevant to these representations.
- 2.35 Appeal refs APP/Y5420/C/14/2212163 and APP/Y5420/C/14/2212166, dated 25<sup>th</sup> September 2014 (at **Appendix 10**) quashed enforcement notices at Unit 4 and Unit C, 199 Eade Road that related to the unauthorised change of use of commercial units to residential use. The Inspector for the enforcement appeals considered in detail the current lawful uses of the estate and condition and quality of the estate for employment uses. The key and relevant points from the decision are set out below.

### *Suitability of the Estate for Employment Uses*

- 2.36 The Inspector accepted at para 21 of the decision, *'the appeal sites are no longer suitable for business, and agreed evidence tends to show that this part of the LSIS does not continue to meet the demand and needs of modern industry and business'*.

### *Lawful Residential Uses*

- 2.37 The Inspector accepted there were significant amounts of existing lawful residential uses at the site. At para 32 of the decision, the Inspector states *'the sites are no longer suitable for pure business or industrial use, partly because of the amount of lawful residential use already established in the vicinity'*.

- 2.38 The Inspector also recognised the significant residential element of the estates and residential environment at Para 29 of the decision, stating *'the environment is consistent with the character of Overbury Road, immediately to the northeast, which appears to be dominated by residential and live/work units and where a sign has been erected saying Artists Village'*.

### *Future of Estates*

- 2.39 The Inspector accepted residential uses on the estate were appropriate at para 35, supporting the avoidance of the long term protection of sites allocated for employment use, where there is no reasonable prospect of a site being used for that purpose.

### **3.0 LONG TERM VISION FOR SITES**

#### ***SA 34 Arena Design Centre***

- 3.1 The long term vision for this estate is for a residential led mixed use re-development of the site to be delivered through a masterplan. The intention is for an improvement in the existing employment offer through denser re-provision and intensifying existing levels of employment.
- 3.2 In addition the vision is for retention of the existing warehouse community through the re-provision of innovative creative living solutions. The vision includes maximising delivery of Private Rented Sector Housing, creating a sustainable community as well as creating an architecturally interesting and distinctive place. The vision also includes improving access and connectivity of the site to improve the public transport accessibility level.

#### ***SA 38 Overbury Road and Eade Road***

- 3.3 The long term vision for this estate is for a mixed use re-development of the site to be delivered through a masterplan. The intention is for an improvement in the existing employment offer through denser re-provision and intensifying existing levels of employment.
- 3.4 In addition the vision is for retention of the existing warehouse community through the re-provision of innovative creative living solutions. The vision includes maximising delivery of Private Rented Sector Housing, creating a sustainable community as well as creating an architecturally interesting and distinctive place, with a landmark building marking the gateway to the area on the corner of Eade Road and Seven Sisters Road.



## 4.0 POLICY REPRESENTATIONS

4.1 This Section sets out Provevell's specific representations to individual policies within the Site Allocations DPD.

### **SA2: Changes to Designated Employment Areas**

4.2 Policy SA2 of The Site Allocations DPD currently proposes to change the designation of LSIS 1 (Crusader Industrial Estate) to include SSPS17 and 29 and re-designate the whole area as a Local Employment Area: Regeneration Area. This means site allocation SA34: Arena Design Centre will now be an allocated Local Employment Area. This is also stated as part of the site allocation SA34: Arena Design Centre.

4.3 In addition Policy SA2 proposes changes to LSIS 16 (Vale Road Eade Road), which part re-designates it to Employment Land: Regeneration Area and expands the area to include land at Overbury Road, which was previously not designated as an employment area. This is set out in further detail in Site Allocation SA38.

### **Representation**

4.4 Provevell object to the designation of site SA34 Arena Design Centre as a Local Employment Area: Regeneration Area, and object to the designation of part of site SA38 Overbury Road Eade Road to a Local Employment Area: Regeneration Area. There is no site specific policy justification within the Site Allocations DPD and Evidence base for the re-designation of these areas. Our reasons and evidence for objecting to the re-designation is set out below.

#### ***i. Current Designations***

*SA 34: Arena Design Centre*

- 4.5 Currently figure 5.1 and Policy SP2 of Haringey's Local Plan Strategic Policies, does not designate Arena Design Centre as an employment area of any kind. This amendment to the designation therefore does not comply with the Strategic Policies in Haringey's Local Plan Strategic Polices.
- 4.6 In addition Haringey's UDP and Proposals Map (2006), does not allocate the site as an Employment Area.
- 4.7 Since the UDP was published in 2006, that did not consider Arena Design Centre to be an important employment area, there have been further changes on the site through increasing levels of lawful residential use. The site has an established residential use and is for the most part now lawful by reason of longevity and/or having gained Certificates of Lawfulness. The site has become almost wholly residential in nature and very little employment is left on the site. Our survey confirms only 5 people are employed across the site. Further evidence will be submitted shortly from a local commercial agent who has confirmed the only commercial occupied unit would be almost impossible to market for industrial use, and the cost of refurbishment to bring the unit back to a suitable quality to let vs potential return does not make it viable for commercial use. The site makes very little current positive economic and employment contribution, and will make even less future economic contribution. In addition from 15<sup>th</sup> April 2015 Unit E right will benefit from permitted development rights for change of use from B8 to C3.
- 4.8 The site has therefore considerably more lawful residential floorspace, and far less employment floorspace than it did in 2006, when the current Local Plan did not consider the site worthy of designation as an important employment area. This draft allocation conflicts with existing local policy and national guidance at Paragraph 22 of the NPPF that requires planning policies to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
- 4.9 In addition Atkins Haringey Employment Land Study recommends at para 8.17 there is little benefit in safeguarding employment sites that are not fit for purpose and could be used to relieve the Borough's housing and regeneration pressures.

- 4.10 It is therefore unjustified that the draft Site Allocations DPD now designates the site as an Employment Area: Regeneration Area, as it is not currently an important employment site, is certainly less important than the last Local Plan designation in 2006, and due to permitted development rights changes the only remaining commercial unit will be capable of changing to residential from 15<sup>th</sup> April 2015.

*SA 38: Overbury Road and Eade Road*

- 4.11 Provewell welcome the re-designation of the southern part of their site from a LSIS to a Local Employment Area: Regeneration Area. This more accurately reflects and acknowledges the site is no longer locally significant comprising entirely commercial uses, but more accurately recognises the mix of uses present at the site and the poor quality of the site for traditional employment provision.
- 4.12 The re-designation of the site from a LSIS to LEA Regeneration Area, will allow for a mixture of uses on the site including retaining the existing warehouse community, employment provision and the provision of private rented sector residential use.
- 4.13 Provewell, however object to the re-designation of the north eastern half of the Eade Road site to LEA: Regeneration Area (specifically around Overbury Road).
- 4.14 Currently Figure 5.1 and Policy SP2 of Haringey's Local Plan Strategic Policies, does not designate this part of the site as an employment area. This amendment to the designation therefore does not comply with the Strategic Policies in Haringey's Local Plan Strategic Polices.
- 4.15 In addition Haringey's UDP and Proposals Map (2006), do not allocate the site as an Employment Area.
- 4.16 Since the UDP and Proposals Map was published in 2006, that did not consider this part of the site to be an important employment area, there have been further changes on this part of the site through increasing levels of lawful

residential use. The site has an established residential use and is for the most part now lawful by reason of longevity and/or having gained Certificates of Lawfulness. This part of the site has become even more residential in nature and very little employment is left. Our survey (**appendix 8**) confirms the majority of the units along Overbury Road and Tewksbury Road are in residential use.

4.17 This part of the site has therefore considerably more lawful residential floorspace, and far less employment floorspace than it did in 2006, when the current Proposals Map and UDP did not designate this part of the site as an important employment area. This draft policy designation therefore conflicts with guidance at Para 22 of the NPPF that requires planning policies to avoid the long term protection of sites allocated for employment use where there is no reasonable protect of a site being used for that purpose.

4.18 It is therefore unjustified that the draft Site Allocations DPD now designates this part of the site as an Employment Area: Regeneration Area, as it is not currently an employment site.

***ii. Assessment of Employment Sites in Atkins Employment Land Review***

4.19 The Site Allocations SPD relies on the Atkins Employment Land Study to inform the designations of the employment sites. At Para 5.10 of the Land Study it confirms the assessments of the employment sites were based on visual surveys of the sites and are qualitative in nature.

4.20 As the survey was effectively done on a visual 'walk by' basis, the detail and accuracy of this assessment is therefore limited in scope, inaccurate and misleading.

*SA 34: Arena Design Centre*

4.21 The evaluation in the Employment Land Study does not evaluate the quality of Arena Design Centre for employment uses, as it is currently not a designated Employment Area. Therefore the re-designation of this site from non designation

to a LEA is not at all justified, and consideration must be given to our own survey at **Appendix 7**.

*SA38: Overbury Road and Eade Road*

4.22 The assessment fails to review the Overbury Road part of Site SA38 (which currently does not form part of the LSIS). This assessment must therefore be read alongside our own quantitative surveys of the employment sites that paint a far more accurate picture of the current state of the sites. Our quantitative surveys (at **Appendices 7 and 8**), confirm for both estates there are significant swathes of lawful residential uses and will therefore remain as such or increase with the recently announced changes to permitted development rights.

4.23 The Employment Land Study assessment for DEA16 Vale Road/ Tewksbury Road considers the entire LSIS, that comprises sites SA 37, SA38 and SA39. These three sites vary considerably in their nature and use, which is partly recognised in the re-designations. However the assessment is incorrect when it states at para 5.91 'there is considerable unplanned, unlicensed occupation of parts of the site (around Overbury Road/Eade Roads and Chilli Works)'. Our own employment survey confirms that for Site SA38, over half of the estate's floorspace is lawful residential use.

4.24 It is of relevance to note that detailed analysis and assessment of the Eade Road Overbury Road site was made by the Inspector for the Appeal decisions at Eade Road (**appendix 10**), that confirmed,

*'The sites are no longer suitable for business, and evidence tends to show that this part of the LSIS does not continue to meet the demand and needs of modern industry and business'.*

4.25 A far more holistic and accurate assessment of the Eade Road Overbury Road estate must therefore be considered before re-designating part of Site SA38 from non designation to LEA, rather than solely relying on the qualitative visual survey contained with Atkins Employment Land Survey, that actually fails to assess this part of the site. The re-designation is unjustified given it is no longer

suitable for business, as confirmed by the Inspector of the Eade Road appeal, and as confirmed by our own survey of the estate.

- 4.26 The Employment Land Survey recommends at para 8.17 there is little benefit in safeguarding the employment sites that are not fit for purpose and could be used to relieve the Borough's housing and regeneration pressures, and at para 8.19, sites that are not fit for purpose and unlikely to meet future business needs should be considered for release.
- 4.27 Therefore the re-designation of Site SA34 Arena Design Centre and the Overbury Road part of Site SA38 to LEAs is unjustified given they are no longer fit for purpose nor do they meet the demands for modern industry.
- 4.28 These sites should therefore be considered for release in line with the Atkins Employment Land Study recommendations.

### **Employment Floorspace Figures**

- 4.29 Page 15 of the Site Allocations DPD sets out existing floorspace figures and proposed floorspace figures.

#### *SA34 Arena Design Centre*

- 4.30 The Table identifies 4,600 m<sup>2</sup> of existing employment floorspace, and 4,600 m<sup>2</sup> of proposed floorspace.
- 4.31 This amount of employment floorspace is incorrect, and Provevell object to the re-provision of this quantum. Our survey and record of Certificates of Lawfulness confirms 4,600 m<sup>2</sup> of lawful residential use on site, and only 1,000 m<sup>2</sup> of floorspace in lawful commercial use. A review of the VOA data confirms 1,336 m<sup>2</sup> of employment floorspace (although the VOA figures includes Unit J and Unit L6 that are actually in residential use).

- 4.32 This figure should therefore be changed to a maximum of 1,000 m<sup>2</sup>, reflecting the existing commercial floorspace found on site. As any new floorspace will be of much greater quality and employment densities, there is likely to be significant employment generated from redevelopment proposals.

*SA38 Eade Road Overbury Road*

- 4.33 The Table identifies 17,900 m<sup>2</sup> of existing employment floorspace, and 17,900 m<sup>2</sup> of proposed floorspace.
- 4.34 This figure is misleading as it is unclear what area this includes. The Employment Land Survey confirms 17,771 m<sup>2</sup> of employment floorspace for DEA16 Vale Road/Tewksbury Road, but this figure encapsulates the entire LSIS, including Vale Road, Eade Road (a separate site allocation ref SA 37), and the site (that is not a Site Allocation) in between that and Site SA38. Site SA38 comprises about one third of the overall area (according to the Employment Land Survey, this figure is derived from VOA data, and EGI data).
- 4.35 Therefore the actual amount of employment floorspace for Site Allocation SA38 Overbury Road Eade Road is unclear. Our survey suggests approximately 3,925 m<sup>2</sup> of the floorspace in employment floorspace, and The VOA indicates 4,399 m<sup>2</sup> (although the VOA figures includes 1-19 Tewksbury Road, 7,13,23,25,27 Overbury Road, which are in residential use).
- 4.36 This table should therefore be updated to clarify this situation, with a maximum of 3,925 m<sup>2</sup> reflecting the existing commercial floorspace found on site. As any new floorspace will be of much greater quality and higher employment density, there is likely to be significant employment generated from redevelopment proposals.

**Requirement of re-provision of original pre-conversion levels of Employment Floorspace**

- 4.37 Currently the policy for warehouse living areas requires the original floorspace before conversion to residential use began to be replaced as part of new developments.
- 4.38 Provevell strongly object to this requirement. This is a very unreasonable expectation for both of Provevell's sites that were last in fully commercial use 10-20 years ago.
- 4.39 The policy should instead make reference to the current lawful and established planning position of the uses on site rather than as currently proposed, the original floorspace prior to the conversions.

*SA 34: Arena Design Centre*

- 4.40 Arena Design Centre currently under the existing Local Plan does not have an employment designation. In addition the earlier Reg 18 draft Consultation Document of Haringey's Site Allocations DPD (2014), accepted '*Sections of Arena Business Centre have been in live/work use for a long period, and a return to commercial use is not considered likely*'.
- 4.41 Therefore under existing policy any redevelopment of this site would require replacement/ increase in the number of jobs and not the re-provision of pre-conversion levels of floorspace.
- 4.42 This policy approach is far more reasonable and reflects the nature of this estate that is largely residential. Paragraph 22 of the NPPF requires planning policies to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Arena currently has no reasonable prospect of being returned to commercial use, which must therefore be a material consideration when deciding if there should be a return to pre-conversion levels of commercial floorspace, which is currently required by this draft policy.



*SA 38: Overbury Road Eade Road*

- 4.43 The Inspector for the enforcement appeals at Unit 4 and Unit C, 199 Eade Road considered at para 32 of their decision, "the sites are no longer suitable for pure business or industrial use, partly because of the amount of lawful residential use already established in the vicinity". Thus the existing position and context of the site must be given serious consideration in the planning policy, and not the pre-conversion status of the estates which is a very historic position.
- 4.44 We contend a more appropriate way of assessing the re-provision of employment on these estates would be to look at job numbers and increasing density rather than floorspace.
- 4.45 We request the policy wording is changed from re-provision of pre-conversion floorspace levels, to re-provision of existing lawful levels of employment floorspace. This will lead to a more sound policy basis, that will ensure job numbers are increased through denser re-provision of employment, and allow for a more viable redevelopment.
- 4.46 A denser re-provision of existing lawful commercial floorspace reflects the change in type of employment provision, with the limited current employment provision at sites SA34 and Site SA38 as B2 or b8 employment which employs very few people. The type of re-provision of employment proposed at these sites will be B1 use for SMEs that is much denser therefore leading to an increase in job provision.
- 4.47 This sort of employment use will also be more compatible with the warehouse living and residential uses.

**Differentiation of Estates**

- 4.48 The Site Allocations DPD fails to differentiate between the different warehouse living areas, which leads to erroneous designations as well as not acknowledging the implications for site specific allocations.

- 4.49 The areas identified all have varying levels of lawful uses, varying physical constraints and varying standards of accommodation, but are given the same policy treatment.
- 4.50 The policy currently requires re-provision of pre-conversion levels of employment floorspace for all the warehouse living policy areas. This blanket policy fails to fully understand or take account of the different characteristics, locations and lawful uses of each site.
- 4.51 A much fairer and more reasonable way to encapsulate these site differences would be for re-provision of existing lawful employment floorspace.
- 4.52 For example Sites SA34 Arena Design Centre, SA 35 Crusader Industrial Estate and SA 36 Omega Works are all allocated as a LEA: Regeneration Area, and within the Haringey warehouse district, and therefore currently are all required to re-provide pre-conversion levels of employment floorspace. As is clearly visible from the sites they do considerably vary.
- 4.53 Crusader Industrial Estate is currently designated as a LSIS, and is in active employment use with no residential uses. Crusader is assessed by Atkins Employment Land Study which states the site "provides for a variety of employment uses with relatively well functioning B2/B8 space. The site has good public transport links and parking provision". The assessment also confirms a low vacancy rate of 17% which relates to one large B class unit.
- 4.54 Omega Works is not assessed by Atkins Employment Land Study but it currently has a mix of poor quality live/work, employment and residential uses.
- 4.55 Crusader and Omega contrast significantly with Site SA34: Arena Design Centre in terms of the land use and quality of site for employment. Arena Design Centre only supports 5 jobs through one commercial occupier the Stonecutter. In addition the Stonecutter will be vacating by October 2017 when their lease expires. They have indicated they will not be renewing their lease given the conflict with the residential uses on the site, the poor access and poor working environment.

4.56 ProveWell therefore object to:

- i. the blanket requirement of all sites within the warehouse district to re-provide pre-conversion levels of employment space, and instead it should be re-provision of existing lawful employment use;
- ii. the re-designation of Arena Design Centre, Crusader and Omega Works to LEA Regeneration Area. There are significant differences in these estates. Arena Design Centre does not warrant re-designation to a LEA Regeneration Area, (which would then be the same classification as Crusader);
- iii. not acknowledging current levels of residential uses on the sites and the impact of this on the viability of redevelopment. The varying levels of lawful residential floorspace across the sites will have a significant impact on the viability of the redevelopment of the estates. Where there is a requirement of policy for sites within the warehouse policy area to re-provide for the existing community, re-provide employment floorspace, varying levels of residential PRS will be required for cross-subsidisation to make redevelopment viable. Where there are higher levels of existing lawful residential uses on sites, a higher amount of residential provision will be needed as part of the redevelopment to justify its viability, compared to sites where there are relatively low levels of existing lawful residential uses, that will need a far lower amount of residential provision to justify its redevelopment.

4.57 Policy therefore needs to allow for differentiation between the estates, and we suggest the most appropriate way to do this is to have regard to the existing lawful position of the uses on the sites, as well as their designation.

#### **SA34 Arena Design Centre**

4.58 In addition to the above comments on the principles behind the site allocation policies, further representations are made below on the site specific policies.

***Designation as Employment Area: Regeneration Area***

4.59 Provevell object to this re-designation. The reasons are set out above but summarised below:

- Conflict with Existing Local Plan designations and no justification for re-designation;
- Most of this area is lawful residential use;
- No assessment of this part of this part of the estate in the Evidence base, specifically Atkins Employment Land Study;

***Quantum of dedicated employment floorspace should match that originally built on site***

4.60 Provevell fundamentally object to this requirement. We contend the wording should be changed to re-provision of current level of lawful employment use, for the reasons set out above. This will through an agreed masterplan with the Council, ensure the number of jobs on the site is increased through denser re-provision.

***Height Limit of 6 storeys***

4.61 Provevell agree the site should respond appropriately to the scale and massing of surrounding development. However currently the limitation of 6 storeys is unduly restrictive and does not allow for flexibility that should be explored through a masterplan. For example there may need to be greater flexibility to ensure a viable scheme can be delivered, this may require an increase in height at an appropriate part of the site to ensure the full regeneration benefits of the site are deliverable.

### ***Net Residential Units***

- 4.62 The table at Page 15 of the document indicates an indicative net residential units for the site of 140. It is accepted this is worked out using the London Plan density guide, however we request this is stated as a guide or the minimum net additional units. We also request this number is in addition to the re-provision of the existing community in warehouse living. This will ensure the provision of housing and employment on the site is maximised and allow the flexibility for a viable scheme to be delivered.

### **SA38 Eade Road, and Overbury Road**

- 4.63 In addition to the above comments on the principles behind the site allocation policies, further representations are made below on the site specific policies.

### ***Gateway Building on the Corner of Eade Road and Seven Sisters Road***

- 4.64 Provevell support the wording that allows for a gateway building on the corner of Eade Road and Seven Sisters Road, as this marks a potentially crucial gateway to the warehouse district.
- 4.65 London Plan Policy 7.7 supports tall buildings where they improve the legibility of an area by emphasising a point of civic or visual significance, where they contribute to improving the permeability of a site and wider area and where they make a significant contribution to local regeneration.
- 4.66 The corner of the Eade Road and Seven Sisters Road therefore could be potentially appropriate for a tall building that marks the gateway to Haringey Warehouse District, significantly contributes to the regeneration of the site and wider area and improves the legibility and permeability of the site and wider area.
- 4.67 Provevell request the wording is minimally changed with the insertion of 'tall', so the second point of the policy reads:

4.68 *There is potential for a **tall** building on the corner of Eade and Seven Sisters Roads marking the gateway to the warehouse district from Seven Sisters Road.*

***Designation as Employment Area: Regeneration Area***

4.69 Provevell support the re-designation of the southern part of the site from a LSIS to a LEA, which reflects the current mix of uses on the site, and the absence of industry.

4.70 Provevell however object to the re-designation of the northern part for the site from no allocation to LEA allocation. The reasons are set out above but summarised below:

- Conflict with Existing Local Plan designations and no justification for re-designation;
- Most of this area is lawful residential use;
- Evidence from appeal decisions on Eade Road confirming the area should not be protected long term for employment use;
- No assessment of this part of this part of the estate in the Evidence base, specifically Atkins Employment Land Study.

***Quantum of dedicated employment floorspace should match that originally built on site***

4.71 Provevell fundamentally object to this requirement. We contend the wording should be changed to re-provision of current level of lawful employment use, for the reasons set out above. This will ensure the number of jobs on the site is increased through denser re-provision.

### ***Net Residential Units***

- 4.72 The table of Page 15 of the document indicates an indicative net residential units for the site of 220. It is accepted this is worked out using the London Plan density guide, however we request this is stated as the minimum additional units. We also request this number is in addition to the re-provision of the existing community in warehouse living, i.e. a net increase. This will ensure the provision of housing and employment on the site is maximised and allow for a viable scheme to be delivered.

## **5.0 CONCLUSIONS OF SITE ALLOCATIONS DPD REPRESENTATIONS**

- 5.1 These representations have been prepared on behalf of Provevell Estates to the Local Plan, Site Allocations DPD Preferred Options. Provevell Estates own Site S34: Arena Design Centre and Site SA38: Overbury Road and Eade Road.
- 5.2 Provevell support the positive policy contained within the Preferred Options Site Allocations DPD, that promotes the mixed use redevelopment of their estates. Provevell support the delivery of this through an agreed masterplan that will set out the further detail and design of estates.
- 5.3 These representations include a detailed analysis of the two estates, and provides evidence on the current lawful land uses of both estates.
- 5.4 Arena Design Centre is predominantly in residential use, with approximately 6,600 m<sup>2</sup> of residential use. The site has very little actual employment, approximately 5 jobs are supported across the site. The site is currently not allocated by the Local Plan to be an employment area, and is not an important LEA. Therefore Provevell object to the re-designation of the site as a LEA.
- 5.5 Overbury Road Eade Road is currently predominantly in residential use, with approximately 14,430 m<sup>2</sup> of residential use. The site is certainly no longer performing the role of a Locally Significant Industrial Site, and therefore Provevell support its re-designation to a LEA: Regeneration Area, which will allow for a mix of uses. Provevell however do object to the designation of the north eastern part of the site around Overbury Road as a LEA. This part of the site is not currently allocated by the Local Plan as an employment area, and our own evidence suggests it is predominantly residential in nature. There is no justification for its re-designation and Provevell object to the proposed designation of this part of the site.
- 5.6 Provevell would encourage LB Haringey to take a more qualitative view on employment in their policy wording. Currently the policy is drafted requiring replacement of pre-conversion levels of employment floorspace across the estates. Given the existing residential levels found in the estate, this is



unfeasible, when the estates were last in industrial use 10-20 years ago. Instead the policy should have regard to the existing lawful position of the estates, as well as the number and quality of jobs created. Re-provision of employment will be in a denser form compared to the historic position of the estates, which will result in an increased number of jobs. Provewell therefore request policy is changed to reflect this.

- 5.7 One of the recommended policy implications of the Atkins Employment Land Study is where sites are not fit for purpose and unlikely to meet future business needs they should be considered for release.
- 5.8 These representations have clearly demonstrated the sites are no longer fit for commercial/employment purpose and cannot meet future business needs, so should therefore be released in accordance with the thrust of paragraph 22 of the NPPF.

## **6.0 DEVELOPMENT MANAGEMENT POLICIES DPD POLICY REPRESENTATIONS**

6.1 This Section sets out Provevell's specific representations to individual policies within the Development Management Policies DPD.

### **Policy DM 5 Siting and Design of Tall Buildings**

6.2 This Policy refers to Map 2.2 for areas suitable for tall buildings.

6.3 The Map is unclear as to exactly where tall buildings are accepted, as many of the Site Allocations are left white, with tall building clusters only allocated for Tottenham Hale, Haringey Heartlands and Wood Green.

6.4 Provevell recommend the policy wording is changed to ensure exceptions to this policy are allowed for suitable sites that are allocated within the Site Allocations DPD, that will be delivered via an agreed masterplan with the Council.

6.5 English Heritage and The Design Council's consultation version of Tall Buildings, Advice on plan making, submitting, assessing and deciding planning controls (2014), considers in the right place well-designed tall buildings can make positive contributions to city life. The guidance supports tall buildings in the right place where they can serve as beacons of growth and regeneration, and stimulate further investment.

6.6 London Plan Policy 7.7 supports tall buildings where they improve the legibility of an area by emphasising a point of civic or visual significance, where they contribute to improving the permeability of a site and wider area and where they make a significant contribution to local regeneration.

6.7 A number of the sites within the Site Allocations DPD, such as SA38 Overbury Road and Eade Road are large strategic sites in very sustainable locations. This site could be potentially appropriate for a tall building that marks the gateway to Haringey Warehouse District, that significantly contributes to the regeneration of

the site and wider area and improves the legibility and permeability of the site and wider area.

- 6.8 The re-development of the site will be delivered through an agreed masterplan, therefore this policy needs to allow for flexibility to explore whether tall buildings are appropriate in suitable locations within these sites, in order to maximise delivering employment and housing as well as creating high quality well designed areas.
- 6.9 For example Site SA 38: Overbury Road and Eade Road is in a very sustainable location. The site has a PTAL of 5, and is within close proximity to Manor House Underground Station and Seven Sisters Road where a number of bus routes pass. The site will be re-developed through an agreed phased masterplan with the Council and is a key strategic site marking the entrance to the emerging Haringey Warehouse District. A gateway building on the corner of Seven Sisters Road and Eade Road may be appropriate here, and there is acceptance and provision within the draft Site Allocation policy for this.
- 6.10 Therefore emerging Policy DM 5 needs to allow for exceptions to this policy for suitable parts of appropriate allocated sites that will come forward through an agreed masterplan.

### **Policy DM48 Safeguarding Employment Land and Sites**

- 6.11 Provevell object to the inflexibility of the wording of this policy, and specifically the safeguarding for employment use land within Local Employment Areas.
- 6.12 The policy refers to Policy SP8 of Haringey's Local Plan Strategic Policies, however conflicts with some of the guidance within this policy.
- 6.13 Policy SP8 acknowledges there needs to be flexibility for where local employment areas are no longer suitable for industrial or other employment generating uses, and a progressive release of industrial land will facilitate urban regeneration. In addition Atkins Haringey Employment Land Study recommends at para 8.17 there is little benefit in safeguarding employment sites that are not fit for

purpose and could be used to relieve the Borough's housing and regeneration pressures.

6.14 Policy DM48 does not currently give sufficient weight to the guidance set out in paragraph 22 of the NPPF that warns against the long term protection of employment sites, where there is no reasonable prospect of a site being used for that purpose.

6.15 Whilst it is recognised employment land needs to be carefully managed and protected, the policy wording must be changed to allow for the future flexibility of sites where there is no reasonable prospect of it being used solely for employment purposes.

6.16 Provevell also object to the safeguarding of 'land'. This suggests inflexibility and protection of all land within the sites solely for employment use. This conflicts with guidance in Policy SP8 of the Local Plan and Policy DM50 that allows for the provision of a mix of uses. The provision of a mix of uses on Local Employment Areas will be required if employment uses are re-provided and improved to ensure viable redevelopments are delivered.

6.17 In addition the number of jobs on employment sites can be increased through denser re-provision of the employment floorspace. This would increase the number of jobs whilst allowing a mix of uses. Currently this policy does not recognise or plan for this, and therefore needs to contain greater flexibility in its wording. Suggested wording is set out below (new wording **emboldened and underlined**):

A. The Council will safeguard for employment, ~~use land~~ **existing lawful employment floorspace** within its designated Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas, **where the designated employment sites continue to be suitable for employment and fit for purpose**, in accordance with local Plan Policy SP8.

B. Outside of these areas, the Council will seek to retain in employment use any non-designated employment floorspace and sites, **where they continue to be suitable for employment and fit for purpose.**

### **Policy DM50 Facilitating Site Regeneration and Renewal**

- 6.18 ProveWell support the inclusion of a policy promoting site regeneration and renewal, particularly for former industrial and employment sites in Haringey where there are a large number in poor condition that could benefit from the regenerative nature of re-development.
- 6.19 ProveWell support an element of re-provision of employment floorspace on these sites, but regard must be had to the existing lawful position of employment floorspace on the site.
- 6.20 We recommend therefore the policy wording is slightly altered so that point c. includes reference to the lawful position of the sites and reads as follows,
- c. That maximum amount of employment floorspace is re-provided within the mixed use scheme, with no net loss of existing **lawful** employment floorspace.*
- 6.21 The Council should therefore accept that in appropriate circumstances consideration can be given to accepting reduced and higher quality employment floorspace with increased employment densities.
- 6.22 ProveWell object to the supporting text at paragraph 5.17 of this policy that refers to the redevelopment of non-designated employment sites in lower PTAL locations (lower than 4), not being considered suitable for accommodating higher density mixed use schemes. There are many examples across London where the GLA have accepted very high densities, exceeding London Plan guidance, for schemes that have relatively low PTALs.
- 6.23 This supporting policy text is too restrictive and does not allow for flexibility where sites have fallen redundant or where there is no realistic prospect of the

site being re-utilised for employment floorspace. This wording conflicts with the thrust of paragraph 22 of the NPPF that requires planning policies to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

- 6.24 The supporting text at Paragraph 5.17 therefore needs to be removed or altered to allow for flexibility where sites are in poor condition and could benefit from re-development but with a PTAL of under 4, to ensure compliance with the NPPF.

### **Policy DM51 Warehouse Living**

- 6.25 Provevell support Policy DM 51 Warehouse Living, that promotes warehouse living in Haringey Warehouse District.
- 6.26 Provevell consider warehouse living within Haringey Warehouse District an innovative form that can significantly contribute to meeting the housing and employment needs of the area.
- 6.27 The contribution innovative forms of housing such as warehouse living can make is recognised by the Mayor's Housing Strategy that sets out at Section 4.10 Mayoral support for new approaches to meet housing supply and Section 2.6 and Policy P7 that supports innovative building approaches and modern methods of construction.
- 6.28 Provevell support point b. of Section C of the policy that considers the lawful planning uses on site, establishing the existing baseline with respect to the intensification of the employment offer and re-provision of the host community. However the policy must also consider that warehouse living can contribute towards the employment needs of LB Haringey and that the designated floorspace for work within these typologies can part re-provide existing lawful employment uses as part of the redevelopment of the sites.
- 6.29 It is important the existing lawful planning uses on a site are used as the baseline for this policy, which will allow an intensification of employment.

- 6.30 The policy needs flexibility so that different typologies can be explored through a masterplan, as currently warehouse living comprises a mix of types, sizes and configurations. Suggested additional policy wording is set out below:

**M. A range of typologies for warehouse living should be explored through a masterplan approach.**

#### **Policy DM52 Loss of Employment land and floorspace**

- 6.31 Provevell support the protection of employment floorspace where it continues to meet a need. However Provevell object to the onerous conditions within this policy that have to be met to allow the change of use of employment floorspace to non employment floorspace.
- 6.32 Specifically Provevell object to the requirement of a 3 year marketing campaign. This is too onerous where there is no reasonable prospect of the employment floorspace being used for employment uses, and will restrict the bringing forward of other viable uses for these sites, leading to vacant buildings that make a negative contribution to Haringey and the wider area. Advice has been given by local commercial agents that there is little demand for existing sub standard employment accommodation at Provevell's estates Arena Design Centre and Overbury Road and Eade Road. They have also confirmed given the current rent levels it is uneconomical to redevelop the sites to provide new employment floorspace, which makes reuse of the sites for employment use unfeasible and unviable.
- 6.33 The appeals (refs APP/Y5420/C/14/2212163 and APP/Y5420/C/14/2212166) at Unit 4 and Unit C, 199 Eade Road were accompanied by evidence demonstrating the units were no longer marketable for industrial occupiers. The units had not been marketed nor vacant for 3+ years prior to their occupation for warehouse living. The Inspector accepted at para 21 the submitted evidence demonstrates the site "*does not continue to meet the demand and needs of modern industry and business*".

6.34 In addition the Inspector considered at para 32 *"the sites are no longer suitable for pure business or industrial use, partly because of the amount of lawful residential use already established in the vicinity"*.

6.35 Therefore the policy needs to ensure it is not overly restrictive by imposing a 3 year rule. It must take a more holistic approach considering the surrounding area, the condition of the site and its ability to meets the needs of modern industry. Suggested wording is set out below (new wording underlined and emboldened):

A. the site is no longer suitable or viable for its existing or an alternative business or industrial use; and

B. An open and recent marketing campaign covering a minimum continuous period of ~~3~~ 2 years, has been undertaken without success' or

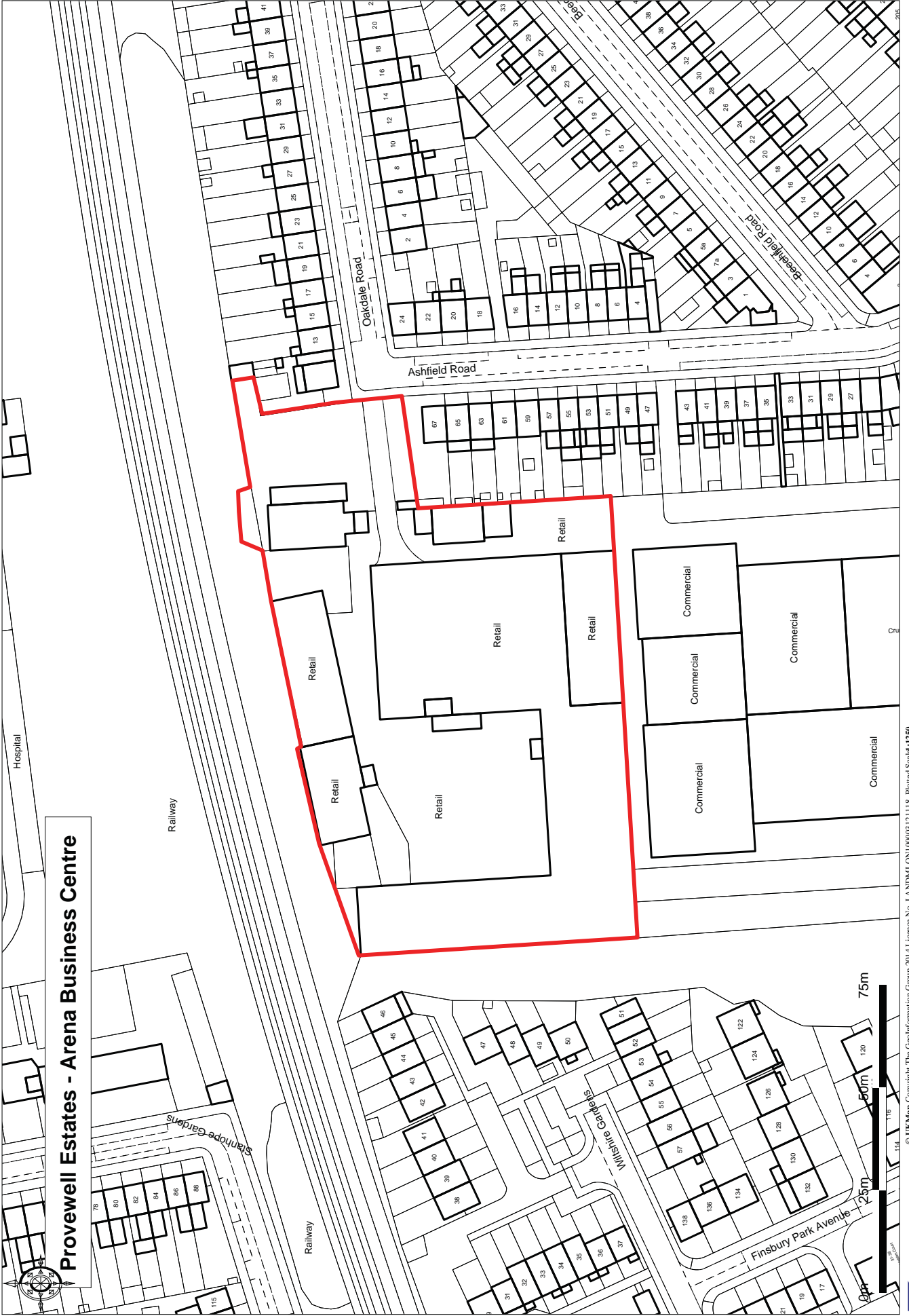
**C. robust market demand analysis confirms there is no reasonable prospect of the site returning to an employment use due to demand, viability and quality of site for employment use; or**

D. a change of use is required to enable site redevelopment as part of a strategically coordinated regeneration scheme or programme, with demonstrable wider community benefits that outweigh those of retaining the land exclusively for industrial and business use.



# **APPENDIX 1**

# Provevell Estates - Arena Business Centre



# **APPENDIX 2**





Specialist School

Primary School

Primary School

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# **APPENDIX 3**

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6<sup>th</sup> March 2014

Dear Sir / Madam,

**VALE ROAD/TEWKESBURY ROAD, VALE ROAD, HARINGEY,  
LONDON N4 1DJ  
LB HARINGEY – SITE ALLOCATIONS DPD (REG 18)  
CONSULTATION DOCUMENT  
REPRESENTATIONS ON BEHALF OF PROVEWELL ESTATES**

I write on behalf of my client, Provevell Estates, with regard to the Council's draft Site Allocations document which is currently out for public consultation. Provevell own the south eastern corner of the Vale Road/Tewksbury Road site (Site Allocation S3), and want to make representations on the development potential for this part of the site (a site ownership plan can be found at **Appendix A**).

Our client welcomes the current allocation as set out by Haringey Council in this document and the potential of the site to contribute towards the residential need in the borough.

**Council's approach to redevelopment of the site**

*Vale Road/Tewkesbury Vale Road*

The wider Vale Road/Tewksbury Road is allocated as Site S3 within the document. The site covers 7.15ha. The draft Haringey Site Allocations DPD acknowledges some existing residential, live/work uses in the area and outlines the potential development capacity of the site for 97,000sqm residential (approx. 1,000 units) and 134,000 sqm commercial development, with the potential for a gateway, landmark building for the south eastern corner of the site.

**Representations**

It is understood through conversations and a meeting with Gavin Ball, LB Haringey planning policy officer, the floorspace figures as forecasted in the Site Allocations document are not based on any concrete evidence base. Instead they broadly correlate to the London Plan's housing requirements for Haringey and the ultimate overall need for new housing in the borough. These are subject to review pending the findings of the latest Employment Land Review that is currently being undertaken.



In light of the above Provevell welcome the Council's allocation of the site, and consideration for redevelopment of the site. Provevell consider there is considerable capacity and potential for residential development for the south-eastern part of site in Provevell's ownership given the significant existing lawful residential use at this part of the site and the residential nature of the site.

Given Provevell's ownership of the south eastern corner of the site and the residential nature of this part of the site, which differs considerably to the western part of the site which is still commercial in nature, we consider it would be beneficial for the purposes of the Site Allocations document to split the site up into 2 sub areas.

These representations apply to the south eastern corner which is in Provevell's ownership.

#### *Principle of residential use at the site*

The site covers a wide area which is in mixed use. In the south eastern corner many industrial units are no longer in continued use and have been converted into purely residential accommodation. As such a significant proportion of this sub area is in lawful residential use and approximately 700 residents are known to inhabit this area. Though there are instances of continuing employment use at the site, the site no longer holds its designation as a Locally Significant Industrial Site (LSIS), and is no longer suitable for industrial uses.

As such we would argue that many of the commercial premises on site are no longer of a standard that would support modern economic uses.

The Haringey Employment Study 2004, as prepared by Atkins, provides an assessment of employment land supply and demand in Haringey. Having provided detailed commentary of each designated industrial site, this report has been updated in 2009 and subsequently 2012 to assess changes in demand and the wider market.

Importantly and relevant to our case, the study identifies that the majority of the defined employment areas in Haringey are more than 20 years old and in 'fair' or 'poor' condition. In addition to this, the study confirms access to the DEAs is generally poor, particularly for HGVs and the situation is compounded by congestion and inadequate site access, circulation and parking provision. Our site Vale Road/Tewksbury Road has 100% of buildings over 20 years old and the condition of the estate is rated as 'fair' as is its appearance.

A core principle of the NPPF at paragraph 17 is to *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value*. Our site meets this principle and would be more effectively utilised for alternative uses, either for residential or mixed use development.

The site provides a principal development opportunity that can reutilise previously developed land and also contribute towards Council aims to regenerate the area.

#### *Contribution to meeting Haringey's housing targets*

In terms of site dynamics the site currently holds a significant degree of residential despite its DEA designation. It is evident that the south eastern corner of the designated industrial site in particular has a significant residential element and feel.

We support the allocation for residential uses in this part of the site. The only operational industrial use in this location is a wall paper distributor and food distributor, these themselves having a separate access point and thus being self contained relative to residential uses. Employment uses currently in operation at the site are low-level but have a high environmental impact.

As such we do not consider the site to be suitable for traditional industrial uses going forward.

As aforementioned, we are of the opinion that the site holds a greater capacity for residential use beyond the floorspace figures forecasted within the Site Allocations DPD. Indeed, developing the site for housing could significantly contribute to meeting local housing targets including affordable housing as set out in Strategic Policy SP2.

London Plan Policy 3.3, Increasing Housing Supply sets out the pressing need for more homes in London. As part of this, it is noted at part E that, *'Boroughs should identify and seek to enable development capacity to be brought forward to meet these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including: a. intensification, b. town centre renewal, c. opportunity and intensification areas and growth corridors, d. mixed use redevelopment, especially of surplus commercial capacity and surplus public land, e. sensitive renewal of existing residential areas.'*

The draft further alterations to the London Plan were released in January 2014. Within this, alterations have been made to the annual average housing supply targets for each borough during the period 2015-2025. With regards to LB Haringey, the Borough has experienced an increase both in terms of their expected minimum ten year target and their annual monitoring target. The FALP identifies a need to increase housing numbers in Haringey from 8,200 to 15,019. Similarly where the annual monitoring target was originally 820 units per annum, this is now 1,502 units per annum.

In light of the above we consider that the site holds a greater potential for housing development and to an extent this ties in with the existing nature of parts of the site which have been in residential use for some years. It is clear that Haringey needs to release more land for housing to meet this demand.

#### *Gateway Development*

Within the document, it is stated that, *'the Seven Sisters Road frontage and south eastern corner of the site also form an important gateway to the borough and a notable landmark building of especially high architectural quality would be desirable here'*.

We support the potential for a significant landmark building on the south eastern corner of the site. As noted the south eastern corner forms an important gateway and represents a suitable location for a high quality building that can incite some prominence along the Seven Sisters Road. This would naturally derive interest into the site which would enable a commercially viable scheme to come forward on the rest of the site. Further to this it would also establish a strong sense of identity which would enhance legibility in and around the site.



Please acknowledge receipt of all representations made above in line with the consultation draft of the Haringey Site Allocations DPD. We look forward to discussing matters with you further.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'John Ferguson', is placed over a light blue rectangular background.

**John Ferguson**  
**Senior Planner**

Our Ref: JF/MR/16559  
email address: [john.ferguson@cgms.co.uk](mailto:john.ferguson@cgms.co.uk)  
Direct Dial: 0207 832 0282

Planning, Regeneration and Economy  
Level 6  
River Park House  
Wood Green  
N22 8HQ

6<sup>th</sup> March 2014

Dear Sir / Madam,

**GREATER ASHFIELD ROAD, ASHFIELD ROAD, N4 1NY  
LB HARINGEY – SITE ALLOCATIONS DPD (REG 18)  
CONSULTATION DOCUMENT  
REPRESENTATIONS ON BEHALF OF PROVEWELL ESTATES**

I write on behalf of my client, Provevell Estates, with regard to the Council's draft Site Allocations document which is currently out for public consultation. Our client wishes to make representations to the draft allocation at Greater Ashfield Road (Site S2).

Provevell own the majority of Arena Business Centre, the northern third of this site, and welcome the inclusion of the site within the Site Allocations document. Provevell welcome the consideration of 37,000 m2 of potential residential floorspace across the site.

**Council's approach to redevelopment of the site**

*Greater Ashfield Road*

Greater Ashfield Road is allocated for development. Within the site allocation it is noted that the site can be split into three; the Crusader Industrial Estate, the Arena Business Centre to the North and Omega Works to the south. Potential development capacity has been assessed on the site and this outlines capacity for 37,000sqm residential and 52,000sqm commercial.

Notwithstanding this the document states the following;

*'The nature of development possible on these sites is dependent on decisions on the future of the current industrial uses, but if a wider mix of more people-intense development is permitted, it is likely that some continued employment generating uses would also be required'.*

**Representations**

These representations have been made to support the proposed residential capacity of the site, and the potential the site can make towards meeting the overall housing need in Haringey.



140 London Wall  
London EC2Y 5DN

Tel: 020 7583 6767  
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[www.cgms.co.uk](http://www.cgms.co.uk)

Offices also at:  
Birmingham, Cheltenham,  
Dorset, Edinburgh,  
Kettering, Manchester,  
Newark

It is understood the floorspace figures broadly correlate to the London Plan's housing requirements for Haringey and the ultimate overall need for new housing in the borough. These are subject to review pending the findings of the latest Employment Land Review that is currently being undertaken.

In light of the above and though we welcome the Council's allocation of the site, we seek to argue and promote greater capacity for residential development at the site. This is in line with historic and existing uses and the nature and condition of current built development on the site.

#### *Principle of residential at the site*

Arena Business Centre holds a significant residential element with a degree of some active business use. Though the site allocation states that there is unpermitted residential use at the site, many units have been in residential use for some time and have therefore been legalised through Certificates of Lawfulness. The document also recognises there is vacancy at the site and we consider these buildings to be outdated and no longer suitable for continued commercial use.

Additionally the site is surrounded predominantly by residential uses to the east, west and south and despite its industrial legacy, would be better suited to more complementary uses such as denser residential in the area or mixed use development.

In light of this we would argue that many of the commercial premises on site are no longer of a standard that would support modern economic uses.

As such we focus your attention to the Haringey Employment Study 2004, prepared by Atkins which provides an assessment of employment land supply and demand in Haringey. Having provided detailed commentary of each designated industrial site, this report has been updated in 2009 and subsequently 2012 to assess changes in demand and the wider market.

The study identifies the majority of the defined employment areas in Haringey are more than 20 years old and in 'fair' or 'poor' condition. In addition to this, the study confirms access to the DEAs is generally poor, particularly for HGVs and the situation is compounded by congestion and inadequate site access, circulation and parking provision.

As stated in the Site Allocations Document, *'none of the existing buildings on this site need to be retained for heritage reasons, although the Hermitage Road facades of Omega Works have some appeal'*. This supports our consideration of the buildings as being outdated and no longer appropriate for modern commercial operations.

A core principle of the NPPF at paragraph 17 is to *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value*. Our site meets this principle and would be more effectively utilised for alternative uses, notably residential.

The site thus provides a principal development opportunity that can reutilise previously developed land and also contribute towards Council aims to regenerate the area.

#### *Opportunity for intensification of residential development*

As aforementioned, we are of the opinion that the site holds a greater capacity for residential use beyond the floorspace figures forecasted within the Site Allocations DPD. Indeed, developing the site for housing could significantly contribute to meeting local housing targets including affordable housing as set out in Strategic Policy SP2.

London Plan Policy 3.3, Increasing Housing Supply sets out the pressing need for more homes in London. As part of this, it is noted at part E that, *'Boroughs should identify and seek to enable development capacity to be brought forward to meet these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including: a. intensification, b. town centre renewal, c. opportunity and intensification areas and growth corridors, d. mixed use redevelopment, especially of surplus commercial capacity and surplus public land, e. sensitive renewal of existing residential areas.'*

Draft further alterations to the London Plan were released in January 2014. Within this, alterations have been made to the annual average housing supply targets for each borough during the period 2015-2025. With regards to LB Haringey, the Borough has experienced an increase both in terms of their expected minimum ten year target and their annual monitoring target. Originally, 8,200 the minimum ten year target is now set at 15,019. Similarly where the annual monitoring target was originally 820 units per annum, this is now 1,502 units per annum.

In light of the above we would suggest that the site holds a greater potential for housing development and to an extent this ties in with the existing nature of parts of the site which have been in residential use for some years. It is clear that Haringey needs to release more land for housing to meet this demand.

Currently the site holds a significant residential feel and an established residential stock. This is best exemplified by the Arena Business Centre with much of the built development on site being in lawful residential use. Additionally there are residential areas surrounding the site to the east, west and south.

We thus consider that there is an opportunity for intensification of residential uses at the site that could not only be incorporated on the northern part of the site, but across the whole of the site. As the document notes, the PTAL level is currently 1-2 and *'due to these sites industrial legacy, connection through and between the sites is poor'*.

Essentially residential redevelopment of the site could therefore enhance permeability onto and through the site through the provision of new access points beyond that currently provided at Ashfield Road. This extends to long term aspirations to improve access to public open space at the site which could be brought forward in conjunction with access and amenity improvements.

#### *Massing and density*

As surplus industrial land, this can be released for higher density residential development in line with London Plan strategic objectives. Though the site currently has a PTAL rating of 1-2, there are opportunities to enhance access and permeability onto the site.

Therefore in the long term, and given its urban location, density levels could be optimised to provide for a higher density development such as 200-450 hr/ha.

The document further states the following;

*'Massing could be higher in the centre of the site but should drop down to close to the 2 storey terraces on Ashfield and across Hermitage Road, but the two storey houses to the west are on higher land and it may be possible to use this level difference'.*

Existing warehouses, particularly within the centre of the site, are equivalent to 2-3 storeys. We thus consider there is potential for denser, higher development which would accord with longer term aspirations to improve access at the site.

Though the document outlines support for continued employment generating uses at the site, we consider that this can be effectively met by retaining and enhancing existing live/work units at the site and also incorporating small flexible creative workspace.

Consequently residential led redevelopment would thus provide an opportunity to viably meet increased housing targets that would also enhance the current layout of the site. We thus believe that the above should be reflected in changes to the site allocations document which would see an increase in the potential capacity for higher and denser residential development at the site.

Please acknowledge receipt of all representations made above in line with the consultation draft of the Haringey Site Allocations DPD. We look forward to discussing matters with you further.

Yours faithfully,



**John Ferguson**  
**Senior Planner**

## NOTE OF MEETING

### EADE ROAD AND ARENA DESIGN CENTRE MASTER PLANNING

**Job No:** 17700  
**Site:** Unit 4 and Unit C, 199 Eade Road, Haringey, N4 1DN  
**Venue:** Haringey Council  
**Date:** 15<sup>th</sup> July 2014

**Attendees:**

|                    |   |   |
|--------------------|---|---|
| Stephen Kelly      | - | Assistant Director for Planning LB Haringey |
| Gavin Ball         | - | Planning Policy Officer LB Haringey         |
| Matt Rimmer (MRi)  | - | C108 Consultants                            |
| John Ferguson (JF) | - | CgMs Limited                                |

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#### Purpose of Meeting

The purpose was an informal conversation about the masterplanning of Provewell's Eade Road Estate and Arena Design Centre to inform representations to the Site Allocations DPD.

MR and JF set out Provewell's position. JF described Provewell are about to instruct an architect to work up two masterplans for the sites to inform representations to next stage of Site Allocations DPD. Provewell were keen to retain existing community, retain commercial use and provide new housing, and want to work with the Council.

GB outlined the Site Allocations DPD is dependent on Employment Land Review findings, with the message so far being there is a serious need to retain employment land.

GB stated that we can't look at 2 sites individually without talking about whole area.

Regarding Arena, GB mentioned the need for exploring opening up link at Arena with St Anne's hospital site with tunnel under railway.

SK outlined concerns regarding viability of vertically stacked mixed use schemes with creative/employment uses at ground floor and residential above. He mentioned Islington have looked at this and affordable workspace, and he is not convinced it is viable. SK outlined his concerns on delivery and supply of masterplan scheme, and does not want to be at the EiP with a plan that is not deliverable or viable.

SK outlined Haringey need more employment land and there is a debate on whether they provide more B8 space or more space for SMEs and creative space. There is a clear need for both and London has a significant need for B8 floorspace. SK mentioned Hackney would also be concerned at loss of this site for B8 employment. SK mentioned the importance of understanding the warehouse community, i.e. economic benefits, how many have gone on to successfully transition to medium sized enterprises.

SK commented a horizontally stacked mixed use scheme may work better here with residential/Private rented sector on the edges transitioning to more commercial at the western boundary of Eade Road.

GB commented there is a need for this site to produce an increase in employment, by employment numbers rather than strictly floorspace.

SK recognised Eade Road masterplanning could be undertaken in a more piecemeal way, where as Arena needs to consider more holistically with Crusader and Omega Works.

JF explained the extent of lawful planning uses on both sites and talked through the map of lawful uses.

SK commented regardless of planning situation with lawful residential units, many of the units do not comply with the Housing Act and building regulations, thus technically they could be shut down. SK acknowledged short term work had been undertaken to improve present situation, but many of the units are a long way short of the Housing Act standards for resi and HMO.

SK confirmed they can't allocate all industrial sites to SMEs.

GB confirmed the challenge here was how to retain the creative community and increase commercial uses.

SK questioned what financial tools were available to retain community and employment uses.

SK confirmed they are very keen to support the creative community here, but viability of any masterplan needs careful consideration. Clarity is needed on the type of product to be delivered i.e. Pocket Living, Private rented sector, naked house.

SK stated that housing land is less needed than employment land in Haringey, as a significant amount of new housing will go to Tottenham Hale, where as there are real problems of where the increased future employment needs will go.

SK stated importance of deliverability and economics of any proposals. SK was keen to get understanding of current position, economic activity of residents, through the auditing of the sites to quantify economic and social benefits. Any masterplan would need to be underpinned by this economic evidence. GB advised an economist of viability consultant would be needed to justify any plan.

SK stated the potential for transition between residential and employment on edges of estates to more pure employment towards the centre.

GB stated the need to demonstrate the story of the place and community.

SK confirmed the direction of the London Plan is all about sustainable communities and private rented sector and this could feed very well into a masterplan for the sites.

## NOTE OF MEETING

**Re:** Eade Road, Arena Masterplanning, Haringey Site Allocations DPD  
**Job No:** 17700  
**Client:** Provewell Estates  
**Date:** 18<sup>th</sup> August 2014  
**Venue:** Haringey Council

### Attendance:

|                      |   |
|----------------------|---|
| <b>Stephen Kelly</b> | – Assistant Director for Planning LB Haringey                                 |
| <b>Gavin Ball</b>    | – Planning Policy Officer LB Haringey   |
| <b>Fortune Gumbo</b> | – Planning Enforcement Officer/ Project Manger for live/work uses LB Haringey |
| <b>David West</b>    | – Studio Egret West   |
| <b>Philip Atkins</b> | – Planning Resolution   |
| <b>Matt Rimmer</b>   | – C108 Consultants  |
| <b>Matt Roe</b>      | – CgMs Consulting   |
| <b>John Ferguson</b> | – CgMs Consulting   |

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*The purpose of the meeting was to discuss the potential of masterplanning the Provewell Estate for mixed use redevelopment, and the upcoming Site Allocations Preferred Options Document consultation*

MRO introduced the meeting and the progress made to date following the last meeting held on 15<sup>th</sup> July 2014 with the SK and GB. MRO explained viability was being considered as this was a concern previously raised and David West had now been appointed.

PA confirmed Provewell's serious intentions for the estate and money was being invested in a full topographical survey of the estate, to enable a deliverable and viable proposal.

SK outlined the key challenge at a macro level was the policy challenge of retention of pure employment land, demand and type of employment reprovion. SK stated early indications from Atkins' Employment Land Review suggests the need for 35 ha of new employment land to be allocated.

SK stated the key is to understand how to maximise employment densities. What is the existing density at Eade Road and how can this be maximised? How can employment drive other uses. SK questioned what employment figure for the estate would be used to asses replacement/reprovion, and how employment reprovion feeds into live/work policy. SK asked how amenity would be safeguarded through provision of industrial living accommodation.

SK commented that storage and distribution use was not the most efficient use of employment land in Haringey and they would therefore be after more people intensive employment such as creative industries, SMEs etc.



SK stated the enforcement investigations would continue, until a planning policy situation is reached for the sites.

SK stated they are open to the right response for the site that is viable and rational, and a robust evidence base is required to justify a policy response to allow reallocation of the sites. SK stated Haringey are keen to work with the landowner, design team and stakeholders to establish where the line is drawn regarding extent of employment provision, housing and industrial living.

GB recognised the mixed views of the wider community around the warehouse community, but there is some support for it.

SK outlined the challenges of creating a new policy for the site and industrial living that is robust and defensible to ensure other industrial sites in Haringey are not lost. SK stated the need to create a 'sustainable community', that involves accommodation for families as well as current residents who are typically in their 20s.

SK confirmed the need for the site and population to contribute economically, with a net increase in economic contribution of the site.

SK outlined a number of planning instruments that could be utilised to facilitate the re-development of the site including Local Development Order, Site Specific Supplementary Planning Document.

DW set out his understanding of the site and potential for the site to be a test case for communal living and working/ mixed use development. DW stated the need to find the thing that unlocks the site, and referred to the project as Estate Regeneration rather than redevelopment.

GB questioned how the community is retained and rehoused throughout the development and affordability of area is retained.

DW stated any development could be phased to allow relocation of residents on site as development proceeds.

SK and GB outlined affordable rent in Haringey as 60% of market rent for 1 / 2 beds and 50% of market rent for 3 beds (subject to confirmation from Haringey Housing team).

SK stated importance of design team and planners to clearly demonstrate what the model for the site looks like, and for any proposal to be evidentially sound and viable. This could allow a distinct allocation / policy framework. This is essential to ensure other industrial estates are not lost/exploited. SK stated he is looking to CgMs and Planning Resolution to work alongside them to create a new policy framework in which the site can come forward under.

SK reaffirmed their appetite for redevelopment but this depends on what is presented to them and what a viable proposition looks like.

PA stated this site could be a test case and market leader in communal living and mixed uses on a former industrial site. PA stated different configurations need to be explored to test viability, which can then be presented and discussed with Haringey.

GB stated he would be interested in seeing the site as a destination, which the South Tottenham area currently lacks. GB stated Haringey would be keen to pursue community spin offs and facilities that residents need and want to visit.

SK stated the importance of political support and getting Members onside to allow an experimental, innovative scheme. SK stated industrial living is on the radar of the leader of the council and it may help to show them examples eg Fish Island.

SK mentioned it may prove worthwhile undertaking a research exercise of similar sites/projects where this has been done .e.g. Custard Factory, Birmingham.

SK outlined timeframes and next steps. The Preferred Options Document will be out for consultation in November 2014, and a decision will need to be made September/October regarding the policy direction for the site. This will require evidence and economic modelling to demonstrate what is achievable, as well as community engagement.

SK agreed a follow up meeting for 3pm, 12<sup>th</sup> September 2014. By this date SK and GB need to be convinced by the credibility of a scheme that results in loss of pure employment land and an idea of viable output options. This needs to be demonstrated robustly through evidence to allow parameters to be set. SK would like ideas on how we would write the policy for the site to allow industrial living here as a pilot, whilst opening the floodgates for other industrial sites in Haringey.

SK stated more time could be available if a broad policy framework for the site is agreed in the Site Allocations which would subsequently allow for a detailed SPD to set the detailed policy for the redevelopment of the site or a Local Development Order.

## NOTE OF MEETING

**Re:** Eade Road and Arena Masterplanning  
**Job No:** 17700  
**Client:** Provewell  
**Date:** 12<sup>th</sup> September 2014  
**Venue:** The Borough of Haringey

### Attendance:

|                 |  |
|-----------------|--|
| Stephen Kelly   | - Assistant Director for Planning LB Haringey                                    |
| Gavin Ball      | - Planning Policy Officer LB Haringey  |
| Fortune Gumbo   | - Planning Enforcement Officer/Project Manager for live/work uses<br>LB Haringey |
| Matthew Roe     | - CgMs Consulting  |
| Bethan Hawkins  | - CgMs Consulting  |
| Philip Atkinson | - Planning Resolution  |
| Matt Rimmer     | - C108 Consultants   |
| David West      | - Studio Egret West  |
| Peter Croft     | - Studio Egret West  |
| Lester          | - Studio Egret West  |

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**Purpose of meeting:** The purpose of the meeting was to present the typologies of various options of the live/work concept for the masterplan and to discuss the viability of the proposed masterplan.

### **Introduction**

MRO introduced the masterplan and the progress made to date following the last meeting held on 18<sup>th</sup> August 2014 with the SK and GB.

MRO explained that viability appraisals had been undertaken for both sites and confirmed that the masterplan proposals presented viable opportunities for Haringey. MRO highlighted that the schemes would bring forward an increase in flexible and modern employment floorspace.

PA expanded upon the above points and explained the aim was to capture the existing community and the way they work and live and bring this concept through the plans.

DW introduced the presentation and the background work to the concept of live/work, including:

- Briefing process to capture and form masterplan
- Exemplar prototype (Light touch framework for a collage/plan for the areas)
- Potential density and massing through existing buildings on site
- Collage framework for a series of spaces
- Viability – research
- 4/5 typologies proposed rather than 1 prototype

MRO explained the concept of the existing employment space and detailed the viability appraisals and attrition surveys that had been undertaken.

## **Presentation**

### ***Typologies and ratios for live/work***

DW, PC and L presented the typologies and the initial stages of the masterplan. PC used examples of Fish Island in Hackney for an example of the success of live/work concepts.

SK queried the planning permission of the live work units in Hackney.

SK queried the ratio of live/work space and how to determine the appropriate ratio.

PC responded and explained the various typologies of the live/work concept and the design of modules and space.

PC/DW confirmed that an appropriate ratio was 8 bedrooms per module which included private studios within bedroom and a communal live/work space.

GB queried the relationship with the bedroom module and the workspace/employment floorspace.

DW explained the flexibility of the plan to balance employment space and living space and confirmed that the typologies that were presented were flexible. DW confirmed that quantity surveyors were working on the costs of each of the prototypes presented.

SK queried what the prototypes equated to in terms of new floorspace and new units.

PA confirmed that there would be an intensified and significant increase in flexible, modern and useable employment floorspace.

SK was concerned about employment areas and any provision that does not provide an increase in employment floorspace. SK stated that there are two threads to the proposal (financial model/rental level).

MRO confirmed that the employment space would be the lower end of market rent and 40% of market rent on live/work units.

PW explained the design would increase employment space through using the sites vertically and horizontally to intensify the uses.

### ***Concept of a 'Destination'***

PC, PW & L introduced the idea of the areas becoming a destination to visit (market areas) in the wider community and improving connectivity and accessibility to these areas.

SK sought further clarity on this concept querying whether the sites were evolving to become destinations or inclusive communities. SK was concerned about the connectivity of the sites to the surrounding areas. If the proposal was creating 'destinations' consideration is needed to the surrounding communities.

MRO confirmed that the existing communities wanted to expand to the wider areas.

PW used examples such as Broadway Market, Victoria Park, Maltby Street as examples where communities and people pass through the areas and confirmed the concept was not to create somewhere like Camden Market where people would specifically visit (tourist destination).

SK stated that spatially this would change the concept and clarity was needed on the 'destination' concept.

### ***Planning Policy and Viability***

SK confirmed that the pace of work was inline with the evolving policy. SK stated that it was an interesting presentation and would like to present it to the Planning Portfolio Holder and Corporate Director (Nature of the proposals needs to be run past these people).

DW confirmed the 'level of destination' was to be appropriate to the surrounding areas.

L explained that they were concentrating on this community aspect through site visits and extensive research.

SK stated that the proposal was interesting and exciting for Haringey. SK stated the need to consult the councillors and administration in the proposals.

SK left meeting.

GB explained the site allocation policy is to be drafted and go before cabinet in November. GB confirmed that he liked the presentation and would like to share it.

PA suggested that Egret West should add more text to the presentation so that it can be used in isolation.

GB suggested that he would like to use the typologies of live/work living to frame emerging policies. GB explained he would like to introduce the concepts to communities and members.

FG queried the viability and wanted to see the work undertaken. FG stated that the team would need to be prepared to defend the proposals. FG explained that Haringey did not want to reinvent the failures of Hackney.

PA confirmed each proposed typology was viable and used information from appraisals to explain. PA explained the benefits of the work undertaken to date and that other similar sites had not worked through this process.

### **Next Steps**

Studio Egret West to edit the presentation so that it can be read and presented in isolation and send to SK, FG and GB.

SK, FG, GB to present the masterplan proposals and provide feedback from the council on typologies.

MRO and PA to discuss viability further with FG.

**CgMs Limited**  
**September 2014**

## NOTE OF MEETING

**Re:** Eade Road and Arena Masterplanning  
**Job No:** 17700  
**Client:** Provewell Ltd  
**Date:** 29<sup>th</sup> September 2014  
**Venue:** Haringey Council, Wood Green

### Attendance:

Lyn Garner (LG) - Director for Planning, Regeneration and Development LB Haringey  
Gavin Ball (GB) - Planning Policy Officer LB Haringey  
Fortune Gumbo (FG) - Planning Enforcement Officer/Project Manager for live/work uses LB Haringey  
Steve Russell (SR) - Private Sector Housing officer, LB Haringey  
Philip Atkins (PA) - Planning Resolution  
David West (DW) - Studio Egret West  
Matthew Roe (MR) - CgMs Consulting  
John Ferguson (JF) - CgMs Consulting

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**Purpose of meeting:** The purpose of the meeting was to present the typologies of various options of the live/work concept for the masterplan and to discuss the viability of the proposed masterplan with Lynn Garner, Director for Planning, Regeneration and Development.

### **Introduction**

MR explained the context of the project and the sites, and summarised the progress made to date and following meetings held on 18<sup>th</sup> August 2014 and 11<sup>th</sup> September 2014 with the SK and GB.

LG stated she understood the majority of the sites were in lawful and unlawful residential and HMO uses. Some of the units were live work, but LG stated she had seen little evidence of work when she visited the sites. LG noted she had inspected every part of Arena and 221 rooms had been confirmed. She noted that some of the units had up to 18 residents and were thus HMOs and residential.

### **Presentation**

DW ran through the presentation explaining the ideas of the different typologies that could be used at the site and drew on inspiration from other examples across London and Europe.

LG stated her interest in Hackney Wick and how this area worked, specifically the tenure and form of uses.

SR stated he was very interested in the typologies being presented and really liked the concept. SR stated the housing would need to meet the Housing Act 2004, and housing

standards. SR is currently concerned about the units and specifically the fire risk. SR appreciates the area will be redeveloped but would like to see some immediate short term improvements to address fire risk.

DW questioned with this being a pilot scheme and exploration of new typologies could there be a relaxation of housing standards to allow experimental forms of housing.

SR stated this would be a discussion for later down the line, but minimum safety standards would need to be met.

LG questioned how the estate would be managed, and is there demand for this type of living and employment space.

MR responded stating Provewell would manage the estate and are exploring options to manage individual units, such as cooperatives. MR stated Chris Currell (Currells) has undertaken research and advised there will be a demand for this type of employment use and residential use, at approx £10/ sq ft.

GB stated as London evolves the demand for this form of employment is increasing and is moving out to Haringey.

LG was very interested in the whole idea, but was keen to understand the existing position and how the masterplan compared. LG stated she had been to Arena and counted approx 200 beds. The proposal therefore appears to not provide much of an uplift in this number.

MR confirmed a survey was being undertaken and we would establish existing position, and seek to provide: 1. A retention/uplift in employment numbers, 2. Retention of existing community and 3. Uplift in market housing as PRS.

LG questioned affordable housing provision.

MR stated the communal live/work would be at around 40% of market rent and would therefore constitute affordable housing.

LG questioned the proposed rent levels and whether this would fall within housing benefit levels. LG noted the Council would be concerned if a 'ghetto' of accommodation for people on housing benefit was created.

JF and MR believed the proposed PRS would be above this level as the rental values are proposed at market rates.

LG was keen to see a transparent viability assessment of the site.

JF responded stating a very initial viability appraisal had been undertaken to demonstrate a scheme is viable, as requested early on by GB and SK. A more detailed assessment will be needed.

PA stated this is a PRS scheme that Provewell intend to retain ownership of, therefore it is a different viability model to conventional residential developments, that would need to be considered.

GB stated it would be useful to present to Members before publishing the Site Allocations Document.

LG stated she liked the concept and idea and considered it would be a good idea to present to Cllr Goldberg, Cllr Strickland, Cllr Kober, Lead and deputy leader of the Council, and lead members for Planning and Regeneration.

***Next Steps***

1. FG to organise presentation to Members. This could be within next 2 weeks
2. CgMs to establish existing position on number of residents and employment numbers.
3. Provewell to engage with SR on making units safe and removing fire risk.
4. Consider release of more detailed financial viability assessment.
5. GB to start to draft policy document using information from SEW presentation.

**CgMs Limited**  
**October 2014**



## NOTE OF MEETING

**Re:** Eade Road and Arena Masterplanning  
**Job No:** 17700  
**Client:** Provewell  
**Date:** 22<sup>nd</sup> December 2014  
**Venue:** LB of Haringey, River Park House, Wood Green

### Attendance:

Matthew Pattison – Head of Planning Policy LB Haringey  
Gavin Ball - Planning Policy Officer LB Haringey  
Fortune Gumbo - Planning Enforcement Officer/Project Manager for warehouse living LB Haringey  
Philip Atkins - Planning Resolution  
Matt Roe – CgMs Consulting  
John Ferguson – CgMs Consulting

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***Purpose of meeting:*** *The purpose of the meeting was to discuss the draft policy wording for warehouse living, as issued to CgMs on 9<sup>th</sup> December 2014.*

MR set out an introduction to the site and planning context.

MR stated we were disappointed that it appeared all the positive progress with the masterplan had been undone. MR questioned the intentions behind the draft policy wording, and particularly the requirement of the draft policy to require provision of commercial floorspace to pre-conversion levels. MR stated this was unreasonable given the current state and nature of the employment sites, and the significant levels of lawful residential floorspace.

GB stated the sites were historically employment sites, therefore they are trying to achieve a mixed use position through the policy wording. GB stated officers still supported our vision for the future of the area but they couldn't expressly support residential development in writing.

SP stated through the policy they are trying to achieve a mechanism through the policy wording for a mixed use allocation with commercial at ground floor, that allows for residential above. SP stated they want re-instatement of better quality employment space, which would enable residential above.

PA stated we were disappointed that Provewell's sites had been lumped in the same category as other sites that have a lot less lawful residential floorspace and are better quality employment sites.

SP stated they want the proposals to come forward through masterplan led development, due to the complexities of each of the sites, and different characteristics and uses.

GB confirmed Eade Road is an existing employment designation, therefore they need stringent policy wording to ensure an element of the redevelopment is commercial and will remain commercial in the long term. The new designation as a Regeneration Area will allow mixed use redevelopment and our aspirations for significant residential on the sites.

PA questioned why there was no reference to a gateway scheme, allowance for buildings to exceed 6 storeys nor considerations of viability and cross subsidisation.

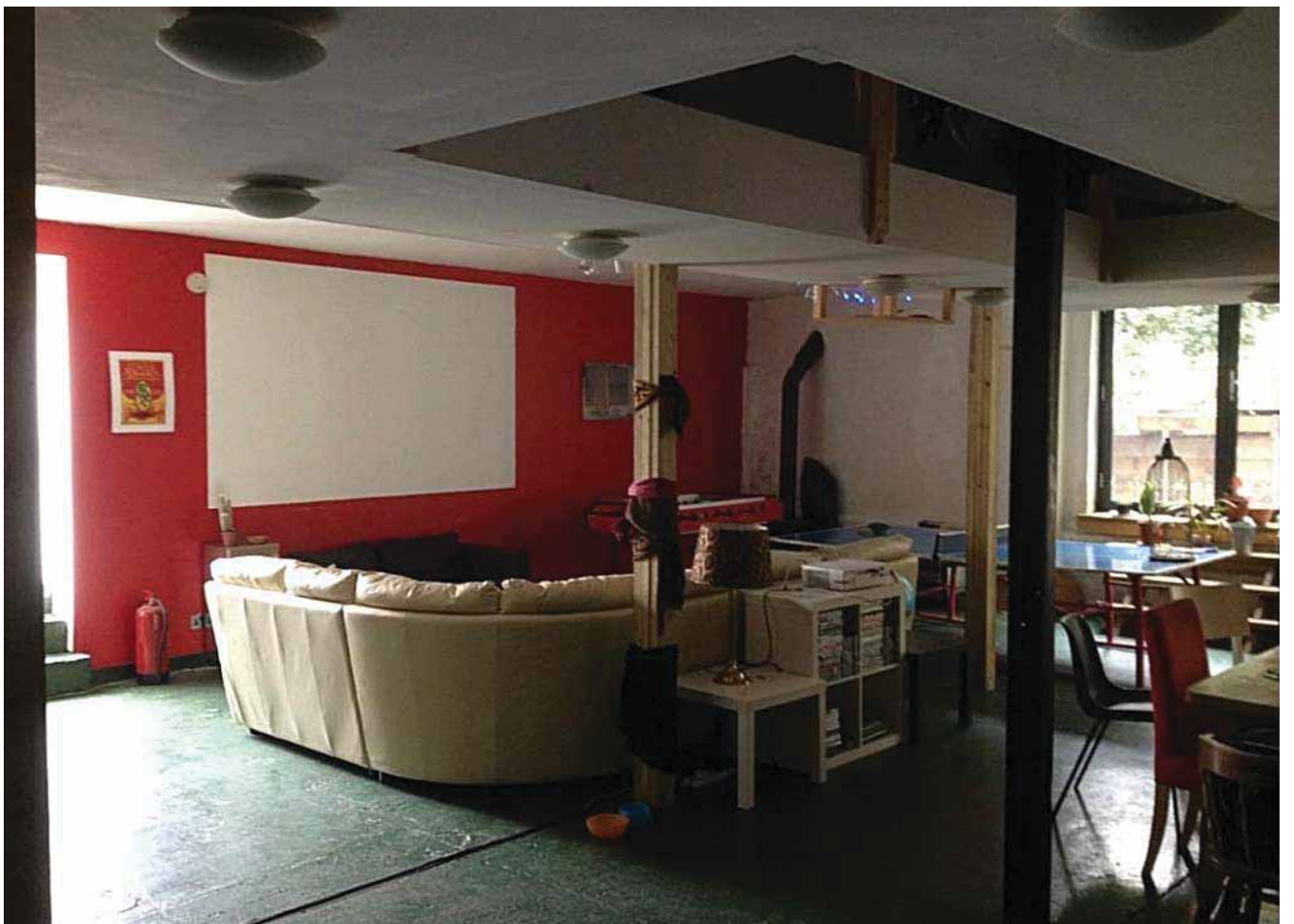
SP stated they will consider this and invited Provewell to make comments on the draft policy wording and to forward them on before a draft is finalised and taken to Cabinet on 16<sup>th</sup> January 2015.

**CgMs Limited**  
**December 2014**

# **APPENDIX 4**



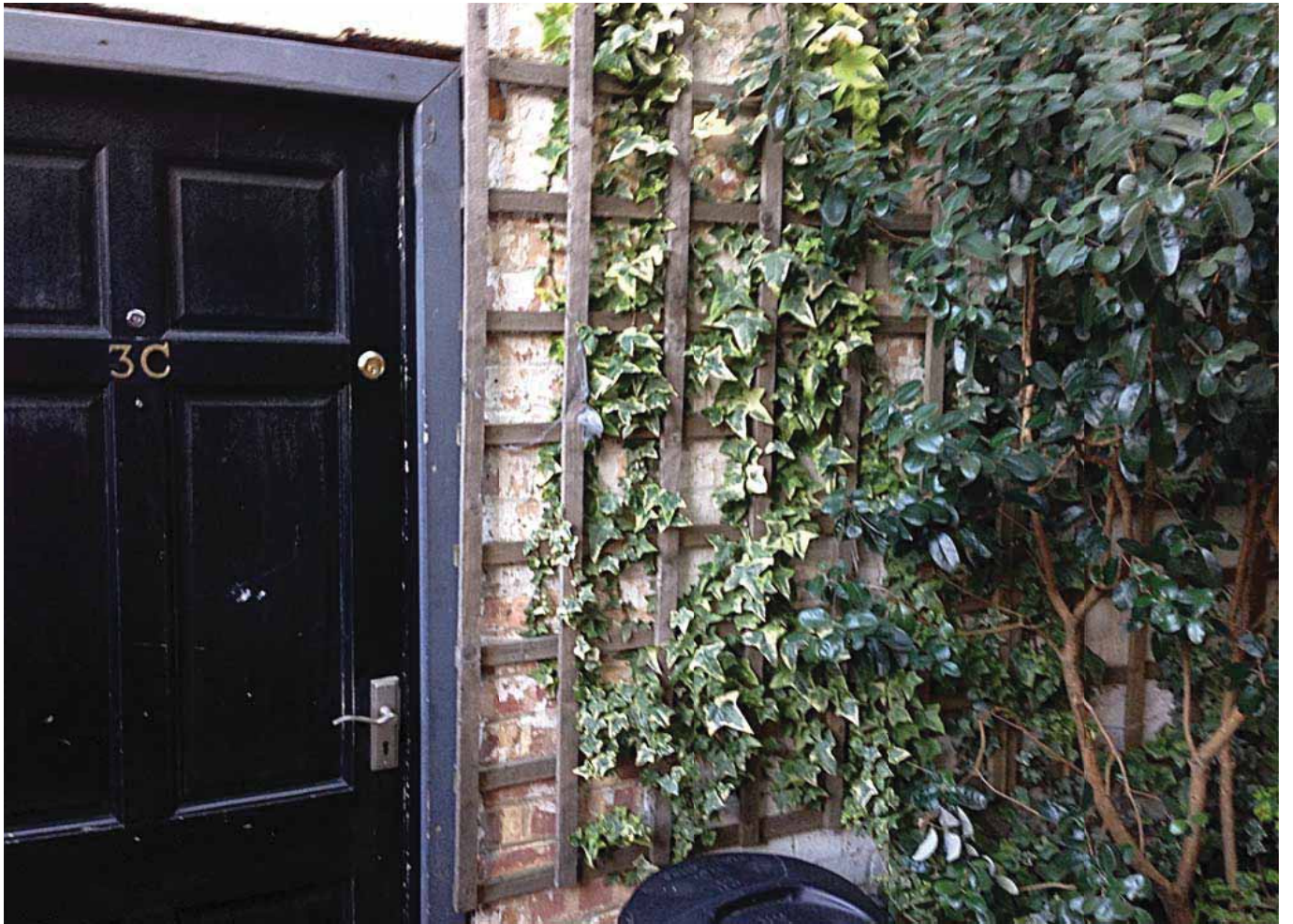


















# **APPENDIX 5**





