

Tottenham Hale Area Action Plan

Preferred Option Consultation Draft

Prepared on behalf of: Micuber Estates (Land Owner) Berkeley Square Developments (Development partner)

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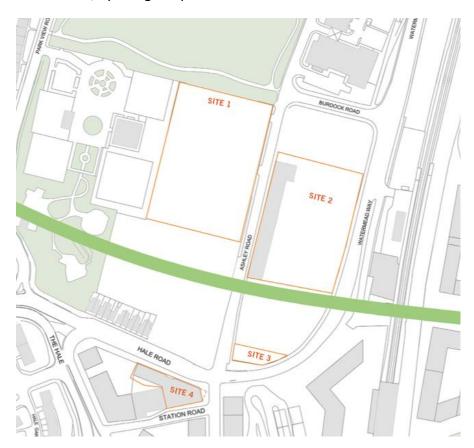
London Borough of Haringey – Tottenham Area Action Plan Development Plan Document

Preferred Option Draft for Consultation – February 2015 – 27th March 2015

1 - General Background

Micuber Estates are active property investors and landowners in Tottenham Hale and in conjunction with Berkeley Square Developments, as their development partner, have prepared this response to the current Area Action Plan for the Ashley Road area within the new Tottenham Hale District Centre.

Sites relevant to this consultation response are, sites on either side of Ashley Road, which are owned by Micuber Estates – as sites 1, 2 and 3 below. In addition and also owned by Micuber Estates, is the most prominent site on the Station Square north Island adjacent to the new Premier Inn Hotel site by Berkeley Square Developments on Station Road – see Site 4 below. The hotel will be the London Borough of Haringey's first branded hotel with construction starting in March 2015, opening in April 2016.



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Looking forward, Micuber Estates and Berkeley Square Developments wish to ensure that a planning framework is established that will guide the most appropriate form and type of development and create an identity for Tottenham Hale.

The owners wish to ensure that an Area Action Plan (AAP) for Tottenham Hale responds to current and future requirements for the area and fully considers the constraints and opportunities for sites such as theirs and therefore be capable of not only being brought forward for development but also active use and contribute to the regeneration. Importantly, the owners and their development partner wish to ensure the classification of Ashley Road as one entity, firmly established as an important site within the new District Centre is retained as opposed to reclassified as Ashley Road North/South as divided by the Green Link as proposed in the recent AAP edition.

2 - Planning Background

The Tottenham area and specifically Tottenham Hale has been subject to several planning and regeneration guidance documents:

- "Transforming Tottenham Hale" Supplementary Planning Document (October 2006) this provided strategic guidance on the delivery of sites. The subject site 1 to the west of Ashley Road was promoted for residential-led mixed-use development, whilst site 2 was again advocated as a mixed-use development with a retention / increase in employment provision. Overall, a new neighbourhood area with a community focus was advanced. Whilst plans have progressed for some parts (e.g. Hale Wharf, Station Interchange, Ashley Road South), for others (such as Ashley Road North) matters have not progressed. Key objectives such as the re-alignment north-south of Station Road were proposed and subsequently tested and proved to be unachievable due to the physical constraints.
- "Lower Lee Valley Opportunity Area Planning Framework" (October 2007) identified
 these sites as being within a larger "Growth Area." The report did not identify these
 sites as being in either a Strategic or Locally Significant Industrial Locations / sites but
 did advocate Ashley Road for residential, employment and new school uses within the
 Regeneration Area.
- "Tottenham Hale Physical Development Framework" (March 2014) this effectively
 was a refresh of the 2006 SPD with offices, residential, education and health facilities
 proposed for the area. Key elements such as the re-alignment of Station Road northsouth remained.

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- "Tottenham Hale District Centre Framework" (THDCF) (October 2014) prepared by Allies & Morrison and Urban Practitioners, this considered the subject sites and grouped them within the lowest ranking of employment designations, the Local Employment Areas. As such, in addition to re-provision of employment uses, employment generating development, not necessarily within the B Use Classes can be considered acceptable. This is with mixed-use development, including residential also considered important and extensively identified within the Framework proposals.
- "Haringey Local Plan Preferred Options" (February 2015) one of a suite of planning documents being consulted upon currently, like the THDCF it identifies the site as lying in a Local Employment Area. This policy has been formulated with reference to "The Employment Study, 2009."
- "Tottenham Area Action Plan, Preferred Options" (9th February 2015) this document, currently subject of public consultation, places all of the subject sites within the Tottenham Hale District Town Centre (Map 4.1) which overall aims to bring forward retail, leisure, healthcare and community facilities and aims to retain the "Designated Employment Area: Regeneration Area Status" applied through the Local Plan.
- London Housing Zones (20th February 2015) announced jointly by The London Mayor and The Chancellor, Tottenham Hale is one of 20 sites in London to receive/are about to receive this status. These Zones have been chosen to deliver 50,000 new homes by 2025 with Tottenham Hale bringing forward 5,000 of these through a bespoke (engineered through a Planning Performance Agreement mechanism) planning and funding approach and 4,000 new jobs.

3 - The District Centre Area

Key points from the aforementioned documents, especially as they have been progressively advanced are:

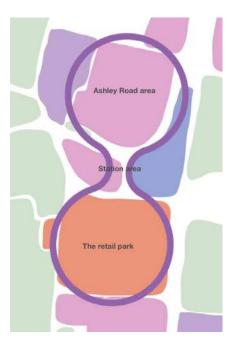
- The draft AAP choosing now to concentrate new District Centre Uses on Station Square West (TH1) and inference that by bringing forward a Council-approved District Centre Framework for Tottenham Hale Retail Park (TH5) this area will also be the focus for town centre uses.
- A comprehensive regeneration of the area around Tottenham Hale Station, which includes the area from the retail park to Ashley Road's junction with Down Lane Park.
- The overwhelming focus for the area to be that of a Housing Zone, providing Private Rented Sector, Market-Sale and Affordable homes whilst creating a sense of place and community.



- The focus for the subject sites is to take a mixed-use approach, advocating complete residential use west of Ashley Road with a mix of commercial and residential uses to the east.
- Establishing a local landmark building on Site 4 which provides a focal point for pedestrian movement around Station Square and also a connection to the new North-South route between the current retail park and emerging Green Link.
- The recognition that non-B Use Classes can comprise the suggested employment areas west of Ashley Road.
- The recognition that Ashley Road (and further south) towards Hale Retail Park will be a key north-south axis in conjunction with the east-west green link.

A comprehensive approach to bring forward the District Centre as envisaged by the THDCF is recognised. Here, the Ashley Road area is firmly placed as the heart of the District Centre; an approach we fully support and believe is critical to realising the full potential for Tottenham Hale. We do not concur with the AAP's reclassification of the Ashley Road into Ashley Road North and Ashley Road South, such an approach is detrimental to the aspirations of the Housing Zone and Council objectives to create a place with a single identity, and moves away from the principles established in the District Centre Framework.





In addition, the THDCF goes on to promote a helpful and comprehensive detailed approach to land use (page 57)

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With the Housing Zone status now applied to Tottenham Hale and the rapidity required to ensure complimentary services such as retail, healthcare and community uses are provided alongside these new homes, we believe that the Ashley Road area, alongside Station Square West (TH1) and the retail park TH5 should be jointly considered to provide these complementary services and therefore encourage a broader mix of use and movement through the District Centre

In addition the Ashley Road sites (Sites 1, 2 and 3), when combined with those outside of Micuber Estates direct ownership, offers a comprehensive development area that can be bought forwards in a timely programme and in a more accessible location for the broader community, both existing and new. This accessibility and centrality argument is more evident when the overall AAP area is considered in context (Key Diagram Figure 1.3). A more northern, than southern orientation for key town centre uses would reflect the geographical disposition of the area, and the relationship with the key public realm improvements (namely the Green Link) and the public amenity space (Down Lane Park and the Lea Valley water park). We do recognise that TH5 would retain its ability to provide "destination retail" as outlined in the THDCF and in any event, is likely to be delayed due to its current obligations to existing tenants but should not prevent the full potential of Tottenham Hale being achieved.



We therefore believe that Station Square West as a destination/arrival point should form the central hub of the District Centre, with Ashley Road increasing its commercial profile by assisting more promptly in bringing forward District Centre uses alongside the ability of TH5 to re-provide larger scale town centre / retail uses in the future when such a development can be delivered.

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4 - Ashley Road

The subject sites 1 and 2 form the majority of landholdings lying within the AAP's Ashley Road South (TH2) designation, formerly a single Ashley Road area within the THDCF. This proposes to allocate this area for "an employment led mixed use quarter north of a new District Centre, creation of a new Green Link, and enhanced Ashley Road."

We have reviewed the "Haringey Employment Land Study 2015" (HELS) and also sought to review the "Haringey Economic Growth Assessment," (HEGA). We have also been made aware that the council have commissioned a socio-economic study, which has yet to be completed. On these reports:

- HELS we summaries key points and comment below.
- HEGA Unfortunately council officers have been unable to provide us have a copy of
 this report despite repeated requests for over a month. The document has been
 stated within Cabinet reports to form part of the evidence base for planning policy
 review purposes. We are continuing to press the council for this report and the lack
 of clarity may lead to further representations being submitted.
- Socio-economic report we were interested to learn of this report currently being prepared as it is our experience that these reports normally form part of an evidence prior to documents such as the AAP being issued for final public consultation. We would be interested to understand more about this study and when/how its findings will be applied to inform future planning policy. We request being informed of the outcome of this study and being involved in its preparation where appropriate.

Having reviewed the HELS study, we note that Borough-wide:

- The demand for office accommodation across Haringey is weak and struggles.
- An overall surplus of employment land exists across Haringey by approximately 5ha.
- Demand exists in Haringey for light industrial business units (B1c/B2) with a lack of availability for such premises.
- Local businesses looking to expand increasingly search beyond the Borough towards Hertfordshire.
- "Given Haringey's strong housing and regeneration priorities, there is no benefit in safeguarding industrial land and warehousing that is surplus to requirements".
- The Council should adopt "a cautionary approach to further employment growth prospects".

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- The increased B1a/b requirements could be largely accommodated through the reuse of surplus industrial sites.
- The Council, landowners and developers should work together to bring forward new mixed-use developments where appropriate and facilitate intensification of existing employment sites where possible.
- The HELS study was prepared based on theoretical data and not actual market data and is therefore not representative of the commercial rents for offices or warehouses.
 The report suggests (at paragraphs 3.3 to 3.7) the rents being paid are higher than those being received. This is discussed further at Section 6 below and details of the actual rents are provided.

Site specifically (although covers land to the north, south and east of subject sites) the study:

- Notes the northern part of the site accommodates older units for a range (B1a, B2 and B8) of employment uses.
- Notes current office uses are currently rated "average" with industrial/sui generis "poor".
- The site supports low to medium value uses.
- Recommends that a "Regeneration Area" designation apply across the rest of the sites (including subject sites).
- Recommends Station Square West (TH1) be de-allocated.

When the HELS study recommends that a "Local Employment Area — Regeneration Area" (LEARA) be applied to the subject sites it makes clear that of the 3 employment categories which can be applied to sites, the Regeneration Area status is the most flexible. After the "B" Use Classes as a starting point, the definition (table 2-2) states that "it can include uses appropriate in a mixed use development, such as small scale "walk-to" retail, community and residential uses." It then goes on to state that uses should reflect town centre and retail policies so not to encourage development outside town centres. On the latter, as the sites are within the proposed "Tottenham Hale District Town Centre" (Map 4.1), the accompanying policy itself advocates "a range of retail, leisure, healthcare or community facilities with active ground floor frontages" (Policy AAP3 — C). On the former, we agree with the land-uses referred to and note that the text does not limit uses to those stated so others, such as student residences, a hotel or new college / academic campus, can also be deemed appropriate.

Having noted the HELS findings and recommendations we turn now to the AAP itself. As a reminder, and in summary:

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- The subject sites (sites 1, 2, 3 and 4) are within the Tottenham Hale District Town Centre where retail, leisure, healthcare or community facilities are encouraged with active ground floor frontages.
- Residential development encouraged across the AAP area (given an added focus by the award of Housing Zone status).
- Allocating the site for an employment led mixed use quarter north of a new District Centre, creation of a Green Link, and enhanced Ashley Road.

Taking the latter point, we examine in more detail implications for the area.

"Employment led"

We recognise that "employment" for this site, being in an identified Regeneration Area can cover a very broad range of employment uses. In addition, we have witnessed the stricter B1, B2 and B8 application of planning policy say 10 years ago, to a more diluted and broad land use range now. For instance uses such as hotel have become more acceptable aligned to employment uses. For reasons outlined below, and in our local market assessment, the demand for the more traditional B1, B2 and B8 uses is not strong. Therefore, recognising the strong push for housing, a broad range of uses are proposed by Berkeley Square Developments and Micuber Estates. There is evidence locally of the success of mixed-use residential development, namely Hale Village, which whilst providing a quantum of residential development, also contributes significantly to local employment.

"Mixed use Quarter"

For the reasons outlined above a truly mixed use is advocated, with land uses currently being promoted being:

- A1 retail
- A2 Financial and Professional Services
- A3 food and drink
- C3 dwelling houses
- B1 offices
- C3 dwelling houses
- C1 hotel
- D1 health centres, nurseries

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Sui Generis

The Ashley Road site 1 provides the most exciting opportunity within the Housing Zone for an inspirational residential development of exceptional quality and standard of living accommodation. With the benefit of close connectivity through the train and bus stations, in addition to direct access to Down Lane Park, this will create a place where families and individuals will thrive, and benefit from a diverse and vibrant development. The potential to include active ground floor retail, public amenity and community facilities in a location that via the Green Link also enables residents from outside of the Housing Zone to directly benefit from this thriving mixed use development and the broader District Centre facilities.

The Council's aspiration to retain the existing warehouse style buildings on Site 1 (16 Ashley Road) is not supported; as it will limit the potential to create truly innovate design and accommodation standards. The existing buildings have little architectural merit or historical value, other than Berol House, which will be retained, with continued investment supporting its improved appearance.

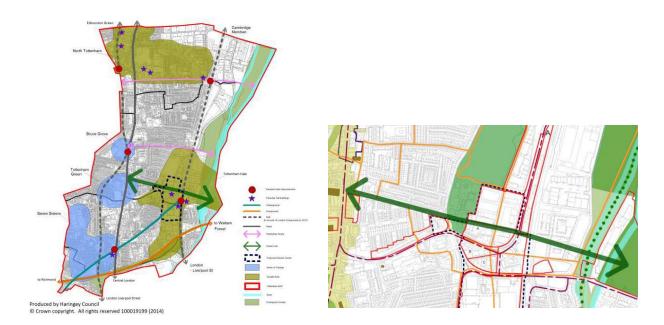
Site 2 offers the opportunity to create a diverse mixed use scheme development, which could include a variety of employment uses and also residential development. We support the proposals in the THDCF for residential and commercial development, with such commercial uses to reflect both market requirements and viability. The current market requirements are detailed in Section 6 below, but current market rents did not support the further development of B1 of B8 uses, however other opportunities exist for C1, C3, D1 and Sui Generis.

The scale of this new development will take reference from the surrounding context, and be used to shelter the residential development from the realities of the highways infrastructure, which is both detrimental visually and environmentally to any residents. A mixed use, employment-led scheme on Site 2, will step down from the height of the existing Unite Development on Hale Village, to create a courtyard with Berol House, which enables pedestrian movement between the station and Ashley Road. Berol House could benefit from an additional two-storey modern development to increase the B1 capacity, then the residential development on the West of Ashley Road will be of varying heights to create an exciting design which is not over-bearing but delivers the quantum of housing needed. By working with the Green Link there are design opportunities to create exciting areas of public realm and open square's for pedestrian movement, entrainment and pop-up markets. Around such squares, additional height could be appropriate and we support a review of the public realm strategy to reflect the proposals contained in Appendix 1 of this response which illustrate such potential along Ashley Road



"North of a new District Centre"

This statement P99, under "Proposed Site Allocation" is inaccurate. Figure 1.3 whilst not entirely of clear resolution, when aligned with Map 4.2 "The Green Link," shows the TH2 site as lying within the town centre defined area.



The rationale for these landholdings being part of the District Centre area are clear:

- The preceding and recent (October 2014) THDCF recognised the appropriateness for the area to include key town/district centre uses. For example, "the Green Link with a cluster of bars and cafes," (P68), reference to 4,167 sqm retail (P69), and both sides of Ashley Road identified for retail and commercial uses at ground floor (P65).
- The THDCF, when referring to the diagram below, states "A connected and integrated district centre." (P56).
- The THDCF placing this area as part of and nearer the centre of the District Centre.

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- The use of the green link as a key east-west pedestrian linkage would be more appropriate through the middle of a District Centre rather than on the edge where employment uses could be less appropriate.
- The concept of the District Centre as initially prepared by Allies and Morrison was explicit in its inclusion of Ashley Road to its boundary with the Down Lane Park and any move away from this goes to the heart of the District Centre proposals and the intention for comprehensive regeneration (see page 53). Micuber Estates and Berkeley Square Developments strongly resist any recommendation to segregate the District Centre and weaken the sense of place across the whole area.

"Green Link" and "enhanced Ashley Road"

As outlined earlier, the north-south and east-west axis which the AAP (and indeed previous master-plans) promote, perform key roles for the new District Centre, not least of which will be to resolve some of the physical constraints of Tottenham Hale where the existing road infrastructure dominates the environment and constrains pedestrian movement. The use of the Green Link as a key east-west pedestrian linkage would be more appropriate through the middle of a District Centre rather than on the edge where employment uses (B2, B8) would be less appropriate.

The Green Link as a principle is supported by Micuber Estates and Berkeley Square Developments, however, further information is required to ensure it delivers the promised

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connectivity. Notwithstanding this, the potential to connect the residential areas on Ashley Roads to both the Tottenham High Road and Lea Valley Water Park will be a significant contributor to the sense of place and overall identity of Tottenham Hale when considered against other destinations in London.

5 - Station Square West

Given its location within the District Centre area this land (referred to in the HELS as the "island" (para 5.89) and subject site 4) was recommended in that report to be de-allocated from the LEARA designation, which we agree with. The AAP (TH1 - B, page 95) does indeed not refer to this area as having a LEARA designation and promotes compressive redevelopment incorporating new District Centre uses, including hotel (planning permission granted), residential, active ground floor retail and public realm. In addition supporting text notes that buildings of 11+ storeys will be considered and this we also agree with as it provides an opportunity to create landmark development, particularly with the constraints of the tube line impacting on the viability of a reduced scale development.

The current land use as a car park and car repair garage offers little by way of visual aesthetics or employment use. The site is constrained by the surrounding roads and proximity of the Victoria line which runs under the corner of the site, and any development will need to consider the costs of building over the tube line and isolating the building from vibration.

We note the revised expectation in Policy "AAP1- E" Regeneration that a comprehensive approach to development is expected by the Council with neighbouring landowners interests and adjacent uses being assessed and accounted for when detailed planning commences, with this obligation being added between the Cabinet approved AAP draft and the AAP issued for consultation. Micuber Estates and Berkeley Square Developments respect this approach and have established constructive dialogue with neighbouring and surrounding landowners, however there are limitations with respect to retaining the ability to delivery the individual sites within their respective ownerships. Council officers have been party to this dialogue and respective design teams have held joint meetings to ensure this comprehensive approach is in place. An emerging design for the Island supports a development of some scale on subject site 4 and by developing these sites in the initial stage of the regeneration, will provide an early opportunity to improve the public realm around the Station Square. Micuber Estates and Berkeley Square Developments support the statements from the Council that a Meanwhile Strategy is being prepared to consider how the Station Square is to be developed in stages and welcome a copy of such proposals.

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6 - Commercial / other uses

In order to inform land use for the Ashley Road area and in light of the difficulties experienced by Berkeley Square Developments when trying to let Image House (the site now subject of the hotel planning permission, and shortly construction), a local market assessment was undertaken and a commentary is provided below.

Image House

Circa 14,000sqft of B1 office space, formerly owned by the occupying business, until the business was sold to a third party and was relocated elsewhere. Subsequently the building was extensively marketed for new tenants by leading local agents Strettons Chartered Surveyors, and was partially re-let, albeit on a short term basis with low rent. Subsequently the building was sold and redeveloped as a Premier Inn hotel, as the office use was unviable.

The development of the 96-bedroom Premier Inn Hotel represents a £10.5million investment in the heart of the proposed Tottenham Hale District Centre, it is also the first branded Hotel in Haringey. Once open, the development will create around 35 new jobs, predominantly from the local area, with further jobs created during the construction period. In addition, the hotel will contribute strongly to the local economy and support more money being retained locally and reinvested.

The hotel was developed on the basis of a pre-let arrangement to Premier Inn hotels, and was therefore not speculative. Since securing planning permission for the Premier Inn, further limited expressions of interest have been received by the developer from for a further 120 bedroom hotel within the District Centre, which could also create a further 40 new jobs and investment in the area.

Ashley Road

The Ashley Road area is currently a mix of commercial office accommodation, light industrial and low-grade manufacturing warehouses. The area has suffered from constantly failing demand, the decline of manufacturing generally in Tottenham Hale and the absence of a local office market to replace the loss of employment.

The Council own land directly to the south of Berol House, which has been vacant, save for a short term letting to the Contractor's involved in the redevelopment of the gyratory around the station. Apart from Berol House, the other buildings along the Road are of low quality and the area suffers from a parking problem – with many using the Road as a place to leave cars before taking the train in to London.

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The area offers a fantastic opportunity within the regeneration to provide much needed connectivity to Down Lane Park from the Station Square and retail park to the south. The proposals for the Green Link also offer a physical relationship with Hale Village and Hale Wharf – which will help promote the sense of place and identify of the area.

Berol House

Berol House is an Edwardian Building and the former Berol Pencil factory. It was acquired by its current owners in July 1995, with work to refurbish the building commencing in 1999, since when over £3million has been spent to create multi-tenanted serviced offices and limited low-grade manufacturing facilities. More recent upgrades include a new entrance lobby, air conditioning, updated IT infrastructure and hard landscaping.

The total accommodation on the site is 45,000sqft, including 11,000sqft of manufacturing (B2) and 1,850sqft café (A3), the remaining 32,150sqft is office accommodation (B1).

The office accommodation ranges from 400sqft to 5,584sqft, with the typical letting being 1,900sqft with an average net rent of £11psqft. Of the total office space, 40% is tenanted by Government backed organisations or charities including the Shaw Trust, the North London Waste Authority and Working Links. The typical lease is 3 years, and although the ground floor has been let for an average of 15 years, with the last lease expiring May 2034, albeit there are tenant break options from year 5 onwards.

The manufacturing units are two portal frame warehouses, of 28,000sqft and 35,000sqft, with an average net rent of £6.50psqft.

All of the accommodation provided includes an element of car parking and this remains a key priority for the tenants as few employees live within walking distance of the building.

Whilst Berol House is currently fully let, the rent per sqft has not increased in the last 10 years and remains suppressed as tenant demand is very limited. As at November 2013, the Berol House office accommodation was 40% vacant, with this only being filled when the Haringey Council closed Lea Valley TechnoPark to the north of Berol House.

It is expected that Berol House will be retained and there is the potential to increase capacity through additional floors if the demand is supported by the market. In the interim, the current owners will continue to invest in the building and supporting the current tenants.

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Lee Valley Techno Park

The Lee Valley Techno Park freehold is owned by Haringey Council and provides 70,914 sqft of multi occupied serviced office and business centre (B1). The offices have been operating at a substantial loss for a number of years, with occupancy levels of 33% as at September 2013. In addition, 20% of the tenanted space is by the Council, with only 13% of the offices being commercial leases.

The Haringey Council Cabinet Report (Lea Valley Technopark: Acquisition of Technopark and Sale for Education Use, dated 16 January 2013), stated the following:

- 5.7 The Council have commissioned expert advice regarding retaining employment use on the Technopark site and have been exploring opportunities to improve occupancy levels and mitigate the annual financial loss. Over the past twelve months, actions have been taken by the Council to change and increase advertising for Technopark and to review the size of available units. A specialist resource has also been appointed to manage lettings. The impact of these actions is not yet fully understood but it is believed to not have significantly reduced the annual financial liability.
- Advice has confirmed that demand is low because Tottenham is not a recognized office location or an established office market. Where occupiers do have a requirement, they generally have to be located in the borough for a specific business purpose. Technopark was developed to offer Small & Medium Enterprises' (SME's) small office space on flexible terms. The general market trend is for SME's not to take on leases and to work remotely. Furthermore, Technopark was built in the 1990's so the office specification is dated. Even with a refurbishment, it has been advised that it will progressively become harder to let. The advice concluded therefore in considering any future options for the site, the least likely driver of value will be continued office use. See the Appendix in part B of this report for a copy of this advice.
- 5.9 Action taken by the Council to date to improve occupancy levels, including advertising and improvements to the website, has seen limited change to the number of vacancies.

In addition, the report also stated that the "Council obtained expert advice regarding employment used and demand is low because Tottenham Hale is not a recognised office location or an established office market, and therefore in considering any future options for the site, the lease likely driver of value will be continued office use". The Council's employment target of 4,000 jobs needs to be further defined and recognise the limitations of

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the market for B1 use and that other options, such as hotels, student residences, colleges, and creative workshops must be considered in more detail.

The announcement of the potential closure of the Lee Valley Technopark resulted in increasing the demand at Berol House, but did not create any new or additional requirements.

18 Ashley Road

18 Ashley Road was acquired by the current owners in 1996 and is a large warehouse (B1/B8) which is currently let to ReStore, a not for profit organisation which provides a community recycling centre for furniture and electrical goods. Previously located in Kings Cross, they moved to more affordable premises in Tottenham Hale in 2000. In addition, a second tenant operates roof material trade counter from the premises.

The building is 25,990sqft and the current rent is £6.16psqft and let until 2020 without a break. The tenant currently enjoys the benefit of the highways links to the site and it is expected that they would seek a more industrial location with strong highways connectivity and access for large vehicles and lorries.

<u>Ashley Works (16 Ashley Road)</u>

The Ashley Works buildings were acquired by the current owners in 1973, and includes 52,863sqft of manufacturing warehouses (B2) in generally average condition. The site is currently multi-tenant, with the owner occupying 45,250sqft for fabric manufacturing, albeit demand for fabrics has been steadily declining and as such the building has been divided to allow 3 additional tenants to operate from the building.

The additional tenants include a womens clothing business, a metal works and a food preparation business. The average net rent for this site is £6.00psqft with leases expiring in mid-2019.

Demand for the manufacturing space remains very limited and it is expected that during the redevelopment of Tottenham Hale, the current fabric manufacturing operations are expected to be relocated within Haringey, to a purpose designed manufacturing facility within an industrial park which has good access for transport and is located away from residential properties.

The pedestrianisation of Ashley Road will also impact the demands for manufacturing space and move the focus towards a more commercial and retail environment, which is typical for a residential area.

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Overall, the local market for employment uses is not strong. Furthermore, given the Housing Zone status the area now benefits from and the identification of the sites in the AAP as being within the District Centre area we do not believe that B2 and B8 uses are appropriate on the subject sites.

In addition to the residential demand expressed universally for this area, we have established that demand does also exist for education facilities, hotel, retail and an extent of other commercial uses. Having established market demand, we have undertaken a series of site assessments and commissioned masterplanners to undertake preliminary studies for the area.

Sentinal House - 1 Ashley Road

Sentinal House is currently let to Cambridge Education Systems Limited, a private college, recently formed. The building benefits from a prominent location adjacent to the station and is in a good state repair with modern offices and facilities. Despite this, the building continues to attract low net rent of £10.50psqft.

This gateway site to Ashley Road could offer a break between the busy Watermead Way and a public square leading into the Green Link. A possible glazed retail development which allows a high degree of visual and physical permeability would promote the relationship between the Station Square and Ashley Road, whilst also offering some sanctuary from the surrounding highway.

7 - Proposed Master-Plan

With the benefit of the information and rationale expressed already, Micuber Estates and Berkeley Square Developments commissioned John McAslan and Partners, architects, to undertake a preliminary study for the areas of Ashley Road and Station Square West where they have land interests.

This, (appendix 1), demonstrates how key principles set out in both the AAP and the THDCF can be embraced to ensure that an appropriate form of District Centre development can be brought forward and delivered:

- A full range of uses appropriate for a District Centre (A1, A3, B1, C3, student residence, and D1)
- Maximising ground floor active frontage opportunities

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- The retention (and extension) of Berol House as a business centre
- North-south and east-west connectivity with this connectivity ensuring linkage to important aspects of the area such as the existing Hale and Hale Village built form, Down Lane Park and the Tottenham Hale transport hub
- The incorporation of employment uses west of Ashley Road with a concentration of residential (including family housing) on the eastern and south eastern fringes of Down Lane Park
- Reflection of buildings/building heights already constructed (Hale Village) or granted permission in and about to commence construction (Premier Inn) and also the intensification of land use brought on by it's District Centre designation and its Housing Zone status.
- The introduction of additional key focal points such as a public market, increased public realm and sympathetic "green fingers" leading to exiting green space

8 - Conclusion

Micuber Estates and Berkeley Square Developments welcome the opportunity to comment on this AAP. Tottenham Hale has been the subject of many masterplans, action plans and other planning guidance documents. These have not all resulted in commensurate development.

Recently however, increased recognition has been given to key attributes such as transport links, ease of access to the City of London and Stanstead Airport, and substantial either inefficient or underused landholdings. Keen to continue to invest in the area, Micuber Estates and Berkeley Square Developments wish to bring forward on their landholdings a scale and form of development in the area, which is not only appropriate but responds to market interest and therefore is capable of being delivered and a catalyst for change and improvement..

It is clear that delivering an appropriate range, scale and form of residential development is the primary focus for the area. Recognising the area's potential we were encouraged to see masterplan activities evolve from the 2006 SPD to the 2014 THDCF. On the back of retail, station and hotel development coming forward at Station Square West, we agree with the Council's proposed removal of the LEARA allocation from these sites. We are however surprised and disappointed to see the AAP use the Green Link to segregate the Ashley Road North especially when the Key Diagram (Figure 3.1) clearly shows the sites both lying in the defined District Centre boundary. Furthermore we do not see the rationale and practicality of retaining a LEARA allocation on a site which:

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- Is within the District Centre
- Local market evidence shows cannot deliver substantive employment
 with the Green Link and Ashley Road links joining here it is far more appropriate for
 a stronger focus to be applied to district centre/residential rather than LEARA
 employment uses

We therefore suggest that:

- The LEARA allocation is removed
- The severance of Ashley Road North and South be removed and the 2 areas be combined in a single designation
- Reference (P99) to Ashley Road South being "north of a new District Centre" be replaced with "within the District Centre as shown on the Key Diagram"

Similar to the text used in the other District Centre sites we would also suggest new text be applied to the combined Ashley Road North and South site.

"Comprehensive redevelopment of the Northern end of Ashley Road forming part of a new District Centre, creation of a new Green Link and an enhanced Ashley Road."

In order to achieve some consistency in the policy text we would also suggest revised text be applied to TH1 Station Square West Area A.

"Area A: Comprehensive redevelopment of the Southern end of Ashley Road forming part of a new District Centre, creation of a new Green Link and an enhanced Ashley Road."

In order to assist future consideration, masterplanning and subsequent planning applications we have demonstrated through the Ashley Road Masterplan Preliminary Study how a range of uses A1, A2, A3, C3, B1, C1 and student residences (sui generis) appropriate for the District Centre can be brought forward and integrated within a comprehensive development.

Overall Micuber Estates and Berkeley Square Developments look forward to working with LB Haringey and other landowners to regenerate and deliver an area of London which has been chosen to bring forward much needed residential development and associated land uses, in this case befitting a new District Centre.

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Appendix 1

Ashley Road Preliminary Study

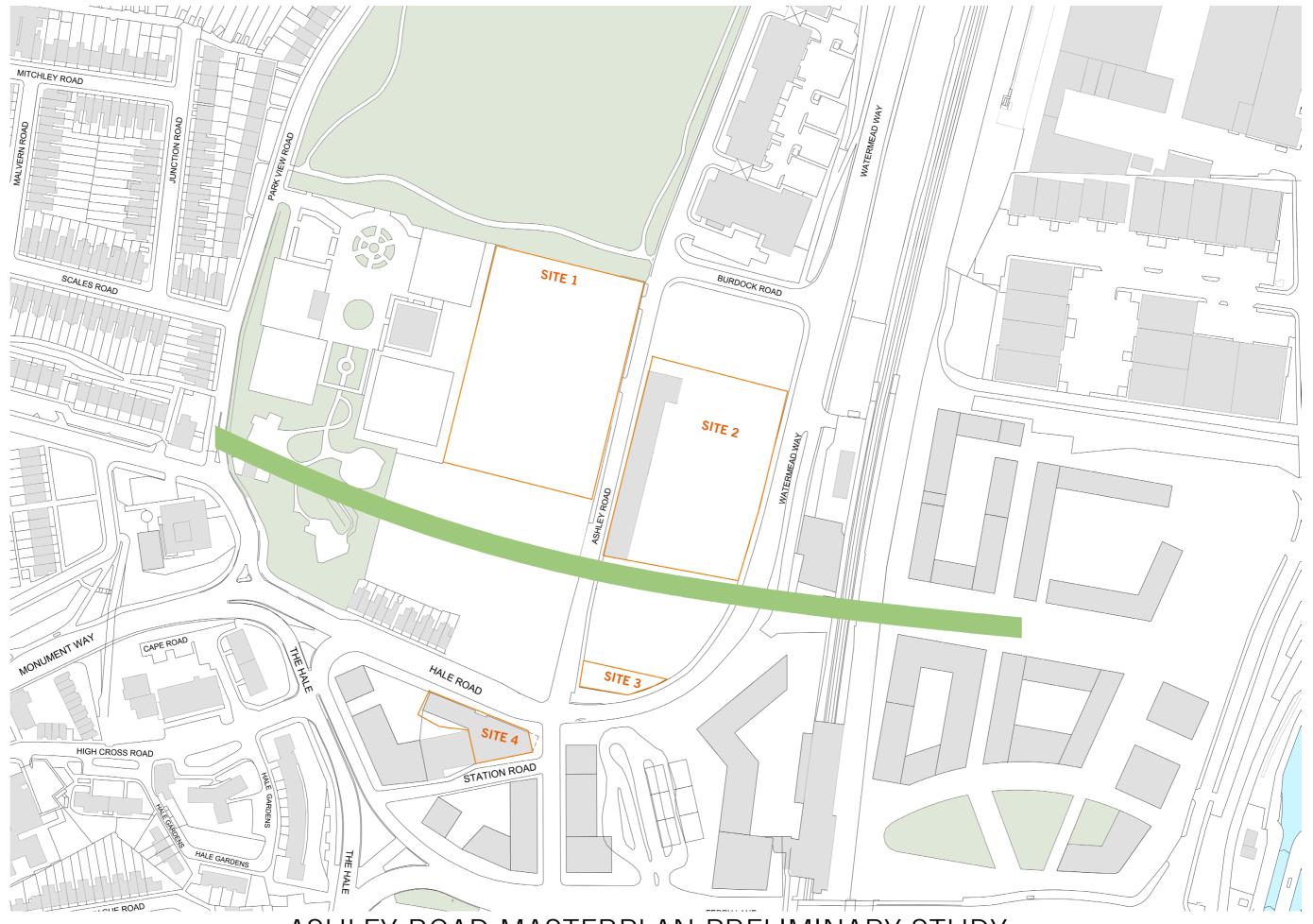
ASHLEY ROAD WASTERPLAN

Preliminary Study

27 th MARCH 2015

JOHN McASLAN + PARTNERS

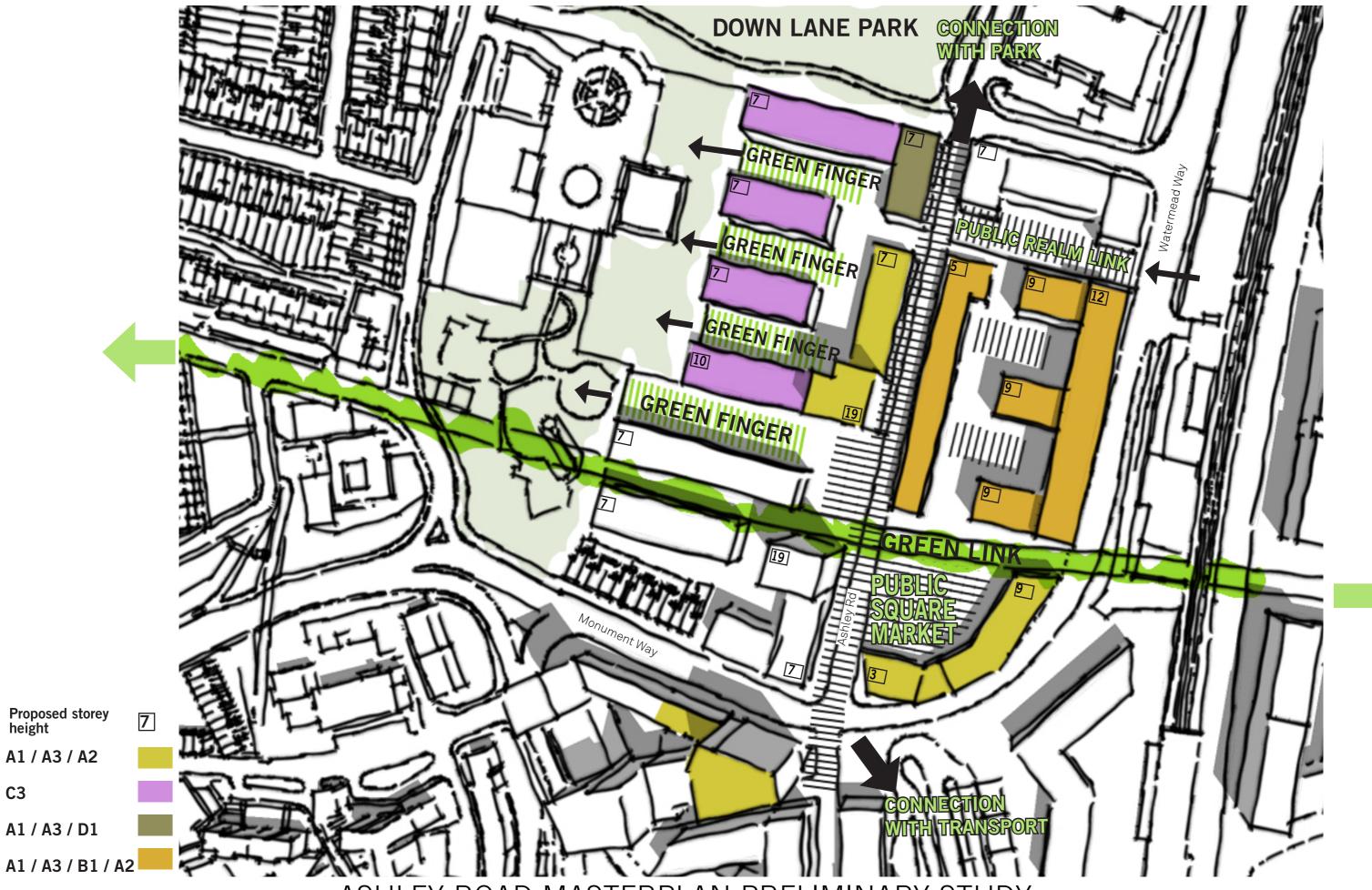
SITE PLAN



ASHLEY ROAD MASTERPLAN PRELIMINARY STUDY

JOHN MCASLAN + PARTNERS 27th MARCH 2015

CONCEPT DIAGRAM I GROUND FLOOR USES



ASHLEY ROAD MASTERPLAN PRELIMINARY STUDY JOHN MCASLAN + PARTNERS 27th MARCH 2015

CONCEPT DIAGRAM I UPPER FLOOR USES

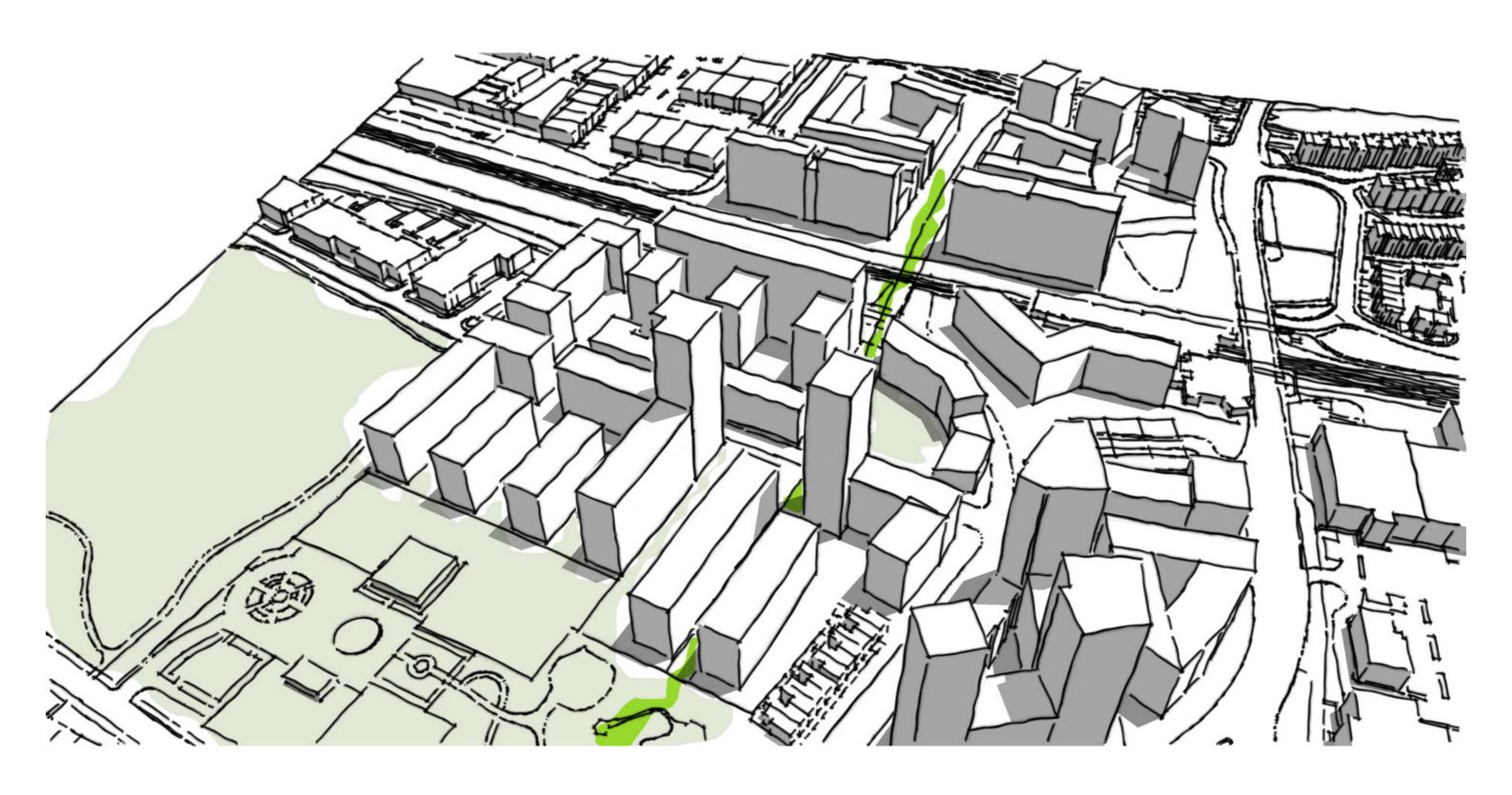
A1 / A3 /A2

C3

B1/D1



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ASHLEY ROAD MASTERPLAN PRELIMINARY STUDY JOHN MCASLAN + PARTNERS 27th MARCH 2015

Preliminary Study

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