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6th 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.

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



Shulem's Estate - Arena Business Centre



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