

Defend Crouch End, c/o SMART Urban Ltd (Agent) and Nicola Spokes

Representor Reference ID's: 69 (Defend Crouch End)

[And 66 (Will & Nicola Spokes), 67 (Susan Taylor)]

Site Allocation Development Plan Document Site SA49 Park Road and Lynton Road

Representors: Nicola Spokes & Susan Taylor of Defend Crouch End with Seema Manchanda of SMART Urban Ltd (Agent)

## Hearing Statement

This statement responds to the Inspector's Draft Matters and Issues for Examination with regard to SA49 in the SADPD. The changes Defend Crouch End would like to see made to the policy for this site were set out at the end of the previous letter and this document supplements that representation.

### 1. Proposed heights have not been specified in most site allocations to add flexibility to the policies. Why is it necessary to specify up to a five storey height for this allocation?

1.1 The reference to heights at 2.140 on page 122 relates to the existing planning consent where it states that 'there is an existing consent ...permitting development up to five storeys' but this statement does not correctly reflect that consent which actually permitted the 'erection of a further two floors to existing 2 storey building' ie four storeys. The planning application reference number is HGY/2006/1839. The screen shot summary for the case is attached below.

Reference number	Site Address	Ward	Applicant details	Agent details	Development	Decision
<a href="#">HGY/2006/1839</a>	72 - 96 Park Road London N8 London		Mr Stephen Oratis Orantez House, 72 - 96 Park Road, London, N8 8JQ	Andreas Wagner Vivendi Architects LLP, Unit E3U, Bounds Green Industrial Estate, London, N11 2UD	Erection of a further two floors to existing 2 storey building to create 4 x two bedroom, 2 x one and 3 x three bedroom flats and 4 additional commercial units. Development includes alterations to elevations, formation of 5 car parking spaces and provision of covered bin storage.	Grant permission

1.2 Defend Crouch End have asked that the red line of the site be redrawn to exclude the site of this consent. However, if the boundary of the site is not redrawn and if the reference to heights from the existing consent is mentioned Defend Crouch End would like the actual consented height to be correctly referenced to four storeys.

1.3 The area is primarily residential and comprised of two storey dwellings. Those built during the 1800s were worker's cottages and those built later in the Grove and on the south side of Lynton Road are also relatively compact houses. For this reason any large out of scale development too close to the existing residences would feel overbearing and dominating. In addition despite not being considered an attractive feature the wall on the west side of the Grove is not ill regarded by residents and so we have are more cautious about opening this

up in any development. Not only might it have the potential to create overlooking to residents of the Grove where there is none now it would also change the basic character of the courtyard and affect its value as a feature separating residential from employment use. The reference to heights in the Development Guideline in bullet points 5 and 6 are made in general terms. We have suggested alternate wording for bullet point 5 as set out in our letter which aim to protect the amenity of residents in Lynton Road, the units on the Grove as well as the other areas mentioned and correctly references the Mission Hall Building (not a church).

**2. Would there be a loss of industrial floor space and would this comply with the London Plan and Strategic Policies?**

- 2.1 As currently worded the Development Guidelines section of the policy for SA49 opens the door to a net loss of employment with a requirement for financial compensation as set out in the Planning Obligations SPD.
- 2.2 We do not consider this to be the appropriate policy context for this site. The employment space is currently in use and meeting demand from a range of businesses and supporting the local economy. We do not consider the approach meets the following tests (b) justified; (c) effective and (d) consistent with national policy.
- 2.3 The NPPF paragraph 20 requires local planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century. Both Haringey Local Plan Policy SP8 and the London Plan Policy 4.4 recognise Employment Land/other areas as requiring protection where there is demand. The site is currently in use as employment land, albeit not designated as Local Employment Land, we consider it has equivalent value as such. As currently drafted we consider the policy does not fully reflect the evidence available in regard to employment land and so doesn't comply with London Plan and Strategic Policies.
- 2.4 We have previously provided evidence from the Just Space Campaign which collates evidence with regard to employment and highlighted the evidence from Haringey's Employment Land Study (February 2015); taken as a whole makes a case that there has been a steady decline in available employment land particularly for class B1 uses and that the losses of employment land have been greater than demand.
- 2.5 Two further GLA documents merit attention in terms of showing the scale of loss of employment land.
- 2.6 The London Industrial Land Supply & Economy Study 2015 (Aecom; Cushman & Wakefield) highlights in the Executive Summary that 'all London sub regions have witnessed a contraction in the supply of industrial land....dating back to 2001' and overall that this release has been greater than the recommended levels in the GLA Land of Industrial and Transport SPG stating that the 'trend rate of release for 2010-2015 is 105ha per annum compared to the recommended rate of release of 37 ha per annum. [This study provides more up to date data those quoted in the previous letter; however the principle remains the same.] This study provides a great deal of data broken by borough and figure 2.17 on page

64 shows release of industrial land in Haringey in the period has been double the GLA benchmark. Table 6.1 on page 141/142 shows industrial rents in Haringey have increased 74% between 2001-2015; vacant land in the borough is 7.3% (just under the GLA frictional vacant land figure of 8%). The report goes on to show in figure 6-11 on page 148 that the employment densities in Haringey increased by 50% during 2010-2015; showing that the land is being used more intensively. The report highlights a trend showing a move of employment outside London, particularly for sectors less reliant on the London context, to the wider south east. They recommend at 8.4.4 'that care is needed at a local level to be clear on what industry is being protected and to ensure policies are sufficiently robust and unambiguous'.

2.7 Chapter 4 of the Draft Economic Evidence Base 2016. The main findings of the report pertinent to the issue here is that GLA Economics predict an average 0.69% employment growth per annum to 2036 although the forecasts are subject to wider economic factors such as interest rates; EU referendum etc. At page 170 the paper discusses industrial land supply and cites that some commentators have raised 'loss of employment land in industrial estates as a risk factor for the London economy'. Page 171 considers the supply of land for SMEs, the type of business we see in Lynton Road and highlights that 'there is a concern that the cost of workspace in London is such that start-ups and small businesses cannot find the space they need, and that this may be damaging the economy'. Map 4.1 shows that there is only 1 incubator, co-working space in the London Borough of Haringey and while we do not think it is this one the nature of the Courtyard is a collection of small businesses operating in close proximity and it is clear this type of space is in limited supply in the borough. In part the study argues that the supply is to do with demand from new technology businesses and that in outer London boroughs it is difficult to discern whether the market is failing to provide sufficient affordable workspace provision in Outer London or if this is a reflection of lower demand. However, in the context of Crouch End, an affluent and fairly central London neighbourhood we would disagree to some extent and instead consider that the local policies play a big part in the safeguarding of employment land (Hackney for example secured a number of exclusions from the Government's Office to Residential permitted use in order to protect similar sites) and that pressure instead comes from the very high demand for housing and relative values that make housing the developers preferred choice.

### **3. Would a mixed use allocation affect the employment opportunities/floor space or jobs in the area?**

3.1 As currently drafted the policy refers simply to 'redevelopment for a mix of residential and employment uses'.

3.2 This approach does not give weight or preference to either use and in such circumstances when such a site is redeveloped weight is then driven by land values; effectively prioritising residential uses. In our view this is likely to lead to a heavily residential development with a minimum of employment floor space and will probably result in an overall loss of floor space in the area. With regard to jobs we have provided evidence (above from the Aecom report) that employment densities are increasing but in our view this may or may not be a positive as it is a reflection of changing business types and practices.

- 3.3 Defend Crouch End have suggested changes to the Site Requirements to specifically seek employment led mixed use as we consider this would better reflect the sites current use as employment land and would protect it in future.
- 3.4 We have also proposed changes to the Development Guidelines bullet points 3 to promote 'a development that enhances employment floor space' and point 4 'redevelopment should increase jobs and employment opportunities on the site'. It is our contention that the land use policy should prioritise provision of employment land and that this is the more important of the two points but that both should be included.

**4. Is the character of the area sufficiently protected by the site requirements and development guidelines?**

- 4.1 No, as currently drafted the policy for SA49 is inadequate to protect the character of the area. The key aspects needing protection are:
- the protection of the green space,
  - the retention of the Old Piano Factory and upgrading of its status to locally listed building
  - the overall heights and mass of any new development to ensure that the adjoining conservation area is not harmed (considered above),
  - the level of employment space (considered above).
- 4.2 With regard to the Green Space Defend Crouch are very disappointed that their application to protect the site as an Asset of Community Value was refused and are somewhat cynical about this outcome as the council are looking to dispose of the site for development as evidenced by the SSAD.
- 4.3 The Council ACV panel reasons for refusal were given as follows: Although The Green is an open space its main use is as a thoroughfare. There is no evidence of community use such as seating and the terrain is not conducive to socialising/leisure/recreational uses. The Panel appreciate the benefits of the view and the trees however there is insufficient evidence that the space could have health benefits. The Assessment Panel therefore have concluded on the evidence provided that The Green does not at present or has not at any time in the recent past had an actual non ancillary use which furthered the social well being or social interest of the local community through recreation, culture or sport.
- 4.4 We clearly disagree with the Panel.
- 4.5 We acknowledge the green space is very small but that is not a barrier to value, especially in London where many people do not have gardens to look into or large spaces of their own to enjoy. Even small spaces are loved and this is a mini shared space in for residents of Lynton Road and the Grove. We append more recent photographic evidence of this showing dog walkers and sunbathers. There were originally three benches on the space in the 1970s (see photo which is actually a still from a 1997 episode of The Professionals), however, these

were removed due to anti-social behaviour from those leaving the pub late at night (a consequence of cheek by jowl mix of urban uses). The space is now a more peaceful green spot particularly as it also acts to create a sense of separation for the residents from the busy Park Road to the west.

- 4.6 The mature trees on the site definitely bring environmental benefits in terms of air quality, pollution, climate change adaptability, health benefits and amenity for residents. The environmental and social benefits of trees is widely accepted and reflected in planning policies and the widespread adoption of urban tree planting programmes. London has a target of 20,000 additional street trees over 7 years (GLA). The recent London itree survey gives strong evidence for the benefits of trees and has found that each year London's 8.4m trees (of which 6.2% are silver birch)
- remove 2,241 tonnes of pollution worth £126m per year. Air pollution is a major issue for London and the contribution made by trees to its reduction has a direct positive impact on public health and is literally life saving.
  - intercept rainfall and prevent nearly 3½ million cubic metres of water from entering the drainage system and so, reducing the risk of flooding and water pollution events. This is the equivalent of 1365 Olympic swimming pools with a monetary value of £2.8m per year.
  - store 2.4 million tonnes of carbon and they sequester carbon dioxide from the atmosphere to reduce the impact of climate change; equivalent to the carbon produced from 26 billion vehicle miles.

We also append a link to a Guardian newspaper article showing the now accepted benefits of urban trees which also highlights the iTree study together with some international studies. We consider some of the advantages; primarily water retention and social benefits are stronger on this site if the Green is retained in its entirety, not just the trees. This will also further protect the trees from possible removal at a later stage.

- 4.7 The Green has been here for long enough to be important to the current local community and its loss would be of great detriment to them. A History of the County of Middlesex: Volume 6, Friern Barnet, Finchley, Hornsey with Highgate (originally published by Victoria County History, London, 1980) gives us information as to the origins of the green space on pages 111-112.

The Grove, on the north side of Lynton Road, was cleared in 1969 (fn.276) and in 1976 there were 48 dwellings in small red brick blocks.

- 4.8 Council policy also acknowledges the value of the Green for local character in the current adopted Crouch End Conservation Area Character Appraisal, Cabinet Draft 14<sup>th</sup> September 2010 states the following with regard to Lynton Road (page 49):

Lynton Road 5.2 Lynton Road, situated at the conservation area's northern boundary, is characterised by two storey late 19th Century stock brick terraces. The road is unusually quiet considering its closeness to the town centre, with audible birdsong and residential character. The original granite kerbstones and gutters

remain intact and many of the original interlocking artificial stone paving slabs remain on the pedestrian pavements, but they are often broken, uneven or patched with tarmac and concrete. There are many young street trees, with a few mature trees at the eastern end, where there are also a group of eight cast iron Tuscan column style bollards at the junction with Middle Lane. Unfortunately, the original cast iron lamp standards have been replaced by modern lighting columns. The southern end of Lynton Road is blocked to vehicular traffic by an extension of the pedestrian paving and a group of bollards, the short section from Park Road acting only as a service road to the small commercial estate beyond the conservation area boundary. Adjoining this is a well maintained grassed area with several mature trees at the junction with The Grove that, although outside the conservation area, adds to its quiet verdant character.

4.9 It is of utmost importance that the green space is now protected in the Site Allocation DPD. We do not consider that the approach taken by the ACV panel should set the approach taken by the Local Plan. We do not consider the Plan not the ACV panel's reasons for refusal to meet the Planning soundness test (b) of being justified.

4.10 The case for the Old Piano Factory has been set out before. We simply add a new reference to the early development of the area from A History of the County of Middlesex (ibid)

As early as 1869 houses had been erected in the Grove (fn. 67) and 57 cottages had been built by Thomas Beall in the Grove, Willow Walk, and Park Road. (fn. 68)

The Mission building dates from 1881, a little later than the first cottages but of the same era and it was originally linked to the Old Piano Factory. We know from the document above that most buildings on the Grove were cleared in 1969. We consider therefore that the case for retention is stronger as the many of the early buildings have already been lost to clearance schemes and the buildings are in use and add to the character of the area.

## **5. Conclusion**

5.1 Defend Crouch End accept the site has development potential within the plan period but have set out a case for further protections of employment use and local amenity and character. We continue to seek the proposed amendments to the policy as set out in our initial letter.

Word count main text: 2775

## Appendices

Links to documents referred to.

[http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey\\_employment\\_land\\_study\\_-\\_final\\_feb\\_2015\\_0.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_employment_land_study_-_final_feb_2015_0.pdf)

[https://www.london.gov.uk/sites/default/files/industria\\_land\\_supply\\_and\\_economy2015.pdf](https://www.london.gov.uk/sites/default/files/industria_land_supply_and_economy2015.pdf)

<https://www.london.gov.uk/sites/default/files/chapter4-draft-eeb-2016.pdf>

Crouch End Conservation Area Statement

[http://www.haringey.gov.uk/sites/haringeygovuk/files/crouch\\_end\\_character\\_appraisal\\_web\\_viewing\\_compressed\\_0.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/crouch_end_character_appraisal_web_viewing_compressed_0.pdf)

A History of the County of Middlesex: Volume 6

<http://www.british-history.ac.uk/vch/middx/vol6>

Uses of the Green Space



Dog walking, cycling and sunbathing; a small oasis in urban environment.



Previous benches; still taken from an episode of The Professionals (series 3; episode 6) filmed in 1997.

<http://www.mark-1.co.uk/Professionals/c06.htm>

### Benefits of Trees

The iTree study 2015

<http://www.forestry.gov.uk/london-itree>

<https://www.theguardian.com/cities/2015/aug/15/treeconomics-street-trees-cities-sheffield-itree7>