



Haringey

### Comment

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Event Name Haringey Core Strategy Proposed Submission

Comment by Mr Jasper Woodcock

Comment ID

4

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Consultation Point 3.1.14 Paragraph ( [View](#) )

Status Submitted

Submission Type Web

Version 0.2

#### Legal compliance

Do you consider the DPD is legally compliant? Yes

#### Soundness

Do you consider the DPD is sound? No

#### Unsound

Do you consider the DPD is unsound because it is not: (1) Justified

#### Reasons for compliance and soundness

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraphs 3.1.14 – 3.1.18 headed Areas of Change – Wood Green Metropolitan Town Centre I wish to object to the inclusion of Fig.3.3 entitled 'Wood Green Area of Change' on p. 66. My reasons are:  
1) The phrase 'Area of Change' is not defined anywhere in the Core Strategy. It was used in conjunction with phrases such as 'managing growth', 'areas of renewal', and 'areas of intervention' in the 'Core Strategy - Issues and Options December 2007' Document. It is not made clear what if any are the distinctions in meaning between these phrases. The clear implication, however, is that Haringey council will look more favourably at development proposals within a designated area of change than in other

areas. 2) In the text, the reference to Fig. 3.3 comes at the end of para 3.1.14 which leads the reader to assume that it is a map of Wood Green Metropolitan Town Centre. This assumption is reinforced by para 3.1.18 where it says, 'The town centre has been tightly drawn as defined by the existing UDP'. 3) However, the boundary outlined in Fig 3.3 corresponds neither to Wood Green Town Centre boundary nor to Wood Green Town Centre SPD boundary, both as shown in Fig.1.1 on p.viii of the Wood Green Town Centre Supplementary Planning Document dated October 2008. In the Issues and Options December 2007 document, the Town Centre is represented diagrammatically by a simple circle in Map 9.1 'Areas of Renewal and Intervention' on p.23, so its boundaries cannot have been commented on in that consultation. 4) The map in Fig.3.3 arbitrarily extends the area purporting to be the Town Centre beyond the limits delineated in the SPD without any evidential justification as follows: i) An irregular polygon is added to the north. This includes parts of Commerce and Nightingale Rds to the west of the High Rd. To the east of the High Rd, it includes part of Woodside Park and the whole of Earham Grove, Canning Crescent, Newnham Rd, and Kings Rd. As drawn the boundary does not follow the course of roads or building lines or other features on the ground. It cuts through a historic local park (Woodside) and a conservation area (Nightingale Rd). It appears to have been drawn completely arbitrarily. ii) To the East of the SPD Town Centre, it extends to include Stuart Crescent and the Jubilee Gardens, again without relating to features on the ground. iii) To the west of the SPD boundary, it includes some but not all of the area included in the Heartlands regeneration scheme, excluding areas to the north and south, cf. map of Heartlands/Wood Green Growth Area on p.62 of the Core Strategy. Again the exclusions appear completely arbitrary. 5) The map in Fig.3.3 adds a completely unwarranted specificity to the vague statement in 3.1.18 that 'in planning for the future intensification of the town centre, opportunity sites will be considered that lie beyond the UDP town centre'. If it is allowed to remain in the document there is a real risk that it will be taken to authenticate an extension of the boundaries of the Town Centre for which no justificatory evidence is provided and upon which there will have been no consultation.

### **Changes necessary for legal compliance and soundness**

**Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified in the question above (Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The following changes are necessary: 1)The reference to Fig.3.3 at the end of para 3.1.14 to be omitted. 2)Fig 3.3 to be omitted or replaced by the map of the Town Centre boundaries as shown in the Wood Green Town Centre SPD Fig 1.1. 3)If the Town Centre SPD map is included as a replacement Fig.3.3, the reference to it to appear in para 3.1.18 thus, 'The town centre has been tightly drawn as defined by the existing UDP (Fig.3.3)'. These changes will purge this section of the Core Strategy of an apparent extension of the Town Centre that is arbitrary and lacking any evidence to justify it.

### **Legal Compliance**

### **Soundness**

### **Guidance notes**

**Please tick the sections of the guidance that you wish to read.**

### **Introduction**

### **General advice**

**Participation at oral part of examination**

**If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?** YES, I wish to participate at the oral examination

