



18<sup>th</sup> March 2016

**Delivered by email**

Local Plan Consultation  
Planning Policy  
Haringey Council  
River Park House  
225 High Road  
Wood Green  
London  
N22 8HQ

Dear Sir / Madam,

**SUBMISSION OF REPRESENTATIONS TO WOOD GREEN AREA ACTION PLAN: ISSUES AND OPTIONS CONSULTATION DOCUMENT (REGULATION 18)**

We write on behalf of our clients, West Indian Cultural Centre LLP & Emyrean Developments & Paul Simon Magic Group, to make representations to the 'Wood Green Area Action Plan (AAP) Issues and Options' Consultation Document. Paul Simon Magic Group is an active residential development company in the London Borough of Haringey (LBH) as well as other parts of London. Further information can be found at [www.magic-homes.com](http://www.magic-homes.com).

Our clients are seeking to promote the redevelopment of the West Indian Cultural Centre (WICC) as well as some adjacent properties, which are identified within the south eastern corner of Draft Site Allocation 'SA 23: Clarendon Road South', within the emerging 'Site Allocations Development Plan Document (DPD)'. It is within this context that these representations are made.

We consider that the proposals for the WICC site could assist LBH with its housing delivery targets for the AAP area, as the scheme could be completed within the next 5 years as it's delivery is not dependent upon the provision of Crossrail 2.

We note that the policies contained within the Wood Green AAP will supersede the allocations within the Site Allocations DPD as well as the policies within the Development Management DPD once formally adopted.

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## Representations

The Wood Green AAP seeks to provide a comprehensive and cohesive planning policy framework for the transformation and regeneration of Wood Green over the next 30 years. It is envisaged that this document will help to optimise the development potential of Wood Green and change the perception of the area for the better. We confirm that our clients are fully supportive of the long-term regeneration proposals for Wood Green and is supportive of the broad regeneration principles for the area.

We note the council's ambition to secure 'Opportunity Area' status for the area and we support this fully. Furthermore, we support the aim to develop at least 4,600 new homes in the Wood Green area over the plan period alongside additional commercial uses.

The AAP clearly supports the delivery of Crossrail 2 (CR2) and seeks a general increase of Public Transport Accessibility Levels (PTAL) across the area. Our clients support this ambition and considers that a new Crossrail Station at Wood Green (single station proposal) is most appropriate.

Having reviewed the 4 Development Options for the area, we consider that Option 4 'Complete Transformation' (the Council's favoured option) is most appropriate to engender the comprehensive enhancement and regeneration of Wood Green. Therefore, our comments relate specifically to p.66-71 within the AAP document.

We note that Option 4 seeks to provide 6,000+ new homes in the Wood Green AAP area along with associated retail, leisure and commercial uses. This Option also seeks to provide a single CR2 station only at Wood Green and places an emphasis on economic regeneration.

## Outputs

P.66 of the Wood Green AAP specifically lists a number of 'Outputs' that would be generated by Option 4. We provide our comments on the key points as follows:

- 'Density and height will shift towards the existing Wood Green library site to capitalise on a centrally located Crossrail 2 station and a major new square. Heights could range from up to 18 and up to 35 depending on location';

We support this aim and consider that the word 'storeys' should be inserted after '...18 and up to 35' for clarity. The 'outputs' go on to state (in part) as follows:

- 'High level of change across all sectors and maximised provision of housing and new jobs locally.'
- 'Town centre heart 'shifted' to the south and the west away from the crossroads toward a key new public space located where the current library stands.'
- 'Connection from new public space on the High Road to a new public space to the north of the proposed Clarendon Road development.'

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We confirm that we support the key aims listed above. However, we note that penultimate bullet point states 'Town centre residential development maximised'. We consider that this should be amended to state 'Town centre and residential site allocations will be maximised' to recognise that some sites outside of the town centre have significant capacity to deliver new housing and should also be 'maximised'.

## **Building Heights**

P.69 of the AAP provides a map which details the 'indicative building heights' across the area for Option 4. It identifies the WICC site as being appropriate for '4-6' storeys. We consider that this 'indicative building height' should be increased at the site.

There are a number of key reasons why building heights at this site should be increased. Firstly, the proposed allocation of the area as an 'Opportunity Area' is relevant. Part 'B' 'Planning Decisions', sub-section 'c' of Policy 2.13 'Opportunity Areas and Intensification Areas' within the London Plan is most relevant. It states:

- 'B Development proposals within opportunity areas and intensification areas should:
  - c contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks.'

Furthermore, paragraph 2.61 forms part of the supporting text to Policy 2.13 and states (in part) 'The Mayor expects both types of area to make particularly significant contributions towards meeting London's housing needs.' Figure 1.1 (below) details the draft site allocation for SA23: Clarendon Road South.

## SA23: CLARENDON RD SOUTH



Figure 1.1: Draft Site Allocation 'SA 23: Clarendon Road South'

The WICC and surrounding properties are located in the southern section of this site allocation and the WICC site benefits from a PTAL level of 5. This is shown at Figure 1.2 (below) which is taken from Transport for London's 'WebCAT' online mapping tool.

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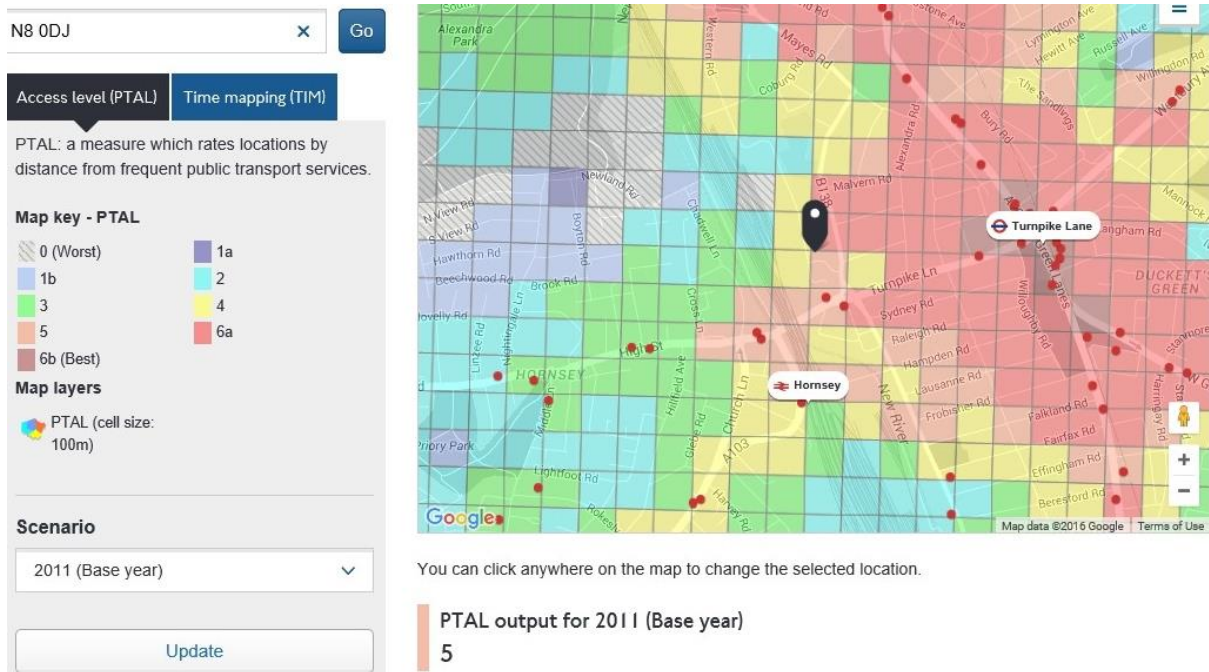


Figure 1.2: PTAL Map for WICC site: Source: WebCAT

The site has a PTAL of 5 and there are strong arguments to justify that the WICC is within a ‘central’ location. The London Plan defines ‘central’ locations as follows:

‘central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.’

The site is located within 800 metres walking distance of Wood Green town centre boundary, which is a Metropolitan town centre. The area has a mix of different uses, including retail, commercial, leisure, community and residential. Many buildings in the area have large building footprints and are 4-6 storeys in height. The residential building directly to the west of the WICC is approximately 7 storeys in height.

The existing gasholders the north of the site are equivalent to 10 residential storeys in height and the outline planning permission for Clarendon Square permits buildings of approximately 4-9 storeys across large building footprints. Further north, The Mall, The Chocolate Factory and a number of other buildings on the High Road are 4-6 storeys high or more and also have large building footprints. The New River Village development to the west also provides large building footprints and buildings heights of up to 7 storeys.

On this basis, a site with a PTAL of 5 within a ‘central’ area should provide a residential density of between 650-1,100 hr/ha as identified at Table 3.2 ‘Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare) within the London Plan. This also ignores the fact that the site is within an ‘Area for Intensification’ and is being promoted as an ‘Opportunity Area’ by the Council, where higher densities are encouraged, subject to specific site constraints.

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In terms of urban design, the WICC site forms a landmark corner plot at the corner of Turnpike Lane and Hornsey Park Road. It is logical in design terms for any proposed building to provide greater height than the existing residential building to the west, which rises up to seven storeys. There is also the potential for this site to act as a 'gateway' site at the south-western corner of the AAP regeneration area, which has the potential to provide a high quality tall building, which could help to change the perception of Wood Green.

Exact building heights would need to be tested through detailed design and townscape analysis, as well as technical considerations such as daylight and sunlight implications. However, we consider that there is the potential to provide a building of between 10-12 storeys and potentially more, subject to detailed design and analysis. On this basis, we consider that the map at p.69 should be updated to identify that building heights of 10-12 storeys may be acceptable at the WICC site.

### Upper Floors

We note that the 'ground' and 'first' floor plans on p.71 identify that 'community / health' uses will be provided at the ground and first floor levels. It is the intention of our clients to replace the WICC facility as part of any redevelopment proposals and we are content with this approach in principle. This approach is also consistent with Policy SP16: 'Community Facilities'. However, the 'upper floors' plan on p.71 also indicates 'community / health' uses, which we assume is an error, as this is not repeated in the 'upper floor' plans in Options 1-3. We would be most grateful if you could update this plan to indicate 'residential use' at the upper floors.

### Summary

The AAP seeks to engender the comprehensive redevelopment of Wood Green over the next 30 years and represents a once in a generation opportunity to deliver physical change alongside long-term socio-economic benefits for the local community. We look forward to discussing the policy aims and site specific proposals with you in detail in due course. However, should you have any queries, please contact me at these offices (Tel: 020 7255 0524).

Yours Faithfully,



Matt Humphreys, MRTPI  
Director

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