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Council's Planning Offices River Park House 6th Floor Wood Green N22 8HQ

29 March 2017

Dear Sirs,

OBJECTION TO WOODGREEN AREA ACTION PLAN PREFERRED OPTION VERSION SUBMITTED DURING CONSULTATION ROUND FEBRUARY – MARCH 2017

We write to you in objection to the current wording of the above document. Our comments specifically relate to proposed allocation <u>WA SA 14: Land between Westbury and Whymark Avenue</u>. We write on behalf of the owners of Whymark House, occupied at ground floor level by Pound Land, No 12-14 High Rd, Wood Green, London N22 6BX.

Proposed rewording of Allocation WA SA 14: Land between Westbury and Whymark Avenue

Whilst this representation is an objection, as it requests changes to the document, we would however like to affirm our general support for the redevelopment of this allocation. We are pleased and supportive of the Council's proposed redevelopment of the allocation, and the comprehensive, bold approach offering the chance to support a tall landmark building.

We do however feel that the wording of the supporting text, specifically para 8.27– providing the site allocation, is too onerous and restrictive in its focus upon just the provision of residential development. Paragraph 8.27 is repeated below for reference;

"Redevelopment of existing town centre buildings to create a new gateway development marking the entrance to Wood Green from Turnpike Lane Station, with town centre uses at ground floor level, and residential above."

Quite simply, we strongly request, as this letter proceeds to justify, that the wording is changed to;

"Redevelopment of existing town centre buildings to create a new gateway development marking the entrance to Wood Green from Turnpike Lane Station, providing a mixed use scheme with town centre uses at ground floor level, and other uses above, including hotels and tourist accommodation. The provision of residential use will also be strongly encouraged."

The current wording of the policy strongly suggests that the Council intend for only residential development to be provided above ground floor level through any redevelopment.

However, turning over the page to the stated "site requirements" paragraph advises that a mix of residential and commercial floorspace will be permitted above the active frontages. It adds that new office floorspace will be sought on this site. This is far more reflective of the range of uses that we would expect this site to be suitable for, and wonder if it is the intention of the Council for the allocation to be so specific given this later reference.

The wording of the policy should be therefore changed, to reflect the range of suitable uses, and the following reasons;

Directors
Helen Cuthbert | Stuart Slatter | Claire Temple
Associate Director
Alastair Close | Vicki Freestone | Katie Turvey

Consultants
Caroline Dawson | Dan Templeton
Associates
Sally Arnold | Rachel Ford | Rob Scadding | Heather Vickers | Alan Williams
David Williams

Suitability of the site for a Hotel or other form of Visitor Accommodation

It is our own view that the site would be equally well suited to the provision of a hotel, as it is for residential, as we proceed to explain.

The London Plan 2016 provides regional guidance, and of course all Local level planning documents must comply with this. London Plan 2016 Policy 4.5 London's Visitor Infrastructure advises that borough should assist the capital in growing tourism through seeking to achieve 40,000 net additional hotel bedrooms by 2036.

In doing this they should ensure that new visitor accommodation is located in appropriate locations, and in areas such as this allocation, i.e. beyond the Central Activities Zone (CAZ), they should be focused in town centres, opportunity and intensification areas, where there is good access the Public Transport.

Allocation WA SA 14 is within the Wood Green Metropolitan Centre, Wood Green Growth Area and has a PTAL rating of 6b – only metres from Turnpike Lane Underground Station. This is not only the highest PTAL rating available, but this will further increase with the forthcoming introduction of Cross Rail in 2018. These characteristics make the site, through the application of London Plan Policy 4.5, an ideal site for the provision of a new hotel.

These characteristics also make the site ideally suited to the provision of a hotel in accordance with Saved Local Plan Policy CLT4 and emerging Development Management Policy DM53 "Hotel and Visitor Accommodation." Both policies advise that "hotels and other visitor accommodation are generally appropriate in locations within existing town centres, or areas well served by public transport."

However, despite this clear promotion from both regional and local policies for Hotel provision, this does not come through at all in the promotion of WA SA 14.

In fact, none of the proposed allocations within the Wood Green AAP specifically indicate where the provision of hotels or visitor accommodation will be suitable. This is unhelpful to prospective hotel providers looking to locate within this specific area – as other policies strongly encourage.

Need to ensure potential for phased, rather than single comprehensive redevelopment

We support the Council's aspiration to develop the entirety of this allocation, to provide a well-planned, comprehensive landmark feature. However, we are reassured to see the acknowledgement by the Pre-Submission version of the draft Site Allocation Plan (Jan 2016) that this allocation is within the ownership of multiple private freeholds and leaseholds.

It would seem somewhat unrealistic to have an allocation dependent upon all of these owners agreeing on a single redevelopment proposal for the entire site. As such, we note that the policy allows for "a set of phased and co-ordinated developments in line with a site wide masterplan." (para 8.28)

This would of course allow for some elements of the allocation to come forward without the need to wait for the rest of the allocation, provided that a Master Plan accompanying any application demonstrates that it will not prejudice the remainder. This is expressed by bullet point 1 on page 137. This is an essential component of this allocation if it is to result in its redevelopment, and we strongly support its retention.

In order to promote this allocation as much as possible, the Council's policies must be explicit in their support for all appropriate uses on this site. The policy should therefore be amended to include explicit reference to the potential provision of a hotel and other tourist accommodation.

Conclusion

The site is excellently suited to the provision of a hotel of other forms of tourist accommodation, as per the London Plan 2016 and other policies of Haringey. In order to give this allocation the very best prospect of redevelopment the policy should be explicit in the full range of appropriate uses, and so should include clear reference to hotels and other forms of tourist accommodation. The wording of allocation WA SA 14: Land between Westbury and Whymark Avenue should be changed accordingly, as we have suggested.

We request to be informed of all following stages of the plan, including the opportunity to attend and contribute at the Examination in Public.

Yours sincerely,



Adam Wilkinson MRTPI

Senior Planner

Planning Potential

Enc.