



17th March 2017

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 DOCUMENT:
PREFERRED OPTION CONSULTATION DRAFT (REGULATION 18) FEBRUARY 2017**

We write on behalf of our clients, West Indian Cultural Centre LLP & Empyrean Developments & Paul Simon Magic Group, to make representations to the 'Wood Green Area Action Plan (AAP) Preferred Option' Consultation Draft (regulation 18), February 2017. 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.

Our clients are seeking to promote the redevelopment of the West Indian Cultural Centre (WICC) as well as some adjacent properties. These are identified within the south-eastern corner of Draft Site Allocation 'WG SA 24: Clarendon Rd South', within the 'Site Allocations' section of the Draft Wood Green AAP (Chapter 8). It is within this context that these representations are made.

We consider that the proposal for the WICC and surrounding sites could assist LBH with its housing delivery targets for the AAP area. It should also be noted that 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 are supportive of the broad regeneration principles for the area.

We note the council's ambition to secure 'Opportunity Area' status for the area within the next version of the London Plan and we support this fully. Furthermore, we support the aim to develop at least 7,000 new homes in the Wood Green area over the plan period alongside additional commercial uses to provide a further 4,000 jobs. We are also supportive of the extension of the Town Centre boundary to the west.

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 consider that a new Crossrail Station at Wood Green (single station proposal) is most appropriate.

Comments on Draft Site Allocation WG SA 24 Clarendon Rd South

Our clients' landholdings fall within Draft Site Allocation WG SA 24 'Clarendon Rd South' at 27-33 & 9-70 Clarendon Road, Wood Green, N22. The site allocation totals 2.2 hectares and benefits from a PTAL of 4 and potentially 5, depending upon detailed assessment.

Given that the next version of the London Plan is expected to designate the Wood Green AAP area as an 'Opportunity Area' (OA) we consider that the entirety of the Wood Green AAP area comprises a 'Central' Location. However, p.165 of the draft AAP states that site allocation WG SA 24 is 'urban' in character. We do not agree that the site is urban in character and request that this is updated to 'central'.

We consider that the site and emerging context adhere to the qualifications of 'central' areas within the London Plan and that the site is clearly capable of delivering residential densities of between 650-1,100+ habitable rooms per hectare (hrph) in line with Table 3.2 'Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)' within the London Plan.

We have not repeated our reasoned justification why the site constitutes a 'central' location, instead of an 'urban' location as this was highlighted within our representations to the first round of consultation to the Wood Green AAP in March 2016. A copy of our original representations is provided at Appendix 1.

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We note that the proposed site allocation states as follows at paragraph 8.47:

'Subject to appropriate re-provision of the existing community uses, creation of a new primary school, and new mixed use development including community, commercial and residential uses.'

The 'commentary' section (paragraph 8.48) goes on to state:

'This site is currently of a mixed characteristic, including a mix of community, employment and residential uses. There is potential for the site to be used more intensively, and complement the development which is expected to take place in the Clarendon Rd development. There is a need for new primary school provision, and this site offers an ideal location to serve both the Wood Green and Harringay areas.'

We note that any future redevelopment proposals will be required to provide replacement community uses and our client is supportive of the provision of a new primary school within the site allocation. We consider that the principle of additional commercial and residential use is also acceptable.

Overall, we consider that the WICC and adjacent sites are particularly well-suited to the provision of a replacement WICC, potentially a new school and residential use at the upper floors. We also agree that there is clear potential for the site to be used more intensively and complement the development that is expected to take place in the adjacent Clarendon Road development.

Indicative Development Capacity

We note that the 'Indicative Development Capacity' (IDC) for the site seeks to provide 289 residential units alongside 7,354 sq m of employment floorspace and 9,193 sq m of education floorspace.

We also note that Appendix A 'Indicative Development Capacities by Site' (p.164) states the following for sites which have not been brought forward (either via a planning permission or via pre-application discussions):

'the potential development capacity of the site has been estimated in accordance with the methodology described below. It should be noted that the development capacity attributed to each site is as an indicative minimum, not prescriptive.'

Although this comment is noted, we still consider that the indicative and minimum number of residential units identified for WG SA 24 should be increased as the site is capable of delivering significantly more floorspace than the 36,772 sq m identified at p.165.

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Adjacent Residential Density

We consider that WG SA 24 has significant development capacity, which is not identified within the draft site allocation. As a comparable, we have assessed the residential density of Clarendon Road (site allocation WG SA 18) as this site is similar in terms of character and lies immediately to the north.

Clarendon Road provides a site area of 5 hectares and 14,091 sq m of commercial floorspace; 7,046 sq m of town centre floorspace and 1,610 residential units are noted in the IDC section. We understand that the owners of this site (St William) are intending to submit a planning application for approximately 1,600 residential dwellings at the site in 2017.

The commercial floorspace proposed at Clarendon Road is approximately double that proposed at Clarendon Rd South and the Town Centre floorspace proposed is approximately 2,000 sq m less than the educational floorspace proposed at Clarendon Road South. However, 1,610 residential units are proposed at the site. For ease, we have removed the non-residential floor areas within both site allocations for the following residential density calculations.

In terms of residential density, the Clarendon Road site will be developed at a significantly higher residential density than Clarendon Road South. For example, if we take 1,610 (IDC number of dwellings) and multiply that by 3 (average number of habitable rooms per unit) we produce 4,830 habitable rooms across the 5-hectare site. If we then divide 4,830 by 5 (number of hectares) we arrive at a residential density of 966 hrph.

In comparison to the Clarendon Road South site, if we take 289 (IDC number of dwellings) and multiply that by 3 (average number of habitable rooms per unit) we produce 867 habitable rooms across the 2.2-hectare site at Clarendon Road South. If we divide 867 by 2.2 (number of hectares) we arrive at a residential density of 394 hrph.

Even if we took the approximate residential density (calculated as above) for the permitted scheme (ref: HGY/2009/0503) of 1,080 dwellings at Clarendon Road (site allocation WG SA 18), this still produces a residential density of 648 hrph, which significantly exceeds the indicative residential density of WG SA 24 of 394 hrph.

In summary, we consider that the IDC for the number of dwellings at WG SA 24 'Clarendon Road South' has significant potential to be increased. If WG SA 24 was developed at the same residential density at Clarendon Road, which lies immediately to the north, it would produce an indicative number of dwellings of 708 in total. For clarity, this is detailed below.

966 (Clarendon Road hrph) multiplied by 2.2 (site area of WG SA 24 in hectares) = 2,125 habitable rooms in total. If we divide this by 3 (average number of habitable rooms per unit) this results in approximately 708 residential units at the site.

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We note that the 'Development Guidelines' section of draft allocation WG SA 24 states (in part):

'This site is within an area considered to be generally more suitable for family housing within the AAP area.'

Therefore, even if we altered the calculation above to assume an average of 4 habitable rooms per unit (which would equate to a three-bedroom family dwelling) the IDC number of dwellings at the site would be 531 residential units.

In any event, we consider that the IDC for residential development at site WG SA 24 should be increased from 289 to above 500 dwellings as the current proposal would fail to optimise the development potential of the site, which would conflict with Policy 3.4 of the London Plan.

We also consider that these additional residential units within site allocation WG SA 24 (approx. 200+ units above the current IDC) will increase scheme viability across the site which will be required to fund the significant planning requirements in the area.

These items include, the replacement of existing community uses; a new school; replacement of existing employment floorspace (or a payment in lieu); affordable housing provision; payment of the Greater London Authority (GLA) Mayoral Community Infrastructure Levy (CIL) as well as the Haringey CIL. These significant costs will need to be funded in part by the redevelopment of the site. Therefore, increasing the residential capacity of WG SA 24 will in turn increase scheme viability and assist with the provision of these requirements.

For the reasons noted above we consider that there is significant potential to increase the IDC for residential use and unit numbers at the site.

Site Requirements

We note the 'Site Requirements' section within site allocation WG SA 24 and consider that these are acceptable in principle, subject to detailed discussions with LBH and relevant stakeholders.

Development Guidelines

The development guidelines section of Site Allocation WG SA 24 states that 'the principles of the Clarendon Rd Character Area should be used to guide development on the site'. We note that the Haringey Urban Character Study (February 2015) refers to the area within the site allocation WG SA 24 and indicates at p.156 of this document, that mid-rise buildings (3-6 storeys) and mid-high rise buildings (6-11 storeys) are appropriate within this area.

As noted above, we consider that the indicative development capacity and built form proposed would fail to optimise the development potential of WG SA 24. We consider that the site represents a 'gateway' site to the Wood Green AAP area and opportunities for taller buildings should be explored.

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Subject to detailed townscape analysis, daylight, sunlight and shadowing assessment, we see no reason why tall buildings of approximately 14 to 20+ storeys could not be provided within this area.

In addition, we would like to highlight that in October 2016 LBH granted planning permission (ref: HGY/2016/1573) for a redevelopment at 'Railway Approach Hampden Road, N8 OHG' for the provision of two buildings between 4 and 14 storeys in height comprising 174 residential units. The residential density of the scheme equates to 715 hrph. See figure 1.1 below.



Figure 1.1: Image of the Hampden Road Development (Source: Design and Access Statement)

The permitted development is located approximately 100 metres to the south of WG SA 24 and although it is not located within the Haringey Heartlands Intensification Area or the Draft Wood Green AAP area, it shares many characteristics to WG SA 24. Both sites are located between the railway line and areas of lower density residential use. Both sites are also easily accessible by local bus routes and Turnpike Lane Station (Piccadilly Line) to the east. See Figure 1.2 below, which shows the redline site area for the Hampden Road proposal and shows the WICC site at the top of the picture.

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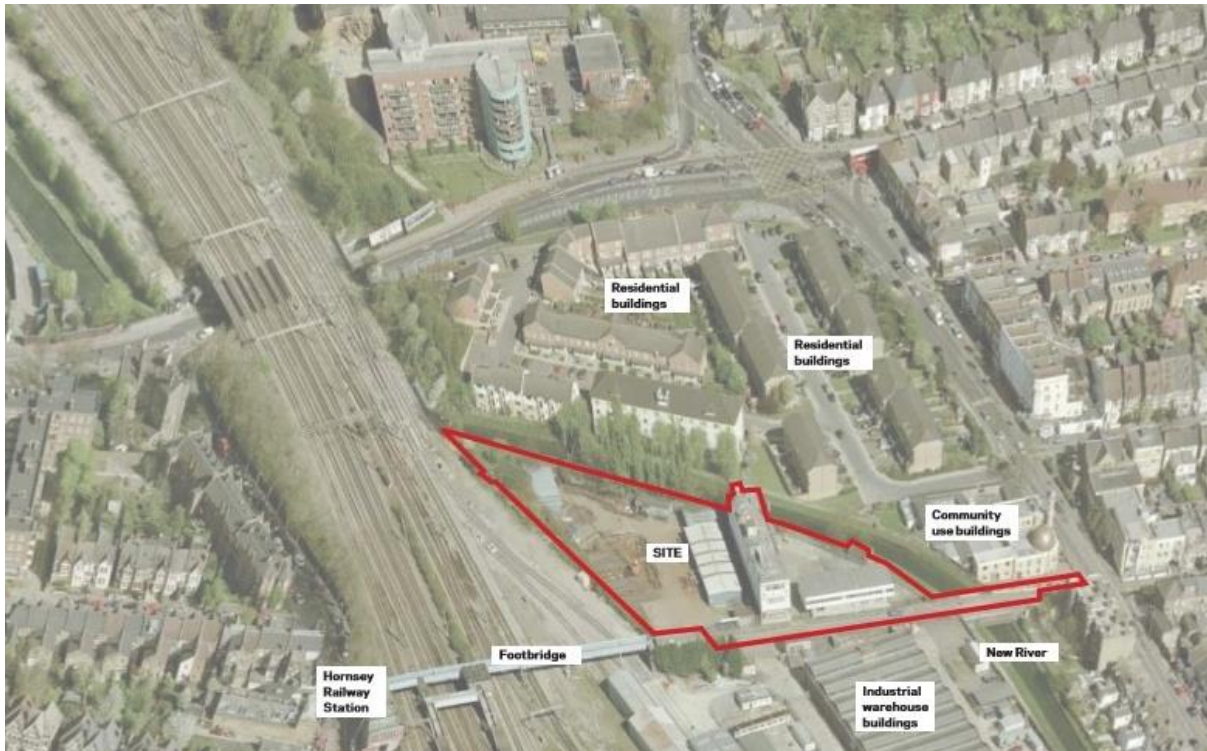


Figure 1.2: Hampden Road Redline Site Boundary, with WICC to the north.

We consider this recently permitted proposal provides a useful vision of how WG SA 24 could be developed in the future and should be used as a minimum ‘benchmark’ in terms of development capacity. Overall, we consider that the residential density and general built form should be above 14 storeys, subject to detailed assessment and we consider that this should be explored further in the draft Tall Buildings Supplementary Planning Document (SPD) which is expected to be issued for consultation by LBH in the coming months.

We note that the next bullet point within the ‘Development Guidelines’ states:

‘This site is within an area considered to be generally more suitable for family housing within the AAP area.’

We consider that all sites within the Wood Green AAP area are capable of providing a mix of dwelling types and do not consider that site allocation WG SA 24 should be required to provide more family housing to compensate for a lack of family housing provision on other development sites within the AAP area. This point is discussed further within our detailed comments to draft policy WG2 ‘Housing’.

We also note that the ‘Development Guidelines’ go on to state:

‘This site lies outside of protected view corridors, and may be suitable for tall or taller buildings, subject to other design considerations.’

We agree with this view and consider that WG SA 24 and the WICC site has the potential to provide tall or taller buildings and that the guidelines within the Haringey Urban Character Study (February

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2015) should be increased in this instance to optimise the development potential of the site and provide a gateway to the Wood Green AAP area. Subject to detailed assessment we do not consider that 'heights should be restricted where they adjoin the properties on Hornsey Park Road', as noted within the Development Guidelines.

The Development Guidelines also refer to community use and state:

'Opportunities to collaborate with existing community facilities providers in the area to improve the overall level of service should be explored.'

We agree that the opportunity to collaborate with other existing community facilities providers, including the WICC, to improve the overall level of services should be explored.

Overall, we note the remaining points highlighted within the 'Development Guidelines' at the site and are generally supportive, noting the points made within these representations.

Chapter 7 AAP Area-Wide Policies

Having reviewed the draft 'area-wide' policies within Chapter 7 of the AAP, we are generally supportive of these policies. However, we have the following specific comments.

Policy WG2 Housing:

Part 2 of WG2 'Housing' states:

'2. Development proposals incorporating a housing element will be expected to provide the housing in accordance with the indicative minimum capacities, set out in the Site Allocations within this AAP. All new development will be design-led, and higher densities and capacities than indicated in each in indicative capacity may be acceptable in appropriate locations, providing the other policies of this AAP and Haringey's Local Plan are not compromised.'

Whilst we agree with the general aim of this draft policy (point 2) we consider that the following amendments should be made to clarify that the council is supportive of development at higher densities. We consider that points 2 of draft Policy WG2 should be amended as follows:

*'2. Development proposals incorporating a housing element will be expected to provide the housing in accordance with the indicative minimum capacities, set out in the Site Allocations within this AAP. All new development will be design-led, and higher densities and capacities than indicated in each in indicative capacity **will be encouraged**, providing the other policies of this AAP and Haringey's Local Plan are not compromised.'*

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Point 3 within draft Policy WG2 refers to dwelling mix and states:

'3. Sites will be required to deliver a mix of sizes of units across the AAP area, including ensuring an appropriate mix of 1, 2, and 3+ bedroom properties are created. New family housing will be focussed outside of the town centre and Cultural Quarter, in the Zone More Suitable for Family Housing.'

We consider that all major residential development proposals should be required to provide a mix of dwelling types and that all sites within AAP area are capable of accommodating family housing. We see no reason why well-designed and high-quality proposals cannot accommodate family housing within the town centre or the cultural quarter.

Family housing is normally defined as dwellings with 3 or more bedrooms. Many well-designed new build residential schemes incorporate family housing and a varied dwelling mix can assist with the creation of mixed and balanced communities. Family housing can easily be provided in the form of apartments or 'flatted' schemes which helps to ensure that the development potential of individual sites is optimised.

We note that point 1 of draft Policy WG2 seeks to provide 'mixed and balanced communities' and we consider that this should be provided across the entire Wood Green AAP and that smaller units and family units should not be separated or focussed on individual site allocations. We consider that this approach accords with policy 3.8 'Housing Choice' within the London Plan. Therefore, we consider that point 3 should be amended as follows:

'3. Sites will be required to deliver a mix of sizes of units across the AAP area, including ensuring an appropriate mix of 1, 2, and 3+ bedroom properties are created. It is considered that all sites are capable of providing a mix of dwelling types.'

Paragraph 7.21 notes that the council considers that the most suitable location for new family housing will be away from the mixed-use developments in the town centre and Wood Green Cultural Quarter. It notes that this is partly due to the elevated noise levels associated with mixed-use development. We consider that residential development at the upper floors of new developments will either be acceptable or note in terms of noise impact. It is irrelevant if these are one-bedroom, two-bedroom or three-bedroom units. Paragraph 7.26 refers to family unit provision and states:

'7.26 Any reduction in the percentage of family size units in the Town Centre locations should be offset by increased percentages of family units in other specified/identified site locations to ensure overall dwelling mix targets are achieved.'

As noted above, we consider that all sites are capable of providing family units and that varied dwelling mixes across the entire AAP area will help to create more mixed and balanced communities. We do not consider that those development sites outside of the Town Centre or the Cultural Quarter should be expected to provide an increased level of family homes and that dwelling mixes should be agreed on a site by site basis and informed by local need.

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Policy WG5 Wood Green's Urban Design Framework

Part 2 of draft Policy WG5 refers to potential locations of tall buildings and states:

'2. New landmark buildings will be supported at the locations identified in figure 7.12, subject to policies DM1, and if tall, WG6, DM6, and should emphasise the major points of arrival into the town centre (identified in Figure 7.12).'

Figure 7.12 highlights the potential locations for tall buildings within the AAP area. We note that these are at the major points of arrival into the town centre. We consider that there is additional opportunity to provide tall buildings at other locations within the AAP area and that these should be provided at the major points of arrival into the AAP area, not just the Town Centre. We consider that Site Allocation WG SA 24 has the potential to act as a 'gateway' site into the AAP area, which could accommodate a tall building. Therefore, we consider that point 2 of draft policy WG5 should be amended as follows:

'2. New landmark buildings will be supported subject to policies DM1, and if tall, WG6, DM6, and should emphasise the major points of arrival into the Wood Green AAP area.'

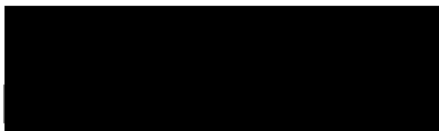
Policy WG9 'Community Infrastructure'

We note that part 1A identifies the need for a new primary school at site allocation WG SA 24. We can confirm that our client is supportive of this requirement in principle.

Summary

The Wood Green 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,



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Director

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