

Our ref: J032858

Haringey Planning Policy
River Park House
225 High Road
London
N22 8HQ

22nd February 2016

Dear Sir/Madam

Haringey Local Plan: Pre-Submission Site Allocations DPD (January 2016)

Comments made on behalf of Wood Green Investments Ltd

- 1.1 GL Hearn submits these representations in relation to the Pre-Submission Site Allocations Development Plan Document (DPD) on behalf of Wood Green Investments Ltd.
- 1.2 These representations follow the previous representations submitted by GL Hearn Ltd on behalf of Wood Green Investments Ltd for comments on the 'Preferred Options Site Allocations DPD.
- 1.3 These representations relate only to the Pre-submission Site Allocations DPD of the Local Plan.

SA1: Indicative Crossrail 2 Areas

- 1.4 Wood Green Investments Ltd supports this policy to protect sites required for the construction of Crossrail 2 alongside ensuring that a mix of uses and potentially enhanced infrastructure is sought from future proposals in these areas.

SA3: Changes to Town Centre Boundaries

- 1.5 Wood Green Investments Ltd supports the expansion of town centre boundaries within the borough, particularly in Wood Green.

SA 15: Westbury & Whymark Aves

- 1.6 Wood Green Investments Ltd ('the client') has an investment in relation to properties 4, 6, 8, 10, 12 and 14 High Road within the proposed site allocation area 'SA 15: Westbury & Whymark Aves' and therefore has an aspiration to bring forward and encourage the development of this area. These aspirations have been discussed with the Council on 20th August 2015 led by Matthew Patterson, Head of Strategic Planning, Transport & Infrastructure in regards to the upcoming Wood Green AAP.

Site Allocation Particulars

- 1.7 The Current/Previous use of the site is described within the document as being 'Predominantly Residential'. It should be noted that the current use of the site offers principally retail units at ground floor with some residential units above and therefore it is suggested that this be amended.
- 1.8 It is stated that the indicative development capacity for Town Centre uses is approximately 742 sqm. Having done some measurements of the existing site, the existing ground floor area totals approximately 3000sqm. As the Council have indicated that they would preferably like to see town centre uses at ground and first floor levels, this would potentially amount to a maximum capacity of approximately 6000 sqm. On this basis Wood Green Investments Ltd would request that the figure be revised to consider this.

Proposed Site Allocation

- 1.9 Haringey's vision for SA 15, as an area for *"Redevelopment of existing town centre buildings to create a landmark building marking Turnpike Lane Crossrail Station, with town centre uses at ground and first floor levels and residential above"* (Paragraph 2.43) is welcomed and supported by Wood Green Investments Ltd.
- 1.10 As was mentioned in the representations previously submitted on the 'Preferred Options Site Allocations DPD', whilst it is understood that that the Crossrail 2 proposal is clearly a strong instigator for development, our client would look to ensure that development is encouraged on this site regardless of whether Crossrail 2 is formally announced to be aligned with Turnpike Lane Station. Re-development in this area would significantly regenerate the area positively irrespective of whether Crossrail 2 does come through this station. We would like to ensure that this is reflected within the text at paragraph 2.42.
- 1.11 In recognition of the above our client proposes the following new wording for the text at Paragraph 2.42:
- "Redevelopment of existing town centre buildings to create a landmark building marking Turnpike Lane Crossrail Station, with town centre uses at ground and first floor levels and residential above."*
- The re-wording of paragraph 2.4 will also sit in line with the reference to the station within the Commentary.
- 1.12 This proposed re-wording would not compromise the opportunity to redevelop the site if Crossrail 2 does come forward on this basis would support development of the site in either instance.

Commentary

- 1.13 The re-wording of paragraph 2.4 will also sit in line with the reference to the station within the Commentary (Paragraph 2.43) which describes the station as 'Turnpike Lane tube station'.
- 1.14 In addition, it is noted that the 'Timeframe for Delivery' of redevelopment of the allocated site is marked for 2020 onwards. It has been reasonably assumed that this is to be in line with the proposed delivery of Crossrail. Wood Green Investments Ltd would suggest that this timeframe may restrict development opportunities on the site.

- 1.15 It is stated within Paragraph 2.43 that redevelopment will be encouraged through a 'comprehensive development'. However due to the complex land ownership, especially on Westbury Avenue, this would result in a comprehensive delivery being unlikely. Therefore the delivery of this site should be encouraged to come forward in a phased or incremental approach over the time period from 2015-2020 and onwards.
- 1.16 It is therefore suggested that the text at Paragraph 2.43 be amended to read:
“... New town centre uses, an improved public realm, and residential development will be encouraged through either a comprehensive or phased development in line with a site-wide masterplan.”
- 1.17 In recognition of the above, Wood Green Investments Ltd seeks to work together with LB Haringey to progress a comprehensive strategy for the site however not a comprehensive delivery. Prescriptive policy is inappropriate in this instance and likely to restrict and unduly delay future development proposals.
- 1.18 The importance of viability is enshrined in para.173 of the NPPF which states:
“Plans should be deliverable. Therefore the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”

Site Requirements

- 1.19 Our client welcomes the Site Requirements and supports the proposed requirement of ground and first floor town centre uses fronting the High Road as well as the proposed fulcrum of tall buildings at Turnpike Lane.
- 1.20 It has been noted that the specificity of tall building development in terms of height and design of the building that was included within the 'Preferred Options' document has been removed, and this is supported by our client.
- 1.21 The document states at bullet point three “Ground floor and town centre uses will also be expected on the north side of Westbourne Avenue.” It is believed that the reference to Westbourne Avenue has been made in error and that it should read either “Whymark Avenue” or “Westbury Avenue”. For the avoidance of doubt it would be useful if this could be clarified and amended accordingly.
- 1.22 The policy states at bullet point four that “Development will accommodate the fulcrum of the Turnpike Lane tall buildings cluster facing the High Road opposite Turnpike Lane station”. The specificity of this may restrict development options, and therefore our client would suggest rewording the sentence to remove “opposite Turnpike Lane station”.

Development Guidelines

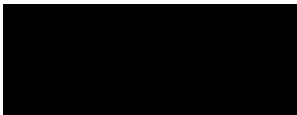
- 1.23 Our client welcomes and supports the majority of the development guidelines, especially the creation of a high quality frontage to the High Road and the opportunity to provide additional town centre uses at first floor level.

- 1.24 It is however noted that in relation to the text stating that “Height should fall away from its peak at the frontage to Wood Green High Road along Whymark Avenue”, that this is neither clear in terms of how this would work with multiple development options, nor is it worded in such a way which allows for development flexibility in terms of where the ‘peak’ of development should be located.
- 1.25 In relation to the above, it is suggested that the sentence should be reworded to read: “Height should fall away from its peak on the High Road towards the east of the site”.

Conclusions

- 1.26 Our client supports the aspirations behind the proposals for SA 15: Westbury and Whymark Aves, specifically in relation to properties 4 – 14 High Road, Wood Green; however there is concern that delivery of the site could be compromised by policy in its current form due to the restrictive time pressures, the requirement for a comprehensive rather than incremental development and the suggested close alignment with the proposed Crossrail 2 delivery which has not yet been confirmed.
- 1.27 Our client would like to work collaboratively with LB Haringey to ensure a strategy is adopted for the site that ensures a viable and successful area within an appropriate timetable regardless of whether Crossrail 2 comes into fruition or not.
- 1.28 I trust the above is clear and we would be grateful if you could provide us with confirmation of these representations.

Yours sincerely



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