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Sent via email to: localplan@haringey.gov.uk

29 March 2017

Our ref: J10352

Dear Sirs.

Wood Green Area Action Plan Regulation 18 Preferred Option Consultation Draft, February 2017 Representations on behalf of Lazari Investments Limited

We write to provide representations on the above consultation on behalf of our client, Lazari Investments Limited (Lazari), in response to the London Borough of Haringey's consultation on the Preferred Option Consultation Draft (published February 2017).

Our client is the freehold owner of 26-42 High Road, which makes up part of the site, at 16-54 High Road, allocated as site SA 13 within the emerging AAP, for "comprehensive redevelopment of current buildings for mixed use development consisting of town centre uses at ground and first floor level, with residential above."

Background

Lazari are the freehold owners of the majority of the allocated site SA13 which is bounded by Bury Road to the east, Whymark Avenue to the south, and High Road to the west (see Appendix A for site location plan).

The site currently comprises a mix of retail units at ground floor fronting the High Road, with ancillary back of house space at First and Second floors. The site is in a highly sustainable location, approximately 100m north of Turnpike Lane Tube Station and is served by a number of regular buses.

The site is predominantly vacant following the departure of the retailer BHS.

The existing buildings on the site are dated and no longer fit for purpose. The rear of the site provides a wall of dead frontage along the existing residential street of Bury Road.

The site is therefore in much need of redevelopment, and there is a real opportunity to maximise the benefits of this key gateway site to deliver the aspirations of the AAP and act as a catalyst development for the future long term regeneration of Wood Green.





Wood Green AAP

Lazari acknowledges that the Metropolitan Town Centre of Wood Green is allocated as a Growth Area in Haringey's Local Plan: Strategic Policies (2013), and as an Opportunity Area in the London Plan (2015).

In association with these designations and given the areas excellent access to public transport, Lazari acknowledges the considerable opportunity to regenerate Wood Green through a co-ordinated and comprehensive approach. In light of this Lazari welcomes the preparation and publication of the Area Action Plan to help shape the future regeneration of Wood Green.

Lazari also considers the benefits the introduction of a new Crossrail station would bring to Wood Green, and is of the view that such benefits should be maximised in line with Wood Greens designation as a Metropolitan Town Centre.

Lazari is supportive of the overall objectives which are set out for Wood Green in the AAP and considers that to achieve this, increases in overall densities and heights within the centre will be necessary.

Site Allocation SA 13

As set out above, Lazari are the freeholder owner of 26-42 High Road, which makes up part of the site allocation at 16-54 High Road, allocated as site SA 13.

Lazari welcomes the site allocation for comprehensive redevelopment for mixed use development consisting of town centre uses, with residential above, however they have some specific comments and concerns in relation to various aspirations for site SA 13.

Mix of uses

Lazari acknowledge the Council's aspiration is for a mix of residential, employment and town centre uses at the site. While these uses are considered appropriate for Wood Green, Lazari considers that the focus for uses on the site should be the provision of retail and other town centre uses at the ground floor, fronting the primary shopping frontage of the High Road and Whymark Avenue, with residential and other town centre uses above.

Lazari considers appropriate other town centre uses could include the provision of a hotel which would provide high employment levels in accordance with the AAPs aspiration for increased employment in the centre and an enhancement in the local economy.

Lazari also considers that there is a good opportunity for the redevelopment of the site to provide additional active frontage along Whymark Avenue.

New Laneways

It is suggested within the document, and as part of the site allocation for SA 13 that new laneways should be created, running east – west off the High Road, in addition to Whymark Avenue. The Council have suggested that these will have secondary town centre frontages at ground floor level.



While Lazari considers that the addition of some laneways will aid permeability from along the High Road and create more direct access for residents from the retail frontages along the High Road to the surrounding residential areas, the provision of retail uses along such laneways is not considered to be a viable use. The concern is that secondary laneways off the High Road will not be considered a desirable location for retailers seeking to locate into the area.

The design of such laneways, which would link the retail High Road to residential areas, for example, along Bury Road, is not appropriate for use as a retail pitch. Ordinarily an 'anchor' tenant, such as a food store or department store would provide the required incentive for shoppers to visit a retail pitch. An anchor tenant will not however be attracted to the small units which would be provided along such laneways, away from the primary High Road frontage. Without an anchor, such laneways would lack pedestrian footfall and would therefore be unappealing to both retailers and shoppers alike.

It is considered that the lack of demand for small retail units, away from the primary frontage, without the benefit of an anchor tenant, and on a laneways that link to quiet residential areas would generate units difficult to lease, and would only be of interest (if at all) to tenants of low grade quality.

A collection of empty or low grade retail lettings off the High Road would not be the best way to regenerate Wood Green in line with the aspirations of the AAP.

On this basis, we suggest the following text is omitted from the allocation SA13 text at page 135: '...These will have secondary town centre frontages at ground floor level, and are suitable as zones to help improve Wood Green's evening economy.'

Given the residential nature of Bury Road and the surrounding area, we consider that residential uses at ground floor to create a residential mews through the site at SA 13 would be the most appropriate use, and would create the desired natural surveillance and vibrancy as per the aspiration of the AAP.

Density

It is acknowledged that the draft allocation SA13 sets out the indicative development capacity, including residential capacity (487 units), employment (4,432sqm) and town centre floorspace (4,432 sqm). The methodology is set out in Appendix A of the emerging document and uses a series of assumptions to reach these figures. We acknowledge that the development capacities given are indicative only which we consider is the correct approach. We welcome the required flexibility to deliver development at the site which should be determined on its own merits and individual site characteristics as part of a planning application.

Given the Council's aspiration for indicative development capacity at site SA 13, it is considered that the allocation should acknowledge and include commentary on the required increase in density that will be necessary to achieve such density.

We acknowledge that throughout the AAP the Council consider that increases in overall densities will be required, particularly to meet the Council's housing needs. Paragraph 4.29 of the AAP sets out that that new housing developments are likely to be delivered at high densities.



We consider that without an increase in density, the aspirations of the AAP are not achievable. In line with this the Council's overall vision for Wood Green is presented as an Isometric image of development at Figure 6.1 which demonstrates significantly higher densities along the eastern site of Wood High Road to the existing context.

We consider that such increased densities will enable delivery of the aspirations of the AAP, including housing need, and are in line with Wood Green's designations as a Metropolitan town centre, Growth; and Opportunity Area.

Lazari are supportive of the development of higher densities at the site and consider that such higher densities are critical to create the residential viability required to enable investment into the site for such comprehensive redevelopment and to deliver improved public realm, provide a range of new higher quality retail and town centre uses, and new residential units to include much needed affordable housing stock.

Height

The site SA 13 is a key site in the regeneration of Wood Green, and is located in an area that is a gateway site to the Metropolitan Town Centre from the Turnpike Lane end to the South. The site is located adjacent to the Westbury/Whymark Avenues site which is earmarked for a landmark building (figure 7.12). The adjacent landmark building is earmarked in this location to signify the entrance into Town Centre from Turnpike Lane Underground Station, which frames Wood Green High Road.

In accordance with this gateway location and in order to deliver the Council's vision for Wood Green, higher intensification within this site is required and the AAP should allow for this and enable higher buildings on the site

We again acknowledge the Council's Isometric image of development at Figure 6.1 would indicates higher buildings along the whole eastern side of Wood Green High Road, including at site SA 13. Lazari are supportive of this and consider redevelopment of their site within SA 13 could act be a catalyst development to springboard the delivery of the whole AAP Masterplan.

The provision of higher buildings on the site is in accordance with the aspirations of the AAP and is in line with the emerging Development Management Document (Submission Version 2016), figure 2.2, which identifies Wood Green as one of the areas within the identified 'Tall Building Growth Areas.

Summary

Lazari Investments Ltd supports the publication of the AAP to allow for the comprehensive regeneration of Wood Green. In addition, Lazari supports the inclusion of site SA13 and considers that their site at 26-42 High Road could act as a catalyst development to springboard the future delivery of the AAP Masterplan.

In order to achieve the Council's aspirations set out in the AAP, Lazari consider that higher densities and higher buildings will be necessary, and both higher densities and higher buildings are shown in the Council's Isometric image of development, at Figure 6.1.



We trust these comments will be taken on board and would welcome on-going engagement in respect of the emerging document.

Should you have any comments or queries please contact Caroline Keane or Sophie Hinton at this office.

Yours faithfully

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