



# PARKSIDE MALVERN RESIDENTS ASSOCIATION

Alexandra Road, Hornsey Park Road, Malvern Road, Park Ridings, Ravenstone Road  
and The Avenue, N8 - [www.PMRA.co.uk](http://www.PMRA.co.uk)

(Reply by email to [parksidemalvernra@googlemail.com](mailto:parksidemalvernra@googlemail.com) or by post c/o 137 Hornsey Park Road, N8)

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Planning Policy  
Haringey Council  
6<sup>th</sup> Floor, River Park House  
225 High Road  
Wood Green  
London, N22 8HQ

Attn. of Beth Kay, Head of Regeneration

Our reference: consultation letter Final

30<sup>th</sup> March, 2017

Dear Madam,

## **Re: Consultation Response to Wood Green AAP - February, 2017**

I write on behalf of Parkside Malvern Residents Association (PMRA), the registered residents association covering Hornsey Park Road, Park Ridings, Malvern Road, Ravenstone Road and The Avenue, N8 and further to our meeting with officers on 28<sup>th</sup> March, 2017 in response to the Council's consultation on the draft Wood Green AAP dated February, 2107. The views expressed in this letter are those of the Committee and the membership.

We would like to register our objection as PMRA to the draft AAP as detailed below. The wider membership will also have individual concerns which have not been covered by this letter which will have been communicated at the various public consultations events held over recent weeks.

### **1. Generally**

The AAP opens by stating it to be "predicated on maximising the benefits associated with the introduction of a new Crossrail station to the centre of Wood Green". There is no agreed Crossrail 2 project and never has been one with a central station. This, and the proposal to redevelop The Mall/Sky City and acquire land through Compulsory Purchase Orders for a major reconfiguration of the town centre makes the AAP, (itself an increase in density over Option 4 from the pre consultation AAP 'Issues and Option' in January, 2016) extremely high risk in a period of economic uncertainty and change.

We also object to the way the community has been presented as supportive of the plans with phrases such as "Respondents generally supported" and "Many people felt" and "The community and major landowners of Wood Green, together with public Bodies" were "mostly supportive of widespread redevelopment or significant transformation of Wood Green", and how quickly the documents makes the assumption that this must mean Options 3 & 4 in the 2016 Issues & Options consultation document. Option 3 is then said to be higher risk than Option 4 without any real supporting evidence. We have particular concerns with the words in 1.12 "many respondents" were "supportive of the removal of the Mall in favour of a more permeable street-based network" as there is quantum given to the meaning of 'many'.

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We object to the AAP not having clear proposals to deliver infrastructure first and create the means to support and assimilate as development arrives, and not after the event. The application of CIL and listed projects in 6.12 should set out clearly all of the infrastructure needed to support development, e.g. street works, access to the over-ground stations, the new bridge at Alexandra Palace, genuine improvements beneath Hornsey Railway Bridge and the extension of the New River Path/ link to Newlands Field. We are concerned that the council has a poor track record of delivering infrastructure and public realm improvements.

## 2. Crossrail

The AAP appears to have been put together to create an inflated and false proposal to undermine TfL's preferred option for the Crossrail branch to run via Turnpike Lane and Alexandra Palace, and sway it to reach an alternative view.

The basis of the AAP is therefore flawed and the risks of proceeding with a plan contrived around a non-core branch line that may never be built exceptionally high. Crossrail 2 is a south west to north east railway providing a regional connection to the Upper Lea valley and Network Rail beyond whose main objective will be achieved without a branch towards Wood Green: if a branch is provided, there is a strong possibility it will be delayed far beyond the planned completion of the core scheme and beyond the timescale for development proposed in the AAP. With the present economic uncertainty and increasing calls for investment in major infrastructure to be made in the Midlands and North of England, it is not credible to propose major reconfiguration of the town centre and demolition of hundreds of homes on the premise of a railway station that may never be built.

With no central station, there is no case for the proposed increase in densities nor a case for major reconfiguration of the town centre between the High Rd/Library and Coburg Rd around a new 'central' square.

At a meeting with this Association on 28th March, 2017, officers agreed the timing of the AAP is not right when the AAP, its costs and its economic case are built around their personal view of Crossrail 2 being delivered.

***The basis on which the AAP is written is flawed: the AAP in its current form should be withdrawn and a revised AAP based upon the earlier option 2 developed and consulted upon.***

## 3. Inappropriate intensification and density

We object to the increased floor areas and housing densities proposed in the AAP and the omission of previously included advice on maximum building heights. The density and floor areas for the Heartlands site, for example have changed from 1080 residential units to 1,610 (consent HGY/2009/0503), Commercial space from 700sq.m to 14,091sq.m and Town Centre space from 920sq.m to 7,064sq.m, while the overall number of units has increased from 6000 in the draft AAP Option 4 to 7,400 without any justification.

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We note floor areas and densities are at the upper limits of the London Plan and that they ignore key constraints of the area including the sensitivity of building close to existing communities of largely two storey Victorian streets, poor links between the east and west sides of the East Coast mainline, the need to retain a vibrant but vulnerable retail offer, the existing deficiency of open space and reliance on existing residential roads already subject to traffic congestion, noise, vibration and air pollution. As demonstrated by the recent pre application report to the planning subcommittee concerning the Iceland site, the proposed densities cannot be achieved within existing or good planning policies.

***The inflated densities are not acceptable and will harm the retained neighbourhoods and must be revised, and building heights indicated as proposed in earlier consultation on the Site Allocations Plan.***

#### **4. Encroachment and adverse impact on neighbouring communities**

The AAP isolates and ultimately relies on and threatens the communities off parkland Road/Station Road and Hornsey Park. The intensification and high densities will create stress in these communities through the constant threat from encroachment, traffic, movement through the area, pressure from bad landlords and poor quality house conversions as the rented sector is supplied with new high quality homes. The AAP fails to consider the threats and needs of these communities during and following development and how they will need support and investment to avoid them becoming the new 'sink' parts of the town centre.

The current configuration of The Mall provides a protective barrier between the High Road and Hornsey Park. We object to proposals for redevelopment that will open up the Hornsey Park area to the blight it has experienced for the past 40 years where the town centre presently meets the residential neighbourhood. The so called "more permeable street-based network" will introduce the widespread anti-social behaviour associated with town centres (urinating in the street, fear of crime, litter and dumped rubbish, parking and drop-off, night-time noise and activity) in close proximity to homes and harm the amenity of our neighbourhood and be prejudicial to quiet enjoyment.

We object to the lack of any consideration being given to dealing with current excessive levels of traffic and associated congestion, noise, vibration and pollution and the phrase in 4.37 on page 50 "It is unlikely that the number of journeys passing through the area will change in the near future, but methods of making these routes as civilized as possible through the Wood Green area will be considered".

***The AAP must propose specific measures and give equal access to CIL investment to ensure these communities remain vibrant, safe and sustainable in the face of major change and unplanned consequences: the creation of identifiable 'home zones' must be a priority.***

***Hornsey Park must not be opened up to the High Road. A barrier space in Alexandra Road, as proposed in our proposal for a pocket park, must be introduced.***

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***Residential roads must be restricted to light vehicles and restrictions introduced to prevent them being used as town centre circulation or on street parking (blue badge or otherwise).***

***Market stalls in the High Road and any new street activities must be restricted to the ends of the roads immediately adjacent to the High Road and the associated activity kept away from homes.***

***The AAP should include proposals to protect the area from increased levels of traffic and specific measures to reduce traffic in Hornsey Park Road and Alexandra Road.***

## **5. Failure to respect the established community and see it as part of the future**

The AAP fails to understand why Wood Green has declined when other areas have seen exceptional growth and so comes to the wrong conclusion on whether major change is necessary.

It sees the established community as a hurdle to be overcome rather than seeing it as part of the solution.

The AAP fails to identify that the established community (businesses and developers who are already active in the area, together with the existing residential community and council) are already regenerating Wood Green and that, with care and potentially a Neighbourhood Forum, a better model for success could be found.

Unless specifically addressed, its legacy will be a long period of stress on the remaining community rather than new and old being able to support one another.

The AAP should be scalable, and recognise that it is better to build on success rather than seeking to deliver over intense development where there is no basis, context or infrastructure. The latter will result in the existing town centre and neighbouring communities being harmed.

***The AAP should have a sustainable development ethos whereby the town centre is revitalised by its established community in partnership with the new whilst at the same time with new homes and missed use development is introduced from the west using current and, as appropriate new consents (St. William, Workspace/Chocolate Factory, Iceland/LB Haringey/Bitten Place) and community assets.***

## **6. Caxton Road and the case for a Boulevard**

We object to the unnecessary destruction of this community and valuable townscape. While the area has undoubtedly been harmed by a failure in planning policy and traffic, its community and structure should form part of a rich tapestry made from the new integrated with the best of the old.

Successful town centres do not require or rely on boulevards: they need connected spaces of value to the whole community – for home, work, commerce and leisure. These are at their most successful when they meld the new with the best of the old.

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The concept of having connected open spaces of civic and community value to link east and west (High Road to the railway) can be achieved without destroying a swathe of Caxton and Mayes Road. Without a central Crossrail station, there is no economic or commercial case for a central square in this location. The proposed boulevard and square will not demonstrably sustain or enhance the vitality and viability of the town centre over the alternative.

Mayes Road is a street of 'boulevard' quality with a beginning (Wood Green Common/Cambridge House), middle (Coburg Road to Caxton Road) and end (The Mall): hierarchically, it is as important in the functioning of the town centre as the High Road and should be considered a community asset and developed to become no less impressive than a Parisian tree lined avenue, alive with its community and not dominated by road traffic and parking.

***The 'middle' section of Mayes Road should be improved and enhanced, in the style of Exhibition Road or Sloane Square to become a valid part of the connection between Coburg Road and the High Road, via the Library site/Caxton Passage/redeveloped loading bay.***

## **7. Links to the west and Alexandra Palace**

We object to the reconfiguration of the town centre and excessively high densities being put forward on the basis of a new connection being made to Alexandra Palace: the AAP contains no such connection nor the means to deliver one. The AAP is wrong to suggest there is or could ever be connection here with Alexandra Palace: no such connection has ever featured in the plans for Alexandra Palace and Park, it would be harmful to the nature reserve and would be extremely expensive and unfunded. The suggestion in the AAP is simply a fiction used to justify excessive built density and under provision of new open space. At best, the Penstock Path could be given a new limb to link to Newlands Field, a remote area  $\frac{3}{4}$  of a mile from the elevated Alexandra Palace, unlit and accessible only across fields without pathway or public transport.

The AAP should also be less obsessed by the importance of a single link to the west of the borough via a boulevard and Coburg Road when there are four existing connections whose successful integration with the town centre are more important to successful growth and sustainability of Wood Green, namely, 1) Hornsey Railway Bridge between New River Village/Hornsey High Street and Turnpike Lane/ Clarendon Road South/Heartlands, 2) Penstock Path to New River Village/New River Path northwards/Newlands Field towards Alexandra Park and Muswell Hill, 3) New River at Wood Green Common and 4) the footbridge at Alexandra Palace railway station, which should be established for pedestrian and cyclists.

## **8. The Mall/Sky City**

We object to plans to redevelop the Sky City/The Mall and the unnecessary destruction of this community asset. Some would say, with justification that this award winning, iconic 20<sup>th</sup> Century development, opened by the Queen in 1981 and a first of its kind in the UK, is a heritage asset and worthy of restoration and further development to achieve its potential in the 21<sup>st</sup> Century.

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The Mall is the most successful part of Wood Green's retail offer. It has achieved this with no help from council planning and regeneration and in the face of changing retail habits and competition. Capital and Regional are quoted in both council literature and the Evening Standard as saying they are committed to Wood Green and to help it reach its potential: it can't do this if it isn't here.

The AAP has failed to consider the issues that should be considered in an Integrated Impact Assessment of such a major decision. Work undertaken by UCL and resources available to the council and community through their Engineering Exchange should have been taken into account: as a result, no other (better) options have been looked at seriously and costed, in terms of the economic case and the cost to the community.

The AAP fails to identify the case for redevelopment over the benefits of delivering a major refurbishment/ modernisation and extension in half the time without destroying the area's growing retail and economic success. Existing housing could be refurbished earlier and opportunities to create new homes and open space taken forward: there are excellent opportunities to do this whilst integrating Sky City into the townscape and resolving issues around access, orientation and fear of crime. The AAP should prioritise building on existing success and supporting existing communities, not trusting in something that will see a period of reverse growth, uncertainty, disruption and risk.

This aspect of the AAP is undeliverable when this proposal is wholly dependent on factors that council planning cannot control, including the delivery of Crossrail, retailers remaining or returning to the town centre following the period of uncertainty, decline and redevelopment, and the growth of competitors such as Westfield-Stratford, Brent Cross and the West End, all of which will become little for than 30 minutes away (not far when town centres must also offer more than just convenience).

***No evaluation of the risks and disruption involved from compete redevelopment is made nor consideration given to the impact of a period of uncertainty and decline from which there is no guarantee the town centre will recover. The negative impact and costs include loss of retail employment and associated economic benefits for the area, loss of homes that could be refurbished at far less cost, the social and health costs of reprovison and loss of community.***

## **9. Loss of housing/ existing communities broken up/ loss of home and security**

We object to the way the proposal has been presented as a foregone conclusion and communicated to its established community in Sky City, contrary to the Supreme Court's endorsement of basic requirements of a 'fair' consultation exercise, namely the 'Gunning principles', (October 2014) which found that consultation should take place when a proposal is still at a formative stage. At the same time, retailers won't renew leases or take new ones if there is uncertainty.

The comment "there was qualified support for rehousing existing/affected residents in an improved standard of accommodation" fails to mention the very real concern that residents will be displaced from the area or be at risk of losing security of tenure.

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The AAP contains no credible proposal to provide alternative housing to residents whose homes are proposed for demolition: in the recent consultation meeting with PMRA on 28<sup>th</sup> March, 2017, officers stated existing housing policies would be used in conjunction with future planning permissions that are to be negotiated on a site by site basis. Thus, the re provision of homes lies well outside the AAP and beyond the control of planning officers to deliver, in terms of number and timescales.

The AAP statement "Existing planning policies will be used to ensure that an appropriate proportion of new homes are affordable, and that affordable stock levels are increased through new development" ignores the fact that 'affordable' bears no relation to the housing cost before displacement and that the council/landlord may consider its responsibility performed without offering displaced residents equivalent housing in the nearby new developments.

The AAP places the threatened community in an invidious position, facing rehousing from a condemned Sky City they call home to a place and at a time that no one can predict, all in the knowledge that failure to accept what is offered may discharge the council, as author of their misery, of all responsibility. This is an unacceptable and avoidable consequence of the AAP's unsubstantiated proposal to redevelop The Mall/Sky City.

The financial model of new developments will also be distorted as new affordable homes will be needed for those made homeless by the redevelopment instead of those genuinely in need of a new home.

***The AAP must be revised to bring forward proposals for an integrated approach to refurbish, modernise, extend and, as necessary reconfigure those aspects of the development that detract from its function, form, economic success, and enable its residents to be part of its future as a successful and sustainable community in the heart of the town centre and wider neighbourhood.***

## **10. The Moselle Brook**

The AAP takes a timid and tokenistic approach to opening the Moselle Brook, the area's most important heritage asset and fails to grasp the contribution an open watercourse could make to Wood Green and its future. Sites in the AAP offer the opportunity to 'daylight' a significant stretch of water. The water quality of the river will, within two years be good and of the standard expected for open water courses. Daylighting accords with the Environment Agency's Thames River Basin Management Plan, the London Plan and respect for Blue Ribbons, and the council's own policy SP5. Thames 21 believes 'daylighting' to be both feasible and appropriate. The current approach ignores statutory obligations and is unduly deferential to reluctant developers. Other local authorities are embracing the opportunities and working with the relevant agencies to restore their rivers and create environments and natural habitats of lasting health and community value.

***The AAP must require the river to be daylighted, riparian ecology restored and access created in all but the most extenuating circumstances. If necessary, CIL money must be applied or forgone to***

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***achieve this and the maintenance cost that would otherwise have arisen in connection with the culvert, applied to the river.***

## **11. Lack of Open Space and the natural environment**

The western segment of the AAP contains a significant area of public open space deficiency. A significant part of Hornsey Park is, likewise deficient. Ducketts Common is already intensively used by a far wider community than that anticipated by the Local Plan's assessment of access to such space. The proposed pocket park on Hornsey Park Road must be provided equally, if not mostly for the benefit of the existing, under provisioned community: with Wood Green Common already used intensively when weather permits, there should be no under provision of open space through the excessive housing densities and floor areas proposed by the AAP. Access to Alexandra Park is neither safe nor convenient as open space for the nearby community. It is also, from time to time, closed off for events.

The AAP should be as demanding and aspirational on environmental considerations and the natural environment as it is on densities and floor space. We think it misleading to have coloured areas such as Loading Bay 7 (end of Park Ridings/end of Mayes Road) and the old petrol station on Mayes Road the same green as parks and public gardens (the same green is used on a piece of the land between the Iceland site and Hornsey Park Road) when clearly these are built space.

***The proposed density of housing development and floor space is excessive for the proposed public open space: provision must be made for allotments. The quality of space must encourage pride and healthy living, whether through exercise, growing food or mental well being by connecting with nature.***

## **12. Healthcare**

We object to proposed location of a medical centre on the Iceland site: it will not be well connected to the High Road and the area east of it. It is not served by any buses and Hornsey Park Road cannot be expected to support the traffic serving it. There is a danger that it will attract large numbers of people expecting to park and lead to further traffic congestion, blue badge parking on yellow lines and pollution. The site owner's interpretation of how to develop the site is crowded, poorly laid out, overlooks adjoining houses, fails to respect the course of the river, lacks amenity space and fails to deliver the quality of public realm described in the AAP. The site is simply too small and in the wrong place for this use: however, wrongly this test of the AAP has not picked up these failures.

Restrictions on vehicular access, a lack of pedestrian access and poor public transport make this site highly problematic as a new major primary care hub.

***Healthcare should remain in the Heartlands site accessible to the proposed bus service and integrated in that development. Pending completion, the council, developer and CCG should work together to procure suitable temporary, modular health building: there are many suppliers of such solutions.***

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## 13. Hornsey Filter Beds

We object to the loss of Metropolitan Open Land (MOL) and encroachment on Alexandra Park and the New River at this import point. The site also contains the listed concrete filter beds from the 1850 whose integrity and ecological potential will be lost if development is permitted. The water treatment works is a necessary and complementary addition to this utility land but it should not be allowed to become a barrier against which built development becomes permitted. It is possible that, in time, the water utility buildings will not be required, following which they can be removed and the land restored. An appropriate use should be found for the filter beds that does not see the loss of openness and connection between Alexandra Park and the New River/linear park connecting to Hornsey High Street or introduce yet further enclosure, following development of Coronations Sidings and New River Village.

***The land should be retained as MOL and a use compatible with this status brought forwards that is supportive of the community's need for open space.***

## 14. Conclusion

We have a General Meeting of the Association on the 26<sup>th</sup> April to discuss our concerns and will update you on any further matters then. In the meantime, please do not hesitate to contact me if you need any clarification or you feel it would be helpful to discuss any of the matters raised.

Yours faithfully

*Polly de Boer*

Polly de Boer – Association Secretary,

For and on behalf of Parkside Malvern Residents Association

cc

Ryan Burton King and Marcus Ballard - Co Chairs, PMRA

Emma Williamson, Assistant Director of Planning

Cllrs Ahmet, Mann and Strickland