

# **Submission in response to Wood Green AAP Regulation 18 Preferred Option Consultation Draft, February 2017**

**Submitted by and on behalf of affected  
residents**

**Re: Proposed demolition of residential  
properties on Caxton Rd, Mayes Rd and  
Coburg Rd**

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**Submission in response to Wood Green AAP Regulation 18 Preferred Option  
Consultation Draft, February 2017  
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**Re: Proposed demolition of residential properties on Caxton Road and Mayes Rd.**

We wish to register in the strongest terms **our objections to the proposals in the Wood Green AAP relating to the demolition of existing residential properties on Caxton Road and Mayes Rd.** Many of the broader points we propose here also apply to other areas within the AAP where existing housing will be lost, however for the purposes of clarity we limit our observations here to the Caxton Road/Mayes Rd site areas identified in the plans of the AAP.

The proposals set out in the AAP entail the demolition of all the residences on Caxton Rd (nos.1-19), a significant portion of the residences on Mayes Rd (nos.86-98 and 63- 81) and Coburg Rd (nos.11 and 13). Although the plans do not make this explicit, this **will result in the loss of approximately 100 homes**, and the permanent dispersal of their inhabitants. This is justified in the AAP on three main grounds: (1) expanding the existing retail area (the creation of a new town square); (2) creating a new East-West corridor linking the High Street and the proposed new commercial/residential area in the Cultural Quarter/Heartlands; and (3) opening up a view of Alexandra Palace, to encourage shoppers on the High Street towards this new area.

Setting aside for a moment the obvious distress these proposals have caused the affected residents, and the moral objections that can be raised against the forced destruction of family homes in the interests of expanding a retail area, it is our contention that the redevelopment objectives of the Wood Green AAP can be achieved without recourse to the drastic measure of knocking down existing housing stock on the streets identified. As outlined in detail below, we believe that **creative modifications of the existing plans will allow for the retention of the existing residential properties** without compromising the fundamental objectives of the redevelopment scheme. Further, we believe that the **destruction of existing housing stock contradicts many of the stated aims and priorities of the Wood Green AAP**, and as such has no place within the scheme.

In the text that follows we:

- Outline our key objections to the plans for Caxton Rd and Mayes Rd
- Suggest proposals for amendments to these plans
- Register our wider concerns with the process of consultation

## **1. The destruction of housing is unnecessary; modifications to development plans can be made to avoid this outcome**

In addition to creating a larger retail area (the new town square and market) the plans for WGS A8 and WGS A9 (covering the Caxton Rd/Mayes Rd area) are justified on the grounds of creating a new east-west route linking the High Rd and Heartlands; and opening up a view of Alexandra Palace. We contend that **neither of these rationales justifies the destruction of homes**, and further, that **modifications to the plans could easily be made to achieve the desired outcomes by other means**. We take each point in turn below:

### ***A. Creation of an East-West corridor***

The AAP proposes to create a new east-west corridor linking the High Road, proposed new town square, and Heartlands area. This can be achieved without the destruction of existing housing. Indeed, the current development plans in fact **already contain two routes that will create just such a linkage** between the specified areas:

(i) The development of Station Road, which would connect the north end of the High Road to the north end of the Heartlands/cultural quarter area

(ii) The development of a new street network 'within the [current] site of the Mall extending Hornsey Park Rd and Park Ridings as pedestrianized streets with a perpendicular route linking the new town square with Wood Green High Rd further south' (p73).

Option (ii) above, in other words, already creates an east-west connection of the High Rd and new town square to the Heartlands/cultural quarter area at a more southerly point of the High Rd. This route is **less than 50 yards from the proposed east-west corridor that would involve the demolition of all the houses on Caxton Rd and a significant proportion of the houses on Mayes Rd**.

It is our contention therefore that it is wholly unnecessary to create an east-west corridor in the manner proposed. **Alternatives could include:**

(a) Creating a route using the **existing unused and non-residential land adjacent to Caxton Rd** (currently comprising the car park at the back of the Hub plus the unused parcel of wasteland on the corner of Caxton and Mayes Rd). This route would run from the unused land adjacent to Caxton Rd, cross Mayes Rd at the point where it is opposite Brook Rd; and go along Brook Rd to Coburg Rd at the heart of the Heartlands development. This route has several advantages: it would not involve the destruction of any residential properties; Brook Road is already marked as on the east-west route and does not have any current residential use; the area at the junction of Mayes Rd and Brooks Rd is designated for retail development, and so would suggest a more 'consistent' route from retail to retail (the new shopping plaza towards the retail end of Mayes Rd). **See Annex 1: Map: Route (A)**

(b) Creating a route using the **existing unused and non-residential land adjacent to Caxton Rd, turning right onto Mayes Rd, and left onto Coburg Rd**, without destruction of the residential properties. *See Annex 1: Map: Route (B)*

(c) Creating a straight route that **cuts through only the existing unused and/or industrial sites sitting between the back of the High Rd and the entrance to the tunnel on Coburg Rd**. This route would just clip the back gardens of the houses on Mayes Rd, but would not involve the demolition of existing houses. *See Annex 1: Maps: Straight Route*

(d) Making the Hornsey Rd-Park Ridings connection the principal route. As the development plans acknowledge, this route would **‘[reinforce] the existing historic street pattern’** (p73) and therefore seems more appropriate (aesthetically, historically and in terms of the natural flow of the street-scape) than a route that involves demolishing and fundamentally altering the ‘historic street pattern’.

*For maps and assessment of the alternative routes proposed, see Annex 1*

### ***B. Achieving a view of Alexandra Palace***

The AAP’s plans for WGS8 entail knocking down existing nineteenth century housing stock in order to ‘[enable] a view of Alexandra Palace from the new square’ (p71). **We fundamentally reject any plan that prioritises a view (for shoppers) above the right of local residents to remain in their homes.** Further, the development plans emphasise not the aesthetic merits of the view *per se*, but rather its ‘role in drawing the attention of visitors to Wood Green High Rd towards the western extension of the Town Centre towards Heartlands’ (p89). In other words, the view serves to draw visiting shoppers/consumers from one retail area to another. This **does not constitute a reasonable justification for demolishing local residents’ homes**, not least when the planning document itself acknowledges that ‘There are numerous views of Alexandra Palace through the AAP area’ (p20).

We further **contest the assumption that the demolition of the houses identified would achieve the desired view** since:

(i) The High Rd stands at 23.2m above sea level, Caxton Rd at 21.8m, and Alexandra Palace at 89.9m. From street level at the back of the houses on Caxton Rd, it is currently **barely possible to see Alexandra Palace**. This would be the line of sight from the proposed new town square, approximately 66.7m below the Palace.

(ii) The view of Alexandra Palace from the direction of the proposed square **can only be achieved from an elevated vantage point, and even then, is partially obscured, and seasonal**. The best view from this location is achieved in winter. The rest of the time, leaves on the trees obscure the view, with the exception of the broadcast tower. **Annex 2, Photo 1** illustrates the best view achieved from the **roof level** of 15 Caxton Rd. It follows that views from street level (approx. 7m below) would achieve an inferior line of sight. The **artist’s impression of the town square**

**with ‘framed’ view of Alexandra Palace is therefore inaccurate and misleading** (AAP, Fig.7.14, p90).

(iii) Proposed developments in the Clarendon Road/Heartlands area allow for the construction of **tall buildings**; indeed the SWOT analysis for the Clarendon Rd area recognises as a ‘threat’ the potential obstruction of views towards Alexandra Palace (p43). This means that buildings erected in one part of the AAP could obstruct the desired view from another area of the AAP.

It is not beyond the wit of town planners **to achieve a view of Alexandra Palace by other means** – elevated areas of the proposed new square; creating a line of sight from the current site of the Morrisons store, to suggest just a couple of alternatives.

*For suggestions of alternative viewing point sites, see Annex 2, photos 2 and 3*

### ***C. Expanding the retail area***

The destruction of housing in the affected area is rationalised in the AAP on the grounds of expanding the retail area in the vicinity west of the High Rd (p47). Besides **objecting to the prioritisation of retail/consumption over the rights of existing residents to remain in their homes**, we contend that the housing on Caxton Rd and Mayes Rd can be retained without significantly affecting the capacity of the AAP to deliver this objective. The AAP identifies **a whole range of options for expanding the retail offering in this area**, including creating ‘new streets to the west of the High Rd on ... the site of the Mall’, ‘activating Station Rd as part of the town centre offer’, ‘providing complementary spaces ... in the Heartlands sub-area’ and ‘redesigning currently underused sites such as Morrison’s and Mecca Bingo’ (p47).

Taking into account the potential to develop the large patch of wasteland next to the Mall, plus the ‘generally vacant ... delivery yards and half-empty car parks’ west of the High Rd (p48), this is more than adequate to deliver the expansion of retail space.

## **2. Demolishing the housing stock on Caxton Rd and Mayes Rd contradicts the Council’s stated housing policy aims**

Haringey Council recognises the need to increase housing stock in the area. The AAP scheme purports to address this need. There are, however, a number of clear inconsistencies between the stated policy aims and the AAP proposals.

The AAP makes several references to **the need for family homes**, stating, for example, that ‘there is a pressing need for larger affordable homes’ and to provisions to **‘ensure that the existing family stock is not eroded’** (p75). At the same time, the proposals acknowledge that **‘the majority of [new] dwellings [built under this scheme] will tend to comprise apartments over shops’** (p75) and that new housing developments will be ‘high density and with a **high proportion of**

**smaller (1&2 bed) units'** (p45). These, by the plan's own admission, are **not** likely to be **suitable for families**.

Further, one of the stated aims of the AAP is 'to improve the diversity and choice of homes' (p75). **Demolishing** an entire street-and-a-half of varied **Victorian homes** (two-storey, three-storey, and four-storey houses, many of which have back gardens) **will not 'improve the diversity and choice of homes'** in the area, but will **reduce choice and diminish the diversity of the streetscape**.

It is **perverse**, therefore, **to demolish the existing, good quality housing stock** on Caxton Rd and Mayes Rd, much of which is comprised precisely of that scarce commodity: **good-sized family homes** – not least when there are no assurances that like-for-like (in terms of size, outdoor space and capacity) replacements will be built (or that existing residents could afford these if they were).

We further reject the assumption in the AAP that the Wood Green Central area is 'not suitable' for family homes. The fact that many families have chosen to live there refutes this claim; it is precisely the excellent access to shops, amenities and transport links that attracts families to the area. The model of urban planning that pushes housing out to the periphery while retaining a mainly commercial centre has long been discredited; a mixed-use urban centre where people can live, work and enjoy the amenities is surely a better way to achieve the aspirations of the AAP.

### **3. The plans will break up an existing local community, contrary to the aspirations of the AAP**

One of the stated aims of the AAP is 'to support mixed and balanced communities in Wood Green'. The **Mayes Rd/Caxton Rd area already supports a 'mixed and balanced' community**. The housing demarcated for destruction is occupied by a mix of private renters, council tenants, and owner-occupiers, and its residents embody the demographic diversity (age, ethnicity, religion, occupation etc.) that gives Wood Green its unique character. To knock down these houses would be **to break up an existing local community whose residents are committed to the area**, send their children to local schools, put money into local shops and services and pay taxes to improve the local environment. Its residents would be dispersed (or in the case of council tenants "decanted"), with **no reassurances that they could continue to live in the local area to which they are committed**.

### **4. The destruction of a large number of Victorian houses constitutes a destruction of Haringey's heritage assets, contradicting the AAP's purported values**

The AAP asserts that '[e]xisting buildings and open spaces of historic or architectural interest must be preserved or enhanced' and that 'all development proposals should demonstrate an understanding of the local historical environment' (p91).

**The houses on Caxton Rd and Mayes Rd earmarked for destruction were built in the earliest period of Wood Green's development in the Victorian age.** The houses that now make up 86-90 Mayes Rd (Gloucester Villas), for example, were built in **1863** (the year of Abraham Lincoln's Emancipation Declaration), pre-dating the houses on Parkland Rd (adjoining Caxton Rd) whose 'residential character' is to be respected under the AAP (p85), and pre-dating the houses on the Noel Park estate, whose 'historic character' is to be preserved.

The plots of land now comprising Caxton Rd, Mayes Rd, Middleton Rd and what was then known as Wood Green Terrace were purchased in 1855 by one Thomas Whitaker ('gentleman') and John Ivory (a 'pianoforte maker') who were authorised to develop the land 'as building sites or other parts thereof to be dedicated to the use of the public as roads or streets'. One of these lots (lot 120) was 'set apart for an Inn, Hotel or Public House ... to be used for no other purpose' – presumably what is now Duke of Edinburgh pub (Mayes Rd) which is also singled out in the AAP for its historic value.

These houses and streets, in other words, were built at the very inception of the original nineteenth century development of Wood Green, marking a significant moment in area's history and creating the very streetscape that has been passed down to the present day. As such **they have a particular historical value.**

As the AAP's own SWOT analysis states, the 'loss of existing character/impact on heritage assets' represents a potential 'threat' (p29) of the development scheme. Indeed, the AAP does much to signal commitment to preserving 'the historical streetscape rhythm' (p68) in relation to the High Rd retail area. As the plan states, 'Wood Green contains a number of characterful terraces ... [these] are of historic value to the centre' (p72). These historical streetscape considerations should not be limited to the commercial area but **should apply equally to the residential area**, especially given that Victorian terraces are uncommon in the so-called 'residential hinterlands' of Wood Green Central.

Lastly, these nineteenth century houses on Caxton Rd and Mayes Rd have a **genuine aesthetic value that should be preserved.** This is particularly the case given that much of central Wood Green is dominated by the visually unappealing and unsympathetic buildings permitted under previous planning regimes. The area comprised by Caxton Rd, Mayes Rd and Parkland Rd stands as an island of the Victorian age surrounded by a sea of modern developments dating mainly from the 1970s to 1980s (the Mall, Morrison's supermarket etc.).

## **5. Concerns with the failure to offer protections or guarantees to affected residents**

It is of utmost concern that the AAP offers absolutely no reassurances about what provisions will be made for residents who would be affected by the demolition of their homes. Indeed the AAP's statement on 'Decanting/Replacement of Demolished

Stock' (p49) asserts that 'finding relocation opportunities is not a planning matter'. Affected residents are thus left with the vague assertion that 'there is an expectation that the increase in local housing stock will improve the area's ability to meet housing need' (p49). There are a number of issues here:

- This is no more than a general assertion about an intention to increase housing stock overall, and is framed as an 'expectation', not a commitment or a guarantee
- There is no specific commitment that affected residents will be relocated ('decanted') to new housing developments within the area
- It does not address the issue that under the development plans, like-for-like replacement housing is not guaranteed. As the AAP acknowledges, the majority of the new developments will be high density 1-2 bed apartments and apartments above shops, not family homes and are therefore unlikely to be suitable for many of the families affected by the demolition of their homes. From the evidence of past such regeneration schemes in London, it is likely that displaced residents will be priced out of the new housing developments. We note that in the proposals for WGSA1, other residents are singled out for some form of protection, *vis.* 'redevelopment involving the use of the travellers' site ... will not be considered unless adequate re-provision of these housing units has been secured' (p107). Two points can be raised here: (a) 'adequate re-provision' is not defined – and who decides what is 'adequate'? and (b) **In the interests of equality, protections should be extended to all affected residents**, not limited to specified groups.

## **6. Consultation of affected residents was inadequate; vulnerable residents in particular have not been adequately informed**

We refer to this issue here in the context that had consultation documents been more explicit, we believe that public opposition to the plans would be greater.

The discovery that one's home is at risk of demolition is a cause of enormous stress and anxiety. It is therefore **imperative that those at risk of losing their homes are adequately informed**. While the Council has held a number of public events and consultations to publicise the AAP scheme as a whole, these are not adequate to communicate in detail the local-level effects of the different parts of what is, by any measures, a huge and complex development scheme

Residents on Mayes Rd and Caxton Rd received a letter informing them that they fell within an area designated for development. However this **letter does not state explicitly that residents could lose their homes**. Instead it directs the reader to a web-link to the Wood Green AAP Regulation 18 Preferred Options Consultation Draft, a detailed and highly technical document some 175 pages in length. The proposed demolition of homes in the WGSA 9 area is expressed in the single phrase



on p125 – ‘No buildings to be retained’. Notably, there is an inconsistency between the area laid out on the map (which includes houses on both sides of Mayes Rd, plus Coburg road) and the text in the address box below, which mentions only one side of Mayes Rd (nos.86-98). This **creates uncertainty and confusion** as to which areas are indeed to be demolished.

Clearly, (assuming first that they had read and followed up on the original letter), not all residents will be able to negotiate the Preferred Options Consultation Draft, whether through **lack of access to the internet, mobility issues, language skills etc.** It has been our experience that **the majority of residents on the affected streets either did not in fact know about the redevelopment scheme at all, or did not know that their homes would be directly affected in this way.** This is particularly concerning in relation to vulnerable residents, such as the elderly.

In cases where it directly affects people’s homes, the Council has a responsibility to inform residents of houses earmarked for demolition in clear and explicit terms what are the implications of the development scheme. It was in fact **vigilant residents who took the lead in informing their neighbours** about the scheme and its direct implications for their homes. It is our contention that **if these implications were more widely known, they would not gain widespread support.** This has been borne out in our petition and in the comments submitted to the Wood Green Map Commonplace page.

**We urge the Council to listen to the voice of local residents, to amend its plans to take into account the concerns outlined above, and give serious attention to the alternatives proposed.**

## Annex 1 – Alternative routes for East-West corridor (1) Straight Route



**Route:** From Pembroke Tunnel (Coburg/Western Rd) – through current industrial area and via currently unused/wasteland section of Caxton Rd to back of High Rd

### **Benefits:**

- **No destruction of families' homes**
- **No destruction of Victorian architecture**
- **No compromise on planning vision of a straight route**
- **Better line of sight options for view to Alexandra Palace en route**
- **Minimal adjustment while still delivering AAP objectives**

**Drawbacks: none**

## (2) Route (A)



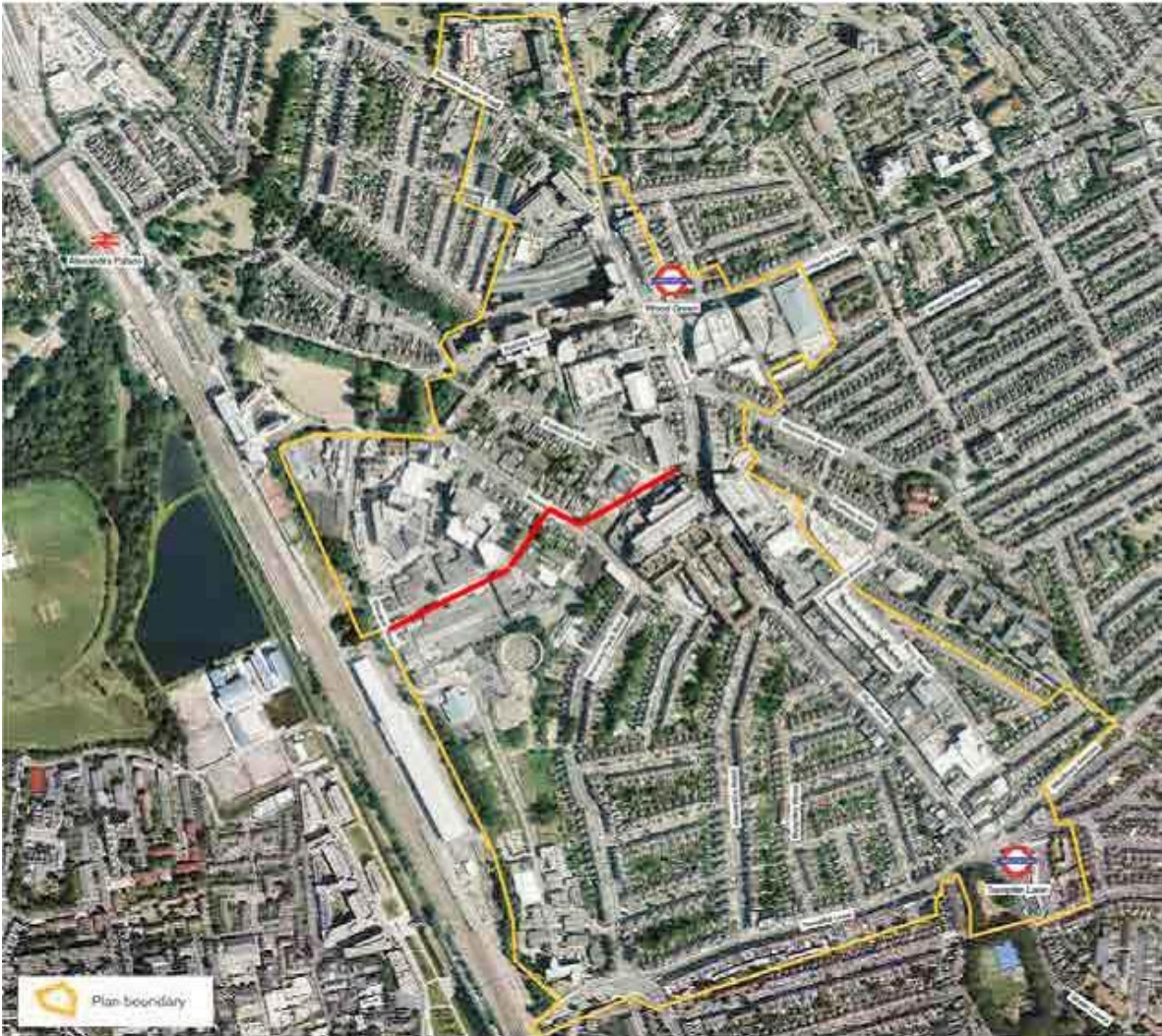
**Route:** From High Rd via Caxton Rd (loading bay/car park / waste ground side) to Brook Rd to Coburg Rd

### **Benefits:**

- **No destruction of families' homes**
- **No destruction of Victorian architecture**
- **Retain historic access routes**
- **Minimal adjustment while still delivering AAP objectives**

**Drawbacks:** Planners prefer a straighter route

### (3) Route (B)



**Route:** From High Rd via Caxton Rd (loading bay/car park / wasteland side), turn right onto Mayes Rd, turn left onto Coburg Rd

#### **Benefits:**

- **No destruction of families' homes**
- **No destruction of Victorian architecture**
- **Retain historic access routes**
- **Minimal adjustment while still delivering AAP objectives**

**Drawbacks:** Planners prefer a straighter route

## **Annex 2: Views of Alexandra Palace: line of sight issues**

### **Photo 1: View from roof level of 15 Caxton Rd**

**Comment:** This is view from roof level of Caxton Rd (7m above ground level). It is at best a partial and obscured view, best seen in winter when there are no leaves on the trees. The proposed new town square would sit some 7 metres below this; a clear view of Alexandra Palace cannot be achieved from that vantage point.



**Photo 2: Alternative viewing points (i) view along Straight Route (map 1)**



**Comment:** This view could be achieved along Straight route (map 1). Taken from current car park 1st floor height.

**Photo 3: Alternative viewing points (ii) Current view from Morrison's car park**

**Comments:** This offers a clear view of Alexandra Palace, suggesting that this could be a good site for a pedestrian retail/cafe area, with a Crossrail entrance, closer to other local transport links, ie. Wood Green underground and bus station (current and proposed)



## **ADDENDUM: Response to Sustainability Appraisal, Wood Green Area Action Plan Regulation 18 Consultation 14 Feb – 31 March 2017**

### **Submitted by and on behalf of affected residents**

We respond below to the claims made in the Sustainability Appraisal (SA) specifically with regards to the demolition of homes on Caxton Rd and Mayes Rd.

We note at the outset that according to the SA, the AAP ‘aims to ensure that investment decisions meet the aspirations of the local community and the Council for the area as a whole, as well as specific places and locations within it’ (p4). The plans with respect to Mayes Rd and Caxton Rd **do not meet the aspirations of the local community**; indeed, as evidenced in the residents’ submission to Haringey Council and accompanying petition, **the local community in fact strongly opposes these plans.**

### **Response to the Appraisal Findings with respect to Caxton Rd and Mayes Rd**

The SA purports to assess two options with respect to Mayes Rd and Caxton Rd: Option 1 (Redeveloping the properties at Mayes and Caxton Rd) and Option 2 (Retaining the properties at Mayes and Caxton Rd). The findings are summarised in Table 7.1 (Summary Appraisal Findings) and Appendix VI (‘detailed’ Appraisal Findings).

The assertions made in these appraisals are problematic in a number of ways. We deal first in general terms with the evidence base, methodology and overall findings, before addressing the specific claims of the appraisal.

In sum, we conclude that the demolition of existing homes on Caxton Rd and Mayes Rd is

- **Not sufficiently justified**
- **Not reasonable**



## 1. Evidence base and Methodology of the SA

- **No evidence base** is provided to support the claims made in the appraisal. On what evidence, for example, does the SA support its assessment that crime will be reduced under Option 1 than under Option 2? Or that there are 'no notable implications' for biodiversity, noise, air quality etc.?
- The SA states that accurate predictions are 'inherently challenging', that there is a 'limited understanding of the baseline' and that 'in many instances it is not possible to predict significant effects' (p22). The appraisal therefore **cannot claim to be either accurate or reliable**.
- The **methodology of the SA is opaque**. The study identifies criteria to be assessed (the 'sustainability topics') and questions to ask, but not *how those questions were answered* – ie. it identifies *criteria* for assessment but not *methods* of assessment. What information was used to generate responses to the questions / reasonable assumptions?
- The **methodology is flawed**. The SA states that 'in many instances it is not possible to predict likely significant effects ... but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference' (p57). How is it possible to assess the relative merits of a given option without having an understanding of the potential effects?
- The SA purports to offer a 'detailed', 'rigorous' and 'systematic appraisal of and consultation on reasonable alternatives' including the 'redevelopment of existing homes'. The assessment of Options 1 and 2 relating to Caxton Rd and Mayes Rd comprises 4 pages of a 67-page report (pp15-16, pp62-63). The **study cannot be described as rigorous or systematic, nor its findings detailed**. Further, residents have not been explicitly canvassed on the alternatives (Options 1 and 2) as set out in the SA.
- The **information provided in Appendix VI is clearly inadequate**. For 14 out of 21 criteria, the table simply states 'no notable implications'. This is the case even for topics where there are very clearly obvious implications of choosing one option over another, such as for example, waste management, the town centre, townscape, open space, water resources, air quality, energy consumption etc. The methodology suggests that 'where an issue or an effect is not referenced, the implication of that is that there is no point to be made that warrants a mention' (p57). We contend that such issues as townscape and cultural heritage, open space, water resources etc. do 'warrant a mention' in appraising the scheme.

→ *The appraisal thus cannot be considered to be a robust, evidence-based study. The decision to demolish people’s homes cannot be made on the basis of such flimsy and inadequate evidence.*

**2. Overall findings**

Taking the findings at face value (setting aside for a moment the evidential and methodological shortcomings outlined above), the **appraisal does not provide an overwhelming case in support of Option 1.**

Table 7.1 ranks option 1 as preferable in just 5 out of 17 criteria; in 9 criteria options 1 and 2 are considered to be equal; 1 as unknown; and 2 place option 2 higher. The table in Appendix VI does not provide a ranking for 15 out of 21 criteria. This does not constitute a robust case for support for option 1.

There are also **serious and unexplained inconsistencies** between the findings in Table 7.1 (p16) and the table in Appendix VI (pp62-63). We highlight these inconsistencies in the table below. Note that Table 7.1 ranks 17 criteria; Appendix VI ranks 21 criteria.

| <b>Topic</b>       | <b>What does Table 7.1 say?</b> | <b>What does Appendix VI say?</b>  | <b>Comment</b>   |
|--------------------|---------------------------------|--|--|
| Crime              | Options 1 and 2 ranked equally  | Option 1 ranked higher   | <b>Inconsistent</b>  |
| Community Cohesion | Ranks option 2 higher           | Inserts a question mark, stating that ‘it is not clear which option will have a more or less significant effect’ | <b>Inconsistent. In each case where option 2 is ranked higher in the first table, the second table removes that ranking and inserts ? or blank</b> |
| Town Centres       | Ranks option 1 higher           | Claims ‘no notable implications’   | <b>Inaccurate (there clearly are implications); and how was ranking reached if there are ‘no implications’</b>                                     |

|                                 |  |  | <b>one way or the other?</b>  |
|---------------------------------|--|--|---|
| Townscape and Cultural Heritage | Inserts a question mark ( <i>ie. unable to rank? Unable to assess?</i> ) | Not ranked: segment left blank                               | <b>No details provided, despite obvious impact on townscape and cultural heritage implied by destruction of Victorian houses</b>  |
| Sustainable transport           | Ranks option 1 higher  | Ranks option 1 higher but states 'no notable implications'   | <b>If there are no notable implications, how was the ranking reached? There clearly are implications; why are these not discussed given centrality of Crossrail to the AAP?</b> |
| Accessibility                   | Does not appear in Table 7.1   | Ranks option 1 higher and provides one sentence 'discussion' | <b>Inconsistent: why in one table and not the other?</b>  |
| Skills and Training             | Does not appear in Table 7.1   | Not ranked   | <b>Inconsistent: appears in one table not the other</b>   |
| Waste Management                | Does not appear in Table 7.1   | Claims 'no notable implications'                             | <b>Inconsistent: appears in one table and not the other. Inaccurate and misleading: claim that</b>  |

|       |  |  |   |
|-------|--|--|---|
|       |  |  | there are no implications for waste management cannot reasonably be sustained   |
| Noise | Ranks option 2 as preferable; states that 'noise is likely to increase' under option 1 | Not ranked; claims 'no notable implications' | <b>Inconsistent.</b> In each case where Table 7.1 ranks option 2 as higher, the Appendix removes this ranking and replaces it with no ranking or a '?'<br><b>Misleading:</b> as with waste management, above. |

→ The shortcomings identified above **raise serious questions about the quality and utility of the appraisal.** The **inconsistencies and other deficiencies** of the study **do not inspire confidence** in the process or in the competence of those assigned to assess and execute it.

→ Particularly concerning is the manner in which **Appendix VI attempts to overturn any positive appraisal of option 2.** In each case where Table 7.1 ranked option 2 as higher, Appendix VI removes that ranking and replaces it with a '?' or a blank.

→ The AAP is a major development plan on a hugely ambitious scale. The residents of Haringey have a **right to expect that appraisals of the impact of such a redevelopment will be carried out thoroughly, professionally and with due care at all stages.** The diligence one would expect given the scale and implications of the AAP is not reflected in this document.

### 3. Detailed appraisal findings (Appendix VI) (pp62-63)

We take each topic in turn, setting out the claims of the SA and our response.

#### Crime

SA claim: 'Mixed use schemes (Option 1) ensure that sites are busy throughout the day, therefore reducing crime/fear of crime.'

Response:

- No evidence to support the claim
- Caxton Rd and Mayes Rd in their current use are already busy throughout the day, as they serve as through-routes to Morrisons and the High Rd (in one direction) and to the Cultural Quarter/Heartlands area, back entrance of the Mall, and Station Rd/Alexandra Palace
- An expanded town centre that borders on, but does **not** involve the demolition of the houses on Caxton Rd and Mayes Rd would also be busy throughout the day
- Official crime statistics locate Caxton Rd and Mayes Rd as *between* crime hotspots centred around the tube stations and the Mall. It is possible to infer that an extended retail area and Crossrail station could *increase* criminal activity in the area, given the opportunities offered by crowds of shoppers and commuters. For figures see:  
<http://www.ukcrimestats.com/Postcode/n226TB>

#### Education

SA claim: 'no notable implications'

Response: Displacement of existing residents will remove educators who live in the area

#### Health

SA claim: 'no notable implications'

Response:

- Displacement of existing residents will remove health care professionals who live in the area
- Uncertainty with regards to the fate of their homes, potentially massive disruption, and the numerous financial, practical, familial and emotional implications of eviction and relocation away from support networks etc. are already causing significant stress to the affected residents. Stress is a well-known contributor to mental health issues. All residents are currently being subjected to high levels of stress

## Housing

SA claim: 'The redevelopment of these properties will create a net uplift in the total number of residential units, and habitable rooms within the AAP area'.

Response: We deal with this in detail in our submission document (pp4-5) but to summarise:

- There may be a net uplift in the total number of housing units but these will be primarily 1-2 bed apartments and apartments above shops, not family homes (which the AAP acknowledges are much-needed; and which the Caxton Rd and Mayes Rd properties currently supply)
- Demolishing the properties on Caxton Road and Mayes Rd will impact on the quality and diversity of homes in the area
- No justification is given for why the proposed new housing should specifically be located on Caxton Rd and Mayes Rd (as opposed to anywhere else)

## Community cohesion

SA claim: 'There is the potential for the replacement of existing [sic] housing to have an impact on community cohesion locally. The benefits of providing new homes ... could also create improved community cohesion in the future. As such it is not clear which option will have a more or less significant effect'

Response:

- It is clear that the demolition of existing houses on these streets will permanently break up an existing, vibrant local community who have a significant commitment to and investment in the area
- The Mayes Rd/Caxton Rd area already supports a 'mixed and balanced' community. The housing demarcated for destruction is occupied by a mix of private renters, council tenants, and owner-occupiers, and its residents embody the demographic diversity (age, ethnicity, religion, occupation etc.) that gives Wood Green its unique character.
- The SA states that it is not clear what will be the outcome for community cohesion of building new housing (in this case, 1-2 bed apartments above shops)
- Displacing 'stable communities' of long-term residents (those in family homes, owner-occupiers, etc.) will have a negative effect on community cohesion if they are to be replaced by populations likely to be short-term and transient.
- The SA recognises that '**regeneration ... may bring some disruption to existing communities, for example where rehousing is needed to allow for reprovision, or where private housing rents become an issue for some residents** (p26). This is a euphemistic way of saying that **council tenants may not be rehoused in the same area, and that residents may be priced out of new developments.** This is a potential outcome of Option

1: existing council tenants, private renters and owner-occupiers will all be displaced; and increased rents/property prices in the new development will limit the ability to achieve the desired 'mixed and balanced community' as it will be affordable only to a certain demographic.

### **Accessibility**

SA claim: 'The redevelopment of these properties will create a key opportunity to improve east-west connectivity which will make jobs and services more widely accessible'

Response:

- On the east-west corridor, please see 1A (pp2-3) of our main submission in which we set out clear alternatives for the creation of an east-west corridor that fulfils AAP objectives without the demolition of homes
- The claim with regards to making jobs and services more widely accessible is not evidenced; reasonable alternative routes have not been assessed

### **Economic growth**

SA claim: 'Creating new town centre jobs will directly benefit the local economy'

Response:

- There is no evidence that retaining the houses on Mayes Rd and Caxton Rd creates a barrier to job creation
- As outlined in our submission (1C, p4) economic growth (eg. in the form of expanding the retail area) can be achieved without demolishing these homes. There is still a large number of spaces in the area that can be developed for retail and commercial use without the demolition of homes
- A consumer-led model of economic growth (expansion of the retail area) has significant risks. As the SA notes, this is dependent on 'wider factors such as the national economic outlook and challenges to the high street from new developments such as internet shopping' (p30). Wood Green High Rd has seen the closure of a significant number of stores and services in recent years (eg. M&S). Over-extension of the retail area in Wood Green Central carries significant risks.
- Neither the AAP nor the SA provide a specific rationale as to why the economic growth objectives can best be achieved by using space on Caxton Rd and the particular portion of Mayes Rd and Coburg Rd as opposed to anywhere else
- In the short term, anxiety about the possible loss of their homes contributes to reduction in spending and local investment on the part of existing residents (eg. building and renovation projects involving local labour and tradespeople have been put on hold, due to the uncertainty). The Council has put these residents in the position of not being able to invest in their homes.

### **Economic Inclusion**

SA claim: 'Creating mixed-use development promotes flexible working patterns and good physical accessibility to local jobs ... and may help cross subsidise employment uses [sic] that create jobs and opportunities for new businesses to establish [sic]'

Response:

- The phrasing of the SA claim is unclear and does not make sense
- No reason why possible future 'flexible working patterns' should be promoted above the rights of existing residents to remain in their homes
- As above under 'Economic Growth', economic inclusion can be achieved without knocking down the Mayes Rd and Caxton Rd houses
- Again, no satisfactory explanation as to why *specifically* Caxton Rd and a portion of Mayes Rd (as opposed to anywhere else) are required to fulfil those aims

### **Town Centres**

SA claim: 'No notable implications'

Response:

- The SA is muddled and inconsistent on this point. If there are 'no notable implications' why has option 1 been ranked as preferable in this case?
- Given that the demolition of houses on Caxton Rd and Mayes Rd is proposed primarily on the grounds of expanding Wood Green's town centre, why is this not worthy of any discussion here?
- There clearly are 'notable implications' of expanding the town centre in this way, ie. as the Summary (p63) states, 'the potential [for which read actual] effects on the existing residents of the affected properties'
- As in our submission document (p4), we contend that there are many ways in which the commercial area can be expanded without the demolition of these homes

### **Townscape and Cultural Heritage**

SA claim: 'No notable implications'

Response:

- There clearly are 'notable implications' for the townscape and cultural heritage of the area – ie. the destruction of a significant number of original and irreplaceable Victorian buildings from an area dominated by unappealing post-war developments
- On the historical and aesthetic significance of these buildings and how their destruction contradicts the stated aims of the AAP, see our submission pp5-6
- The SA acknowledges that 'preserving or where possible enhancing buildings and areas of architectural and historic interest' should be 'key issues' (p31) in appraising townscape and cultural heritage criteria; that 'heritage assets



should be recognised as an irreplaceable resource', (p49) and that '[the] scale of the regeneration proposed will need to be carefully managed to ensure that existing assets ... are treated sensitively in all proposals' (p31). Demolishing a significant number of Victorian houses does not constitute sensitive treatment of heritage assets

### **Open Space; Water Resources; Soil and Land Quality; Flood Risk; Air Quality; Noise; Energy and Carbon; Waste Management**

SA claim: in all these areas, the SA claims that there are 'no notable implications'.

Response:

- It is self-evident that the construction of an expanded retail area and high density housing developments in the affected area will have significant implications in all of these areas, not least:
- Open Space: the construction of an expanded retail area and housing development will affect the size and quality of the available open space in the affected area, eg. overshadowing and light issues due to increased height of buildings, loss of green spaces including the back gardens of the affected properties
- Noise: while the table in Appendix VI claims there are 'no notable implications' for noise, Table 7.1 ranks option 2 as preferable re noise, and indeed explicitly states below that 'noise is likely to increase' under option 1.
- Increasing the population density of the area will increase consumption of energy and carbon, consumption of water resources, and production of waste. Increased traffic to the area is likely to impact adversely on air quality.

### **Sustainable Transport**

SA claim: 'No notable implications'

Response:

- The claim is inconsistent. If there are no notable implications, why has option 1 been ranked as preferable?
- The lack of a discussion on this point is bizarre. If the very raison d'être of the AAP is to attract Crossrail to Wood Green Central (impacting on the affected area under consideration here), why does the issue of 'sustainable transport' merit no discussion in the appraisal of impacts here?

## **4. Sloppiness and inaccuracies in the SA**

We note that the SA is **riddled with typographic and other linguistic errors** throughout the document on almost every page.

Taking a few pages at random, a small selection of these errors includes: P29: 'it's leisure', 'it's distinctiveness', 'whisl't', 'iindependent', 'Corss Rail'

P30: 'centres baseline', 'Com,mon', 'it's predominantly urban ... nature'  
P31: 'is likely to be place increasing pressure', 'not clear entirely clear', 'Alexandra Palace and Hornsey Water Works and Filter Beds ... lies'  
P32: 'viablke', 'vicic spaces', 'podoium', 'Calreendon [Clarendon] Road'  
P55: 'wood green', 'black households approach as homeless', 'haringey', 'aap', 'northumberland', 'wood green wood green', 'west green', 'noel park', 'london'

On the pages dealing with the 'redevelopment of existing homes' on Caxton Rd and Mayes Rd there are numerous errors:

P15: 'nde', 'Vicrotian', 'thant', 'The methodology in detail in the index'  
P16: 'in-light', 'with regard its impact'  
P62: 'ecxisting', 'create jobs and opportunities for new businesses to establish.'  
P63: 'to increase own centre floorspace'

This is relevant in that it **speaks of carelessness and lack of professionalism** and gives the impression that the document was produced hastily and without due care. This is not acceptable given the very significant implications of its content. The cumulative effect of numerous small errors leaves a very bad impression and **undermines confidence in the competence of the study.**

#### **5. Failure to provide reasonable justification for specifically selecting Caxton Rd and portion of Mayes Rd and Coburg Rd**

We have set out our detailed responses to the AAP in our submission, and to the SA in this Addendum. We add here that **neither the SA nor the AAP give any reasonable justification for why commercial expansion and the construction of new housing should be in this particular area of central Wood Green as opposed to another:** eg. why does it encompass one segment of Mayes Rd and not another? Why include Caxton Rd while excluding the adjacent Parkland Rd? We state this not to encourage demolition of houses elsewhere, merely to point out the arbitrary nature of the decision: an expanded retail area and increased housing could be achieved as much (if not better) in one area than in another. The 'detailed appraisal' offers no reasonable justification for the selection of these streets in particular.

**We reiterate our contention that creative modifications to the AAP can be made to achieve the overall objectives without the demolition of these homes, and without the permanent dispersal of the local community resident on Caxton Rd and Mayes Rd.**

**We urge the Council to listen to local residents, in keeping with its commitment 'to ensure that investment decisions meet the aspirations of the local community'.**

## **ADDITIONAL APPENDIX**

### **Submitted in response to the Wood Green Area Action Plan Regulation 18 Consultation 14 February – 28 April 2017.**

We deal with two issues below:

- 1. Impact of our proposed improvements on the AAP's proposed deliverable goals**
- 2. Misrepresentation of 2016 consultation report during the current consultation**

#### **#1. Impact of our proposed improvements on the AAP's proposed deliverable goals**

The combined area of our homes (Caxton, Mayes and Coburg) is 0.67Ha (2sf) which constitutes 16% (2sf) of the 4.1Ha of WG SA9 (AAP, p124)

Therefore if our proposed 16% is preserved, 84% of "Indicative development capacity" would remain (p124), ie. in approximate terms:

- Net residential units would go from 825 to 693. A gross loss of 132 (whilst retaining our 65 homes\*) = net loss of 67 homes
- Employment sqm would go from 11,655 to 9,790; a loss of 1,865 sqm
- Town Centre sqm would go from 23,311 to 19,581; a loss of 3,730 sqm

Considering the impact to the whole of AAP outcomes (p166):

- Overall Wood Green AAP residential unit growth impact = **less than 1%**
- Impact to 'Social Housing' (assuming social housing targets achieved) = **0.2%**
- Overall Wood Green AAP Employment growth impact = **less than 2%**
- Overall Wood Green AAP Town Centre growth impact = **5%** (this can of course easily be rebalanced by less 'removal of primary shopping area' as shown in fig.7.2 (AAP, p70)

***This seems a more than reasonable compromise in the interests of saving our homes, community and historic buildings.***

\*Interestingly, using the LP density matrix of 405 dwellings per hectare from Table 3A.2 of the London plan (as the AAP does), our 0.67Ha of streets represent a potential of 271 homes; or, using 70 sqm per unit, a more reasonable 96 homes, ie. about 3 flats per large Victorian house. That is, retaining structures intact and allowing future reusing of existing housing efficiently and without environmental waste. (Many of these houses are already contain 3 flats and at least one of the properties contains 6 flats).

It is therefore reasonable to assert that:

- Net residential units would go from 825 to 693. A gross loss of 132 (whilst retaining our *potentially* 95 homes) = **a net loss of 37 homes.**

- Overall Wood Green AAP residential unit growth impact: **less than 0.5%**
  - **Insignificant 0.1% impact to 'social housing'** = 8 homes (assuming social housing targets are achieved). This is very similar to the social housing already available/provided on these streets. So **no net difference to social housing**.

*Saving our homes, community and historic buildings therefore entails very little (and entirely reasonable and justifiable) compromise to the AAP goals.*

## **#2. Misrepresentation of 2016 consultation report during the current consultation**

The Wood Green AAP is currently the "Regulation 18 Preferred Option Consultation Draft". This 'preference' refers to the **Council's 'preferred Option 4'** (also known as 'Option 4: Significant Transformation') presented in the 2016 plans.

During the 14 February to 31 March 2017 consultations, Council officers and Councillors have made repeated reference to the "overwhelming public support" (and other assertions to that effect) for option 4 of the 2016 AAP. This, however, is **highly misleading**, as summarised below:

- Assertions of 'overwhelming support' are based on the 2016 consultation, the report of which is available here:  
[http://www.haringey.gov.uk/sites/haringeygovuk/files/wood\\_greens\\_future\\_issues\\_and\\_options\\_consultation\\_report\\_0.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/wood_greens_future_issues_and_options_consultation_report_0.pdf)

The report confirms (pp3 and 27) that there were **only 1,688 comments** submitted, with **only around 270 in support of Option 4**. About 80 were "concerned" and a further 65 "unsure", making Option 4 only marginally more popular than Options 1, 2, or 3, and certainly **much less than a majority** (270 of 1,688 comments = 15%). **The claim of 'overwhelming support' is therefore unsustainable.**

- 1,688 comments collected from a population of approximately 267,541 (<http://www.haringey.gov.uk/local-democracy/about-council/facts-and-figures/statistics/population-estimates>) does not constitute extensive consultation.
- A local resident who attended the 2016 consultation reported:
  - "I attended the consultation at the high road shop. The four boards were on display and a nice lady offered to explain it all to me. She worked for Haringey and there were also workers from Fluid. She showed me the boards and was very much encouraging me to vote for 'the best' ie. option 4. She was very dismissive of my comments that I liked the library and other features. I queried where the people in sky city would go and she said they would be rehoused somewhere. She

had no details. She didn't show me that Caxton road would be demolished. When I asked about where the river would be, as pictured, she said that was Venice and just there to give an impression. The man from Fluid said the purpose was to make Wood Green like Kingston on Thames, as that was top of the metropolitan centres in London and Wood Green is bottom. The aim is to get in shops with large frontages, I think he called it footplates, so that people come to Wood Green from other boroughs to spend their money, whereas now local people travel out to other boroughs for the shops." Polly

This suggests that **contrary to the aims of 'consultation'** (assumed to be a neutral exercise in which the views of the public on a range of options are sought, and an objective decision on the outcome is based on those views), **the Council already had a preferred option** which they promoted during the consultation exercise. At the very least, it suggests that a **bias towards option 4** might be expected in the consultation results.

Option 4 is the only option that included our homes.

- **Our petition** (currently standing at **1400+ signatories**) **represents over 5 times as many people specifically objecting to the destruction of our roads**, than were inclined or persuaded towards Option 4, and **over 7 times the net support for Option 4.**
- We contend **that no-one opted for supporting 'Option 4: Significant Transformation' with the understanding that it would entail the destruction of so many homes**, and with such adverse effects on family lives and communities. As noted in our previous submissions, even residents on the affected streets were not aware that the AAP would entail the destruction of their homes, as this information was buried in the documentation on Haringey's web-page. It is unlikely, then, that those who responded to the 2016 consultation did so on an informed basis and in full knowledge of the implications of Option 4.
- Haringey Council have conceded that the 2016 consultations were inadequate and that it was not sufficiently viable, on the basis of the data in the 2016 consultation report, to proceed with the process of making Option 4 policy. This necessitated running a second round of consultation (the current Regulation 18 consultation of 2017), in which only one 'preferred option' is offered. As a result of public pressure, this consultation period was extended to the end of April. This is an implicit recognition that **those who would be most directly affected by the destruction of their homes did not feel they had had adequate information or time to respond.**
- In a meeting with residents of the affected streets, it was acknowledged that

the 2016 consultations did not reach those who would be most directly affected: ie. the residents of Caxton, Mayes and Coburg Rds, in the sense that the Council received no submissions from this area. **Had those residents been aware of the implications of Option 4 at that stage, it is certain that they would have raised objections, making it highly unlikely that Option 4 would have attracted majority support.**

- During the Section 18 regulation consultation process, it has become abundantly clear that there are considerable objections to the scale of Option 4, with residents calling for a more 'organic', 'human-scale' and 'incremental' approach to development.

***Taking all of the above into account, we again urge the Council to reformulate the AAP to avoid the unnecessary and unjustified destruction of our homes.***

***28 April 2017***