

Comments and suggestions to the Wood Green Area Action Plan (AAP) (v1.3 – 24/4/17)

1. Introduction

1.1. This statement of comments and recommendations to the Wood Green Area Action Plan has been prepared by Colin Kerr and Simon Fedida.

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2. Introduction, page 7, figure 1.1 Wood Green AAP Area

- 2.1. The AAP area has been massively enlarged since the previous options consultation in 2016. Comparison of the AAP boundary shown on the map on page 17 of the 2016 AAP Issues and Options Report with the figure 1.1 of the current document demonstrates many areas have been added.
- 2.2. The added areas in North Wood Green include amongst others:
 - Station Road north of junction with Mayes Road
 - Barratt Avenue
 - Bradley Road
 - Park Avenue
 - Cumberland Road (*)
 - Wolseley Road (*)
 - Ranelagh Road (*)
 - Selborne Road (*)
 - Warberry Road (*)
 - Ringslade Road (*)
 - Avenue Gardens
 - Nightingale Gardens
 - Trinity Gardens
 - Wood Green Common
- 2.3. All these streets and green spaces are part of Conservation Areas 10 (Wood Green Common) or 12 (Trinity Gardens) except for those marked with a (*).
- 2.4. No explanation or justification has been provided as to the recent inclusion of these areas. There were no references to these areas in the published responses to the 2016 consultation. There are no Site Allocations in these areas. The green spaces have been indicated as access corridors for pedestrians and cycleways, as they have been for many years in many policy documents.
- 2.5. The Figure 2.3b on page 14 illustrating 'Existing Sites and Growth Designations' in the Local Plan show no designations on the added areas except for Station Road and Wood Green Common. The majority of the referenced streets have not been designated in any way.
- 2.6. Page 6, paragraphs 1.4 and 1.5, state that this AAP provides the framework against which development proposals will be assessed. There are no protections offered to these now included streets against inappropriate intensification associated with the AAP – while similar areas have been offered such protections, such as Parkside Malvern.
- 2.7. The Local Planning Authority must be wary of imposing radical planning policies such as this AAP (it is – para 1.11 - the expansion of the 2016 'ambitious' options after all), on residents living in established streets that are tangential to the real business of this plan. A simplified boundary for this AAP is no excuse for a lack of nuance in dealing with residents or subjecting residents to unnecessary planning blight and speculative proposals.

- 2.8. In the absence of any justification for the inclusion of these streets, or protections for them, they should be removed from the AAP.
- 2.9. **Recommendation:** In the absence of any justification for the inclusion of these streets, or protections for them, they should be removed from the AAP

3. Heritage Assets, page 21, para 3.16 and Figure 3.7

3.1. While the Figure 3.7 shows the New River as Locally Listed, it does not show the Statutory Grade II listed Tunnel Entrance to the New River in Park Avenue. It forms a very pleasant riverside view and is an important little gem for the area.

3.2. **Recommendation:** The Grade II listed Tunnel Entrance be shown on Figure 3.7

4. Demographics, page 24, Figure 3.8 Wood Green Study Area

4.1. The map shows an outline in red superimposed on the 'Haringey Super Output Areas'. The red outline has no key – but appears to be the outline of the AAP as described in the 2016 AAP consultation document, and not that of the current document. Surely there is some mistake ?

4.2. **Recommendation:** The Figure 3.8 is annotated with the current outline of the AAP area under discussion, and properly labelled as such.

5. Boundaries of the area, page 28, para 3.53

5.1. Para 3.53 states that 'It is noted that while the Mayes Rd and Hornsey Park Rd areas are within the AAP area, these will, with the potential exception of the area around Caxton Rd, remain as they currently are, and the amenity of existing residents in the area will be protected using existing Local Plan policies.'

5.2. The streets lately added to the 2017 consultation area as mentioned (Station Road north of junction with Mayes Road, Barratt Avenue, Bradley Road, Park Avenue, Cumberland Road, Wolseley Road, Ranelagh Road, Selborne Road, Warberry Road, Ringslade Road) have also been brought into the AAP Area. Residents should be offered the same explicit policy assurances as those in the Mayes Rd and Hornsey Park Rd areas as to the fact that 'they will remain as they currently are, and the amenity of existing residents in the area will be protected using existing Local Plan policies.'

5.3. **Recommendation:** The additional streets added to the 2017 AAP (Station Road north of junction with Mayes Road, Barratt Avenue, Bradley Road, Park Avenue, Cumberland Road, Wolseley Road, Ranelagh Road, Selborne Road, Warberry Road, Ringslade Road) be removed from the AAP, or,

5.4. the text of para 3.53 have added to it:

‘While Station Road north of junction with Mayes Road, Barratt Avenue, Bradley Road, Park Avenue, Cumberland Road, Wolseley Road, Ranelagh Road, Selborne Road, Warberry Road, Ringslade Road areas are within the AAP area, these will remain as they currently are, and the amenity of existing residents in the area will be protected using existing Local Plan policies.’

6. Boundaries of the area, page 28, para 3.54

6.1. Para 3.54 states that ‘There are a number of existing designations within the Wood Green area, as shown on the map below. The AAP boundary has been selected to include all the potentially developable land parcels within the area within the boundary’.

6.2. There are no such designations in the area of the streets added to the 2017 AAP area (Station Road north of junction with Mayes Road, Barratt Avenue, Bradley Road, Park Avenue, Cumberland Road, Wolseley Road, Ranelagh Road, Selborne Road, Warberry Road, Ringslade Road). Since the stated rationale for the AAP boundary does not apply, what then is the rationale for adding these streets to the AAP?

6.3. Recommendation: The additional streets added to the 2017 AAP (Station Road north of junction with Mayes Road, Barratt Avenue, Bradley Road, Park Avenue, Cumberland Road, Wolseley Road, Ranelagh Road, Selborne Road, Warberry Road, Ringslade Road) be removed from the AAP.

7. Character/Sub-Areas within Wood Green, page 29, para 3.56 and Character Area Table

7.1. The para 3.56 states there are 13 character areas in the AAP. The Character Area Table below the text lists 15 character areas. So which is it – 13 or 15 ?

7.2. Recommendation: The para 3.56 be changed to reflect the correct number of character areas.

8. Character/Sub-Areas within Wood Green, page 29, Character Area Table

8.1. The Character Area Table lists 4 Sub Areas. The Wood Green Sub Area 1 is known by 2 names in this document: Wood Green Tube and Wood Green North. This is confusing and is probably a result of the process through with the AAP area has changed since 2016.

8.2. Recommendation: The Sub Area 1 should have only a single name and it be used consistently in the document. Wood Green North is suggested. The related legend in Figure 3.11 on page 30 should also have its text changed to Wood Green North.

9. Character/Sub-Areas within Wood Green, page 30, Figure 3.11, Character Area 2

- 9.1. The Character Area 2 (Alexandra Palace Station) consists almost entirely of the area of the streets added to the 2017 AAP area (Barratt Avenue, Bradley Road, Park Avenue, Cumberland Road, Wolseley Road, Ranelagh Road, Selborne Road, Warberry Road, Ringslade Road).
- 9.2. Character Area 2 could be entirely removed from the AAP if the Alexandra Palace Station were appended to Character Area 11 and the area east of Bounds Green Road appended to Character Area 1. Such a change would restore the AAP boundary in this area to the status quo ante of 2016.
- 9.3. **Recommendation:** Since no rationale is evident for the inclusion of these streets in the first instance, including designations, Character Area 2 should be removed and Areas 1 and 11 suitably amended.

10. Sub Area 4: Haringey Heartlands, 11. Wood Green Common, page 40, para 3.57

- 10.1. The para 3.67 offers an overly negative and pessimistic description of Wood Green Common. Contrast the miserable assessment of the area given in the AAP with the assessment of Wood Green Common given in the adopted Wood Green Common Conservation Appraisal, set out below:

Wood Green Common

4.33 Wood Green Common occupies a large area to the south of Station Road and provides the conservation area with its characteristic sense of openness. The Common is divided into two constituent areas, the open green space at its western end and the well planted landscaped gardens to the east. Views of Alexandra Palace and the area to the west of the railway line are available from much of the Common and also contribute to the area's character.

4.34 The western section of the Common forms a large expanse of grassed open parkland that is lined on its northern side by a row of mature London Plane trees. It is bounded to the south and west by a magnificent classically detailed tall red brick wall that follows a beautifully swept arc delineating the New River Path. The wall is gently swept to follow the contours of the land and is well articulated in a long continuous series of brick panels with plinths and terracotta copings set between piers with terracotta caps. It successfully encloses the views across the common from Station Road and is considered to be a major positive contributor to the character and appearance of this part of the conservation area. A relatively well maintained play area has a neutral impact on the character of the open space at the western end of this section of the Common

4.36 The eastern section of Wood Green Common comprises an attractively landscaped well-planted and well maintained public garden. The garden is surrounded by a dense Hawthorn hedgerow and cast iron railings and is lined to the north and east by mature London plane trees. Its centrepiece is a granite fountain, bearing the inscription 'In the memory of C.W. Barratt Esq., Chairman of Barratt & Co Ltd.', from which a series of pathways radiate to the park's entrances from

Station Road, Western Road and Mayes Road. A prominent pergola, which is now covered in dense vegetation, surmounts a curved pathway and public seating situated to south of the fountain.

10.2. The tree planting of London Planes along the western boundary carried out by the Local Authority, and completed after the date of the Conservation Area Appraisal, has further enhanced the Common.

10.3. Particular mention should be made of the use during clement weather of the Rose Garden at lunch hour by office and retail workers, by wedding parties from the Church in Station Road opposite, on the Common by informal kickabout football groups and summer sunbathing, and of the childrens' playground particularly on Sunday afternoons.

10.4. Recommendation: Para 3.67 be rewritten to convey an objective and positive assessment of Wood Green Common.

11. Decanting/Replacement of demolished stock, page 49, para 4.30

11.1. The para 4.30 does not offer much comfort to those 'decanted' from housing to be demolished, other than to say that there should be more housing around when the dust has settled. Given the scale of 'decanting' envisaged, more is needed on this topic.

11.2. Recommendation: Para 4.30 be rewritten to convey a serious policy response to the issue of 'decanting' people out of their homes.

12. Cycling, page 49, para 4.43 and Figure 4.3

12.1. The para 4.43 and Figure 4.3 shows Quietway cycle routes through Avenue Gardens that do not respect the existing layout of paths in the historic gardens. This is not helpful in encouraging respect for and protection of the fabric of the park. Routes for cycle routes and Quietways, whether indicative outline or not, should always respect the existing layout of green spaces and not encourage the creation of new areas of hard surface or informal pathways.

12.2. Recommendation: Figure 4.3 be amended to show Quietway cycle routes conforming to the existing and historic layout of paths in Avenue Gardens. The legend of Figure 4.3 should be amended to reflect the correct spelling of Quietways.

13. Open Space, page 53, para 4.54

13.1. The para 4.54 states that only the open spaces of Ducketts Common and Wood Green Common are in or adjacent to the AAP area. While this is true of the 2016 AAP area, it is not true of the 2017 AAP area.

- 13.2. The 2017 AAP area has had Character Area 2 (table page 29 and Figure 3.11 page 30) appended to it, and this hasty addition has clearly not been thought through adequately.
- 13.3. The Character Area 2 addition comprises residential streets (Barratt Avenue, Bradley Road, Park Avenue, Cumberland Road, Wolseley Road, Ranelagh Road, Selborne Road, Warberry Road, Ringslade Road) and the substantial green spaces and Historic Gardens of Avenue Gardens, Nightingale Gardens and Trinity Gardens. These open spaces are clearly shown in Figure 2.3d on page 14. Therefore Para 4.54 is an inaccurate statement of the facts concerning open spaces and must be corrected.

13.4. Recommendation: Para 4.54 be amended to include Avenue Gardens, Nightingale Gardens and Trinity Gardens as open space in the AAP area. Alternatively, remove Character Area 2 from the AAP area.

14. AAP Outputs, Methodology and assumptions, page 61, para 6.7

- 14.1. The para 6.7 states that density assumptions for Site Allocations have been increased in this AAP over those assumptions in the current Site Allocations DPD. The only reasons given for this are projected transport improvements, although the majority of AAP sites are already in the highest PTAL ranges, and secondly the Local Planning Authority's 'commitment to growth'.
- 14.2. The paragraph does not state what fractional increase of permitted densities this reasoning justifies, or how the uplift in densities has been arrived at. Since the transport improvements cannot materially change already very high PTAL values, it can only be the Council's 'commitment to growth' that supports increasing already very high densities.
- 14.3. The issue of the detrimental effects of very high densities are so serious on existing and incoming populations of residents, the ameliorating effects of the Council 'commitment to growth' surely requires closer examination as to what this practically entails.

14.4. Recommendation: Paragraph 6.7 needs further expansion on the justification for increased densities and to justify the fractional uplift requested.

15. Public Realm Improvements, page 64, AAP Area-wide, Bullet 2 'Approach to lighting...'

- 15.1. The Bullet 2 suggest an 'an overarching approach to lighting throughout the AAP area to improve night time appearance and safety including the lighting of historic buildings'. The overarching approach to lighting must include a commitment to avoiding light pollution in new installations and reducing light pollution and the wasteful spillage of light into areas where it is not wanted or needed.
- 15.2. The amenity of residents is improved when lighting is confined to where it is needed. In particular, the expanse of Alexandra Park provides a darker night sky than is usual for London, and provides valuable educational and visual amenity for those who care to use it. This amenity should not be carelessly sacrificed.

15.3. Light spillage from development, light pollution from ‘aids to orienteering and wayfinding’ and (notoriously) from the illumination of buildings and the ‘lighting of historic buildings’ must be controlled by sensitive and informed design.

15.4. Recommendation: Bullet 2 should be amended to read:

‘An overarching approach to lighting throughout the AAP area to improve night time appearance and safety, and through good design to minimise light pollution where possible’.

16. Public Realm Improvements, page 64, Wood Green North, Bullet 4 ‘Station Road street scene...’

16.1. The Bullet 4 suggests ‘Creation/enhancement of retail uses and street scene along Station Rd, creating a new “arm” to the town centre’. Station Road is a very long and mainly residential road, particularly in the region extending from the roundabout with Mayes Road and running north to the junction with Park Avenue, and bordering Wood Green Common. This part of Station Road is not suitable for retail uses/‘active uses’.

16.2. The part of Station Road running from the Tube Station to the Mayes Road roundabout is currently a frontage of mixed commercial, retail, office and residential useage.

16.3. These two facts are reflected in the existing Town Centre designation (Figure 2.3c page 14) and the proposed Town Centre designation (Figure 7.1 page 69). The Bullet 4 should make clear that the relevant part of Station Road subject to ‘Creation/enhancement of retail uses and street scene’ applies to the part of Station Road within the Town Centre boundary.

16.4. Recommendation: Bullet 4 should be amended to read:

‘Creation/enhancement of retail uses and street scene along the section of Station Rd that is within the Town Centre boundary, creating a new “arm” to the town centre’.

17. Policy WG1, page 68, para 2 (B) (i) Secondary Frontages along Station Road

17.1. The Bullet (2Bi) suggests ‘Secondary frontages will be allocated on all frontages along Station Rd to encourage a mix of uses. This includes sites which do not currently have active ground floor uses’.

17.2. Station Road is a very long and mainly residential road, particularly in the region extending from the roundabout with Mayes Road and running north to the junction with Park Avenue, and bordering Wood Green Common. This part of Station Road is not suitable for retail uses/‘active uses’.

17.3. The part of Station Road running from the Tube Station to the Mayes Road roundabout is currently a frontage of mixed commercial, retail, office and residential useage.

17.4. These two facts are reflected in the existing Town Centre designation (Figure 2.3c page 14) and the proposed Town Centre designation (Figure 7.1 page 69). The Bullet (2Bi) should make clear that the relevant part of Station Road subject to 'Secondary frontages will be allocated on all frontages along Station Rd to encourage a mix of uses' applies to the part of Station Road within the Town Centre boundary.

17.5. Recommendation: WG1 para 2 (B) (i) should be amended to read:

'Secondary frontages will be allocated on all frontages along the section of Station Rd that is within the Town Centre boundary to encourage a mix of uses.'

18. Figure 7.1 Changes to Town Centre Boundary, page 69

18.1. The Figure 7.1 page 69 purports to show changes proposed to the Town Centre Boundary, by means of showing additions and removals from the area.

18.2. Figure 2.3c page 14 shows the existing Town Centre boundary. There are clearly omissions in the Figure 7.1 that would change Figure 2.3c to Figure 7.1. Most notably, the change of boundary running along Parkland Road to Station Road that encloses a larger area of Station Road within the Town Centre Boundary is not indicated.

18.3. Recommendation: Figure 7.1 be modified to correctly show the additions to the proposed Town Centre Boundary.

19. Page 73, para 7.14 Markets

19.1. The para 7.14 discusses space for rotational/seasonal markets. It states that 'Applications for market uses will have to demonstrate how the market will contribute to the vibrancy of Wood Green overall, and how they will interact favourably with traders on adjacent town centre frontages'.

19.2. A future process for allocating street market spaces should not be bureaucratic or anti-competitive. It should be transparent and provide no favour to existing traders or the more conventional retailers in fixed units along the frontages. Clearly cheap market traders will have an effect on other outlets, including the big four supermarket chains, but this is the nature of competition. The supply of certain products, such as fish, fruit and vegetables at keen prices, is vitally important to the health of residents and consumers in Wood Green, and particularly to those of more limited means.

19.3. The text of para 7.14 does nothing to assuage these concerns – if anything, precisely the opposite.

19.4. Recommendation: para 7.14 be rewritten to ensure that the interests of Wood Green consumers generally, and particularly with respect to competition in the provision of fish, fresh fruit and vegetables, are the primary measure in the allocation of street markets.

20. Policy WG5, page 83, para 6 Bullet E – North-South Route and Figure 7.10

20.1. The Policy WG5 6E creates a new North-South route, as illustrated in Figure 7.10. It is not clear which parts of this route are for vehicles, cyclists and pedestrians. Vehicular traffic is to be expected on Mary Neuner Road, and buses are specifically mentioned. However, it cannot, for example, be the intention to permit vehicular traffic across Wood Green Common.

20.2. A single broad arrow is all that shows the route with no distinction between transport modes. This is not satisfactory, and further detail is required as to the intention of this policy. Where the route is to cross open green space, such as Wood Green Common, policy concerning respect for the existing layout of paths and the character of the historic space is required.

20.3. Recommendation: Policy WG5 6E should be amended to provide more detail as to the transport modes (general vehicles, buses, cyclists and pedestrians) envisaged on different parts of the proposed North-South route. Respect for the existing character of open spaces which are to be accessed should be explicitly mentioned.

21. Character Areas Design Considerations, page 85, para 7.47

21.1. The para 7.47 states there are 13 character areas in the AAP. The Character Area Table on page 29 lists 15 character areas. So which is it – 13 or 15 ?

21.2. Recommendation: The para 7.47 be changed to reflect the correct number of character areas.

22. Character Areas Design Considerations, page 85, para 7.47, bullets 1 to 13

22.1. Bullets 1 to 13 makes summary points under each character area, but not all of them. The numbering scheme does not follow the character area enumeration in the table on page 29, or of the numbering in Figure 3.11 on page 30.. This is careless and confusing and should be corrected.

22.2. Recommendation: The para 7.47 bullets be retitled to be accurately reflect the character area enumeration in the table on page 29 and map in Figure 3.11 on page 30. This should be done in the name of clarity and as an aid to avoid confusion.

23. Character Areas Design Considerations, page 85, para 7.47

23.1. The para 7.47 states there are 13 character areas in the AAP. The Character Area Table on page 29 lists 15 character areas. One of the character areas not mentioned is Character Area 2 – Alexandra Palace Station.

- 23.2. The Character Area 2 (Alexandra Palace Station) consists almost entirely of the area of the streets added to the 2017 AAP area from the 2016 AAP (Barratt Avenue, Bradley Road, Park Avenue, Cumberland Road, Wolseley Road, Ranelagh Road, Selborne Road, Warberry Road, Ringslade Road). It includes the green spaces of Avenue Gardens, Nightingale Gardens and Trinity Gardens, and much of the area of Conservation Areas 10 and 12.
- 23.3. No rationale is given for not providing any design considerations for Character Area 2 (Alexandra Palace Station). The 2017 AAP area has had this Character Area appended to it, and this hasty addition has clearly not been thought through adequately.
- 23.4. We note that the Parkside Malvern Character Area has the following design consideration attached in para 7.47 bullet 13: 'Parkside Malvern: This area is and will continue to be residential in character, new development will be limited and should respect the existing use.'
- 23.5. There are no site designations in Character Area 2 (Alexandra Palace Station), and the AAP itself describes (page 31, para 3.58) the Area as 'personified by a mix of pleasant open spaces and Victorian terraced streets. Part of the Wood Green Conservation Area, Station Road is the main route through the area, and contains a small parade of commercial premises next to the rail station'.
- 23.6. A similar design consideration for this Character Area as for the Parkside Malvern Character Area is appropriate.

23.7. Recommendation: The para 7.47 be appended with a new bullet:

'Character Area 2 Alexandra Palace Station: This area is and will continue to be residential in character, new development will be limited and should respect the existing use.'

- 23.8. Alternatively, Character Area 2 could be entirely removed from the AAP if the Alexandra Palace Station were appended to Character Area 11 and the area east of Bounds Green Road appended to Character Area 1. Such a change would restore the AAP boundary in this area to the status quo ante of 2016.

23.9. Recommendation: Since no rationale is evident for the inclusion of these streets in the first instance, including designations, Character Area 2 should be removed and Areas 1 and 11 suitably amended.

24. Figure 7.11 Legend, page 86

- 24.1. The Wood Green Sub Area 1 is known by 2 names in this document: Wood Green Tube and Wood Green North. This is confusing and is probably a result of the process through with the AAP area has changed since 2016.

24.2. Recommendation: The Sub Area 1 should have only a single name and it be used consistently in the document. Wood Green North is suggested. The legend in Figure 7.11 on page 86 should have its text changed to Wood Green North.

25. Landmark Buildings, page 88, para 7.49

25.1. The para 7.49 states that locations for landmark buildings need only be justified by claiming that they would 'mark' something.

25.2. More effort must be made to justify landmark buildings which are otherwise scattered across the AAP. This is not an acceptable planning process.

25.3. Recommendation: A justification for the location of landmark buildings be laid out, or the location proposals changed or removed.

26. Policy WG6 Local Tall Buildings, Bullet 2, page 89, and para 7.53

26.1. This policy for tall buildings, focussing on putative views from the buildings is completely inadequate. Further, potential 'public' use of high levels cannot be assured, and is often not achieved at the end of a project. How many of these 'novelty' locations can Wood Green reasonably support? It therefore cannot be a justification for granting approval.

26.2. Recommendation: Policy WG6 Bullet 2 and para 7.53 be reconsidered. A more reasonable assessment of the feasibility of public access to high levels is required.

27. Policy WG7 Heritage, page 91, Bullet 1 and Bullet 2C and para 7.56

27.1. The text repeatedly refers to heritage assets listed in Figure 3.8. This is not correct. The assets are actually shown in figure 3.7, page 21.

27.2. Recommendation: The correct figure 3.7 be referenced.

28. Green Grid, page 94, para 7.63 and Figure 7.17

28.1. The para 7.63 states that the impact of new routes on existing open spaces will be closely managed. Yet Figure 7.17 shows Quietway cycle routes through Avenue Gardens that do not respect the existing layout of paths in the historic gardens. This is not helpful in encouraging respect for and protection of the fabric of the park. Routes for cycle routes and Quietways, whether indicative outline or not, should always respect the existing layout of green spaces and not encourage the creation of new areas of hard surface or informal pathways.

28.2. Recommendation: Figure 7.17 be amended to show Quietway cycle routes conforming to the existing and historic layout of paths in Avenue Gardens. The legend of Figure 7.17 should be amended to reflect the correct spelling of Quietways.

29. Green Grid, page 94, para 7.62 and para 7.63

29.1. The Para 7.62 states that Wood Green Common will be improved to act as (one of) the key local parks for the metropolitan centre. Para 7.63 states that developments will be required to demonstrate how any affected assets in the parks will be reprovided and improved.

29.2. It is worth pointing out that Wood Green Common is a registered Town Green under the 1965 Act. It follows that certain protections adhere to Wood Green Common under the terms of the act and successive legislation.

29.3. The status of Wood Green Common as a Town Green should be celebrated in this AAP and policy efforts made to preserve its heritage. These are very well described in the Wood Green Common Conservation Area 10 appraisal. The Common is not a suitable site for built physical development.

29.4. Recommendation: para 7.62 and 7.63 be amended to stress the nature of Wood Green Common, its status as a Town Green, and to offer protection that supports the existing Conservation Area appraisal, and supports existing uses: lunch time meeting place for local workers, informal football matches and games, sunbathing and so on.

30. Policy WG9, Education, page 95 para 7.67

30.1. The authors of this AAP should note that the plural of 'college' is 'colleges'. The word 'collages' refers to something completely different.

31. Policy WG11, Transport, page 99

31.1. The AAP anticipates 71,800 m² of new town centre floor space (page 61, para 6.9 and 6.10). This compares with existing town centre floor space of 120,757m².

31.2. This represents a very substantial increase in the town centre floorspace and therefore in the retail floorspace. It is understood that the AAP wishes to encourage larger footprint chains to the Town Centre. It follows that a substantial increase in HGV deliveries to service the new retail outlets – both large and small – is to be expected.

31.3. Historically, HGV deliveries to the Town Centre have been problematic, causing traffic issues in residential streets over a footprint far wider than the Town centre itself.

31.4. This AAP offers no policy for managing the impact of a potentially very large increase in HGV delivery traffic, and further, does not even offer any rough estimate of the scale of the problem to be managed. This surely is to be addressed by policy within this document.

31.5. Recommendation: Policy WG11 be amended to include management and amelioration of the impacts of the HGV movements required to service the vastly increased retail capacity of the proposed Town Centre, and to mitigate the current inadequate arrangements.

32. Figure 7.19 Cycling Network, page 99

32.1. The Figure 7.19 shows Quietway cycle routes through Avenue Gardens that do not respect the existing layout of paths in the historic gardens. This is not helpful in encouraging respect for and protection of the fabric of the park. Routes for cycle routes and Quietways, whether indicative outline or not, should always respect the existing layout of green spaces and not encourage the creation of new areas of hard surface or informal pathways.

32.2. Recommendation: Figure 7.19 be amended to show Quietway cycle routes conforming to the existing and historic layout of paths in Avenue Gardens. The legend of Figure 7.19 should be amended to reflect the correct spelling of Quietways.

33. ends