

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

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Our ref: LDF14/LDD16/GC02
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For the attention of Matthew Paterson (Local Plan consultation response)

Dear Mrs Williamson

Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

Re: Consultation on preferred option stage Wood Green Area Action Plan

Thank you for consulting the Mayor of London on this Regulation 18 consultation for the Wood Green AAP (a draft Development Plan Document). As you are aware, all Development Plan Documents (DPDs) must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. This letter constitutes the Mayor's representations in response to the Regulation 18 consultation. The Council should note, however, that the draft DPD has not yet progressed to a stage where it is possible to fully evaluate general conformity with the London Plan.

Wood Green Area Action Plan

Strategic context

London Plan Policy 2.13 designates Wood Green and Haringey Heartlands as an Intensification Area with potential to accommodate a minimum of 1,000 new homes, and an indicative employment capacity of 2,000 new jobs. Table A1.2 of the London Plan identifies various opportunities for mixed use regeneration adjacent to Wood Green town centre, and promotes high-density mixed use redevelopment within the town centre itself.

Wood Green is classified by the London Plan as one of thirteen 'metropolitan' town centres in the capital, in recognition of its role and catchment as a centre for retail, employment, service and leisure functions, as well as its good public transport accessibility. Table A2.1 of the London Plan recognises the town centre has having moderate potential for growth, and also identifies Wood Green as a suitable candidate for regeneration in the form of physical, environmental and economic renewal.

The Secretary of State is currently considering two options for future Crossrail 2 services in the Wood Green and Haringey Heartlands area. These comprise: (1) an option for stations at both Turnpike Lane and Alexandra Palace; or, (2) an option for one station at Wood Green. The Secretary of State's decision on Crossrail 2 alignment is expected later this year, after which there will be public consultation on the preferred route. The increased connectivity and enhanced transport capacity that would be provided by Crossrail 2 offers significant opportunities for growth and sustainable town centre intensification in line with London Plan policies 2.13, 2.15, 6.2 and 6.4, and Table 6.1.

Scope of the preferred option

This draft of the Wood Green Area Action Plan (AAP) sets out Haringey Council's preferred option for the future growth and development of Wood Green. Following the consideration of various scenarios at the previous 'Issues and Options' round of consultation, the draft AAP now focuses on option 2 of the abovementioned Crossrail 2 configuration - i.e. a Crossrail 2 station at Wood Green.

Whilst it is acknowledged that a decision on the Crossrail 2 route is still to be made by the Secretary of State, GLA officers support the Council in focusing on the Wood Green station scenario given that it would provide the most significant quantum of housing and economic growth, as well as allowing for the most comprehensive town centre regeneration and community benefit. Notwithstanding this the Council understands and accepts that, if the Wood Green alignment is not selected by the Secretary of State, the drafting of this AAP (and its projected outputs) would require comprehensive review, ahead of further public consultation.

In summary, the spatial objectives of the Council's preferred option AAP comprise the delivery of 7,700 new homes; new workspace to provide 4,000 new jobs; and, a range of economic, environmental and place-making measures intended to revitalise Wood Green town centre. The spatial strategy for this, and the draft policies within the emerging AAP, are considered in more detail below.

Spatial strategy

The draft Wood Green APP fundamentally promotes the intensification and regeneration of the metropolitan town centre, and seeks to align growth with the provision of transport capacity and other essential infrastructure. This is strongly supported in accordance with London Plan policies 2.13, 2.15 and 6.1. Whilst the preferred option would represent a significant degree of intensification and change for this outer London town centre, this is in keeping with the principles of sustainable development and would support the Council's aspiration for Wood Green to be reclassified as an Opportunity Area as part of the current London Plan review.

Land ownership and development potential

Along with various private freeholders, the Council is a major landowner in the AAP area. At the previous consultation stage the Council was encouraged to carefully consider the distribution of uses, social infrastructure and public space relative to land ownership patterns in order to find a configuration of development that, whilst always ensuring site viability, would optimise the balance of public/private benefits and burdens in order to deliver the strategy.

In response it is welcomed that the draft allocations for Council owned sites seek to optimise development potential, whilst jointly contributing amenities for the town centre. The Wood Green library site, for example, includes provision for mixed uses including residential, as well as

contributing generously to provide a new public space for the town centre in conjunction with neighbouring private land.

More generally it is noted that since the previous round of consultation, Lendlease has been selected by the Council as its preferred Haringey Development Vehicle (HDV) partner. The HDV will be a 50/50 partnership between Haringey Council and Lendlease, designed to catalyse the development of a portfolio of Council owned land. The HDV partnership approach is strongly supported by GLA officers, and is likely to significantly enhance the deliverability of this ambitious spatial strategy for Wood Green.

Masterplanning

The inclusion of a key diagram (AAP Figure 5.1) to express strategic connections, infrastructure provision and land use clustering is strongly supported. However, the Council is also encouraged to include broad-brush plans for the major site allocations within the AAP - in order to clearly express the urban design outcome that the Council seeks to achieve. Such design principles should take account of any relevant extant planning permissions as necessary.

As discussed at the previous round of consultation, it is noted that site allocation 9 of the draft AAP includes various Victorian/Edwardian residential terraces (at Mayes Road and Caxton Road) within the area for comprehensive redevelopment. Whilst (subject to the normal requirements of London Plan Policy 3.14) no objection is raised to the proposed re-provision of existing housing as part of wider redevelopment, the proposed loss of these terrace houses is queried in view of their townscape value as a remnant of the historic pattern of development in the area. Accordingly, GLA officers would welcome further discussion with the Council on the proposed urban design strategy for this allocation - in order to explore options to retain these buildings whilst maintaining the Council's broad objectives for the site.

Housing

The AAP plans for the delivery of 7,700 new homes in Wood Green/Haringey Heartlands and would ensure that the London Plan's indicative minimum unit target for the Intensification Area would be significantly exceeded. This level of housing supply is strongly supported in accordance with London Plan Policy 3.3. Indeed, applying the Clarendon Square (Haringey Heartlands) planning permission as a illustrative benchmark (five hectare site, 1,100-1,200 units, 640-700 habitable rooms per hectare), it is clear that the planned housing output for the APP is genuinely ambitious. GLA officers would welcome the opportunity to explore the AAP development capacity study in more detail with the Council.

More generally, the Council's proposed portfolio approach to meeting objectives for family housing and affordable tenure split across a range of sites is supported. The clarity that the plan seeks to provide on density expectations and areas prioritised for family housing is similarly welcomed, as is the acknowledgement that student housing and build to rent accommodation could also make a positive contribution to the town centre.

With respect to the proposed comprehensive redevelopment of existing residential units/estates in the AAP area, the Council is encourage to reference the requirement for (at least) equivalent re-provision of affordable housing floorspace (in line with London Plan Policy 3.14), and to have regard to the Mayor's draft Good Practice Guide to Estate Regeneration.

Employment

The AAP seeks to deliver 80,000 sq.m. of new B Class employment space as part of a drive to achieve a local economy of critical mass within Wood Green's commercial core. This is expected to deliver approximately 4,000 new jobs (well in excess of the London Plan target for the Intensification Area). Noting the enhanced connectivity associated with a potential Crossrail 2 station within the town centre, and the Council's ambition to improve the borough's local employment ratio, this scale of ambition is supported as a means of supporting a vibrant and sustainable outer London centre. In this context the Council's focus on providing new opportunities to nurture and grow local small to medium sized businesses is well considered. Moreover, the explicit requirement for a provision of affordable workspace in certain cases is strongly supported.

Tall buildings and views

In line with the Council's Core Strategy, the draft AAP recognises Wood Green as suitable for tall buildings, and identifies various locations where high quality 'landmark' buildings will be supported. Rather than specifying acceptable heights, the APP promotes a case by case design-led approach, having regard to relevant London Plan and Local Plan urban design policy; a Tall Buildings SPD (which the Council is currently developing); and, the opportunities and constraints presented by local viewing corridors that oversail the town centre. With respect to the latter, it is noted that the Council seeks to open up a new local view to Alexander Palace from High Road (as part of the comprehensive remodelling of the town centre). GLA officers strongly support a design-led approach to tall building development, and acknowledge the benefits of considering each case on its own merits. Nevertheless, in the interests of providing a tangible vision for the local community, the Council is encouraged to present an illustrative massing model within the next draft of the AAP.

Metropolitan Open Land

The AAP area is principally urban town centre, however, the boundary crosses the Great Northern Railway Line to include Hornsey Filter Beds (a water treatment works on Metropolitan Open Land), adjacent to Alexandra Park. AAP site allocation 25 suggests residential-enabled consolidation of waste water infrastructure, and the delivery of a new pedestrian/cycle connection between Wood Green town centre and Alexandra Palace. Whilst the site allocation development guidelines emphasise that development of this site should not have a greater impact on openness, the suggestion of residential use at the site (up to 304 units) leads to conflict with London Plan Policy 7.17.

Notwithstanding this, it is noted that the site has, in part, been previously developed in connection with the existing waterworks use. It is also acknowledged that improved access to open space at Alexandra Park would be of huge benefit to Wood Green in view of the intensification proposed within the town centre. Accordingly, GLA officers would welcome further discussion with the Council on this allocation.

Transport

TfL supports the Council's overall vision to strengthen and intensify Wood Green, as well as the recognition that continued investment in the strategic transport network is critical to enabling this. The overall emphasis of the AAP on sustainable growth aligned with transport provision is supported in line with London Plan Policy 6.1. The Council is nevertheless reminded that Crossrail 2 is not currently a consented scheme, and Wood Green has not been confirmed as part of the preferred alignment.

As set out in the 2015 Crossrail 2 public consultation material, there are currently only plans for one new station entrance at Wood Green (on what is currently the Vue Cinema site). There is no current intention for a second entrance on the library site, and further representations will need to be made on this point during the next round of public consultation if that remains the Council's aspiration. Notwithstanding the Council's aspirations, the draft AAP should make clear that, at present, there are no plans for a second station entrance in this location.

As the Council is generally aware, Crossrail 2 is subject to a safeguarding direction (further details can be found at <http://crossrail2.co.uk/areas-safeguarded/>). Whilst the draft AAP refers to safeguarding, it would be clearer if those areas were presented on a map of the AAP area. The current statutory safeguarding does not cover Wood Green and instead relates to the option for new stations at Alexandra Palace and Turnpike Lane. The current intention is to go out for a public consultation on the revised safeguarding later in the year. Identifying the potential safeguarded areas on a map would help to inform both the timing and delivery of certain sites (including sites 2 and 3 on a Wood Green alignment, and site 15 for a Turnpike Lane alignment).

TfL welcomes the Council's advice that the next version of the plan will be supported by a transport study. The Council is encouraged to make use of TfL's suite of strategic models to support this, and to engage in associated discussions with TfL around the scope of the study.

At the previous round of consultation, TfL supported proposals to create a more permeable town centre and improve conditions for walking and cycling. Since then the Mayor has published Healthy Streets for London, which is a new policy approach to prioritise walking, cycling and public transport. Planning policy documents should seek to embed the Healthy Street approach as part of public realm and place making initiatives. Further information can be found at <http://content.tfl.gov.uk/healthy-streets-for-london.pdf>.

The AAP identifies the potential for around 20,000 sq.m. of additional comparison retail floorspace within the town centre, with an emphasis on larger floorplate units. Such an increase will inevitably place additional demand on the road network for servicing and deliveries. Accordingly the AAP should consider opportunities to manage demand (including identifying potential locations for freight consolidation).

Noting that one of the key place making objectives of the AAP is to revitalise the evening economy, this plan should include a strategy for taxi / private hire vehicles (PHVs). This is particularly important given that the Piccadilly line is now part of the Night Tube network, and this will increase demand for onward taxi travel. Currently there are four 24-hour taxi ranks within the AAP area providing capacity for a total of 13 taxis. The plan should acknowledge this transport infrastructure and consider how the need for taxi and PHVs will be accommodated as part of future development.

Further transport detailed comments are provided in Appendix 1 to this letter.

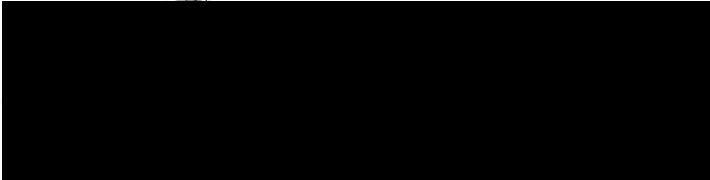
Conclusion

The scale of ambition of this plan is strongly supported in strategic planning terms and the proposed housing and employment outputs are wholly in keeping with the Council's case for Wood Green to be reclassified as an Opportunity Area within the London Plan. In general, the draft AAP has progressed well since the previous stage of consultation, however, the Council should ensure that the matters discussed above with respect to spatial strategy; housing; employment; tall

buildings and views; Metropolitan Open Land; and, transport are addressed by the next consultation draft.

The Mayor will issue his formal opinion on general conformity when requested at the Pre-Submission consultation stage. In the meantime, I look forward to the continued joint engagement of the development of this AAP. Please contact Graham Clements, 020 7983 4265 / graham.clements@london.gov.uk to discuss any of these representations in more detail, and/or to arrange a meeting.

Yours sincerely,



Juliemma McLoughlin
Assistant Director – Planning

cc Joanne McCartney, London Assembly Constituency Member
Tony Devenish, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

London Borough of Haringey – Wood Green AAP (preferred option consultation)

Appendix 1

Representations from the Greater London Authority

Ref #	DPD page/para	Representations
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AAP front end context and policies

	General	Rather than “Crossrail”, the documents should refer to “Crossrail 2” throughout (to avoid confusion with the Elizabeth Line).
	General	The AAP should acknowledge that Crossrail 2 is not a committed scheme.
	Para 3.61	Note that only one station is currently planned under the Wood Green alignment.
	Para 3.63	The SWOT table here acknowledges the threat: “Crossrail 2 not coming would adversely affect the viability of a number of schemes in this area”. The plan should identify which schemes, and consider the implications of a no Crossrail 2 scenario, and clarify what extra Crossrail 2 is bringing to the area in terms of unlocking additional development.
	Para 4.35	If Crossrail 2 does come to Wood Green the demand for buses is likely to change. It is therefore worth noting that the bus network and other modes of surface transport are likely to be reviewed if a new Crossrail 2 station does go ahead in this area, to ensure that the most appropriate services are in place and interchange is as seamless as it can be, and also to ensure that the relevant infrastructure is provided in the most appropriate locations. For clarification, the term ‘spreading’ should be replaced with ‘extending’ as the former implies that buses would be diverted from the High Road, whereas in reality this is unlikely to be the case.
	Para 4.44-4.47	As above, with Crossrail 2 potentially coming to the area (and a significant quantum of new development being proposed), there is a need to consider where demand may be coming from in the future (as desire lines may not be the same as they are today).
	Para 4.46	The issue of footway congestion is identified towards the Turnpike Lane area of the High Road. This should be addressed by looking at opportunities to increase footway width. Further information can be found in http://content.tfl.gov.uk/streetscape-guidance.pdf .
	Para 5.1	Does the AAP propose 7,000 new homes, or 7,700 new homes? This needs to be consistent with AAP Policy WC2. In addition, TfL seeks clarification on what the overall housing uplift would be beyond the existing Wood Green housing target, and how Crossrail 2 has influenced this. Ultimately TfL seeks to ensure that the AAP and Crossrail 2 business case are closely aligned.
	Para 5.3	In the spirit of capitalising on the opportunities of Crossrail 2, the vision for the Wood Green north area should include the potential for a new station entrance on the Vue Cinema site (which would also be consistent with the accompanying figure 5.2).
	Para 5.4	The AAP vision for Wood Green central focuses on a new Crossrail station where there is not currently any plans for such. Whilst it is noted that this is a Council aspiration, the nature of this proposal should be made clear. A fall back scenario should also be developed if no new entrance is created in this location. As stated previously, the Council should make representations on this matter to Crossrail 2 as part of the next round of public consultation on the project.
	Fig 5.3	The legend should say ‘proposed Crossrail 2 station’ given that no entrance in this location is currently planned.
	Para 6.13	This paragraph refers to optimal entry/egress to the bus station; clarification should be provided as to whether this assumes the bus garages remains on site (as this section also refers to considering redevelopment).
	Para 7.31-7.36	TfL assumes that Crossrail 2 will support economic development in this area – e.g. through improved journey times, more travel choices, improved catchment for

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Appendix 1

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		potential employees. Accordingly the Council is encouraged to include these considerations as part of the reasoned justification for economic policies.
	Policy WG11	This should refer to "Crossrail 2". Also, as discussed above, the policy (of its reasoned justification) should acknowledge that there are currently no plans for a new station entrance in the 'central' Wood Green area.
	Para 7.76	It is also worth noting that Crossrail 2 would improve connectivity to Enfield and Hertfordshire. This might also open up new employment opportunities for local residents.
AAP site allocations		
	Various in Northern Wood Green	A number of the allocated sites (Green Ridings House, part of Wood Green bus garage and the Vue Cinema site) have also been identified as potential worksites by the 2015 Crossrail 2 consultation material. These have all been given a long term delivery date in the AAP (post 2027) which is supported, but it may also be worth specifically mentioning that, if it goes ahead, Crossrail 2 could act as a barrier to developing these sites until post-construction (2030+). It is also worth noting that TfL/ Crossrail 2 would own these sites post construction. TfL would therefore welcome further discussions with the Council on their high density redevelopment in due course.
	General	TfL would welcome discussions with the Council on which, if any, of the site allocations are dependent on Crossrail 2 going ahead in order to reach their full development potential. This would help to more clearly quantify the benefits Crossrail 2 in this area – to assist TfL with the next round of the business case. TfL would also welcome the opportunity to work closely with the Council as the AAP, and more detailed site specific proposals, are progressed. In particular, this should focus around the Council's aspirations for a new station entrance at the Library site, and how this relates to future development opportunities.

Please contact Patricia Charleton (patriciacharleton@tfl.gov.uk / 020 3054 7028) if you wish to discuss these comments in more detail.