

BY POST AND EMAIL

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Planning Policy
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26103/A3/RM
31 March 2017

Dear Sir/ Madam,

RE: DRAFT WOOD GREEN AAP – PREFERRED OPTIO, 2017 PUBLIC CONSULTATION REPRESENTATIONS MADE ON BEHALF OF CAPITAL & REGIONAL

INTRODUCTION

We write on behalf of Capital and Regional (C&R), owners of The Mall, Wood Green. The site ownership is shown on the attached plan (**Appendix 1**). As a key stakeholder, C&R are very supportive of the continuing transformation of Wood Green and support the production of the AAP. Whilst C&R generally support much of the content of the draft AAP, there are a few areas where C&R consider greater understanding is needed and changes made. We set out below comments as follows.

REPRESENTATIONS

1. C&R is supportive of the aims and objectives of the AAP, particularly 1.8.2, which proposes creating a town centre fit for the modern economy.
2. On page 29 and the SWOT analysis table, C&R consider it would be helpful to include, under weaknesses, reference to the generally poor public realm that means dwell time is not positively facilitated to the extent it could be. Under part 3, threats, C&R is particularly supportive of the analysis.
3. C&R supports the SWOT analysis set out on page 36 for sub area 2 – Wood Green Central. Over time, quality shopping has retreated and consolidated into the Mall. The High Street could be reinforced as a key part of the shopping centre.
4. The broad analysis set out at paragraphs 4.7-4.9 is supported.
5. Paragraph 4.10 is also broadly supported, but within the following context. C&R's own retail demand analysis of the potential for Wood Green confirms that the centre could sustain

substantially more retail provision than the AAP considers. This would be as a direct result of the AAP strategy implementation. C&R consider that up to about 117,500 sqm (1.25m sqft) of retail and leisure could be supported in a comprehensively redeveloped Wood Green. The leisure component (which would include cinema, other leisure, and restaurants, could account for perhaps 14,000-15,750 sqm or 150,000-175,000 sq ft). Extracts from the Savills retail demand study are attached as **Appendix 2**. Therefore C&R has a fundamental objection over target floorspace within the supported wider vision.

6. C&R support the vision and spatial objectives set out on page 54.
7. Under the "Vision for Wood Green Central", whilst C&R broadly and enthusiastically supports the objective, the way of achieving this needs careful thought and C&R have views on this. C&R because of its ownership and operation as the manager of the shopping centre, expect to play a big and important role in delivering the change anticipated.

In light of the retail and leisure demand findings, set out in more detail in Appendix 2, C&R has commissioned Allies & Morrison (A&M) to develop some initial thoughts on how redevelopment of the Mall could be achieved, in a phased manner, over time. An A&M concept plan and high level explanation of the rationale comprises **Appendix 3**. It is considered that this concept masterplan is consistent with the ideas set out in the draft AAP, assuming that the plans and drawing contained in the AAP are intended to be conceptual in nature and not prescriptive. Specifically, the A&M plan:

Delivers substantially more retail and leisure floorspace than the AAP anticipates (see later comments below);

- a. Provides buildings blocks that at the high level set out would meet the size, servicing and configuration required to organise efficient and attractive units for retail and leisure space at a more detailed scale; and
 - b. Organises the public realm/open space across the area in a form that provides a greater number of smaller, interlinked, spaces, rather than focusing and creating one very large single square. Assuming that the diagrams set out in the draft AAP are conceptual and not prescriptive, then it is assumed the A&M plan would be considered consistent with the AAP, albeit the A&M plan does not provide single large-scale square but distributes a similar amount of public realm more widely through the area.
8. Given C&R's evidence and view on the quantum of retail and leisure floorspace Wood Green could successfully support through a redevelopment and repositioning of the area, C&R do not support the floorspace figure set out at paragraph 6.1 of 17,200 sqm. As identified, C&R and its evidence consider around 117,500 sqm (substantially more) is capable of being supported, with residential, office and other floorspace provided potentially on upper levels.
 9. C&R very strongly support the potential (and preference) for a new Crossrail station at Wood Green Underground Station, as set out at paragraph 6.2.
 10. In reflection of the above, whilst C&R support policy WG1, it does not support A.1 – new town square on allocations WGSAs 8&9, if this is prescriptively requiring a single large-scale new square to be formed, and would be contrary to the A&M approach of public realm being provided around more modest, but more abundant, streets and spaces principles.

11. Whilst C&R support paragraphs 7.2, 7.8 and 7.9, a larger extension to the Primary Shopping Frontage (detailed on Plan 7.2 page 70) is sought. The additional extension areas are shown on plan at **Appendix 4** and reflect the A&M approach set out (see Appendix 2).
12. C&R is not supportive of Figure 7. (page 71), if this is to be applied prescriptively. The plan is too detailed and creates a block plan. This would dictate a form of redevelopment that would not reflect the most efficient, effective or attractive form of development both for operators and for shoppers. C&R considers that a general statement applying to the whole of the AAP might be helpful, were it to confirm that the plans throughout the APP are conceptual/indicative and for guidance only and will not be used and applied prescriptively to any application proposals that come forward.
13. Paragraph 7.10 is not supported for the reasons previously set out. C&R consider a more successful way of providing public realm is through creating a series of smaller, interlinked, spaces, rather than focusing on one large space only. As noted before, if the AAP is not seeking to prescriptively apply a single large new square as a requirement of application proposals and therefore the A&M (see Appendix 3) approach of focussing space on a streets and spaces methodology is acceptable, then C&R would not find use with the AAP.

It is assumed that the approach to the delivery of an east-west connection, which C&R supports, is also set out in the AAP in an indicative way and not prescriptively applied, as identified on various plans within the AAP. Flexibility will be needed to find the final routing and ultimate detailed design. If the Council's intention is to be prescriptive then C&R are not supportive of this approach.
14. C&R support paragraph 7.25 and the flexible application of the approach.
15. C&R is not fully supportive of WG5 because point "D" conflicts with the C&R approach (see Appendix 3) if the requirement for a single large scale square is to be prescriptively applied along with the prescriptive application for the routing of the east-west link.
16. C&R fundamentally disagrees and is not supportive of the development capacity set out on page 166 at WGSAs 8, WGSAs 9, and WGSAs 10. As noted above, C&R consider (as evidenced by Appendix 2) that the redevelopment of Wood Green Central could accommodate in the order of 1.2m sqft of retail and leisure floorspace. The ranges for residential are broadly supported.
17. Finally, we think that reference to Figure 7.20 in WGSAs 10 is an error. We think it should be Figure 7.2 on page 70.

CONCLUSION

As the council will appreciate, C&R is an important and actively engaged participant in the realisation of the AAP vision for Wood Green. C&R is enthusiastically supportive of the majority of the AAP. However, there are some key areas where clarity of approach is sought from the Council on how the AAP should be interpreted, particularly around the indicative or prescriptive nature of many of the plans and figures of the AAP. Perhaps the most important area of concern C&R has with the draft AAP is the substantial difference in scale of redevelopment floorspace for retail and leisure that C&R consider Wood Green can and should accommodate to reflect market demand, and the AAPs present lack of ambition.

We trust these representations prove helpful and we continue to look forward to working with the Council in delivering the regeneration set out in the draft AAP, as modified by the C&R response.

Yours faithfully,



ROBIN MEAKINS
Senior Planning Partner

CC
Ken Ford/Andy Haughey - Capital & Regional
Steve Walker - Allies & Morrison

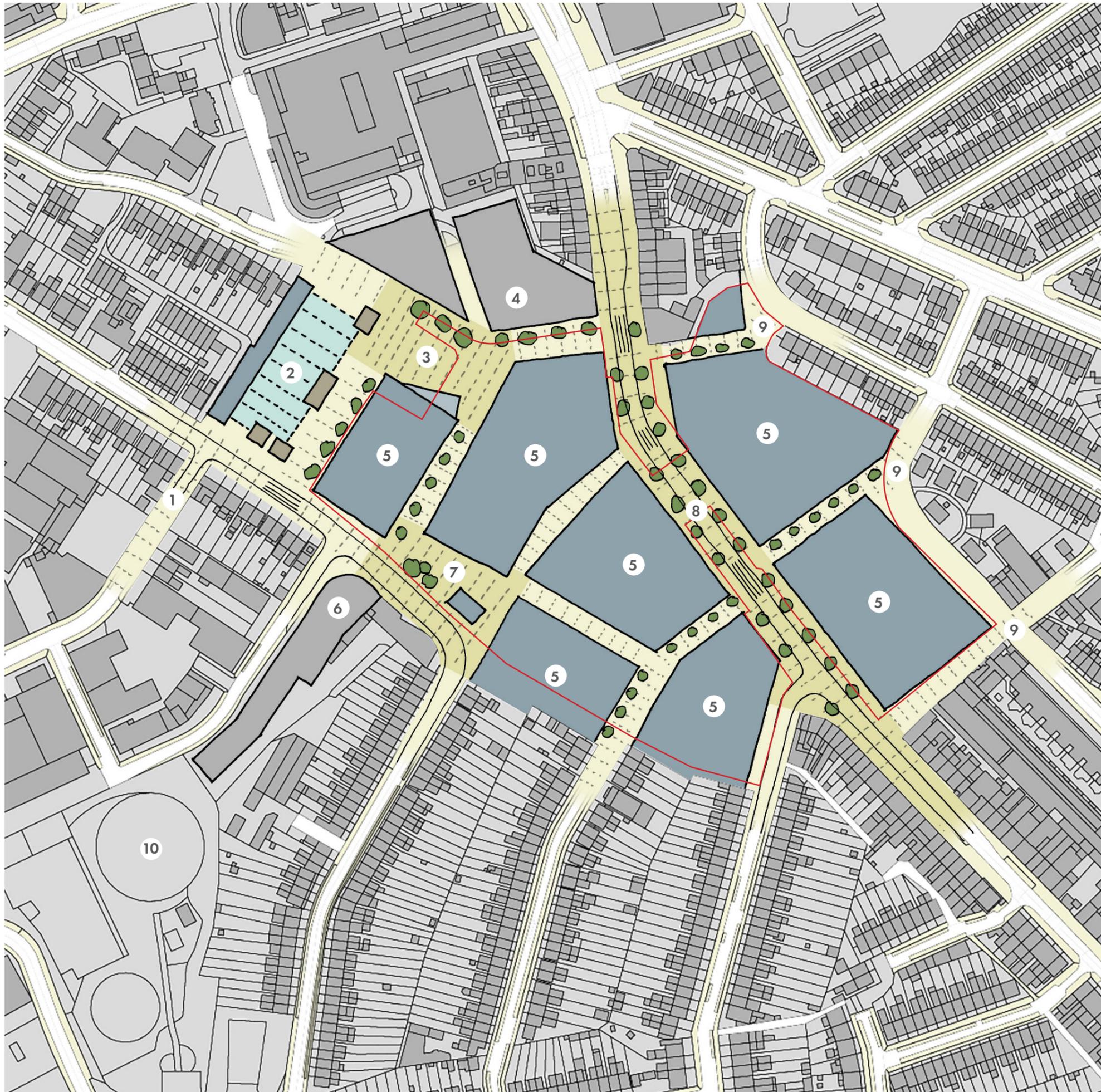
WOOD GREEN AREA ACTION PLAN
Capital & Regional representation

APPENDIX 1
Capital & Regional site ownership



APPENDIX 3

Capital & Regional Redevelopment Concept Plan



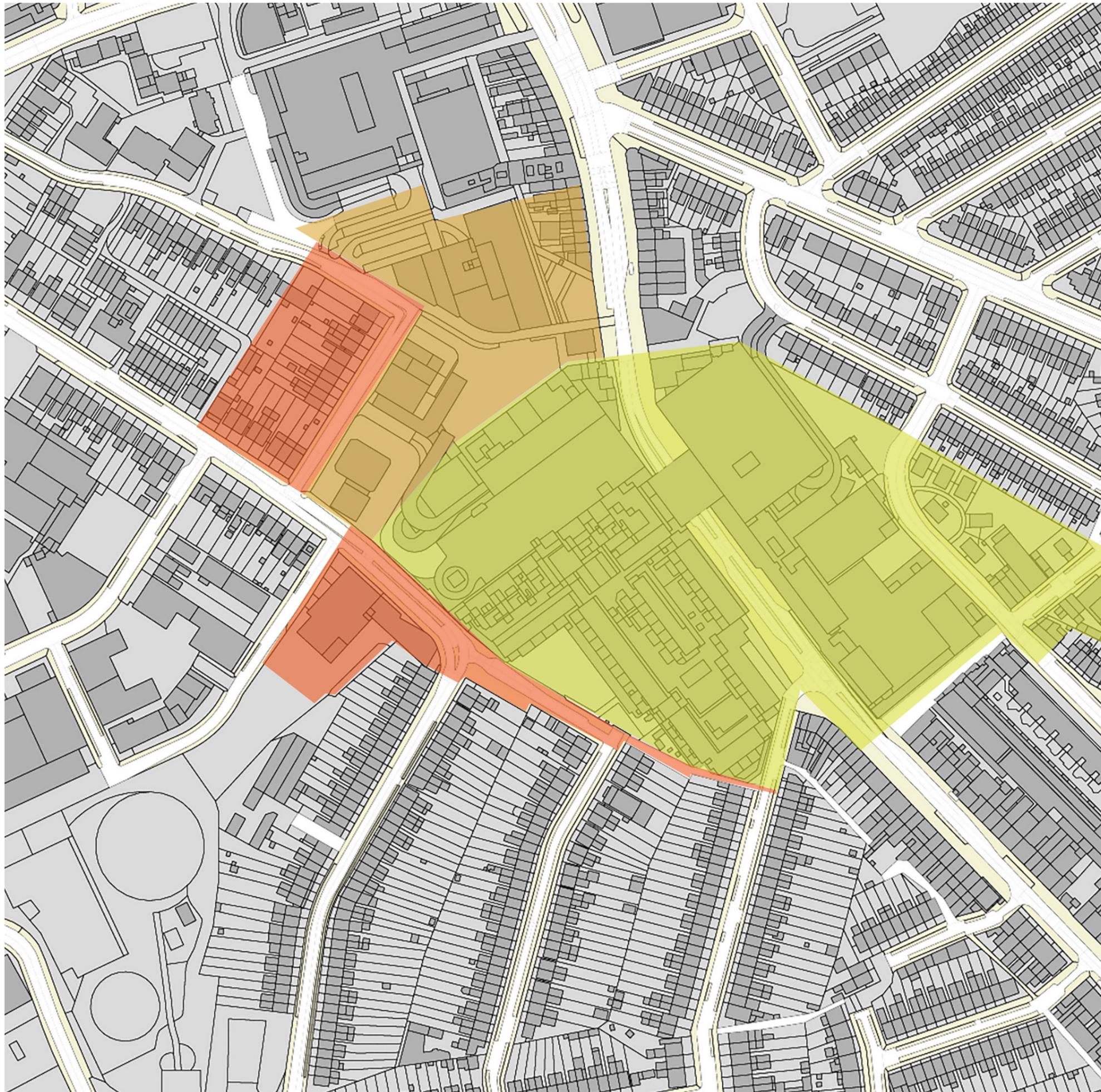
1. New primary east-west route via Coburg Road as proposed in the draft AAP
2. Proposed site for a new covered market as proposed by the draft AAP. Potential is shown for the market to retain and incorporate better elements of the existing historic street frontage to retain local character. The low market building facilitates the proposed strategic view to Alexandra Palace from the High Road
3. New public square as proposed in the draft AAP
4. Library redevelopment incorporating a potential new Crossrail station entrance as proposed in the draft AAP
5. Proposed new mixed-use development, creating a street-based town centre as proposed in the draft AAP
6. Iceland site redevelopment including new health centre, retail and residential being proposed by others
7. New public space providing enhanced connections to the town centre with Hornsey Park Road
8. Remodelled High Road, including the removal of the existing bridge and the establishment of a high quality public realm
9. Clear pedestrian and cycle connections with Pelham Road, Noel Park Road and Lymington Avenue as proposed in the draft AAP
10. Haringey Heartlands Cultural Quarter redevelopment area as proposed in the draft AAP

WOOD GREEN AREA ACTION PLAN

Capital & Regional representation

APPENDIX 4

Primary Shopping Area



-  Existing designated Primary Shopping Area
-  Area proposed to be added to the Primary Shopping Area in the draft AAP
-  Capital & Regional proposals to extend the Primary Shopping Area designation to reflect the draft AAP's proposed market location and to facilitate the creation of a high quality town centre street network which is integrated with the existing context

**APPENDIX 2
EXECUTIVE SUMMARY**



Executive Summary

1.1. Introduction and Context

- 1.1.1. Improvements to the Piccadilly Line, proposals for Crossrail 2, and London Borough of Haringey's regeneration and development aspirations for Wood Green offer the opportunity for significant growth in Wood Green's town centre market and offer. This is an opportunity for the redevelopment of the Mall Wood Green site ('the Site') as part of a comprehensive regeneration of the wider Wood Green area.
- 1.1.2. The emerging vision and development proposals for the Wood Green area comprise the Wood Green Area Action Plan (AAP) Issues and Options Report, the Haringey Heartlands proposals and the creation of Haringey Development Vehicle.
- 1.1.3. This report assesses the Site in the context of three different scenarios which have different impacts on population, retail footfall and general development capacity. The scenarios are:
- No Crossrail 2. Crossrail 2, or its New Southgate branch, does not proceed within the next 20 years. The Piccadilly Line upgrade is though assumed to proceed.
 - Crossrail 2 via Turnpike Lane and Alexandra Palace. The line, including the New Southgate Branch, is complete and operational by the early 2030s.
 - Crossrail 2 route via Wood Green. The line including the New Southgate Branch is complete and operational by the early 2030s.

1.2. Demand Assessment

- 1.2.1. The spatial context of the assessment is the Site's catchment. We start with the definition of the Site's catchment area and analyse its current demographic profile. Then we estimate the projected new population, income, retail expenditure within the catchment and estimate the consequent scale of demand for facilities at Wood Green for each of the scenarios.
- 1.2.2. The existing retail catchment has 66,700 people living within its primary area and 333,100 within its secondary area. The demographic characteristics show that the pool of shoppers is polarised with different retail needs. Moreover major shopping centres appeal to a wider than existing catchment area in order to draw in the necessary revenues to support it. Therefore the development needs to balance the needs of the current customer base who will continue to need to be served by the town centre while attracting people from outside its catchment.
- 1.2.3. Currently there are some excellent brands present, but other than the Primark the retailers in the town lack a destination appeal. The provision is largely geared towards functional fashion and general merchandise as well as convenience and service retail. While this ensured that the town centre provides a useful and well used commodity to local residents, it lacks the ability to draw in trade from outside of the currently tight retail catchment. Moreover the environmental quality is under par with the best retail centres and there is a particular lack of quality leisure and up market retailers, both of which are key drivers of footfall, reduce catchment leakage and pull in customers from further afield. Critical mass of development is required to attract both shoppers and brands to the redevelopment, but in phasing the scheme it is important not to ignore the existing customer base, who would continue to provide an important resource of trade and vitality.

- 1.2.4. Our projections estimate that the existing primary retail catchment will grow by 5,000 people in the next 10 years (8%). By 2031, when our first Crossrail 2 projections apply, the catchment will have grown by a total of 7,000 (from 2016 position), with a further 600 people in our upper estimate. The secondary retail catchment shows a more significant increase in population; 25,000 in 10 years and a further 8,000 by 2031. This could be as much as 42,000 from the 2016 position if our upper estimate projections are realised following Crossrail 2. A new larger retail scheme in Wood Green will however be expected to grow its catchment area and further enhance the access to an even larger catchment population (see section 10).
- 1.2.5. The existing primary retail catchment has a total consumer retail expenditure of £250million. This is anticipated to increase to £270million by 2026. Crossrail 2 would be expected to increase spend in the catchment by £8-13million in 2031, above the standard projection of £275million. This indicates a range in increase of £25-£38million in 15 years. The secondary catchment has a much more significant pool of retail consumer expenditure, with a current total of £1.28bn. By 2026 this is expected to increase almost £100m, and by 2031, by £130million. Our upper estimate for the increase as a result of Crossrail 2 accounts for a further £40m in 2031.
- 1.2.6. We use the information above to assess and test the potential of an enhanced retail scheme in Wood Green and to ascertain, either the optimum or maximum scheme size for redevelopment. We have taken four scenario scheme sizes of 750k sq.ft, 1m sqft, 1.25m sq.ft and 1.5 m sq.ft of retail floorspace. We then apportioned the space according to how we would expect a redeveloped scheme of the various scales would meet both consumer and occupational demand in the next two decades. The model outputs are used to identify how the catchment extent and penetration would be altered following the construction of each of the scenario redevelopments of Wood Green town centre, and the total potential store revenues in each case. From this we have concluded maximum suitable sized scheme based on our assumptions would be 1.25million sq.ft.
- 1.2.7. To secure a department store operator requires a larger scheme. Scenario 3 (1.25m sq.ft) provides the most realistic opportunity for developing a major retail and leisure destination, particularly from 2031 when the population is anticipated to have grown, average household income increased and around when Crossrail 2 is planned to be completed.
- 1.2.8. Crossrail 2 and Piccadilly Line upgrades are of significant value to the scheme; car traffic should not be overlooked as being an essential way for shoppers to reach the scheme. This could have implications on road traffic volumes and infrastructure. The choice of Crossrail 2 station has yet to be determined. While Wood Green station provides a more obvious choice in terms of linking in the redevelopment strategy with the new station, we do not believe that a Turnpike Lake/Alexandra Palace Station option precludes the opportunity to redevelop on the scale envisaged, provided that the scheme design works at linking in with the stations.

1.2.9. Our model output indicates that in terms of phasing, the catchment growth could support Scenario 1 with immediate effect and Scenario 2 by 2026. Scenario 3 could be considered as a Phase 2 development once the initial development has proven concept. The perceived sales densities from the model indicate that the critical mass created from Scenario 3 could be supported in the catchment by 2026. However, there are potential infrastructure issues with regards to roads and possible disruption from Crossrail 2 development to consider. The ease of access for consumers is critical with the larger redevelopment scenarios.

1.3. Development Brief

Scale and Mix of Development

1.3.1. Drawing upon the demand research and our knowledge of shopping centre requirements we have drawn up a suggested mix of different unit types building up to 1.25m sq.ft. This is shown in **Table 12-1**.

Table 1-1 Wood Green Shopping Centre Unit Mixes

Type of Unit	Current, 000s sq.ft GEA	Current	Ideal	750k sq.ft GEA scheme, 000s sq.ft	1.0 m sq.ft scheme GEA, 000s sq.ft	1.25 m sq.ft scheme GEA, 000s sq.ft
Department store	78	13%	20%	80	160	230
Large food store	0	0%	2%	30	30	30
Large scale units (10,000 to 50,000 sq.ft)	202	32%	20%	235	235	250
Small scale units (up to 10,000 sq.ft)	14	2%	15%	235	355	475
Cinema	72	12%	6%	50	70	80
Restaurant	30	5%	13%	70	90	115
Other leisure	228	37%	23%	50	60	70
Total	624	100%	100%	750	1,000	1,250

Source: Savills 2016

1.3.2. The above unit mixes are guidelines. The masterplan architect can vary the individual components within +/-10%.

Layout and Frontages

1.3.3. In reaching development critical mass the scheme needs to factor in an improvement to public realm and leisure space as well as key operators, such as a department store. The scale of development, design and extensive dwell time will be critical in drawing in the best occupiers and in particular anchor tenants that would set the tone for the rest of the scheme.

1.3.4. The masterplan architects should apply good practice principles for shopping centres, together with specific local guidance (see chapter 13) in drawing up designs. This for example should include:

- Designing the centre to have an overall sense of cohesion and unity and that integrates it with the surrounding land uses (see chapter 13).

- Retail and leisure uses to generally be located on ground floor and first floor levels. (We do not anticipate such uses generally being on higher levels but if you believe you have good design solutions that allow a commercially attractive multi-floor format in parts of the centre then do put forward proposals with justification).
- Locating the department store in an anchor location that can draw footfall past other units.
- Designing individual units in a way that gives a suitable ratio of Zone A to other space.
- Minimising no-through routes and layout and maximising through routes to optimise passing custom (e.g. links through to Haringey Heartlands).

1.3.5. We suggest that any future landlord and tenant considerations will include accounting for e-commerce/showrooming and the amount of 'non-store' specific revenues that these channels represent

Car Parking

1.3.6. The scheme should strike an appropriate balance between meeting current car parking commercial standards and anticipating future customer trends which are anticipated to reduce demand for car parking. Further details are given in chapter 13.

Service and Access Arrangements

1.3.7. Currently the Mall's four service yards occupy approximately 10% of the total GEA retail floorspace. Our review of other schemes finds that service yards vary in size and can require between 10 and 15% of the total retail floorspace. Masterplan architects should make suitable provision for service and goods access, taking in to account the centre's operational requirements and where possible minimising negative visual impacts and disturbance to near by land uses.

Other Land Uses

1.3.8. The proposals should include a range of other land uses as appropriate. These uses should though be incorporated in a way that does not compromise the function of the shopping centre. Further details are given in chapter 13.

Summary of Development Parameters

1.3.9. We also reviewed the land requirements for the three phases and suggest land parcels for masterplanning for each option. Masterplan architects should take account of our analysis of GIA to plot area, consequent land requirements, and suggestions on expansion land as a starting point for analysis on land requirements and development. Relevant parameters for masterplanners to take in to account in preparing proposals for the Site and adjacent plots are summarised in **Table 1-2** below.

1.3.10. Masterplanners should also consider that as retail centres continue to be developed, they will inevitably evolve to contend with changing needs, interests and consumer demands. This may take place in the shape of changing layout, types of unit size and arrangements, the range of services offered within shopping centres and also the forms of technology available.

Table 1-2 Summary of Development Parameters for the C&R Site

Parameter	Requirement
Scale of retail and leisure	750k sq.ft, 1.0m sq.ft and 1.25m sq.ft
Scale of residential development and development densities	Maximum possible subject to this not inappropriately restricting the design of the new shopping centre and subject to good design principles
Scale of B1 employment development	Suggest provide 7,000 to 21,000 sq.ft of office space
Inclusion of other uses	To be included as appropriate and for example covering relevant on-site social infrastructure associated with the residential component of the proposals
Heritage requirements	Proposals should appropriately respect heritage assets and justify any impacts on relevant assets
Protected views	Proposals should take account of relevant views and justify any impacts
Building heights	Proposals should use the Wood Green AAP document Option 4 as a guide for building heights and/or give justification for deviation from this document
Car parking	Proposals should include car parking provision. Car parking space should allow for electric vehicles charging and be flexible to adapt to a future possible reducing car parking demand.

Source: Various policy documents and Savills interpretation

Phasing and Timeframe

1.3.11. The Mall currently operates as a successful shopping centre. The proposals for redevelopment should where possible be designed in a phased way so that existing parts of the centre can continue to operate while new development is taking place.

1.3.12. An indicative timeframe for development is as follows

- 2016 to 2019: Feasibility, design, securing permissions and land assembly
- 2020 to 2025+: Phased construction (timeframe depending upon strategy for accommodating existing activities and the ultimate size of the centre)
- 2025 to up to around 2030: phased opening
- (early 2030s: planned opening of Crossrail 2).