



Please reply to: Gerry Ansell

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My Ref:

Your Ref:

Date: 28th April 2017

Dear Sir/Madam

# Re: Wood Green Area Action Plan – Regulation 18 Preferred Option Consultation Draft (February 2017)

Thank you for the opportunity to comment on the Wood Green Area Action Plan. Officer level comments are set out below.

As an adjoining local authority, the Council is keen to continue positive cross boundary partnership working to plan for and deliver sustainable growth, regeneration and infrastructure in north London and the Upper Lee Valley Corridor. Considering that both Council's share common interests regarding the emerging New Southgate Opportunity Area Planning Framework (NS OAPF), the Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) and the London – Stansted – Cambridge Corridor (LSCC), it is important that there is ongoing positive proactive cross boundary working, bearing in mind the proposals for housing and employment growth, and associated infrastructure proposals within the sub region. However, there are a few matters raised in the document which require further discussion and clarification between our two authorities.

## Aims and Objectives

The aims and objectives of the Wood Green Area Action Plan to improve opportunities for businesses to form and grow within Wood Green and to create a thriving location for people to come and share ideas and enjoy a wide range of facilities is supported by Enfield Council.

As you may be aware, Enfield Council's Core Strategy was adopted in November 2010 and the North Circular Area Action Plan (NCAAP), which adjoins the Haringey boundary, was adopted in October 2014. Also, the Proposed Submission Edmonton Leeside Area Action Plan (ELAAP) has been approved for public consultation and submission to the government for examination. In all three documents, there is strong emphasis on cross-

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borough working and development sub-regionally, especially regarding the necessary social, physical and green infrastructure required to support the levels of housing and employment growth proposed.

The Council has commenced a review of its Local Plan aligned with the preparation of the new London Plan to respond to the unprecedented rate of population growth and the need for new homes, infrastructure and jobs. An issues and options document for consultation is anticipated later this year.

### Crossrail 2

The Council is pleased to see that Haringey refers to the introduction of a new Crossrail 2 station in the centre of Wood Green. Enfield strongly supports Crossrail 2 and believes that it will provide the catalyst for transformational change in the Upper Lee Valley corridor, unlocking the potential for thousands of new homes and jobs. In addition, Enfield would like to continue to proactively work with Haringey and other stakeholders in seeking to coordinate future rail infrastructure requirements in the Upper Lee Valley Corridor whilst continuing to build a business case for Crossrail 2. The Council is hopeful that parliament will give permission to build the new line in the early 2020s.

Saying this, whilst Enfield welcomes the proposal for a station in Wood Green to support the business case for Crossrail 2 and commends Haringey's proactive and forward thinking approach to intensifying development and growth around transport nodes, the Council would like to add that the case for any additionality of growth numbers in relation to infrastructure investment and what growth it will bring to the identified development sites will need to be supported by appropriate and robust evidence.

#### Retail

As you are aware, Enfield Council is preparing a review of its own Local Plan and in order to satisfy forecast population growth, just over 65,000 sq. m of retail floorspace is required by 2029. A key factor in reaching this figure is the need to revitalise and enhance our existing town centres and retail parks.

Enfield recognises the importance of Wood Green to Haringey as a thriving metropolitan town centre at the heart of the borough, enabling it to accommodate a large proportion of the borough's projected demand for retail floorspace. The Wood Green Area Action Plan states that there is potential for 71,762 sq. m gross new town centre floorspace. However, the Council feels that the Plan would benefit from clarity in regards to what constitutes this figure, breaking it down further into uses such as retail and leisure.

According to the Wood Green Town Centre Regeneration Retail Capacity Assessment, the projections suggest there is a scope for up to 67,800 sq. m gross of comparison and convenience goods retail floorspace in Haringey Borough as a whole by 2032, of which

26,800 sq. m gross can be accommodated in Wood Green. Hence, you can presume that the increase in indicative capacity for new town centre use floorspace is significantly higher than what the retail evidence suggests. Whilst Enfield is pleased that Haringey has positive aspirations in building a business case for Crossrail 2 by focusing growth around Wood Green station, the case for additionality of growth numbers for town centre uses will need to be supported by appropriate and robust evidence.

## **Employment**

The Council agrees that it is imperative that new development in Wood Green should deliver jobs in order to improve the borough's employment ratio, offer greater local employment opportunities, and drive up the overall viability of the town centre. The AAP states that modelling suggests that in order to maximise the delivery of new jobs in Wood Green, 80,000 sq. m gross of floorspace will be required to meet a jobs target of 4,000 new jobs and boost the weight of employment in Wood Green.

Saying this, the AAP states that there is potential for the site allocations to yield 101,940 sq. m of employment floorspace. It also states that the indicative development capacity figures for employment floorspace have been increased to consider the introduction of Crossrail 2 and the impact it will have on the property market. However, as mentioned before, whilst the Council commends Haringey's commitment to employment growth around Crossrail 2, the case for any additionality of growth numbers will need to be justified by appropriate and robust evidence. Otherwise, Haringey may face scrutiny at the examination stage.

Enfield Council would welcome further discussions on the issues mentioned above considering the key strategic role both authorities will play in providing the necessary infrastructure for the region.

I hope the above comments serve to assist in moving the Wood Green Area Action Plan forward. I look forward to further discussion with you over some of the points raised.

Yours Sincerely

Gerry Ansell Planning Policy Team Leader Strategic Planning and Design

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