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Dear Stephen,

**London Borough of Haringey Draft Local Plan consultation Strategic Policies, Development Management DPD, Site Allocation and Tottenham Area Action Plan TfL response**

*Please note that these comments represent the views of Transport for London (TfL) Borough Planning officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision and they do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.*

Thank you for consulting TfL Borough Planning on these draft policy documents.

Firstly I would like to reiterate that TfL is very keen to work with the Council to deliver aspirations for sustainable growth in the borough and AAP area, and this aspiration is very much shared by the Mayor.

We have identified comments below on particular policies and text in relation to transport schemes. We would recommend that the documents are thoroughly proof read, and there may be particular references which will need to be corrected referring to current and future London Underground, London Overground, Crossrail 2 and National Rail stations and lines and road name references which should be made consistent throughout the documents. The preparation of the next documents for submission should also take into account the introduction of London Overground services from 31 May 2015 and also any further emerging work on Crossrail 2 in coming months. Crossrail 2 is currently expected to complete in around 2030, and it is recommended that any references to 2026 are revised to 2030.

### **Alterations to the Strategic Policies (DPD) (adopted 2013)**

Alt20 The proposed station at Alexandra Palace is expected to open in 2030.

Alt 53 (Policy SP2) – This alteration identifies a number of priority housing estates for renewal. A number of these (such as Northumberland Park, Culvert Road, Durnford Street and Turner Avenue) are all located within the area of greatest anticipated benefit as a result of Crossrail 2 and in line with LB Haringey’s policy aspirations set out elsewhere, it should be ensured that any redevelopment is sufficiently futureproofed so that the full benefits of Crossrail 2 or West Anglia Main Line (WAML) four tracking are captured. Such an approach may also have additional benefits in terms of addressing potential viability issues in ALT64.

Alt 70 (Policy SP8) – Noting the reduction in floorspace protected through Alt 71, and mindful of the opportunities presented by Crossrail 2 and other projects to deliver growth, TfL would support a continuing review of employment land need in the area.

3.1.19 The gyratory work and new bus station have now been completed; this paragraph should therefore be amended to reflect this progress. Further to this, the station upgrade is now committed (at a cost of £32m) as is the West Anglia Main Lane upgrade from Angel Road to Stratford.

3.1.33 For the enhancement of Northumberland Park, the plan could reference the work between TfL, Haringey and the GLA to develop proposals for the White Hart Lane station.

### **Draft Development Management Policies (DPD): Preferred Option**

DM5 Siting of Tall Buildings (Map 2.8) – The identified locations for tall buildings around future Crossrail 2 stations is welcomed.

DM8 Advertisements – Welcome the reference in paragraph 2.55 – although the text should be corrected to “Transport for London Road Network”. TfL has a set criteria of requirements that it imposes on advertisement boards on the Transport for London Road Network (TLRN), particularly illuminated/electronic signs. This requires a number of conditions to be imposed in order to mitigate any impact on safety/driver distraction, details of these can be provided if required.

DM43 Parking – the principle of this policy to help to restrain car use is welcomed.

DM 44 Crossovers and Vehicular Accesses – TfL would suggest including new wording “Any proposals for crossovers on the Transport for London Road Network will require approval TfL as well as by the borough. Any proposals”

here should be in line with TfL's Crossover Guidance." This guidance is available here <http://www.tfl.gov.uk/cdn/static/cms/documents/vehicle-crossovers-guidance-for-applicants.pdf> which, as well as other requirements and regulations, does not allow any entering or exiting of the TLRN other than in forward gear.

DM50 Facilitating Site Regeneration and Renewal – the principle of Policy DM50 is welcomed. Within the context of Crossrail 2 it will be important to provide the necessary flexibility so that currently safeguarded land can, where appropriate change as a result of changing economic circumstances. Notwithstanding this, further flexibility may be required if full benefits from Crossrail 2 are to be realised. For example, the re-provision of existing employment facilities allowing for alternative development which capitalises on Crossrail 2 benefits and supports wider regeneration objectives to take place.

### **Draft Site Allocations (DPD): Preferred Option**

Draft SA1 (Indicative Crossrail 2 Areas) the approach to safeguarding here is strongly welcomed however, it is requested that the wider impact area (currently 800m) is extended to 1km from Crossrail 2 stations. This would reflect the expected zone of influence from Crossrail 2 around the stations as evidenced by impacts associated with Crossrail 1 which has been evidenced by GVA.

Development Sites – the same issues apply for the allocated sites and also the Key Development Sites set out in the Tottenham AAP. Consequently, the indicative development capacities could be higher for certain sites as a result of Crossrail 2 coming forward – especially those where delivery is expected from 2020 onwards. It should also be noted that a number of sites may fall within the Crossrail 2 safeguarding areas following the issue of a safeguarding directive (which were recently issued by DfT on 24 March 2015). This will require the Crossrail 2 project team to be consulted on any development proposals within the safeguarding limits to ensure that they would not adversely affect the delivery of Crossrail 2.

Please note TfL would require early notification and consultation where any sites that currently accommodate or are closely located to TfL infrastructure or assets which would result in either permanent or temporary relocation as a result of development. It should also be noted that were relocation made necessary, the new location should be maintained to at least the same capacity/standard, if not improved.

SA9 Highgate Magistrates Court - This site is located on Archway Road which forms part of the Transport for London Road Network (TLRN). Therefore, TfL would expect to see vehicle and servicing access located off the TLRN, and to be car-free or have low levels of parking provided, given the high PTAL rating of 4. This should be incorporated into the development guidelines.

SA10 LBH Civic Centre- This site accommodates a bus stop outside the entrance; the accessibility of this bus stop would be expected to be maintained if not improved.

SA12 Wood Green Bus Garage and SA 13: Station Rd Offices- It can be seen that inclusion of the Arriva bus garage in the wider area for regeneration would be attractive in any masterplan proposals. There is no evidence that Haringey or other stakeholders have started any master planning process for the site.

London Plan policy is that bus garage capacity for bus routes in London should be retained, and planning applications involving bus garages are referable to the Mayor. Retaining bus use seems to be inherent in the text, and we welcome the bullet that development cannot commence until adequate temporary re-provision of the bus stabling and maintenance has been secured, however TfL would request that an additional bullet point is included stating "Any redevelopment of the Bus Garage site must retain or enhance the capacity for buses and associated facilities on site, or alternatively identify a similar well located site in the vicinity of this site."

SA13 Station Road Offices- TfL would request that an additional bullet point is included stating: "Any development on this site should be aware of the provision of a bus facility on the adjacent site."

SA21 Turnpike Lane Triangle- The site is located at a busy interchange and potential future Crossrail 2 station, therefore TfL would support a scheme which seeks improvements to the public realm and improves accessibility to transport facilities. TfL would also expect a car-free development here due the very high PTAL and therefore recommends changing "parking should be minimised" to "A car-free development would be expected on this site".

SA33 Arena Retail Park- The site requirements should also refer to improving facilities for buses. Service W5 currently runs into the site to serve the food store, and revising the access within this site and on Green Lanes should allow enhancements to the bus network and stops.

SA40 Finsbury Park Bowling Alley- It should be noted that any demolition or re-provision associated with this site should seek to increase the width of the footway here.

SA52 Pinkham Way- The Mayor of London has revealed further details to redesign a number of key road networks in the capital in order to unlock growth and make the capital a more attractive place to live and work in line with the Mayor's 2050 Infrastructure Plan and the recommendations of the Roads Task Force. One of these locations is the A406 in New Southgate, where decking or a mini-tunnel over this junction on the North Circular would unlock land for new homes and connect the area around the proposed Crossrail 2 station. TfL will wish to discuss this further with Haringey (and Barnet and Enfield) councils. As such we would suggest including a new bullet in the development guidelines of "TfL is investigating options for decking or a mini tunnel over this part of the

*North Circular as part of the Mayor's 2050 Infrastructure Plan, which if progressed could change the development context for this site."*

## **Draft Tottenham Area Action Plan: Preferred Option**

### **General comments**

Crossrail 2 is not expected to be completed until around 2030. There are numerous instances in the plan where this date is stated as 2026 (such as 2.30) so that it falls within the timeframe of this plan. If Crossrail 2 is to be included in this AAP, it needs to be made explicit that this will bring benefits in the longer term, not during this plan period.

A number of the sites identified within the AAP are likely to be within the zone of influence of Crossrail 2. Whilst it is acknowledged that Crossrail 2 is not yet a committed scheme, should it become so, it is likely to result in a number of changes to certain site characteristics which could impact upon its development potential. For example, Crossrail 2 could have a positive impact on the PTAL level or site viability which could increase development potential of certain sites. Further consideration of how the AAP could take account of these changes could be beneficial – particularly for those sites where delivery is expected from 2020 onwards. It should also be noted that a number of sites may fall within the Crossrail 2 safeguarding areas following the issue of a safeguarding directive (which were recently issued by DfT on 24 March 2015). This will require the Crossrail 2 project team to be consulted on any development proposals within the safeguarding limits to ensure that they would not adversely affect the delivery of Crossrail 2.

The advice set out in Guidance Note 1 is strongly welcomed and is an exemplary, proactive and pragmatic approach to ensuring opportunities from Crossrail 2 can be maximised, and one which all local authorities who will be impacted by Crossrail 2 should seek to follow (subject to suggested changes suggested for Draft Policy SA1). However, it is not clear what material weight could be afforded to the approach in its current form as a Guidance Note within the AAP. Whilst the same approach is intended as Policy SA1 in the Site Allocations DPD, we would like to work with LB Haringey to identify what opportunities may exist to strengthen these requirements as part of the AAP.

The allowance made in the AAP for reorientation, renewal and mixed use of industrial areas within the South Tottenham and Tottenham Hale areas is welcomed. Further consideration could be given to expanding such support to other industrial areas which are situated within the area of influence of Crossrail 2.

A coordinated approach to the provision of infrastructure to support each of the opportunity sites identified in the AAP will be necessary. Whilst infrastructure requirements are listed under each specific site, reference should be made to the Upper Lee Valley Development Infrastructure Funding Study (DIFS), which is currently being undertaken jointly by the GLA, TfL and the four Upper Lee Valley boroughs. The purpose of the DIFS is to identify and cost the strategic infrastructure required to deliver anticipated levels of growth, to identify the phasing of this in line with development and highlight the timing and scale of funding gaps and possible ways of addressing these. The associated financial model will be flexible and available for use by Haringey Council in the future.

### **Detailed comments**

4.20 Please note that the Department for Transport, not TfL, have issued the safeguarding directions. These have been provided separately to Haringey Council.

5.10 For new wayfinding and signage, TfL would support the use of Legible London signage, which is already being provided in Wood Green.

5.12.1 References a Northumberland Park bus station however this should be revised to read "...Northumberland Park station and bus garage...".

5.28 The traffic gyratory has now been removed.

5.38 The document should refer to the Tottenham Hale station upgrade and West Anglia Main Line improvements.

SS3 Apex House & Seacole Court - It should be added into the development guidelines that servicing arrangements for this site would be expected to take place away from Seven Sisters Road and Tottenham High Road which form part of the TLRN, utilising Stonebridge Road, and avoid impact on existing bus stops.

TG2 Tottenham Chances - Due to the location of this site on the TLRN and high PTAL of 6a, there are both opportunities to create a car free development and remove servicing from the High Road, these should be incorporated into the development guidelines.

TG3 Tottenham Police Station and Reynardson Court - Due to the location of this site on the TLRN and high PTAL of 6a, there are both opportunities to create a car free development and remove servicing from the High Road; these should be incorporated into the development guidelines.

NT2 Northumberland Park – The third bullet point of site requirements should be revised to read “Work in conjunction with TfL to investigate improving bus routes through the area and links with Northumberland Park Station.”

BG1 Bruce Grove Snooker Hall and Banqueting Suite- A further bullet point “servicing and refuse storage to be resolved” should be included within the Development Guidelines. A car free development would also be expected.

TH4: Station Interchange – TfL welcome the reference to “*new residential and/or commercial development above the station*”. However, TfL believes the following statement: “*The new public square will become the heart of the new station*” should seek to better promote Tottenham as a whole, rather than just the station, the words “new station” could be better replaced with ‘...the heart of the new district centre’ or ‘...the heart of the new, fully integrated transport interchange’. Further to this, TfL considers the statement: “*This site will form the new Tottenham Hale District Centre*” should be revised as TfL considers that a number of the sites (all of the ones mentioned in this section) will form the district centre, rather than just this one.

“Development of this site could be up to 11 storeys” – It should be noted that this should be taken as being two storeys of station building with nine storeys above it, making a total of 11 storeys.

“*potential to introduce a new pedestrian link beneath the road to the retail park with the introduction of Crossrail*”. Further clarification is required on this on both the location of the link, and which road is being referred to. The current station scheme proposes closing off the Ferry Lane underpass. It will need to be assessed against any other Haringey Council guidance on creating new underpasses.

“*Creation of a physical link between the Station and the Green Link*”. What is meant by a physical link - does this mean a new station entrance? Clarification is required here.

We would suggest adding two more bullets: “This site should seek an active ground floor frontage to enliven the area around the station entrance” and “A retail use at ground floor level with residential above will represent an appropriate mix of uses.”

TH5: Tottenham Hale Retail Park – We would suggest adding an additional bullet point to the Development Guidelines: “Potential to explore pedestrian connections across the railway to improve access from the east (Ferry Lane estate).”

TH6: Hale Village Tower – We would suggest adding an additional bullet point to the Development Guidelines: “Potential to explore pedestrian connection under Ferry Lane and is a condition of the original Hale Village planning consent to investigate.”

Chapter 6 Implementation, Delivery and Monitoring, AAP Objectives- TfL welcomes the indicator of better transport links, however the reference to Edmonton Green should be deleted.

### **Other comments**

Crossrail 2 is expected to present significant development benefits within key impact areas around the stations it serves. Therefore, recognition with the various consultation documents of the significant potential for Crossrail 2 to act as a catalyst for further intensification of land uses within Haringey and its potential to support additional growth and regeneration priorities within the borough is welcome.

As recognised throughout, Crossrail 2 or the delivery of four-tracking along the WAML would further contribute to Haringey's future housing and economic growth offer. It should be noted that evidence from Crossrail 1 demonstrates that development and regeneration benefits associated with the delivery of transformational rail schemes such as Crossrail 2 are likely to be realised once a scheme becomes committed and well before such infrastructure upgrades become operational. Consequently, early intervention will be required if the opportunities and scale of benefits associated with such infrastructure upgrades are to be realised. Whilst the precise benefits that could be realised by Crossrail 2 or four tracking of the WAML are not yet known, it would be pertinent to incorporate a review mechanism within relevant policy documents, which would allow for the assessment of development potential within the AAP to be revisited and updated if necessary. The inclusion of effective mechanism will ensure that once a scheme becomes committed, any review can take place in a timely manner.

Following the Health & Social Care Act 2012 Local authorities have taken on new public health responsibilities in 2014 and TfL, along with other agencies, have a role in supporting them to deliver improvements in the health of Londoners. TfL has prepared the document via the link, which might be useful to help link to transport and health and could perhaps become part of any evidence base for further work. <http://www.tfl.gov.uk/info-for/media/press-releases/2014/february/tfl-publishes-worlds-first-transport-health-action-plan>



I hope you find these comments useful and take them into consideration. If you have any queries, have further questions or seek clarification please don't hesitate to contact me.

Yours sincerely,

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**TfL Borough Planning**

Cc: Elliot Kemp, Graham Clements (GLA)