

**Comments and Representations to the
Haringey Core Strategy Proposed Submission**

Issued by:

Avenue Gardens Residents Association

V1.1 17 June 2010

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1 Introduction

1.1 This statement of comments and objections to the 'Haringey Core Strategy Proposed Submission' has been prepared by the Avenue Gardens Residents Association (AGRA).

1.2 AGRA wishes to present evidence verbally at the public Examination.

1.3 AGRA covers the area centred around Avenue Gardens, some 650 households, reflecting the general ethnic makeup of the Borough of Haringey. The AGRA area comprises the following streets:

- Barratt Avenue, Bounds Green Road (part to the High Road), Bradley Road, Bridge Road, Buckingham Road
- Cumberland Road, Dorset Road, Park Avenue, Ranelagh Road, Ringslade Road, River Park Road, St Michael's Terrace
- Selborne Road, Station Road, Terrick Road, Tower Terrace, Warberry Road, Watsons Road, Wolseley Road, Wood Green Common.

1.4 The AGRA area includes the Conservation Area of Wood Green Common, and borders Trinity Gardens CA. The area also includes listed buildings, and an Ancient Monument (The New River). The area encompasses two of the most heavily used roads in the Heartlands scheme, Station Road and Park Avenue. AGRA is mostly in Woodside ward, with some streets in Bounds Green and Noel Park wards.

1.5 Any correspondence or enquiries concerning this submission should be addressed to:

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2 **Issue/topic:** Supporting Evidence

Page Number: 5

Paragraph Number: 1.1.13

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This paragraph states that the 'evidence base' for the Core Strategy "includes but is not limited to the following" reports listed.

All material that the Council will rely on to justify and defend the Core Strategy at the Examination must be published, and available for the public to consider during this consultation. The list of documents in the 'evidence base' must be complete, so that there are no surprises at the Examination.

The Core Strategy should be fully supported by the declared 'evidence base' with no other material required. It follows therefore that the list of documents in the 'evidence base' should be complete, and published in full in the Core Strategy.

Suggested changes and revised wording:

The 'evidence base' ... "comprises in its entirety the following documents:", such documents to be listed below.

4/1/11
1.75 Compliant
1.75 (Compliant)
1.75 (Compliant)
1.75 (Compliant)

3 Issue/topic: Supporting Evidence

Page Number: 5

Paragraph Number: 1.1.13

Policy Number:

Objective Number:



Key Diagram Number/Title:

Document is Compliant (Yes or No): NO

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The list of documents in the Core Strategy 'evidence base' includes the Census 2001. This census information cannot still be relevant almost 10 years after its collection, and particularly after the 2004 EU enlargement. Even at the time of publication, the results of the 2001 Census were regarded as providing gross underestimates of the population of the Borough, and not compatible with the established sizes of Doctor's patient rolls. The previous Leader of Haringey Council has written publicly to this effect. Reliance on the Census 2001 is therefore unjustified.

The Town and Country Planning Act mandates and requires the Planning Authority to conduct appropriate surveys and information gathering exercises so as to maintain an up to date picture of the area over which it exerts planning control. What surveys have the LPA undertaken to update the information of the census 2001? If none, as apparently demonstrated by their non- appearance in the list of evidence base documents, then the LPA and by extension, the Core Strategy, is not compliant with planning legislation.

Suggested changes and revised wording:

The Census 2001 is not used as a source of information, and other surveys undertaken to gather more up to date and reliable information and address the Census shortcomings.

4 Issue/topic: Supporting Evidence

Page Number: 5

Paragraph Number: 1.1.13

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified: NO
- Is or Is Not Effective: NOT Justified
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The list of documents in the Core Strategy 'evidence base' includes the Haringey Borough Profile 2001. This document cannot still be relevant almost 10 years after its collection, and particularly after the 2004 EU enlargement. Reliance on it is therefore unjustified.

Suggested changes and revised wording:

Removal of this document from the Core Strategy 'evidence base'.

5 Issue/topic: Haringey in London and north London

Page Number: 10, 11

Paragraph Number: 1.2.9, 1.2.10 and 1.2.11

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified:
- Is or Is Not Effective:
- Is or Is Not Consistent:

NO

NOT Justified

Reasons for Not Compliant or Unsound:

The paragraphs 1.2.9, 10 and 11 nowhere address or discuss the need for employment in jobs located within (as opposed to outside) the Borough which would be required to meet the NLSA vision objectives.

The associated land use requirements to meet the need for employment in jobs located within the Borough are also not highlighted as an issue for consideration. Attempting to meet the objectives in these paragraphs without having as an objective to increase employment in jobs located within the Borough cannot be justified.

Suggested changes and revised wording:

Additional bullet point in para 1.2.11 establishing the requirement to increase employment in jobs located within the Borough.

6 **Issue/topic:** Haringey's People

Page Number: 14

Paragraph Number: 1.3.1, Bullet 1

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):



Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

NOT Justified

- Is or Is Not Effective:

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Bullet 1 reports the Borough population as 230,000. This may be an underestimation.

The Community Infrastructure Study March 2010 suggests (Table 3.2, page 18) that the population of Haringey is 280,000, or 22% greater than the GLA PLP High 2007 figure of 229,666 for 2009, based upon the count of patients on GPs lists.

Either the GP patient lists are wrong, and thus not to be used for planning purposes, or the GLA 2007 projection figure for 2009 is wrong, and thus not to be used for planning purposes.

The text should state that the population of Haringey is between 230,000 and 280,000 people as it is almost certainly the case that the GP registrations indicate more accurately the actual population.

Suggested changes and revised wording:

Obtain an accurate census of the Borough population, or revise wording to read:
"Haringey has a population of at least 230,000 and possibly up to 280,000"

7 Issue/topic: Haringey's People

Page Number: 14

Paragraph Number: 1.3.1, Bullet 4

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:
- Is or Is Not Effective:
- Is or Is Not Consistent:

NOT Justified

Reasons for Not Compliant or Unsound:

Bullet 4 reports the Census 2001 Borough migrant population as 36,000. The census was carried out prior to the 2004 EU enlargement, and thus cannot have taken account of the substantial influx of EU citizens to the Borough since 2001.

There are now markedly different populations, particularly in the middle and east of the Borough, as evidenced by goods available at local supermarkets, compared to 2001.

The Census 2001 figure is almost 10 years out of date. It is not justified to rely on it.

Suggested changes and revised wording:

Obtain a recent estimate of the Borough migrant population.

8 Issue/topic: Haringey's Economy

Page Number: 15

Paragraph Number: Haringey's Economy, Bullet 2

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent: NOT Consistent

Reasons for Not Compliant or Unsound:

Bullet 2 reports the area of employment land as 133 Ha, while admitting to a further 16.6 Ha in bullet 3. The area of employment land in the Borough is therefore 149.6 Ha. The Core Strategy is incorrect.

Suggested changes and revised wording:

New text: "Haringey contains 149.6 Ha of employment land"

~~10/98~~
4/5/1.3

9 Issue/topic: Haringey's Economy

Page Number: 15

Paragraph Number: Haringey's Economy, Bullet 5

Policy Number:

Objective Number:

Key Diagram Number/Title:

Handwritten notes: an arrow pointing to the Policy Number field and the text "4/5/1.3" written vertically.

4/5/1.3

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The proportions of employment by sector do not add up to 100%. Fully a third of the Borough's employment is missing. These figures cannot be robust.

Suggested changes and revised wording:

Obtain a more complete estimate of the Borough's employment sectors.

10 Issue/topic: Haringey's Homes

Page Number: 15

Paragraph Number: Haringey's Homes, Bullet 3

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Core Strategy compares Haringey's housing shortfall per 1000 population with that of inner London. This is a misleading comparison. Inner London has less land for housing and is at a higher density.

Further, Haringey is a destination for new migrants, who by definition are homeless. It is unrealistic to attempt to provide housing for all who arrive in the Borough.

Suggested changes and revised wording:

Delete the comparison with Inner London.

10/28
4/5/1.3

11 Issue/topic: Haringey at a glance

Page Number: 16

4/6/1.3

Paragraph Number: 1.3.2

Policy Number:

10/200

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Core Strategy adduces that Area Assemblies are an effective way of local residents to contribute to local activity plans and other consultative activities supporting the Core Strategy. *JER*

There is no supporting evidence, for example, the number of different people attending assembly meetings on an area by area basis, to justify this statement.

Suggested changes and revised wording:

Remove the statement concerning Area Assemblies.

12 Issue/topic: Wood Green Area Assembly

Page Number: 30 4/7/1.3

Paragraph Number: 1.3.25

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph states that "WGTC .. is divided by a busy road which can cause access problems"

It is not clear what this sentence means. The constituency for which access problems are caused is not stated: for example, is it such for people crossing the road or does it refer to access for shop deliveries?

Suggested changes and revised wording:

The meaning of the sentence should be clarified so that an appropriate comment can be made. One would expect a major "metropolitan centre" road to be busy; compare other centres e.g. Oxford Street, High Street Kensington, Kings Road.

13 Issue/topic: Wood Green Area Assembly

Page Number: 30

4/8/1.3..

Paragraph Number: 1.3.28

Policy Number:

19 2/3

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The key objectives in this paragraph make no mention of reducing traffic volumes, limiting Heavy Goods Vehicles in residential streets, controlling traffic speeding and limiting traffic noise and vibration.

These traffic issues are one of the most consistent and major issues facing residents. It is telling that 'Consultation and feedback' has not identified this as a key objective for the area.

Suggested changes and revised wording:

An additional objective for the area to be:

* Limiting Heavy Goods Vehicles usage in all residential thoroughfares and minimising the impacts of traffic noise and vibration.

14 Issue/topic: Population Change

Page Number: 39

4/9/11.4

Paragraph Number: 1.4.2

Policy Number:

~~ID 20A~~

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text states that the current population of Haringey is estimated to be 228,837, in line with the figure (230,000) reported in paragraph 1.3.1 Bullet 1.

It is likely that the forecast population of 260,000 by 2026 is already substantially achieved, particularly given the fact of the 2004 EU enlargement and the migration of population that has occurred.

It is clear that the population estimates are not robust and need urgently to be reliably updated.

The Community Infrastructure Study March 2010 suggests (Table 3.2, page 18) that the population of Haringey is 280,000, or 22% greater than the GLA PLP High 2007 figure of 229,666 for 2009, based upon the count of patients on GPs lists.

Either the GP patient lists are wrong, and thus not to be used for planning purposes, or the GLA 2007 projection figure for 2009 is wrong, and thus not to be used for planning purposes.

The text should state that the population of Haringey is probably between 230,000 and 280,000 people as it is almost certainly the case that the GP registrations indicate a more accurately the actual population.

Suggested changes and revised wording:

A survey to establish the current population of Haringey is required to produce an accurate figure.

15 **Issue/topic:** Haringey's Growth Areas

4/10/2.1

Page Number: 54

Paragraph Number: 2.1.4

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):	NO
- Is or Is Not Justified:	NOT Justified
- Is or Is Not Effective:	NOT Effective
- Is or Is Not Consistent:	

Reasons for Not Compliant or Unsound:

The assertion that Haringey Heartlands will provide a significant increase in jobs is not robust.

The recent Outline Planning Application 2009 (HGY/2009/0503) for a large part of the site, developed in partnership and in consultation with the Council, and which is under consideration by the Council, does not meet this policy objective. Adopted LBH planning policies (London Plan, UDP 2006, Heartlands Development Framework 2005) envisage the Heartlands Development creating 1,500 (new) jobs.

The Outline Planning Application 2009 covers a substantial proportion of the Heartlands land area (approaching 50%), and a much larger proportion of the 'not at all developed' Heartlands land area. The number of long term jobs generated by this scheme is around 130-140 jobs (Environmental Statement para 1.9, 7.87 and Supporting Planning Statement para 11.33, 11.34).

The current employment on the site is around 150 - 170 jobs (Supporting Planning Statement para 11.30, Environmental Statement Introduction page 7) which will be lost. The applicant themselves state that the scheme involves a net reduction in employment levels (Supporting Planning Statement para 11.36).

In spite of adopted Planning Policy, the scheme therefore anticipates destroying 20-30 jobs. The scheme does not create anything like the pro-rata new job creation (700+ jobs) based on land uses that are required by policy.

Further, the Council have themselves intervened to oppose substantial job generating proposals in Haringey Heartlands. In particular, application HGY/2009/1450 by Network Rail for the Erection of a Maintenance Depot at Coronation Sidings Hornsey, which would have provided upwards of 250 skilled jobs (including offices for up to 250 staff) within the Heartlands area, has been blocked by the Council.

It is not at all clear that if the economics of the Heartlands scheme are to be at all viable, that employment on the scale envisaged is possible. There is no evidence, either on the basis of the Council's track record on dealing with Heartlands proposals to date, or in the Council's involvement with Consortia to bring forward proposals for the Heartlands, or on the basis of the economics of the site given the near and medium term investment climate, that the stated employment objectives can be met.

The Council cannot therefore be justified in claiming that Haringey Heartlands will provide a significant increase in jobs.

Suggested changes and revised wording:

The Heartlands site may be able to induce new employment but the Phase 1 masterplan does not include a net increase; rather it anticipates a net reduction.

16 Issue/topic: Haringey Core Strategy Key Diagram

Page Number: 55

4/11/2-1

Paragraph Number:

Policy Number:

Objective Number:

Key Diagram Number/Title: Figure 2.1 Haringey Core Strategy Key Diagram

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Roads shown in the figure are described in the map key as "A roads major" and "A roads minor". These terms do not match those of the Haringey Road Hierarchy (UDP 2006, Map 7.3 page 114) and are therefore confusing.

Suggested changes and revised wording:

Map and map key to be changed to show the relevant roads in the map appropriately as either Strategic Routes, London Distributor Routes or Local Distributor Routes as specified by the Haringey Road Hierarchy.

17 Issue/topic: Density

4/12/2.1.

Page Number: 56

Paragraph Number: 2.1.8

Policy Number:

10.2/10

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Paragraph 2.1.8 states that the Council will expect the density of housing development to comply with the Density Matrix in the London Plan (Table 3A.2).

The density matrix defines the context of an area for density purposes as either central, urban or suburban. Much of Haringey is suburban (Haringey Core Strategy paragraph 6.1.15, page 141) but some areas are not.

The Inspector for the UDP 2006 Public Enquiry on the application of the London Plan Matrix recommended in his report (paragraph 4.186) that: "The Central, Urban and Suburban areas of Haringey should be defined" and "identified in a reasoned justification and shown clearly on an accompanying map".

The Central, Urban and Suburban area contexts have not been defined in Haringey, no justification has been offered for them, and they are not shown clearly on a map.

Suggested changes and revised wording:

The Inspector's report UDP 2006 should be followed: The main area contexts of Haringey should be identified, justified and shown clearly on a map.

18 **Issue/topic:** Mixed use developments

Page Number: 56

Paragraph Number: 2.1.9

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph makes assertions regarding the provision of mixed use buildings and the benefits flowing from these developments. No evidence is provided to back up these assertions. On the contrary, the evidence that the commercial uses of recent mixed use developments provide any benefits at all is all on the negative.

Most mixed use developments in Haringey simply provide basic commercial units that are taken up by "poor uses" such as betting shops, or are left empty. The general effect is one of tattiness and blight, rather than providing "successful places that have a range of activities, increasing safety and security".

Examples are the commercial units in:
the Heartlands New River Village (The Pump House and boarded up interior block at NRV),
Eclipse House and Solar House in Station Road N22,
West Green Road (betting shop),
Tottenham High Road, opposite Tottenham Lane Green,
Corner of Monument Way
Lordship Lane/ junction with Great Cambridge Road (Metropolitan Police and betting shop)
Corner of Mayes Road with Jack Barnett Way (the Old Job Centre)

Suggested changes and revised wording:

The Council should provide evidence that mixed use schemes in Haringey to date have provided meaningful gains along the dimensions they discuss or otherwise accept that the policy is flawed and cease to promote it.

19 Issue/topic: Mixed use developments

Page Number: 56

Paragraph Number: 2.1.10

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Simply wishing mixed use is not enough. Mixed use development and the vitality which comes with it is inherent in a locality and a response to pressure rather than the result of a planned outcome.

Evidence of the non-takeup of mixed use ground floor provision is present even in buildings within the Wood Green Town Centre boundary. The low quality of the non-residential uses typically seen is problematic and serves to undermine an area rather than support it.

Suggested changes and revised wording:

The Council should provide evidence that mixed use schemes in Haringey to date have provided meaningful gains along the dimensions they discuss or otherwise accept that the policy is flawed and cease to promote it.

20 Issue/topic: SP1 – Managing Growth

4/15/3.1

Page Number: 59

Paragraph Number:

Policy Number: SP1

10
~~2/4~~

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

There are no new jobs or employment target in the Council's expectations of development in the Growth Areas. For a Policy that is 'Managing Growth' this omission cannot be justified.

Suggested changes and revised wording:

Add a new bullet under Council's expectations indicating the amount of new employment to be generated in the Growth Areas.

21 Issue/topic: Accommodating Haringey's growth

Page Number: 60

Paragraph Number: 3.1.5

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Paragraph 3.1.5 notes that the Growth Areas include residential communities and heritage assets such as conservation areas, and that new development must take account of its sensitive context.

The policy of Areas of Change is incoherent if the bounds of these areas are not clearly defined. Without a clear boundary it is impossible to know which policy is applicable.

Conservation Areas are defined because of their value, and therefore all new development must be appropriate to the areas. The thrust of Paragraph 3.1.5 is to weaken the Conservation Area designation. The Local Authority has a legislative duty to preserve and enhance all Conservation Areas whether inside or outside an Area of Change.

Suggested changes and revised wording:

The Council will define a transitional zone around Conservation Areas to protect sensitive contexts. The transitional zone should be clearly defined and policies for the transitional zone articulated. Without this the development would be incoherent, lead to bad urban planning, poor relationships between buildings and inappropriate neighbouring massing and scale.

22 Issue/topic: Council's aspiration for Haringey Heartlands

Page Number: 61
Paragraph Number: Bullet 5
Policy Number: ~~10-219~~
Objective Number: Bullet 5

4/17/3-1

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Bullet 5 concerns the preparation of a business relocation strategy. This is a long running issue that merely serves to blight successful businesses, such as Turnaround Publishing, that are long term residents and substantial employers in the Heartlands area.

It is a scandal that this issue of relocation of businesses has been running for over 10 years. How can any business plan for growth and build successful relationships with its customers when its very premises are under such threat.

The fact is that these businesses in the Heartlands Area have done more for the Borough than any amount of planning paper cranked out by the Council. Once again the Council's commitment to employment jobs within the Borough is brought into question.

The aspirations for Haringey Heartlands should be modified so that businesses are encouraged to stay and to fit in with the planned residential aspirations. This would be a mixed use scheme worth having.

Suggested changes and revised wording:

The aspirations for Haringey Heartlands should be modified so that businesses are encouraged to stay and to fit in with the planned residential aspirations. This would be a mixed use scheme worth having.

23 Issue/topic: (Aspirations) For the eastern Utility Lands

Page Number: 61

Paragraph Number: Bullet 4

Policy Number:

Objective Number: Bullet 4

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Bullet 4 asserts an aspiration for an energy centre and utility compound in the area. This aspiration is not present in the relevant area policy (Heartlands Development Framework 2005). It is not explained what it is, the impact it may have, and no justification is given here for it.

Suggested changes and revised wording:

Justify or remove bullet 4 from the list.

2/19
4/17/15.1.

24 Issue/topic: Growth Areas Haringey Heartlands

Page Number:

62

Paragraph Number:

Policy Number:

Objective Number:

Key Diagram Number/Title: Figure 3.1 Haringey Heartlands/ Wood Green Growth Area

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified: NO
- Is or Is Not Effective: NOT Justified
- Is or Is Not Consistent: NOT Effective

Reasons for Not Compliant or Unsound:

The Core Strategy discusses the Wood Green Growth Area, the Wood Green Town Centre, the Wood Green Area of Change, Wood Green Area of Intensification, and the Wood Green Area Action Plan.

This is a large variety of terms for broadly similar areas. Different extremes of policy in overlapping areas do not make for clarity or good planning. It is clear that much of this is simply due to tactical line drawing around favoured sites by the Council. This variety of policy initiatives must be unified into a coherent set of planning policies for the area.

Suggested changes and revised wording:

A weeding of terms is required and unification of policy for this area is needed. Only then can the policy be effectively examined.

25 Issue/topic: Wood Green Area of Change

Page Number: 66

Paragraph Number:

Policy Number:

Objective Number:

Key Diagram Number/Title: Figure 3.3 Wood Green Area of Change

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Wood Green Area of Change includes sections of Conservation Area and statutorily listed buildings within its boundary. It includes residential streets outside the existing Wood Green Town Centre. The Area of Change extends well beyond the currently defined Town Centre, into a substantially built up largely residential area.

It should also be noted that the Area of Change includes green spaces (Earlham Grove and Woodside Park).

While there are individual sites within the enlarged Area of Change which could be redeveloped effectively, enlargement of the Area of Change beyond the Town Centre and Heartlands Area of Intensification is completely unjustified and unwarranted.

The individual sites outside of the Town Centre and Heartlands Area could be subject to Planning Briefs that would enable the Council to set appropriate aspirations for development that could be justified for these sites.

Its is completely unjustified to include new areas of residential streets and Conservation Area in an Area of Change and require them to be subject to Area of Change policies.

Suggested changes and revised wording:

Revise figure 3.3 to show Haringey Heartlands Area and Wood Green Town Centre as per figure 3.1 as the areas subject to Areas of Change policies

26 Issue/topic: Wood Green Metropolitan Town Centre

Page Number: 67

Paragraph Number: 3.1.17

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph asserts that the Town Centre has relatively few restaurants, cafes, pubs and bars in comparison to a destination that is unstated. As well as being unfinished, the sentence is incorrect. No statistics are given to support the comparison. The object of the comparison is unstated.

In fact, WGTC possesses a multitude of cafes, eateries, takeaways, and pubs; indeed too many takeaway are located in the WGTC for its own good.

Suggested changes and revised wording:

The sentence should be deleted and new text:

“a detailed survey of restaurants and cafes has shown the following numbers of establishment by category..... This is greater/ less than AN Other relevant Town Centre.” Detailed policy will be developed further for consultation.

27 Issue/topic: Wood Green Metropolitan Town Centre

Page Number: 67

Paragraph Number: 3.1.17

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The sentence describing the borders of the centre underestimates the sensitive nature of the boundaries of this area.

The Wood Green Area of Change borders and includes parts of the Noel Park Conservation Area, the Trinity Gardens Conservation Area, the Wood Green Common Conservation Area, and the Bowes Park Conservation Area.

Suggested changes and revised wording:

Revised text to read:

“The Wood Green Area of Change and Town Centre borders and includes parts of the Noel Park Conservation Area, the Trinity Gardens Conservation Area, the Wood Green Common Conservation Area, and the Bowes Park Conservation Area.”

28 Issue/topic: Wood Green Metropolitan Town Centre

Page Number: 67

Paragraph Number: 3.1.18

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Town Centre boundary is tightly drawn for a reason – that is, to limit the deleterious effects of Town Centre policies on neighbouring residential areas. Opportunity sites near the Town Centre should not provide an excuse to extend Town Centre type policies over a wider area under the spurious title of a Wood Green Area of Change.

There is no justification for expanding the Area of Change beyond the Town Centre and Heartlands Area. The enlarged Area of Change is substantially residential. For this reason, development outside the Town Centre should be subject to normal development control policies.

If necessary and the Opportunity Sites are important enough, they should be the subject of planning briefs. There is no reason to extend town centre policies over a wider area to support development of opportunity sites.

It is also noted that no detailed policy has been prepared for the enlarged Area of Change which is now the subject of examination. The Wood Green Action Plan is not yet available for consideration.

Suggested changes and revised wording:

Revised text on Opportunity Sites:

“Planning Briefs will be published for opportunity sites and be subject to the usual development control policies”.

29 Issue/topic: Aspirations for WGMTC

Page Number: 67

Paragraph Number: Bullet 9 - perception

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Core Strategy admits that WGTC is not perceived well. This issue cannot be addressed by policy which does not recognise the lack of retail services. The retail offer in WGTC is limited and does not serve the local populace well.

Policy must start by identifying the lack of retail diversity to support the needs of the population that lives around the Town Centre.

Suggested changes and revised wording:

The authority will pursue a policy for WGTC to extend the diversity of retail and business uses so that the local population have easy access to good quality shopping and business services. This will include limiting the number of betting shops (which are over represented), charity shops, take-away food establishments and games rooms, and will positively encourage retail uses which are not "fashion" outlets – also much over represented and which offer products to a limited range of the population.

30 Issue/topic: Aspirations for WGMTC

Page Number: 67

Paragraph Number: Bullet 10 – night time economy

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Bullet 10 supposes the development of night time economy uses in the Town Centre. This is clearly an aspiration to promote, as opposed to manage, the night time economy in the Town Centre. This policy is a departure from existing UDP 2006 (Inspectors Report Chapter 12 Strategic Policies) and has not been justified.

The Core Strategy is pushing the idea of the 24 hour city, perhaps unwisely. It is clear that a night time economy has not been compatible with local residents' best interests, for example in Green Lanes (reference The Haringey Independent, Friday July 25, 2003, issue #1094).

The danger of the 24 hour city is that it is not for local residents - they are asleep. Visitors to an area do not have the same sense of neighbours that leads to moderate behaviour. People are attracted to the late night scene for 'fringe' reasons, for example, people driving in for a bagel.

The Core Strategy does not address the effect of these influences on increased traffic, noise, safety and crime at unsocial hours.

Suggested changes and revised wording:

Bullet 10 revised text:

“To encourage the development of appropriate leisure uses and to manage the night time economy in the town centre...”

31 Issue/topic: Northumberland Park

Page Number: 69

Paragraph Number: 3.1.25

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text states that at St Francis de Sales, St Paul's and All Hallows Infant and Junior Schools, and at Northumberland Park Community School, performance is at or above the national average, reflecting significant improvements in recent years. School results data from the Department of Education website do not support this assertion.

St Paul's and All Hallows CofE Junior School (Primary)

Performance at St Paul's and All Hallows CofE Junior School is significantly below the England average, with respect to both:

- a) pupils achieving Level 4 or above in English, Mathematics and Science (school aggregate score across the three core subjects was 216 in 2009 compared with the England aggregate score across the three core subjects of 247 in 2009)
- b) pupils achieving Level 5 or above in English, Mathematics and Science (school aggregate score across the three core subjects was 62 in 2009 compared with England aggregate score across the three core subjects of 107 in 2009)

School aggregate score across the three core subjects at Level 4 were 219 in 2006, 241 in 2007, 227 in 2008, and 216 in 2009. Performance was therefore lower in 2009 than in 2006.

School aggregate score across the three core subjects at Level 5 were 84 in 2006, 103 in 2007, 68 in 2008, and 62 in 2009. Performance was therefore lower in 2009 than in 2006.

Performance at St Paul's and All Hallows CofE Junior School is therefore below the England average, and was lower in 2009 than in 2006.

St Francis de Sales Junior School (Primary)

Performance at St Francis de Sales Junior School is above the England average, with respect to pupils achieving Level 4 or above in English, Mathematics and Science. The school aggregate score across the three core subjects was 255 in 2009 compared with the England aggregate score of 247 in 2009.

Performance at St Francis de Sales Junior School is below the England average, with respect to pupils achieving Level 5 or above in English, Mathematics and Science. The school aggregate score across the three core subjects was 86 in 2009 compared with the England aggregate score of 107 in 2009.

School aggregate score across the three core subjects at Level 4 were 206 in 2006, 235 in 2007, 256 in 2008, and 255 in 2009. Performance therefore improved at Level 4 between 2006 and 2009.

School aggregate score across the three core subjects at Level 5 were 55 in 2006, 105 in 2007, 103 in 2008, and 86 in 2009. Performance was therefore lower at Level 5 in 2009 than in 2007.

Performance at St Francis de Sales Junior School is therefore above the England average at Level 4 and below the England average at Level 5. Performance has improved at Level 4 since 2006 but performance has fallen at Level 5 since 2007.

Northumberland Park Community School (Secondary)

Performance at Northumberland Park Community School is significantly below the England average with respect to the percentage of pupils gaining 5+A*-C GCSEs and equivalent, including English and Mathematics. In 2009 the respective figures were 35% (school), and 50.7% (England maintained).

The % of pupils gaining 5+A*-C GCSEs and equivalent, including English and Mathematics, at Northumberland Park Community School was 20% in 2006, 32% in 2007, 38% in 2008, and 35% in 2009. Therefore, performance improved between 2006 and 2008, but deteriorated between 2008 and 2009.

Performance at Northumberland Park Community School is therefore below the England average. Performance improved between 2006 and 2008 but fell between 2008 and 2009.