

# Comments and Representations to the Haringey Core Strategy Proposed Submission

*Issued by:*

**Gladwell-Landrock-Cecile Park Residents Action Group  
(GLC-RAG)**

21 June 2010

## **1 Introduction**

1.1 This statement of comments and objections to the 'Haringey Core Strategy Proposed Submission' has been prepared by Gladwell-Landrock-Cecile Park Residents Action Group (GLC-RAG).

1.2 GLC-RAG wishes to present evidence verbally at the public Examination.

1.3 The GLC-RAG area comprises the following streets within the Crouch End Conservation Area:

- Gladwell Road
- Landrock Road
- the eastern part of Cecile Park
- the southern part of Drylands Road
- Sandringham Gardens
- Ravensdale Mansions between Bourne Road and Sandringham Gardens

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

Bob Maltz

Secretary, Gladwell-Landrock-Cecile Park Residents Action Group (GLC-RAG)

39 Landrock Road

London N8 9HR

ID NO - ~~822d~~ / 1.3.

Page Number: 21

Paragraph Number: 1.3.14

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 key objectives in this paragraph make no mention of

(a) reducing on-street parking pressure

(b) retaining backlands in terrace housing areas and avoiding housing development not on frontage sites

(c) maintaining and enhancing a balanced social and economic population mix in the area

(b) retaining and encouraging a fine-grained mix of land uses to avoid the tendency to a residential monoculture

Suggested changes and revised wording:

Additional objectives for the area to be:

\* reducing on-street parking pressure

\* retaining backlands in terrace housing areas and avoiding housing development not on frontage sites

\* maintaining and enhancing a balanced social and economic population mix in the area

\* retaining and encouraging a fine-grained mix of land uses to avoid the tendency to a residential monoculture

←  
CPG3c -  
why is it  
not in  
IM DPD?

**3 Issue/topic:** Conversions

Page Number: 83

ID - 84

1084 2/2/3-2

Paragraph Number: 3.2.13  
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:

The paragraph 3.2.13 states that the Council will resist conversions in a limited set of circumstances. The Haringey Housing SPD 2008 and UDP 2006 explicitly goes further in resisting conversions. The Housing SPD in particular:

“9.3 The Council has identified areas of the borough which already have a high number of converted properties. Further conversions and HMOs will be resisted for the reasons set out in paragraph 9.1. “

and

“9.4 In addition, the Council will normally resist applications for conversions and HMOs in streets where conversions and/or HMOs already equal 20% of the properties.”

The Core Strategy offers no justification for not including these points or equivalent text in the paragraph. These points are from a very recent planning document, thoroughly consulted upon, carried out to the latest LDF format, and adopted by the Council.

In addition, conversions have a negative impact on the area as a whole, not least because of issues of inadequate and intermittent maintenance, and transience of the population. Excessive conversions also reduce the supply/ access to three/ four bedroom houses, the type of property most needed in the borough.

Suggested changes and revised wording:

Add equivalent text to Housing SPD 2008 paras 9.3 and 9.4 into this paragraph.

4 Issue/topic: Affordable Housing

1085

Page Number: 83  
Paragraph Number: 3.2.17  
Policy Number:  
Objective Number:

1085 no/3/3.2

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 Core Strategy does not indicate a target for affordable housing, either in aggregate or by size of dwelling. It is not possible for the likely effectiveness of the proposed policies to be assessed without such estimates of what is achievable. The London Plan Policy 3A.9 requires DPDs to have such targets. This omission cannot be justified.

Suggested changes and revised wording:

The Core Strategy to give indicative targets for affordable housing by size of dwelling as a result of the proposed policies.

5 Issue/topic: Affordable Housing

Page Number: 84

Paragraph Number: 3.2.23

Policy Number:

1086

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:

1086

2/4 13.2

Reasons for Not Compliant or Unsound:

This paragraph allows developers to social engineer their sites by placing their affordable housing obligation in a separate location to the market units. This undermines policies geared at creating mixed communities, and undermines the Council's own Community Strategy.

The Council offers no justification for this policy, and it is unclear what is trying to be achieved. It can only benefit the narrow interests of the developer and not the community as a whole.

It should also be noted that this paragraph directly contradicts the Core Strategy policy in para 3.2.25.

Suggested changes and revised wording:

Delete paragraph 3.2.23

**6 Issue/topic:** Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

Objective Number: Bullet 1 – Protect B uses ...

Key Diagram Number/Title:

1087

10872-18/5.1

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:

This policy is inadequate: all employment land should be protected. This policy gives the impression that only "B" uses are protected. Any employment land/use which goes out of employment to housing will never revert – there is a ratchet effect. Given the overriding need to create a sustainable future, Haringey must cease to be a dormitory suburb for commuters and the possibility of working closer to home or at home should be made possible.

Suggested changes and revised wording:

Revise text to state that all employment land will be protected.

**7 Issue/topic:** Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

Objective Number: Bullet 4 – Support SME

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:

10  
20/6/15.1

Reasons for Not Compliant or Unsound:

This policy is only meaningful if all land or use currently designated "employment" is strongly protected. The range of SME is huge and their activity ranges from industrial through all sectors to professional services. The types of provision cannot therefore be readily predicted; by their nature the enterprises spring from entrepreneurship in private and voluntary sectors. The upward effect on land values should sites be seen as vulnerable to housing takeover, therefore has to be counteracted by strong policy in favour of employment. If affordable land is not available the possibility of new enterprises being established is much reduced; new enterprises are very sensitive to premises costs, especially in a context of a difficult borrowing environment.

The argument that this could lead to sites being vacant is not a good argument. For a start the borough is heavily developed and should a site need to be dormant for a period there are often alternative short-term uses which meet needs. For example, near Kings Cross there is a site with "gardens in skips" and the cheese grater site was temporarily landscaped. Some sites could be used for educational projects to link with the training objectives in this policy. The bottom line is that we need all the land that we can find to be safeguarded for employment.

Suggested changes and revised wording:

Additional text: "A supply of land will be ensured for SME by not permitting any land in employment uses to go out of employment use, including to housing use".

**8 Issue/topic:** Local Employment Areas

Page Number: 115

Paragraph Number: 5.1.13

Policy Number: SP8

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:

10 117  
20/7/15.1

Reasons for Not Compliant or Unsound:

This para refers to DMP19 which itself refers to a review (2009) of the 2004 Employment Study. The review recommends that all employment land, whether designated or not, should be protected. This supports the proposal made in this submission.

Suggested changes and revised wording:

Include: "The 2009 Review of the 2004 Employment Study concluded that all (designated or not) employment land should be protected and this is the Authority's policy so that over time the uses within the borough are better in balance and sustainable".

*minor change recommended as proposed*

*20/5/5.2*

~~1D 118~~

*no change*

**9 Issue/topic:** Improving skills and training to support access to jobs and community cohesion and inclusion

Page Number: 121

Paragraph Number:

Policy Number: SP9

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 policy sets objectives of increasing and diversifying job opportunities for the local population – all to be encouraged. This cannot be done if the land which could be so used goes out of employment use. Most employees travel out, and if the percentage travelling out is not going to increase, and unemployment to rise, there is a need for employment in the borough. If jobs were in the borough, the jobs would be filled; therefore the emphasis in this plan as a whole needs to be employment. This SPD policy is supported; other policy should be made to align with it.

The policy objectives of housing and employment are not coherent. There is in the plan a fairly detailed housing strategy which is based on housing expansion, when in fact the population of the borough is massively underestimated in the plan; the Community Infrastructure Study March 2010 (Table 3.2, page 18) suggests that the population of Haringey is 280,000. It could be argued on the basis of doctor registrations that full housing expansion up to 2026 has already been more than achieved and that the challenge is quality rather than quantity. If we put this against employment policy we see that employment policy is not at all well developed; indeed the release policy puts employment at risk, and this would lead to a greater percentage of those living in the borough either working outside the borough or being unemployed. The result will be greater stress on transport, less long-term sustainability, and more social exclusion. This must be addressed to prevent the borough becoming a dormitory in the west and a permanently under-employed, poorly provided for east.

Suggested changes and revised wording:

Revise text to state that all employment land will be protected by not permitting any land in employment uses to go out of employment use, including to housing use”.

10 **Issue/topic:** Haringey's Heritage

Page Number: 143

Paragraph Number: 6.2.4

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: NOT Effective

- Is or Is Not Consistent:

10119

22/9/5.2

Reasons for Not Compliant or Unsound:

While recognizing the importance of traditional perimeter block form with frontages facing the street and with private rear gardens, the impression of given by the text is that this is merely of visual importance. The importance of this underlying urban structure to the functioning of

dwellings and (primarily) residential areas, and to the relationship of dwellings to neighbouring dwellings (i.e., front-to-front and rear-to-rear) needs to be made explicit.

Suggested changes and revised wording:

The importance of this underlying urban structure to the functioning of dwellings and (primarily) residential areas, and to the relationship of dwellings to neighbouring dwellings (i.e., front-to-front and rear-to-rear) needs to be made explicit.

**11 Issue/topic:** Protecting our open spaces

Page Number: 150

Paragraph Number: 6.3.3

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: NOT Effective

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph only discusses designated open spaces. There are open spaces which are not designated and which require protection from development. The UDP2006 policy OS10 "Other Open Space" provides an admirable template for the Core Strategy to follow in adding policy, text and bullets on this point.

Suggested changes and revised wording:

Add text, policy and bullets to address open spaces which are not designated.

20/10/67  
ID 120

following the content of UDP 2006 Policy OS10 "Other Open Space".

12 **Issue/topic:** Impact of the built and natural environment

Page Number: 168

Paragraph Number: 7.1.22, 7.1.23

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:

This paragraph does not go far enough in identifying specifically how spatial planning can impact positively on well being.

In particular, in achieving this objective it is essential that streets are created which are understood by people so they feel safe and comfortable in their surroundings.

Urban design should be based on the continuity of the street pattern of the Borough, and if opportunity arises, the natural street pattern should inform the new layout.

Suggested changes and revised wording:

Additional text:

10/23  
20/11/7.1

“Spatial planning should emphasise the feeling of safe and comfortable streets based on the continuity of the street pattern of the Borough, and if opportunity arises, the adjacent street pattern should inform new layouts.”

**13 Issue/topic:** Healthy Eating

Page Number: 171

Paragraph Number: 7.1.34

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:

Handwritten notes: ID 124, 2/12/17

Reasons for Not Compliant or Unsound:

The text reports that the 2006 Haringey Residents Survey found that 40% of the population did not achieve the required level of physical activity (30 minutes of exercise on 3 or more days per week).

The Core Strategy should put forward policies to address the increasing inaccessibility of recreation land to casual use by residents, e.g. the recent fencing-in and locking-up of the Council owned running track at Finsbury Park. .

Suggested changes and revised wording:

The Core Strategy should put forward policies to address the increasing inaccessibility of recreation land to casual use by residents, e.g. the recent fencing-in and locking-up of the Council

owned running track at Finsbury Park. .

14

10/12/6.1

Section/ chapter/ policy	Design 6.1/ Landscaping and public realm
Page/ paragraph	140/ 6.1.13
Intention: support/ object	Qualified support
Soundness/ legality	Sound

**Comment:**

Paragraph 6.1.13 relates to the important role of trees and other greenery in the attractiveness and character of our surroundings. This paragraph is supported but, we suggest it needs to be further strengthened. In recent years one of the biggest detractors to the public realm and the street-scene has been the loss of front gardens and walls to car parking with associated damage to the environment and habitats for wildlife.

It is suggested that the final sentence should include a reference to front gardens by the insertion of these words so that **the final clause should be worded:**

**... to provide a high standard of hard and soft landscaping, of boundary features such as walls and fences, and front gardens.**

← proposed amendment

15

10  
ID 126 22/4/6.1

Section/ chapter/ policy	Design 6.2/ Conservation
Page/ paragraph	142/ SP12
Intention: support/ object	Qualified support
Soundness/ legality	Sound

**Comment:**

The overall Policy Statement SP12 includes as its second bullet point a commitment to preserve and enhance Conservation Areas and their settings. We welcome and support this statement but note that it doesn't provide the necessary level of commitment for it to be effective in countering the loss of front gardens and walls.

English Heritage has encouraged Councils to adopt more effective measures to protect "important details such as windows, doors and front gardens". The measure to secure protection of these aspects is by making more use of Article 4 Directions, which suspend permitted development rights.

To encourage the Council to make greater use of Article 4 Directions (as recommended by English Heritage), we suggest an additional bullet point in the table on page 147, headed "Indicators to monitor delivery of SP11 and SP12" - **this to be worded as:**

- **Increase the usage of Article 4 Directions to protect features such as front gardens and front walls.** *no change*

16

ID 127 22/5/6.3

Section/ chapter/ policy	Safer for all/ 6.3/Open Space and Biodiversity
Page/ paragraph	149/SP13
Intention: support/ object	Qualified support
Soundness/ legality	Sound

**Comment:**

The opening statement of SP13 refers twice to "New" development. Although the principle of this statement is supported, we object to the word "new" and would prefer the statement to refer to "All" development. **We suggest the word "new" be deleted.**

In recent years one of the biggest assaults on open space and biodiversity has been the paving over of front gardens for car parking with associated damage to the environment and habitats for wildlife. We would like to see greater recognition of this in SP13.

**We suggest the final clause of the first bullet point should be reworded to include the word 'gardens': .... Green Chains, gardens, allotments and other open spaces from inappropriate development.**

In Point 2 above in relation to SP12, we commended the greater use of Article 4 Directions. This is equally valid in relation to Open Space and Biodiversity -- in consequence:

We suggest an additional bullet point in the Strategy Statement on page 150, to be – The Council will.... through:

- Increased usage of Article 4 Directions to protect features such as front gardens.

*no change*

Also related to this point is paragraph 6.3.4 on page 151. We welcome and support the reference to “back and front gardens” in this paragraph.

17

*10/12/25 22/16/19 NIA - DM DPD only*

Section/ chapter/ policy	Appendix 1/ UDP Saved Policies
Page/ paragraph	205/ Parking for Development
Intention: support/ object	Object
Soundness/ legality	Probably unsound

**Comment:**

The stated intention here is that UDP Policy M10 should be superseded by DMP12, Protection of Front gardens and Private Off-Street Parking. Because M10 is a narrowly based strand of policy relating only to parking for development it is reasonable for it to be subsumed into a wider policy management statement. However, we have serious reservations about the adequacy of DMP12 (see Point 5 below) and **our objection here is simply to register that we will be submitting more structured comments when DMP12 is subject to formal consultation.**

18

*NIA DM DPD only*

Section/ chapter/ policy	Development Management Policies DMP12/13 Parking for Development/ Protection of Front Gardens
Page/ paragraph	25 to 44
Intention: support/ object	Object (with support for parts)
Soundness/ legality	Unsound

**Comment:**

The provision and management of car parking in new developments and in the public realm generally, calls for close integration of policy and management across Council departments. In recent years this has been highly problematic with conflicts of interest between Planning, Conservation, Transport and Highways. The net result has been a failure to respond adequately to the deterioration of the environment and street-scene from the practice of front gardens being used for car parking.

Producing the Development Management Policies to address these issues gives an opportunity to draw together previously separate strands of policy. An attempt to do this is evident in pages 25 to 44 of the volume of DMPs, but falls short of providing clarity! These pages contain two sections

both of which are headed DMP12 and two headed DMP13! They are a confusing mixture of technical guidelines (e.g. 3.18 to 3.57) and broad policy statements (e.g. the panel above 3.67).

Some of the wording in the policy statement is welcomed and supported, e.g. "Front gardens are greatly valued and they play an important role in London's eco system..." and "The Council will only support the creation of additional private on-site car parking that will not have negative impacts on parking, highways or the environment."

No reference is made to the current SPG1b (Parking in Front Gardens) and presumably the intention is that this will be superseded by one of the DMPs. SPG1b has some merit and we would like to see more of it incorporated into the relevant DMP. SPG1b includes the statement: "Parking in front gardens is generally unacceptable and will not normally receive planning permission" – we would like to see similar unambiguous statements in the DMP.

**In conclusion, as currently drafted the DMPs 12 and 13 on pages 25 to 44 are unacceptable. We look forward to developed versions of these DMPs when they are available for further consultation.**